



ISANA NEPOTISM POLICY

I. Purpose

ISANA understands that employment decisions, board decisions, and decisions about consultant and school service provider contracts can be problematic when an ISANA decision-maker's relative is involved, in that they can lead to charges of favoritism, actual or perceived conflicts of interest, family discord, and scheduling conflicts that may work to the disadvantage of both the organization and its employees and stakeholders.

For the purposes of this nepotism policy, the term "relative" shall include the following relationships: **known relationships established by blood, marriage, or legal action**. Examples include a 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.

II. Avoiding Nepotism

It is the goal of ISANA, for transparency reasons, to avoid nepotism, which means to avoid creating or maintaining circumstances in which the appearance or possibility of favoritism, conflicts of interest, or management disruptions exist due to a relationship between a ISANA decision-maker and his or her relative. This policy shall apply to ISANA board members, ISANA employees, individual consultants hired or retained by ISANA, and school service providers hired or retained by ISANA. For purposes of this policy, a "school services provider" shall be the responsible individual at any organization that provides school services to ISANA.

Relationships between ISANA board members, employees, consultants, or school services providers are permissible under the following circumstances:

- Relatives may not have a direct supervisor/subordinate relationship.
- Relatives may not be responsible for evaluating or making employment decisions about each other.
- Any time an employee, consultant, school services provider or board member is a relative of another, the relationship shall not result in an adverse impact on work productivity or performance. The determination of whether there is an adverse impact shall be in the discretion of the supervisor(s) of the employee(s), consultant(s), or school services provider(s), or in the case of a board member, in the discretion of the ISANA board of directors.
- Any time an employee, consultant, school services provider or board member is a relative of another, the relationship shall not create an actual conflict of interest under the law, and shall not create a detrimental perceived conflict of interest. The determination of whether there is a detrimental perceived conflict of interest shall be in the discretion of the supervisor(s) of the

employee(s), consultant(s), or school services provider(s), or in the case of a board member, in the discretion of the ISANA board of directors.

- Relatives may not audit each other's work.
- ISANA shall not employ or hire/retain as a consultant or school services provider any person who is a relative of a member of the ISANA board of directors or the CEO.

No personal relationship 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.

This policy must be considered when hiring, promoting, or transferring any ISANA employee, when ISANA board members are elected, and when ISANA hires/retains consultants and school services providers. If a relationship addressed within this policy is identified, the matter should be immediately reported to the Director of Human Resources, or to the CEO if the relationship involves the Director of Human Resources.

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

- A determination will be made whether the relationship is subject to this Nepotism Policy based on the conditions described above.
- If the relationship is determined to be prohibited by this policy, the Director of Human Resources, or the CEO if the relationship involves the Director of Human Resources, in consultation with the affected individuals, 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.).

ISANA reserves the right to exercise appropriate judgment to take such actions as may be necessary to achieve the intent of this policy. A Nepotism Disclosure Form shall be completed by all ISANA board members and employees. If a familial relationship begins or changes rendering an individual's Nepotism Disclosure Form incorrect, a new Form must be filled out.

III. Consequences for Violation of this Policy

Employees who fail to properly disclose the presence of any relative within the organization when they complete a 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 when they complete the Nepotism Disclosure Form, or otherwise violates this policy, the board member may be removed from the board consistent with ISANA's bylaws. If a consultant or school services provider violates this policy, the consultant's or school services provider's contract may be terminated or non-renewed, depending on the circumstances.

APPROVED AND ADOPTED by the Board of Directors on June 5, 2018.