



<i>The Classical Academy</i>	<i>Policies and Procedures</i>
Policy Name:	Staff Ethics – Conflict of Interest
Policy Number:	GBEA-TCA
Original Date:	
Last Reviewed:	1/2/24
Category:	Staff
Cabinet Level Owner:	Director of Human Resources

TCA staff members are expected to exercise good judgment and ethical conduct to ensure that conflicts of interest do not occur by engaging in activities that are incompatible with the duties and responsibilities of their TCA position. This includes entering into agreements on behalf of TCA in which they have a conflicting personal interest. Questions relating to a potential conflict of interest should be directed to the TCA staff member's direct supervisor or an administrator in Human Resources.

All staff members shall avoid any action, which could result in, or create the appearance of, using public office for inappropriate private gain or giving inappropriate preferential treatment to any person.

Hiring, Supervising, and Evaluating

All standard hiring procedures are to be followed when any candidate is recommended for hire including documentation of hiring procedure; validation of reference checks; list of all persons involved in the selection process; and, a copy of all relevant records, transcripts, work experience and other qualifications. This evidence shall demonstrate that the hiring recommendation was based on the selection of the best-qualified candidate available to fill this position.

No TCA staff member shall participate in the selection, hire recommendation, offers of employment, direct supervision, or direct evaluation of any candidate who is a member of his/her family. As used in this policy, the term "member of his or her family" shall mean spouse, partner in a civil union, son, daughter, child, stepchild, mother, mother-in-law, daughter-in-law, stepmother, father, father-in-law, son-in-law, stepfather, grandchild, grandparent, guardian, brother, stepbrother, half-brother, sister, stepsister, and half-sister.

"Direct" supervision or evaluation is defined as immediate, first line level or contact supervision and written evaluation responsibilities. "Indirect" supervision is defined as supervision through one or more intermediate supervisors and does not involve responsibility for the written evaluation of the staff member. Indirect supervision may be permitted as long as family ties do not adversely alter the performance of professional duties. No individual with direct or indirect supervision responsibilities shall have written evaluation sign-off responsibilities for an immediate family member.

Staff Members as Parents

TCA staff members who are parents of a TCA student are expected to act in a professional manner and maintain appropriate boundaries when addressing matters for their student.

Contact appropriate personnel to address matters regarding your student, do not involve other staff members who are not directly related to the situation.

Handle the issue at the lowest level possible per Policy KE-TCA Conflict Resolution.

Pecuniary Benefit

No staff member shall engage in or have a financial interest in any activity that conflicts with or raises reasonable question of conflict with duties and responsibilities at TCA. Staff tutoring or giving private lessons for pay to students whom the staff member evaluates and to whom the staff member assigns a grade is normally considered a conflict of interest. However, there may be exceptions, which shall require written authorization from the president.

Gifts

A staff member shall not use his/her position with TCA for personal gain, nor for the gain of friends or relatives.

All staff members are prohibited from accepting gifts of other than minimal value from individuals, companies, or organizations conducting business or seeking to conduct business with TCA. A staff member shall not accept a gift if the acceptance of the gift may unduly influence or affect the staff member in the performance of his/her duties. The acceptance of minor items, which are generally distributed by the company or organization through its public relations program, is appropriate for staff members to receive. Discounts offered to all staff members through TCA approved programs are appropriate.

TCA Materials

Material purchased with TCA funds shall not be transferred from one TCA site to another without written authorization from the president or designee.

Solicitations

External community or business organizations shall not distribute flyers or other materials related to their sales programs. Fund drives conducted internally through the TCA shall be approved by the president or designee. Vendor information shall not be placed in staff mailboxes. Vendor information shall be placed on staff lounge bulletin boards only with principal or site supervisor approval.

Personal Business

TCA staff members shall not transact business affairs on TCA property without specific written prior approval of the president or designee, per Policy GBEA-TCA-E-2. It is permissible for a staff member to make information available related to his/her business only in an officially designated location within the staff area/lounge. Principals or site supervisors will approve such information to be posted or made available. This courtesy does not extend to family members or friends of staff. Staff members are not to use district or TCA e-mail addresses or TCA mailboxes to distribute advertisement of personal business.

TCA staff members shall not initiate distribution of personal business information to parents by way of students or through the use of information obtained through TCA records.

TCA staff members shall not distribute personal business information to other staff members through the use of information obtained through the TCA Staff Directory.

TCA staff members shall not share the confidential staff information found in the TCA Staff Directory with anyone, including a vendor or business.

Confidential Information

All confidential information that a staff member or volunteer receives as a result of his/her association with the TCA shall be kept confidential and not be used to engage in any type of work or discussion outside of TCA.

Sale of Goods or Services by TCA Staff to TCA

A staff member or family of a staff member shall not sell any materials or services to TCA without written authorization from the president, per ASD20 Policy GBEA-E Conflict of Interest Waiver.

This TCA Policy replaces ASD20 Policy GBEA.

Legal References

20 U.S.C. § 1681

Colorado Constitution art. X, § 13C.R.S. § 18-8-308

C.R.S. § 22-32-110(1)(k)

C.R.S. § 22-63-204

C.R.S. §§ 24-18-101 et seq.

C.R.S. § 24-34-402(1)

C.R.S. 24-72-201 (Colorado Open Records Act)

Cross References

ASD20 GBEA-E Conflict of Interest Waiver – Sale of Goods or Services to TCA

GBEA-TCA-E-2 Conflict of Interest Waiver – Personal Business on Campus

GBEB-TCA Staff Conduct and Responsibilities

GBEB-TCA-R Staff Conduct and Responsibilities Procedures

Policy Revision History

Date	Revision Details	Revised By
9/10/21	Policy updated.	Director of Human Resources
8/24/23	Policy updated.	Director of Human Resources
11/14/23	Policy updated.	Director of Human Resources
1/2/24	Policy updated.	Director of Human Resources