

**Staff Conflict of Interest**

**Policy No. 202.2R**

**REGULATIONS**

**Purpose:**

These Regulations support the implementation of Policy 202.2 – *Staff Conflict of Interest*. They outline expectations and actions required to identify, prevent, disclose, and address actual or perceived conflicts of interest.

**Understanding Conflict of Interest:**

Employees and others that interact with the District are expected to carry out their duties with loyalty, integrity, and impartiality. A conflict of interest arises when an individual's personal, financial, or professional interests, whether direct or indirect, can interfere, or are perceived to interfere with their responsibilities to the District.

Conflicts may involve:

- Personal financial benefit or gain
- Decisions involving family members or close associates
- Use of confidential or privileged information
- Outside employment, business activities, or volunteer roles that compete or interfere with District responsibilities
- Actions that compromise public confidence in the District's integrity

Both actual and perceived conflicts must be treated with equal seriousness.

**Employee Responsibilities:**

All employees are expected to:

- Conduct themselves in a way that upholds public trust
- Avoid situations where their private interests may interfere with their professional duties
- Disqualify themselves from decisions where a conflict exists or may be perceived
- Seek guidance when unsure whether a situation may be a conflict
- Promptly disclose any potential or actual conflict to their Principal, Supervisor, and the Superintendent
- Refrain from proceeding with any related activity until the conflict is reviewed

**Duty to Report:**

Employees must report in writing any circumstance that may give rise to a real or perceived conflict of interest. This report should be directed to the employee's immediate supervisor or directly to the Superintendent.

Supervisors must forward all reports to the Superintendent and are not authorized to independently approve or disregard reported conflicts.

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**Examples of Conflict of Interest:**

Situations that may give rise to a conflict of interest include (but are not limited to):

- Using confidential District information for personal gain
- Involvement in hiring or evaluating a relative or close associate
- Directing contracts or purchases toward businesses where the employee or a family member has an interest
- Accepting gifts, or benefits that could influence judgment or affect decision making
- Holding outside employment that interferes with District duties or compromises impartiality
- Using District resources, equipment, or time for personal or commercial purposes
- Representing the District in a way that conflicts with personal or external interests

**Review and Resolution:**

The Superintendent or designate will review each disclosure and determine whether a conflict exists and what action, if any, is required. Possible outcomes include:

- No further action (if no conflict is found)
- Modification of responsibilities
- Recusal from specific duties or decisions
- Discontinuation of outside activity
- Disciplinary action where appropriate

Employees may be asked to provide additional details to support the review.

**Confidentiality:**

All reports and investigations of conflicts of interest will be treated confidentially. However, complete anonymity cannot be guaranteed if facts need to be verified or legal requirements apply.

**Non-Compliance:**

Failure to disclose a conflict or comply with directions to manage it may result in disciplinary action, up to and including termination of employment.