

Conflicts of Interest

The purpose of this policy is to establish standards of conduct for Bellevue School District employees and provide guidance and set clear parameters for staff regarding issues of conflict of interest. The Bellevue School District recognizes the knowledge and expertise of its employees and understands employees may have opportunities to use their expertise outside of the scope of their employment with the District. This policy supports a proactive approach for employees to navigate and avoid potential conflicts of interest in a manner based upon training and education.

A Conflict of Interest is defined as a situation in which a district employee receives, attempts to receive, or promotes a personal benefit to himself/herself directly, or indirectly, or to some other person(s), which results, or appears to result, in an improper gain or an improper advantage by virtue of his/her position in the District.

Situations where a conflict of interest may exist include but are not limited to:

- A. Receiving economic benefit from selling or promoting the sale of goods, services, programs, or activities to students, family members of students in the District, or employees where the knowledge of the staff member's relationship to the District is in *any way* utilized to influence the sale.
- B. Receiving economic benefit from the sale of instructional and training materials and/or equipment where the district has specifically engaged a staff member(s) to develop such materials or equipment. In such instances, the District will retain a proprietary interest.
- C. Encouraging a student who is enrolled in one or more of the staff member's classes, activities or programs to take private lessons or to engage in tutoring, coaching or training for fee from the staff member.
- D. Using or providing for others a list of names and home addresses obtained from school records or school-related contacts for purposes of identifying potential client or customer contacts, or providing a staff or student directory for use in promoting sales of a product or service.
- E. Participating in any way in the selection process for materials, books or equipment when (a) an item developed by or authored by the staff member or a member of his/her family is under consideration for approval for district use; or (b) the staff member is in any way affiliated with the provider of the material, book(s) equipment or services.
- F. Being involved in the selection of an applicant or in the appointment, evaluation or supervision of any other staff member who is a family member.
- G. Using the interschool mail, email or other form of District resource or asset, including District-operated website or District-operated social media tools to promote the sale of goods, services, programs, or other activities in which a staff

member or someone close to the staff member has an economic, personal or private interest.

- H. Purchasing or otherwise acquiring surplus District property in violation of state law, or where the staff member was involved in or had influence in the process of declaring the item(s) as surplus.
- I. Receipt by a staff member or the staff member's office of any benefit, directly or indirectly, in connection with any contract which may be made by, through, or under the direct or indirect supervision of the staff member in whole or in part; or accepting, directly or indirectly, any compensation, gift, gratuity, or reward in connection with such a contract from any other person beneficially interested therein.

The District recognizes that from time to time an employee may use District resources and receive a benefit, provided that the use of such resources and any benefit from such use are of a *de minimus* value. Employees are directed to contact the District Compliance Officer should they have questions regarding whether their use of District resources is in compliance with District policy.

An employee who is found to have engaged in a conflict of interest in violation of this policy may be subject to corrective action, up to and including termination.

Disclosure

Duty to Disclose Potential Conflict of Interest – Employees are required to disclose any potential conflicts of interest. Employees shall submit potential conflicts of interest disclosures to their supervisors in accordance with the accompanying procedure. Examples of situations that require disclosure include but are not limited to the following:

- Outside employment such as working at summer camps, consulting, tutoring, coaching or training, providing private lessons or instruction, providing general services, conducting test preparation, and college and career counseling;
- Relation to another employee;
- Relation to another employee, parent, organization or community member perceived as providing a personal or private benefit;
- Participating in any way in the selection process for materials, books, etc. where there is a perceived private or personal benefit;
- Being involved in the selection process of an employee who is a family member;
- Using interschool mail or other resources, including electronic and social media to promote the sales of goods, services, programs, or other activities that are perceived as providing a private or personal benefit;
- Purchasing or otherwise acquiring surplus District property and having influence in the process of declaring the item surplus;

- Receiving a direct or indirect benefit in connection with any contract made by the District where the staff member is perceived to have a personal or private benefit.

An employee's failure to disclose a potential conflict of interest may result in corrective action, up to and including termination.

Supervisor Responsibility – All supervisors are required to disclose any potential conflicts of interest, that they are aware of or become aware of, involving any employees, even employees who are not under the supervisor's direct supervision. Supervisors shall submit notice of all potential conflicts of interest, within 10 calendar days of their awareness of any potential conflict, to the district compliance officer in accordance with the accompanying procedure. This disclosure requirement includes activities that the employee or supervisor may have considered acceptable in the past and activities that are ongoing, as well as newly planned activities.

Employee Awareness and Training

The District must notify all current employees of the amendments to this policy within one month of adoption, and provide all employees with initial training on this policy within one year of adoption.

The District must provide all new employees notice of and training on this policy at the time of hire.

No less frequently than biannually, the District must provide all current employees with a reminder notification and re-training on this policy.

The Board directs the Superintendent to appoint a compliance officer. The compliance officer will develop and maintain a procedure that establishes the implementation of this policy. The procedure will include definitions, required disclosure of potential conflicts of interest, process review for potential conflicts of interest, and other relevant areas identified for policy implementation.

Cross References:	Board Policy 5008	General Personnel Policy Statement for Classified, Technical, Supervisory and Administrative Employees
	5255	Gifts to Staff
	5281	Disciplinary Action and Discharge
	5630	Volunteers
	6102	District Fundraising Activities
	6112	Rental or Lease of District Real Property

6114	Donations
6220	Bid Requirements
6230	Relations with Vendors
6881	Disposal of Surplus Equipment and/or Materials

Legal References:	RCW 28A.400.332	Use of persons, money, or property for private gain
	RCW 42.23.030	Interest in contract prohibited – Exceptions
	RCW 42.23.040	Remote Interests
	WAC 181-87-090	Improper remunerative conduct
	2 CFR §200.318	General procurement standards

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Bellevue School District
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