

**AMADOR TUOLUMNE COMMUNITY ACTION AGENCY**  
**ATCAA Board and Policy Council, and ATCAA Advisory Councils**  
**Code of Conduct and Conflict of Interest Policy**

The ATCAA Board of Directors, ATCAA Early/Head Start Policy Council and ATCAA Advisory Councils are leaders, models and representatives of ATCAA to our community. All members will be expected to conduct themselves such that their personal and professional conduct does not have a negative effect on services or reflect badly on ATCAA's public image, reputation, or credibility.

Members of the ATCAA Board and Policy Council and Advisory Councils will be informed of this policy and of any approved revisions.

This policy will be periodically reviewed and revised by the ATCAA Board of Directors and the Policy Council.

**The ATCAA Board of Directors, the ATCAA Head Start Policy Council and all ATCAA Advisory Councils or Committees:**

- 1) Will respect and promote the unique identity of each child, family, employee, Council, Committee and Board member and refrain from stereotyping based on age, race, color, religious creed, sex (gender), marital status, sexual orientation, national origin, ancestry, medical condition, physical or mental disability, genetic information, citizenship status, political affiliation/opinion, Veteran's status, request for family medical leave, or any other consideration made unlawful by federal, state or local laws.
- 2) Must uphold the Agency's confidentiality guidelines as follows:
  - a. No confidential information regarding employees, clients, children and families enrolled or accessing any service in any ATCAA program including Head Start/State Preschool, General Childcare, Early Head Start or any ATCAA programs is to be discussed or shared outside of the work setting or Board/Council/Committee meetings. This includes any materials received in writing.
  - b. Confidential information is to be discussed or shared within the work setting and at Board/Council/Committee meetings only as necessary and as it relates to program operations, business or decision-making.
  - c. No confidential information learned, or material shared at Board/Council/Committee meetings or while conducting Board/Council/Committee business may be discussed, shared, or used in any way outside of Board/Council/Committee activities.
- 3) Will communicate and interact respectfully while participating in all Board/Council/Committee activities and when representing ATCAA within the community.
- 4) Will follow the ATCAA Conflict of Interest Policy as follows:

## Conflict of Interest in Hiring

No person will be hired for or promoted/transferred to an ATCAA position over which a family member exercises direct supervisory authority. *(See ATCAA Personnel Policies for more details)*

No ATCAA or Policy Council member, nor any family member of an ATCAA Board or a Policy Council member, may be hired for any ATCAA position, except that a Policy Council member may occasionally substitute in the ATCAA ECS/Head Start Programs.

*“Family Member”* includes any of the following: spouse, domestic partner, sibling, child, parent, grandparent, grandchild, foster parent, stepparent, sibling-in-law, child-in-law, parent-in-law, uncle, aunt, nephew, niece, stepsibling, and stepchild. *“Family Member”* also includes domestic partners *(a person with whom the employee’s life is interdependent and who shares a common residence)* and a daughter or son of an employee’s domestic partner.

### CONFLICT OF INTEREST

No employee, officer or agent of ATCAA or of any subgrantee shall participate in the selection or in the award and administration of a contract if a conflict of interest, real or apparent, would be involved.

A conflict would arise when any of the following has a financial or other interest in the firm selected for award:

- The employee, officer or agent.
- Any member of the immediate family of an employee, officer or agent.
- A partner of an employee, officer or agent; or
- An organization which employs or is about to employ any of the above.

Contractors that develop or draft grant applications, contract specifications, statements of work, invitations for bids and/or requests for proposals are excluded from bidding for the procurement.

The Executive Director, or designee, may approve an exception to this policy only if he or she determines that the financial is not substantial or that it is unavoidable or unreasonable not to make such award.

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Signature of ATCAA Board Member or  
Policy Council Member or  
ATCAA Advisory Council Member

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Date