



Administrative Policy

Policy Type:	Employee Conflict of Interest
Policy Number:	LC-1723
Date Adopted:	4/1/2005
Version:	4.0
Review Cycle:	Annual
Date Last Reviewed:	05/01/2025
Office Responsible:	Human Resources
Reviewing Committee:	Workforce Focus
Related Policies:	NA
Related Laws:	NA

Policy Summary:

Each Jackson College (JC) 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 Human Resources (HR) 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. Every Jackson College employee must handle the business of the College in ways that enhance the fiscal accountability of the institution.
2. A potential or actual conflict of interest exists when a College employee can influence a decision that results in personal gain or advantage, financially or otherwise, for the employee or an immediate family member. Employees must promptly disclose any potential or actual conflicts of interest to the Human Resources Department.
3. No employee shall conclude any College transactions where the employee has a potential or actual conflict of interest, except where Jackson College has approved the transaction notwithstanding the employee's conflict.
4. Except for natural and ordinary social courtesies, no employee shall accept anything of value as defined by IRS guidelines over \$100.00 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.



5. Employees in a position to authorize or execute purchases on behalf of the College shall make known to the College his/her conflict of interest, direct or indirect, in any transaction, or in a proposed transaction to which the College is a party. Conflict of Interest examples could include, but are not limited to, having a financial interest in a business that is bidding on JC business, or a family member owns a business that is potentially doing business with JC.
6. Annually, each employee in a position to authorize or substantially influence business transactions with the College, shall file a statement with the HR 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.
7. Consulting duties, speaking and other personal engagements, or supplementary employment, 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 consulting fees shall be remitted to the General Fund of the College upon receipt to the Business Office.

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 Administrator, Lead Faculty and Department Chair once a year along with a "Conflict of Interest Disclosure" form. Those employees will return the completed form to the HR Office within 10 days. **Any conflict of interest or potential conflict of interest will be immediately reported by any employee regardless of position in the college.**

Change Log:

Date Of Change	Version	Description of Change	Responsible LC Party
10/22/2012	1.0	Update	W. Hendry
09/24/18	2.0	Review	C. Allen
03/29/23	3.0	Review	C. Allen
05.01.2025	4.0	Legal review by Miller Johnson	J. Randle, CHRO