



Board Governance BP 06-15
Board Policy: Conflict of Interest Code

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code for the Gateway Community Charters. (GCC)

Individuals holding designated positions shall file statements of economic interests with the GCC, which will make the statements available for public inspection and reproduction (Government Code Section 81008). All statements will be retained by GCC.

**APPENDIX A
DESIGNATED POSITIONS**

<u>Designated Positions Category</u>	<u>Disclosure</u>
Members of the Governing Board and Alternates	1, 2
Corporate Officers (e.g. President, Secretary, Treasurer, etc.)	1, 2
Superintendent/CEO	1, 2
Chief Business Official	1, 2
Deputy Superintendent	1, 2
Assistant Superintendent	1, 2
Director of Business Services	2
Director of Academics	3
Director of Special Education and Student Services	3
Director of School, Parent and Governmental Relations	3
Director of Human Resources	3
Vocational Academies Director	3
Principal (Principal II, Vocational Academies Principal)	3
Contractor ¹	3
Consultants/New Positions	*

*Consultants/New Positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The GCC Superintendent/CEO may determine in writing that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant’s or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Superintendent/CEO’s

¹ The positions of Contractors is listed in the code because GCC contracts out both business services and IT services to outside sources performing in a staff capacity.

determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code (Government Code § 81008).

APPENDIX B DISCLOSURE CATEGORIES

Category 1

Designated positions assigned to this category must report:

- a. Interests in real property located in whole or in part within two (2) miles of any facility utilized by GCC's charter school, including any leasehold, beneficial or ownership interest or option to acquire such interest in real property.
- b. Investments and business positions in business entities, or sources of income (including receipt of gifts, loans, and travel payments) that engage in the purchase or sale of real property or are engaged in building construction or design.

Category 2

Designated positions assigned to this category must report:

Investments and business positions in business entities or sources of income (including receipt of gifts, loans, and travel payments) from sources that are contractors engaged in the performance of work or services, or sources that manufacture or sell supplies, instructional materials, machinery or equipment of the type to be utilized by GCC.

Category 3

Designated positions assigned to this category must report:

Investments and business positions in business entities or sources of income (including receipt of gifts, loans, and travel payments) from sources that are contractors engaged in the performance of work or services, or sources that manufacture or sell supplies, instructional materials, machinery or equipment of the type to be utilized by the designated position's department.

GCC Board Adopted Revision: September 29, 2020

GCC Board Adopted Revision: July 21, 2015

GCC Board Adopted: March 3, 2015

This is the last page of the conflict of interest code for **Gateway Community Charters**.



CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for **Gateway Community Charters** was approved on _____ 2015. This code will become effective on _____ 2015.

Brian G. Lau

Senior Commission Counsel

Fair Political Practices Commission