

GBEAA STAFF CONFLICT OF INTEREST

Employment of Close Relatives

~~No person employed by the District may be directly supervised by a close relative (including but now limited to father, mother, son, daughter, sister, brother, or spouse).~~ **The Superintendent, Principals, or other administrators with hiring authority may not participate in the hiring of any person related to them within the third degree of consanguinity, affinity, or by law, and no District employee shall be placed in a position where they directly supervise or are directly supervised by such a relative.**

No dependent, as defined in A.R.S. 43-1001 (see also Internal Revenue Code 26 U.S.C. 152), of a Governing Board member may be employed in the District, except by consent of the Board in accordance with A.R.S. 15-502. Small school Districts, as defined by A.R.S. 15-901, are granted an exception regarding employment of substitute teachers. A.R.S. 15-421(E).

This policy applies for summer or part-time work as well as to 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 or domestic partner of a Board member cannot be employed by the District.~~

Business Relations

Any **Governing Board member, administrator, or** employee who has, or whose relative has, a substantial interest in any decision of **contract, sale, purchase, or service to** 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 **contract, sale, or purchase, as provided in A.R.S. 38-501, 38-502 and 38-503.**

"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 **Governing Board member, administrator, or** 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 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). This policy should not be construed to deem unacceptable inexpensive novelty advertising items of general distribution.

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 **only** 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 **Guidance and Acknowledgement of Understanding**

~~The Governing Board may require employee training to ensure District conflict of interest policies are communicated to employees and acknowledged as received and understood. Each employee shall~~ **District shall annually provide conflict of interest training to all employees. The training shall include information regarding the District's policies regarding conflicts of interest, what constitutes a substantial and remote interest, under the applicable statute, the definition of relative pursuant to A.R.S. 38-502(9), how and when to complete the District's annual Conflict-of-Interest Disclosure Form, the requirement to refrain from participating in a matter in which they or a relative has a substantial interest, and the penalties for violating the applicable statutes.**

Each employee shall annually complete and sign annually the **District's Conflict-of-Interest Disclosure Form**, (GBEAA-E), ~~as determined by the District.~~ **and within fifteen (15) days of any change in circumstance. Employees shall complete and sign the Conflict-of-Interest Disclosure Form every January of their employment and, if they are a new employees, within five (5) days of starting their employment with the District. Evidence of the guidance provided and signed disclosure forms shall be maintained by the District in compliance with the Uniform System of Financial Records (USFR), and all disclosures shall be kept on file for public inspection as required by A.R.S. 38-509.**

Investigations

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

When an employee has disclosed a substantial interest or when the District otherwise determines that an employee has a substantial interest, the Superintendent and other administrators as appropriate and necessary will determine what steps should be taken to remediate or eliminate the potential for the employee's improper influence on a District decision implicated by the substantial interest. The administration will document the remediation steps taken.

Adopted: July 26, 2018 **September 22, 2026**

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