

SD42 PROCEDURE 7100.1

CONFLICT OF INTEREST

PURPOSE

The School District is committed to maintaining the highest standards of integrity, impartiality, accountability, and public trust. Employees are expected to perform their duties in a manner that places the interests of the School District above personal interests and avoids actual or perceived conflicts of interest.

SCOPE

This procedure applies to all employees of the School District.

DEFINITIONS

Actual Conflict of Interest

- A situation in which an employee's personal, financial, business, or private interests directly conflict with their District responsibilities.

Perceived Conflict of Interest

- A situation in which a reasonable person could conclude that an employee's private interests may improperly influence the performance of their duties, regardless of whether such influence exists.

Private Interest

- Any financial, business, personal, professional, or organizational interest that may benefit the employee or another person or organization with whom the employee has a relationship.

PROCEDURES

1. Employee Responsibilities

Employees shall perform their duties in a manner that maintains public confidence in the integrity and impartiality of the District.

Employees shall not use their position, authority, or access to information obtained through employment for personal gain or for the benefit of another person or organization.

Employees shall not seek or expect preferential treatment for themselves or others because of their position with the District.

Employees shall immediately disclose any actual or perceived conflict of interest to their supervisor.

Employees are expected to seek assistance from their immediate supervisor or Human Resources, if they are not sure whether a situation is or could result in a conflict of interest.

2. Disclosure Requirements

Employees must disclose a conflict of interest when:

- a. commencing employment if a conflict is known;

- b. circumstances change and a conflict arises;
- c. assigned to a position and/or their duties may create a conflict; or
- d. requested to do so by the District.

Disclosures shall be made in writing to the employee's supervisor.

Supervisors may consult with their zone lead, Human Resources, the Secretary Treasurer, Superintendent, or designate as appropriate.

3. *Assessment and Management*

Upon receiving a disclosure, the supervisor shall:

- a. review the circumstances;
- b. determine whether an actual or perceived conflict exists;
- c. assess the risk to the School District; and
- d. determine appropriate mitigation measures.

Mitigation measures may include:

- a. removal from a decision-making process;
- b. reassignment of responsibilities;
- c. additional oversight or review;
- d. restrictions on access to information; or
- e. other measures deemed appropriate.

4. *Examples of Conflict of Interest*

Examples include, but are not limited to:

- a. providing preferential treatment to individuals, organizations, suppliers, contractors, volunteers, students, or families;
- b. participating in decisions involving an organization in which the employee, a relative, friend, or associate has an interest;
- c. benefiting from confidential information acquired through employment;
- d. having a financial interest in a business that seeks to conduct business with the School District;
- e. accepting outside employment or consulting work that conflicts with School District duties; (OR interferes with an employee's ability to perform their duties, compromises professional boundaries, or involves the inappropriate use of District resources, information, or relationships.)
- f. benefiting, or appearing to benefit, from transactions, contracts, purchases, grants, approvals, appointments, or other decisions that the employee can influence;
- g. entering into financial arrangements that may compromise or appear to compromise professional judgment.

5. *Failure to Disclose*

Where an employee fails to disclose, an actual or perceived conflict of interest, corrective disciplinary action may result.

6. *Record Keeping*

Conflict of interest disclosures and related decisions shall be maintained in accordance with applicable privacy and records management requirements.

APPROVED: September 8, 2026