

GBEAA ©
STAFF CONFLICT OF INTEREST

Employment of Close Relatives

No person employed by the District may be directly supervised by a close relative (father, mother, son, daughter, sister, brother, or spouse). This policy will apply for summer or part-time work as well as for full-time employment.

A dependent of a Board member (a person more than half of whose support is obtained from a Board member) cannot be hired in the District except by consent of the Board. The spouse of a Board member cannot be employed by the District.

Business Relations

Any employee who has, or whose relative has, a substantial interest in any decision of the District shall make known this interest in the official records of the District, and shall refrain from participating in any manner as an employee in such a decision.

Refrain from participating in any manner means more than just refraining from making a final decision. It means participating in any way in the process leading up to a decision. An employee with a conflict of interest must not make recommendations, give advice, or otherwise communicate in any manner with anyone involved in the decision-making process.

Vendor Relations

No employee of the District will accept gifts from any person, group, or entity doing, or desiring to do, business with the District as described in Policy DJ, Purchasing (Purchasing Ethics Policy).

District Purchases from Employees

The District must comply with competitive purchasing rules for any acquisition of goods or services from District employees regardless of the dollar amount. The District may acquire equipment, material, supplies, or services from its employees only under an award or contract let after public competitive bidding [A.R.S. [38-503](#); A.G.O. I06-002]. The requirement applies to any purchase using District monies, including extracurricular activities fees, tax credit contributions, and monies held in trust by the District such as student activities monies, when a District employee acts as the vendor. Oral and written quotations do not satisfy the public competitive bidding requirements.

Employee Training and Acknowledgement of Understanding

The Governing Board may require annual employee training to ensure District conflict of interest policies are communicated to employees and acknowledged as received and understood. Each

employee shall complete and sign the conflict of interest form, GBEAA-E, as determined by the District.

The District will investigate allegations of inadequate disclosure of substantial interests and/or inappropriate participation when a substantial interest may exist.

Adopted: September 10, 2018

LEGAL REF.:

A.R.S.

[15-323](#)

[15-421](#)

[15-502](#)

[38-481](#)

[38-501](#) et seq.

[38-502](#)

[38-503](#)

A.G.O.

I83-111

I03-005

I06-002

Attorney General Arizona Agency Handbook, Appendix 8.1,
Conflict of Interest Disclosure Memorandum

CROSS REF.:

[BCB](#) - Board Member Conflict of Interest

[DJ](#) - Purchasing

[DJE](#) - Bidding/Purchasing Procedures

[GBP](#) - Prohibited Personnel Practices

GBEAA-E ©

EXHIBIT

STAFF CONFLICT OF INTEREST

**CONFLICT OF INTEREST DISCLOSURE
PURSUANT TO A.R.S. §§ 38-501 to 511**

(Instructions)

1. Employees must file a Conflict of Interest Disclosure within five (5) calendar days after commencing work and at least annually thereafter, either identifying any conflict the employee or the employee's relative has or stating that the employee or the employee's relative has no conflict.
2. All Conflict of Interest Disclosures shall be kept on file at Bonita Elementary School District No. 16.
3. It is the employee's responsibility to update and submit to both District Legal and Human Resources Departments within fifteen (15) calendar days of any new conflict arising after the date of the most recent Disclosure.

STATEMENT OF CONFLICT

I, _____, do hereby indicate:

1. That I am presently an employee of the Bonita Elementary School District;
2. That I (or my relative[s]): _____

_____) have a substantial interest in the contract, sale, purchase, decision, investigation, or other matter by the Bonita Elementary School District No. 16 Governing Board as described below.

Identify the contract, sale, purchase, service, decision, investigation, or other matter in which you or your relative may have a "substantial interest" under A.R.S. §§ [38-501](#) to [511](#). (Use as much space as necessary)

Describe the "substantial interest" referred to above. (Use as much space as necessary)

STATEMENT OF DISQUALIFICATION
To be completed if you have a conflict as identified above.

To avoid any possible conflict of interest under A.R.S. §§ [38-501](#) to [511](#), I will refrain from participating in any manner in the matter identified above.

Date

Signature

STATEMENT OF NO CONFLICT
To be completed only if you do not or your relative does not have a conflict of interest.

I, _____, do hereby indicate that I do not have, and none of my relatives has, a substantial interest in any contract, sale, purchase, service, decision, investigation, or other matter of the Bonita Elementary School District.

Date

Signature