

IFTIN CHARTER SCHOOL

CONFLICT OF INTEREST CODE

Adopted:

Supersedes Prior Code Adopted December 13, 2016

I. AUTHORITY

The Political Reform Act of 1974 (Government Code § 81000 et seq.) requires state and local government agencies to adopt and promulgate Conflict of Interest Codes.

The provisions of Title 2, California Code of Regulations, Section 18730, and any amendments thereto, are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the Conflict-of-Interest Code of Iftin Charter School ("School").

II. PURPOSE

The purpose of this Conflict-of-Interest Code ("Code") is to ensure that all officials, employees, and consultants of Iftin Charter School perform their duties in a manner that promotes public confidence, integrity, and transparency, and that is free from bias caused by financial interests.

This Code is intended to:

- Comply with the Political Reform Act of 1974 (Government Code § 81000 et seq.)
- Prevent both actual and perceived conflicts of interest
- Establish clear expectations for financial disclosure, ethical conduct, and accountability

III. INCORPORATION OF FPPC STANDARD CODE

Pursuant to Government Code § 87300, the provisions of Title 2, California Code of Regulations, Section 18730, and any amendments thereto, are hereby incorporated by reference and shall constitute the Conflict-of-Interest Code of Iftin Charter School.

This incorporation ensures that any future regulatory changes adopted by the Fair Political Practices Commission (FPPC) are automatically applicable without requiring further amendment of this Code.

IV. DESIGNATED EMPLOYEES

Designated employees are those individuals who make or participate in making governmental decisions, as defined in Government Code § 82048.

The designated positions and their assigned disclosure categories are set forth in **Appendix A**.

V. STATEMENTS OF ECONOMIC INTERESTS (FORM 700)

A. Filing Requirements

Designated employees shall file Statements of Economic Interests (Form 700) in accordance with Government Code § 87302.

Each designated employee shall file:

- An Assuming Office Statement within 30 days of assuming office
- An Annual Statement by April 1 of each year
- A Leaving Office Statement within 30 days of leaving office

B. Place of Filing

- Members of the Board of Directors and the Chief Executive Officer shall file with the County of San Diego via the official e-filing system
- All other designated employees shall file with the School's filing officer unless otherwise directed

C. Filing Officer

The **Operations Manager** shall serve as the filing officer and custodian of Statements of Economic Interests.

The filing officer shall be responsible for:

- Ensuring timely filing compliance
- Maintaining copies of filed statements
- Providing notice and guidance to designated employees
- Making statements available for public inspection pursuant to Government Code § 81008

VI. DISQUALIFICATION

No designated employee shall make, participate in making, or use their official position to influence a governmental decision in which they have a financial interest, as defined in Government Code § 87100.

A designated employee with a disqualifying financial interest shall:

- Disclose the nature of the financial interest
- Refrain from participating in the decision
- Leave the room during discussion and voting, where applicable

This section shall be interpreted in accordance with Government Code § 87105 and applicable FPPC regulations.

VII. CONSULTANTS

Consultants, as defined in Title 2, California Code of Regulations § 18701(a)(2), shall be included as designated employees if they make or participate in making governmental decisions.

The Chief Executive Officer or designee shall determine in writing:

- Whether a consultant must file Form 700
- The appropriate disclosure category

Such determinations shall be retained as public records.

VIII. ETHICAL CONDUCT AND CONFLICT PREVENTION

In addition to statutory requirements, all employees are expected to conduct themselves in a manner that avoids both actual conflicts of interest and the appearance of impropriety.

A. Contracts and Procurement

Employees shall not participate in the making of contracts in which they have a financial interest, consistent with Government Code § 1090 and § 87100. Employees shall avoid financial relationships that could influence or appear to influence procurement decisions.

B. Gifts, Travel, and Benefits

Employees shall comply with all gift limits and reporting requirements under Government Code §§ 82028, 87103(e), and applicable FPPC regulations. Employees shall not accept gifts or benefits that could reasonably be perceived as influencing official actions.

C. Outside Employment and Activities

Employees may engage in outside employment provided such activities do not conflict with their duties, involve entities doing business with the School, or result in the misuse of School resources or position.

D. Use of Position and Resources

Employees shall not use their official position, confidential information, or School resources for personal or financial gain.

E. Personal and Financial Relationships

Employees shall avoid participating in decisions in which they have a financial interest as defined by applicable law. In addition, employees are encouraged to disclose situations involving immediate family members or close personal relationships that could create the appearance of a conflict of interest. Such situations shall be reviewed and managed appropriately to ensure transparency and fairness.

IX. DISCLOSURE AND REPORTING OF CONFLICTS

Employees who identify a potential conflict of interest shall promptly disclose the matter to the Chief Executive Officer or appropriate authority and refrain from participating in the related decision-making process.

The School may implement measures to mitigate conflicts, including reassignment of duties where appropriate.

X. ENFORCEMENT

Violations of this Code may result in disciplinary action, termination of employment or contract, and/or referral to the Fair Political Practices Commission (FPPC). Violations of the Political Reform Act may result in civil, administrative, or criminal penalties.

XI. REVIEW AND AMENDMENT

Pursuant to Government Code § 87311, this Code shall be reviewed at least biennially and updated as necessary.

Any amendments must be submitted to and approved by the **San Diego County Board of Supervisors**.

APPENDIX A: DESIGNATED POSITIONS

Position	Disclosure Categories
Members of the Board of Directors	1–6
Chief Executive Officer (CEO)	1–6
Operations Manager	1–6
HR Specialist	1–6
Instructional Leader	4–6
Consultants*	As determined

APPENDIX B: DISCLOSURE CATEGORIES

Category 1 – Full Financial Disclosure

Disclosure of all investments, business positions, income, gifts, loans, and travel payments in accordance with Government Code §§ 87206–87207.

Category 2 – Business Entities

Disclosure of financial interests in entities doing business with the School, consistent with Government Code §§ 87103(a) and 82034.

Category 3 – Real Property

Disclosure of real property interests as defined in Government Code § 82033.

Category 4 – Vendors and Service Providers

Disclosure of financial interests in entities providing goods or services to the School pursuant to Government Code §§ 87103(c) and 82030.

Category 5 – Regulated Entities

Disclosure of financial interests in entities subject to School decision-making authority pursuant to Government Code § 87103.

Category 6 – Gifts and Travel Payments

Disclosure of gifts and travel payments pursuant to Government Code §§ 82028, 87103(e), and FPPC regulations.