

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~~ a gift or benefit from any person, group, or entity doing, or desiring to do, business with the District as described in Policy DJ, Purchasing (Purchasing Ethics Policy). ~~The acceptance of any business-related gratuity is specifically prohibited, except for widely distributed, advertising items of nominal value. This policy should not be construed to deem unacceptable inexpensive novelty advertising items of general distribution. Acceptance of business meals and holiday gifts for general consumption are acceptable under this policy.~~

District Purchases from Employees

The District is required to follow the school district procurement rules for all purchases of goods or services from District employees regardless of 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. 106-002]. 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: ~~date of Manual adoption~~

LEGAL REF.: A.R.S. 15-323
15-421
15-502
38-481
38-501 *et seq.*
[38-502](#)
38-503
A.G.O. [183-111](#)
[103-005](#)
106-002

[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