



<p><b>Policy Title</b> Employee Conflict of Interest</p>	<p><b>Original Adoption Date</b> 6/18/1981</p>	<p><b>Policy Number</b> HR-138</p>
<p><b>Responsible College Division/Department</b> Human Resources</p>	<p><b>Responsible College Manager Title</b> Vice President of Human Resources and Talent Development</p>	
<p style="text-align: center;"><b>Policy Statement</b></p> <p><b><u>Conflict of Interest: Employee Responsibilities</u></b></p> <p>The College recognizes that each employee retains legal rights with respect to interests of a personal or economic nature. However, College employees bear certain duties and responsibilities. As College employees, we must:</p> <ol style="list-style-type: none"> <li>1. Comply with all state and federal laws.</li> <li>2. Carry out the intent of the Wisconsin Statutes Code of Ethics for Public Officials and Standards of Conduct with respect to the proper and appropriate performance of the duties of one’s position.</li> <li>3. Act in the best interest of the entire District and to grant no special consideration, treatment, or advantage beyond that which is available to every other person or entity.</li> <li>4. Any gifts of material value received as an employee or department of the college are to be donated to an appropriate non-profit 501(c)3 or returned.</li> <li>5. Not use one’s position, as an employee, to benefit either one’s self or any other individual or an agency apart from the total interest of the District.</li> <li>6. Not use confidential information for the gain or benefit of one’s self, family members or others.</li> <li>7. Not use, or allow the use of, College property and/or equipment, including property leased by the College, for one’s personal use or gain.</li> <li>8. Not participate in outside activities in which our position as a College employee is used to sell goods or services to students for personal financial gain.</li> <li>9. Not engage in or accept any type of work for personal financial gain when the source of information concerning a customer or client originates from information obtained through the District.</li> <li>10. Not engage in nepotism in the supervision of employees. That is, no employee may be assigned to any position or department whereby the employee would be supervised directly or indirectly from an immediate family member. This prohibition means not only that a person cannot supervise a family member but also that the family member cannot be in that person’s chain of command. Employees are required to notify Human Resources of any existing familial relationships or any familial relationships that are created amongst employees by marriage.</li> <li>11. Not offer or give, directly or indirectly, “anything of value” to a local public official if it reasonably could be expected to influence a local public official’s vote; official actions or judgment, or could reasonably be considered as a reward for any official action or inaction on</li> </ol>		



the part of the local official.

12. Not engage in any type of work, under contract with another employer, institution, or other entity that directly competes with the services provided by LTC, and which conflicts with the employee's contractual obligations to the College.
13. Adhere to LTC policy with regard to reporting consensual relationships entered with students or employees whom we teach, advise, evaluate, or supervise, and cooperate with LTC officials in preventing and ending actual or perceived conflicts of interest arising out of consensual relationships.

**Income - Generating Activities Which Are Allowed Under Code of Ethics Policy**

1. Fees and honoraria paid for papers, lectures, demonstrations, creative works or presentations by employees on personal time, and which do not directly involve an employee's official duties or responsibilities to the College.
2. Participation in professional conferences for the purpose of making scholarly presentations, conducting seminars or workshops, as long as such activities do not interfere with the employee's duties and responsibilities with the College.
3. Earned income from passive investments, such as interest or dividends from banks, mutual funds, stocks or bonds.
4. Any other earned income generated by personal investments completely unrelated to one's employment with the College or the implementation of the College's mission.

**Outside Employment Reports and Resolution of Conflicts of Interest**

All employees of LTC are expected to use good judgment and the highest standards of ethics and academic integrity to protect themselves and the College from conflicts of interest. Professional activities, employment or business interests which create an actual conflict or the appearance of a conflict will be reviewed by the respective Vice President. Employees are required to receive approval from their respective Vice President and Vice President of Human Resources and Talent Development before engaging in any outside employment.

