



DIVISION II. College Employees	POLICY NUMBER 2.01.11 (1)
CATEGORY 2.01.11 Conflicts of Interest	DATE Adopted 01/18

2.01.11 CONFLICTS OF INTEREST

Joliet Junior college expects all employees to conduct themselves and college business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

Conflicts of interest should be avoided where possible, or otherwise disclosed and managed in accordance with the corresponding institutional procedure.

Employees shall not use their college position to secure personal financial benefits for themselves or any member of their immediate family. A conflict of interest arises whenever the employee has the opportunity to influence college operations or business decisions in ways that could result in a personal financial benefit to the employee or a member of an employee’s immediate family. Although certain specific examples of conflicts of interest are provided in this policy, they are meant only as illustrations, and department managers and employees are expected to use good judgment to identify possible conflicts of interest and to manage such so as not to adversely influence college operations.

Nothing in this policy shall be construed to permit, even with disclosure, any activity that is prohibited by law.

The following are examples of conflicts of interest requiring employee disclosure. These examples are illustrations only and are not meant to be exclusive.

1. Employee or immediate family member owns, in whole or in part, a business entity with which the college does or proposes to do business, and the employee is in a decision-making role or otherwise is in a position to influence the college’s business decisions regarding the business entity or financially and non-financially benefit from the business decision regarding the entity. Business entity examples for which an employee disclosure is required, include:
 - a) finance or accounting services



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- b) athletic equipment services
- c) consulting
- d) counseling
- e) catering
- f) computer software, consulting, or other hardware services
- g) programming
- h) architectural/construction services
- i) legal services
- j) grant preparation
- k) temporary personnel services
- l) office or lab supplies
- m) painting services
- n) lawn and grounds services

2. Employee holds or assumes an executive, officer or director position in a for-profit or not-for-profit business or entity engaged in commercial, educational, or activities similar to those in which the college engages.
3. Employee participates in consultation activities for a for-profit or not-for-profit business or entity engaged in commercial, educational or activities similar to those of the college.
4. The activities listed below are prohibited. (This section does not apply to activities determined by the employee’s department manager to be within the employee’s college responsibilities.)
 - a) Using college property, facilities, equipment or other resources in any manner that results in personal financial benefit to an employee or a member of an employee’s immediate family.
 - b) Using college property, facilities, equipment or other resources in any manner to support a not-for-profit entity unless the department manager provides special permission.



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- c) Using college stationery or letterhead in connection with outside activities, other than activities having a legitimate relationship to the performance of college business.
- d) Using college facilities or the employee’s position at the college for the purpose of advocating, endorsing, or marketing the sale of any goods or services, other than as part of the employee’s college responsibilities, without the prior approval of the associated department manager.
- e) Using the college’s name, trademark or trade name for personal business or economic gain to the employee or a member of the employee’s immediate family.
- f) Using any college data or information for personal financial benefit to the employee or a member of the employee’s immediate family.
- g) Using any college employee for any outside activity during normal work time for which he or she is receiving compensation from the college (not applicable when employees are on a paid or unpaid leave).
- h) Participating in the selection or awarding of a contract between the college and any entity with which an employee is seeking employment or has been offered employment.
- i) Other activities may be prohibited if a department manager concludes that there is no reasonable way to manage an associated conflict of interest.

Employees should voluntarily disclose to his or her department manager any situation in which the employee has a real or potential conflict of interest. Reference institutional procedure 2.01.11.00 for disclosure protocol.

Violation or failure to disclose or properly identify a conflict of interest may subject the employee to disciplinary action.