

## CONFLICT OF INTEREST

**Purpose:**

To protect the integrity of district information, services, and personnel's efforts.

**Scope:**

The policy applies to all members of the district.

**Policy:**

It is the policy of the district that all members should avoid any activity, practice, secondary employment, volunteer membership, and/or act which has the potential to create a conflict between one's personal interest and one's employment or membership with the district.

Personnel shall be deemed to have a conflict if he/she:

- A. Has any financial interest in any sale to the district of any goods or services when such financial interest was received with prior knowledge that the district intended to purchase the property, goods, or services.
- B. Solicits, accepts, or seeks a gift, gratuity, or favor from any person, firm, or corporation involved in a contract or transaction which is or may be the subject of official action by the district.
  1. Recognizing that personal friendships often precede and can evolve from official contracts between district personnel and individuals engaged in business with the district, reasonable exceptions to this section are permitted for those occasions which are social in nature and are not predicated on the employee or volunteer members' ability to influence, directly or indirectly, any matter before the district.

The employee will be guided in interpretation of this section by the distinction between a gift, gratuity, or favor given or received which has significant monetary value and is offered or accepted in expectation of preferential treatment and an expression of courtesy. Examples of acceptable courtesies include: a meal or social event; exchanges of floral offerings or gifts of food to commemorate events such as illness, death, birth, holidays, promotions; a sample or promotional gift of nominal value (\$25 or less).
  2. Participates in his capacity as a district employee or member in the issuing of a purchase order or contract in which he has a private pecuniary interest, direct or indirect, or performs in regard to such contract some function requiring the exercise of discretion on behalf of the district.

3. Engages in, accepts employment from, or renders services for private interests for any compensation or consideration having monetary value when such employment or service is incompatible with the proper discharge of official duties or would tend to impair independence of judgment or action in performance of official duties, or give the appearance of the above.  
Personnel should not make a unilateral decision, if there is any doubt about his/her private employment, the Chief should be consulted.
4. Except for courtesies as provided in item “B” above, no personnel shall, directly or indirectly, give or receive, or agree to receive any compensation, gift, reward, commission, or gratuity from any source except the district for any matter directly connected with or related to his official services as such personnel with this district.
5. Discloses or uses without authorization confidential information concerning property or affairs of the district to advance a private interest with respect to any contract or transaction which is or may be the subject of official action of the district.
6. Have a financial interest or personal interest in any legislation coming before the district and participates in discussion with or gives an official opinion to the Board of Trustees unless the member discloses on the record the nature and extent of such interest.

**Guidelines:**

- A. If personnel or a member of their immediate family have a financial interest in an organization which does business with the district, the employee must fully disclose the interest to the district and must not represent or influence the district in any related transactions.
- B. No employee or member of their immediate family shall accept or solicit any gift, service, special accommodation, or other favors from any current or potential customers with whom the district does business, if it might be inferred that such action could affect the employee’s business decisions. This policy does not preclude normal, ethical business practices such as token luncheons, token gifts, advertising items such as pens, pencils, calendars, or other gifts of nominal value.
- C. No personnel shall, directly or indirectly, give, offer, or promise anything of value to any representative of any organization in connection with any transaction or business that the district may have with the organization.
- D. No personnel shall engage in conduct which is disloyal, disruptive, competitive, or damaging to the reputation of the district.
- E. Because it is not possible to describe every situation which could arise involving potential conflicts of interest, personnel are asked to carefully evaluate any activity which could be construed as potentially conflicting

with their employment and membership, and to seek advice from the Chief regarding such activity.