

# ULS ANTI-NEPOTISM & CONFLICT OF INTEREST POLICY

## Anti-Nepotism

ULS will hire employees best suited for a position. To avoid favoritism or potential conflicts of interest, ULS will adhere to the following anti-nepotism policy.

This policy will be provided to new staff upon hiring, new Board members upon appointment, and annually to all current members of the Board and staff. A disclosure, made using the final page of this policy, will be required from Board and staff, with an annual affirmation of “no change” submitted via email in subsequent years, or a written form submitted if a new conflict exists. The Executive Director and Board President will determine what action, if any, must be taken as a result of any disclosure.

### I. DEFINITIONS.

Personal relationship: “Personal relationship” within the meaning of this policy means the relationship of husband, wife, domestic partner, father, mother, brother, sister, son, daughter, uncle, aunt, nephew, niece, grandfather, grandmother, grandson or granddaughter, or any of those relationships arising as a result of marriage or domestic partnership (for example, brother-in-law or stepdaughter), that of a close personal friend, or people involved in a romantic relationship.

Employee: Any paid employment, including full and part-time staff or contractor.

### II. EMPLOYMENT OF THOSE IN A PERSONAL RELATIONSHIP

Board Members and employees have ***an ongoing and affirmative duty*** to notify the Statewide Support Unit if they have knowledge of a personal relationship between employees, Board members, job applicants, contractors, or potential contractors.

A Board member or employee of ULS cannot use their authority to benefit or to disadvantage a job applicant or potential contractor with whom a personal relationship exists. The Board member or employee shall not participate in any aspect of the hiring process or the selection of a contractor.

ULS will not hire a job applicant who is in a personal relationship with a current employee or Board member if the applicant would be in a supervisory or subordinate position to the existing employee, including any direct or indirect administrative or operational authority over the other person, or the relationship would otherwise pose a potential conflict of interest. Likewise, the program will not enter a contract with a contractor who is in a personal relationship with a Board member or employee if the contractor would be supervised by the employee or if the relationship would otherwise pose a potential conflict of interest.

Any employee of ULS who has or acquires a personal relationship with another employee may not be in a supervisory or subordinate position with that employee. This includes any direct or indirect administrative or operational authority over the other person, or any other circumstance that poses a potential conflict of interest. This also prohibits an employee from being in an indirect line of authority where such a conflict exists. (For example, an employee cannot be supervised by someone who reports to the employee's family member.)

A Board member or employee of ULS cannot use their authority to benefit or to disadvantage an employee with whom they are in a personal relationship. (For example, providing input on a performance evaluation, signing/approving a check payable, etc.).

In the event of a newly acquired personal relationship, the employees will be offered the opportunity to move to any open position for which they are qualified. In the event no such position is available, ULS and the employees will explore other options prior to termination of employment.

### Conflicts of Interest

The purpose of this Conflicts of Interest Policy is to provide guidance in identifying and addressing actual, apparent or potential conflicts of interest situations.

#### III. Definitions

##### Conflicts of Interest

A conflict of interest is a transaction, contract, or relationship with any person, organization, firm, or business that may compromise, or have the appearance of compromising, an individual's obligation to ULS in favor of his or her personal, business, or other interests.

Generally, a conflict of interest exists if a Board member or employee has a financial or other interest in a firm or vendor being considered or having been selected for an award or contract. An apparent or potential conflict of interest is one that a skeptical viewer could reasonably believe might cause the Covered Individual's decision to be tainted by self-interest.

#### IV. Conflict of Interest Policy

Any actual conflict of interest, or apparent or potential conflict of interest, must be fully disclosed before a decision is made on the proposed transaction. Board members and employees have ***an ongoing and affirmative duty*** to notify the Statewide Support Unit if they have knowledge of a conflict of interest.

In any such situation, the Board member or employee with the actual, apparent, or potential conflict shall not participate in the selection, award, or administration of a contract with ULS until the conflict issue is resolved. Moreover, no such person may be involved in the decision regarding how to address the conflict issue. In rendering service to ULS, Board members and employees must always act in the best interests of ULS and not for personal or third-party benefit or financial enrichment.

No Board member or employee with a financial or other interest in a contractor or vendor may participate in the selection, award, or administration of a contract, unless the recipient has determined, pursuant to the procedures described in this policy, that the interest is not substantial. The interest of the ULS must be the top priority in all such decisions and actions.

As noted above, this policy will be provided to new staff upon hiring, new Board members upon appointment, and annually to all current members of the Board and staff. The Executive Director and Board President will determine what action, if any, must be taken as a result of any disclosure.

#### V. Violation of the ULS Anti-Nepotism and Conflicts of Interest Policy

If a Board member or employee fails to disclose a relationship or conflict under this policy, that individual shall be informed of and afforded the opportunity to explain the alleged failure to disclose. If the Executive Director and Board President determine the individual intentionally failed to disclose the existence of, or all relevant facts related to the relationship, they shall take appropriate disciplinary and corrective action, up to and including termination or removal from the Board.

**ULS ANTI-NEPOTISM AND CONFLICTS OF INTEREST ACKNOWLEDGEMENT  
AND DISCLOSURE FORM**

I have read the ULS Anti-Nepotism and Conflict of Interest policy and agree to comply fully with its terms. I understand I have an ongoing and affirmative duty to report any relationships described in this policy.

Disclosure of a personal relationship with an employee, Board member, job applicant, contractor, or potential contractor employed or seeking employment with ULS: (If None, please leave blank.)

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Disclosure of an Actual, Apparent or Potential Conflict of Interest with a ULS vendor or contractor or other individual in a business relationship with ULS. A list of ULS vendors is attached, and will be updated annually, for your reference: (If None, please leave blank.)

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Signature

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Date

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Printed Name