

LCCS POLICY 145 Conflict of Interest

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Current Effective Date:	1/22/2020
Obsolete/Combined Date:	
Reason for Obsoleting/ Combining:	
See new Policy #:	

Scope:	All LCCS Staff, Interns
Responsibility:	All LCCS Staff
Purpose:	To ensure that the actions and decisions of LCCS staff and/or interns do not pose a conflict of interest or the appearance thereof.
Legal Cite:	O.R.C. 102 et al. Public Officers – Ethics. Also reference Social Work Code of Ethics, Legal Code of Professional Responsibility

POLICY STATEMENT

LCCS employees will act in a manner that does not pose a conflict of interest or the appearance of a conflict of interest when making decisions regarding families or children.

LCCS employees will not sell or supply any services, articles or merchandise to the agency or have a personal financial interest in any contract entered into by the agency.

This policy applies to interns and field placement students.

PROCEDURE - including required timeframes and documentation

LCCS staff will immediately notify his/her supervisor upon being assigned work that involves a friend or relative, so that consideration can be made by the supervisor about whether or not a change in work assignment should occur.

Agency staff will advise their immediate supervisor of secondary employment opportunities. A Secondary Employment Documentation Form must be completed and approved. This should be done prior to accepting the employment. The Supervisor will make a determination about whether a potential conflict of interest exists.

New LCCS employees will complete the Secondary Employment Documentation Form prior to employment with the Agency. The form will be placed and maintained in the employee's personnel file in the Human Resources Department.

No agency staff person will become involved in a professional capacity with a case or referral involving friends or relatives.

No agency staff person will be a participant in any Family Case Conference or other agency meeting involving a friend or relative, except in a supportive role. Participation in any agency meeting as a support person cannot be done on agency/work time.

This policy does not preclude an interview of any agency staff person as part of an ongoing investigation when that staff person has information that is pertinent to the investigation.

As soon as the staff member becomes aware of the possible conflict (e.g., a friend is charged with neglect), the staff member will immediately inform his/her supervisor of the situation so that a decision can be made about whether or not a change should occur.

When there is doubt about any potential conflict of interest, employees will reference the NASW Code of Ethics and seek guidance through the chain of command.

Staff relationship with children in custody:

Any LCCS staff who express a desire to work with a child in some personal enrichment areas such as appropriate cultural, recreational and social activities (e.g., metro parks, museums, neighborhood festival, restaurants), are required to complete the following steps:

- Share all information with supervisor and obtain supervisory approval.
- Discuss the activity with the legal parent, custodian or guardian and obtain approval.
- Discuss the activity with the substitute caregiver to avoid scheduling conflicts or interference with their planned family activities.
- Document all above activities in the casenotes.

A staff person wants to adopt a child:

Agency staff persons are not allowed to adopt children in the permanent custody of LCCS. Staff may take placement or temporary/legal custody of a related child.

Exception:

When the needs of a child are such that securing a permanent home is hindered, an exception may be considered. The Executive Director, after a thorough review of the circumstances, may approve an exception.

This policy will be reviewed with all staff/employees every six months.

CASE PRACTICE GUIDES

Examples of potential conflict of interest situations for LCCS employees (no list can be all inclusive):

- Knowingly purchasing a used car from a person with current LCCS involvement, or from someone for whom we are doing a homestudy.
- Fostering or adopting a child in the temporary custody of the agency.
- Becoming a personal friend of someone with LCCS involvement or with one of the parties in a custody dispute involving LCCS.
- Entering into any business transaction involving someone with a case before the agency.
- Having a personal or business relationship with someone who does business with LCCS (e.g., a bidder on a contract the staff person is involved in getting for LCCS).
- Providing private therapy, counseling, or any service to a person with current LCCS involvement.
- Having secondary employment with community providers, etc and providing therapy, counseling, or any service to a person with current LCCS involvement.

RELATED POLICIES and FORMS

LCCS Policy 435 (LCCS Employee Contracting Opportunities)
LCCS Policy 491 (Agency Interns, Preceptees and Volunteers)
Secondary Employment Documentation Form (Pre-employment Form)