



ADMINISTRATIVE POLICY

Policy Type: Employee Conflict of Interest
Date Adopted: April 2005
Date Last Reviewed:
Office Responsible: Legal Affairs

Policy Summary

Each employee must avoid being placed in a position wherein he / she could profit personally from a decision he / she makes on behalf of the College. If an administrator or any employee believes that there is a possibility that an entangling or compromising business relationship might develop, it is his/her responsibility to bring it to the attention of the Legal Affairs Department so that the action to be taken may be evaluated independently. If a member of an employee's family or any firm, corporation, partnership, individual, trust, estate, or business in which the employee or a member of the employee's family has any financial or beneficial interest is involved in a transaction which could be construed as a conflict of interest if the employee was involved, full disclosure is also required.

Policy Statement

1. It is the primary obligation of each employee to handle the business of the College in ways that enhance the fiscal accountability of the institution.
2. No employee shall conclude any College transactions from which he/she stands to benefit personally except as an employee of the institution.
3. Except for natural and ordinary social courtesies, no employee shall accept anything of value over \$25.00 from persons or firms conducting business with the College. Employees in attendance as a College representative or in a setting where discussions involving or beneficial to, the College may occur or at organized functions which have been considered appropriate and important ones to attend because of the recognized benefits of such attendance to College operations may accept food, refreshments, and entertainment of nominal value on infrequent occasions.
4. Employees in a position to authorize or execute purchases on behalf of the College shall make known to the College his/her interest, direct or indirect, in any transaction, or in a proposed transaction to which the College is a party.
5. Annually, each employee in a position to authorize or substantially influence business transactions with the College, shall file a statement with the Legal Affairs Office disclosing any interests or affiliations that the employee or member of his/her family have that may create a conflict of interest in the College's purchase of goods and services.
6. Consulting duties, speaking and other personal engagements, supplementary employment, etc. should normally be scheduled during vacation time or at other times when the duties will not interfere with the employee's College responsibilities. When such an arrangement is not

possible, the Administrative supervisor may grant reasonable periods of time away from campus, with pay, for the employee to fulfill these types of duties. In the latter case, all fees and salary shall be remitted to the General Fund of the College.

Each employee shall use every effort to preclude participation by the College or its employees in any illegal or unethical activity with respect to any business, company, government, or institution. Any attempt to seek such participation should be promptly reported.

A copy of this policy will be sent to each Administrative, Administrative Assistant and Department Chair once a year along with a "Conflict of Interest Disclosure" form. Those employees will return the completed form to the President's Office within 10 days. Any conflict of interest or potential conflict of interest will be immediately reported.