



OXFORD PREPARATORY ACADEMY

BOARD POLICY

Nepotism Policy

Board of Directors, Employees, Consultants and School Services Providers

Making employment decisions, board decisions, and implementing consultant and school service provider contracts when a relative is involved can cause various problems including but not limited to charges of favoritism, conflicts of interest, family discord and scheduling conflicts that may work to the disadvantage of both the organization and its employees and stakeholders. It is the responsibility of every Oxford Preparatory Academy (“OPA”) board member, employee, and consultant and school services provider to comply with this policy and complete a Nepotism Disclosure Form.

For the purposes of this policy, the term “relative” shall include the following relationships: known relationships established by blood, marriage or legal action. Examples include, but are not limited to, spouse, mother, father, son, daughter, sister, brother, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, stepparent, stepchild, aunt, uncle, nephew, niece, grandparent, grandchildren or cousin. The term also includes domestic partners (a person with whom the employee’s life is interdependent and who shares a common residence) and a daughter or son of a domestic partner.

It is the goal of the organization, for transparency reasons, to avoid creating or maintaining circumstances in which the appearance or possibility of favoritism, conflicts or management disruptions exist. The organization may allow personal relationships between board members, employees, consultants or school services providers to exist under the following circumstances:

- Relatives may not have a direct supervisor/subordinate relationship.
- Relatives may not supervise, evaluate or make employment decisions about each other.
- The relationship shall not create an adverse impact on work productivity or performance in the discretion of the supervisor of the employee, consultant or school services provider, or in the case of a board member, in the discretion of the board of directors.
- The relationship shall not create an actual conflict of interest, and shall not create a perceived conflict of interest in the discretion of the supervisor of the employee, consultant or school services provider, or in the case of a board member, in the discretion of the board of directors.
- Relatives may not audit or review in any manner each other’s work.
- Individuals may not be employed or hired/retained as a consultant or school services provider by the organization if a relative of the individual is a member of the OPA board of directors.

No personal relationship covered by this policy will be allowed to be maintained, regardless of the positions involved and the circumstances above, if it is prohibited by any legal or regulatory mandate, or if it creates a disruption or potential disruption in the work environment in the discretion of the supervisor of the employee, consultant or school services provider, or in the case of a board member, in the discretion of the board of directors.

This policy must be considered when hiring, promoting or transferring any employee, when board members are elected, and when hiring/retaining consultants and school services providers.

If a prohibited relationship addressed within this policy is identified, the matter should be immediately reported to the Coordinator of Human Resources, or the Managing Director if the relationship involves the Coordinator of Human Resources.

When a relationship has been disclosed on the Nepotism Disclosure Form or otherwise reported, the Coordinator of Human Resources, or the Managing Director if the relationship involves the Coordinator of Human Resources, will follow the following procedures:

- A determination will be made whether the relationship is subject to the organization's Nepotism Policy based on the conditions described above.
- If the relationship is determined to be prohibited by this policy, the Coordinator of Human Resources, or the Managing Director if the relationship involves the Coordinator of Human Resources, in consultation with the affected individuals and the organization's Executive Director, or the board of directors if the relationship involves the Executive Director, shall determine the appropriate course of action to resolve the situation (e.g., refusal to hire or retain, transfer to a new position, termination, nonrenewal of a contract, etc.).

The organization reserves the right to exercise appropriate judgment to take such actions as may be necessary to achieve the intent of this policy. The board of directors reserves the right to vary from the guidelines outlined in this policy to address unusual circumstances on a case by case basis, but shall in all instances adhere to all of the conflict of interest laws that apply to OPA.

It is the responsibility of every board member, employee, consultant and school services provider to disclose any existing personal relationship that falls under the definitions provided in this policy to the organization's Coordinator of Human Resources, or the Managing Director if the relationship involves the Coordinator of Human Resources. The Coordinator of Human Resources shall provide copies of the organization's Nepotism Disclosure Forms to board members upon request.

Employees who fail to properly disclose the presence of any relative within the organization on the Nepotism Disclosure Form, or who otherwise violate this policy, will be subject to disciplinary action up to and including the termination of employment. If a board member fails to properly disclose the presence of any relative within the organization on the Nepotism Disclosure Form, or otherwise violates this policy, the board member may be removed from the board consistent with the organization's bylaws. If a consultant or school services provider fails to properly disclose the presence of any relative within the organization, or otherwise violates this policy, the consultant's or school services provider's contract may be terminated or non-renewed, depending on the circumstances.

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