**Political Activities: Employee Responsibilities**

1. It is College policy to encourage members of the College faculty and staff, who wish to do so as a personal activity, to express their viewpoints on political issues, to participate in political campaigns, to offer themselves as candidates for non-partisan office, and to hold such an office. All College employees should feel free to engage in such political activities so far as they are able to do so consistent with their full obligations to the College and in accordance with applicable laws.

College imposes limitations that are reasonably necessary to protect its independence in academic and business matters, and to ensure its adherence to its mission and its compliance with the laws under which it operates. More specifically, those limitations are:

- a. To preserve, in fact and in appearance, the College's non-partisan, independent, tax-



exempt status;

- b. To preserve College resources of all sorts (including among others, faculty and staff time, College space, equipment, supplies and services) for the College's educational, research, and related functions; and,
  - c. To protect against any conflicts of interest or time which may infringe on the ability of College personnel to perform their official duties and meet their responsibilities with maximum effectiveness and objectivity.
2. College employees may engage in lawful political activities. However, such activity, like any other personal, non-official undertaking, must be done on the employee's own time and should not interfere with College duties. Accordingly, employees may not:
- a. Campaign during work hours.
  - b. Use College supplies or equipment, including telecommunication technology, for campaign purposes.
  - c. Represent their political views or the views of any candidate as being those of the College unless there has been specific authorization by the administration to do so.
  - d. Use employee mailing labels (either home or office addresses) produced by the College for distributing campaign materials. A candidate may obtain addresses from the College student, faculty and staff directories, or other published addressed lists.
  - e. Distribute campaign material through campus mail unless it has been received by a federal post office and is properly postmarked.
  - f. Run for partisan political office without first taking a leave of absence from the College during the duration of the campaign and subsequently resigning in the event of an electoral victory

Any employee who refuses to comply with this policy will face disciplinary action, up to and including termination of employment. In addition, penalties for intentional violation of this Code of Ethics shall conform to additional procedures established in Chapter 19 of the Wisconsin Statutes.

#### **Reason for Policy**

The purpose of these operational guidelines is to safeguard the integrity and reputation of Lakeshore Technical College (LTC), its management, faculty and staff by preventing activities that cause, or tend to cause, a conflict of interest for employees of the College. Accordingly, all employees of the LTC have a responsibility to make themselves familiar with, and abide by, applicable laws of the State of Wisconsin, the policies of the District Board, and the regulations designed to implement them.

#### **Cross References and Legal Review**

Reviewed/Revised: 6/21/84; 11/16/89; 5/20/92; 5/19/93; 12/15/94; 12/21/94; 6/17/96; 9/24/01; 10/22/04; 05/02/07; 12/15/08; 2/9/15; 7/1/16; 8/28/17; 1/22/19

Chapter 19 of the Wisconsin Statutes



Legal Counsel Review and Approval: N/A

Board Policy: III.A. General Executive Constraint, III.B. People Treatment, III.C. Compensation and Benefits

#### Definitions

1. Conflict of Interest. A “conflict of interest” exists when an employee has an external economic interest that directly or indirectly affects the employee’s performance of his/her duties and responsibilities with LTC. Though a conflict of interest may arise as a result of an employee’s contacts and activities outside the College, the mere existence of a conflict does not necessarily or immediately imply wrongdoing by the employee. However, any and all conflicts must be immediately acknowledged, disclosed, eliminated or managed.

In some cases, the appearance of a conflict of interest, rather than an actual conflict, may exist. Often the appearance of a conflict of interest may do as much damage as an actual conflict by compromising the credibility or reputation of the College and/or an LTC employee. Therefore, it is imperative that employees evaluate apparent conflicts of interest with the same care as actual conflicts of interest.

2. Business. “Business” means any corporation, partnership, sole proprietorship, firm, franchise, association, organization, holding company, joint stock company, receivership, business or real estate trust, or any nongovernmental legal entity organized for profit, nonprofit or charitable purposes.
3. Business Interest. “Business interest” includes holding any equity interest, including but not limited to ownership of stock, stock options, warrants, or any equity, debt, security or capitol holding in a business enterprise, and/or salary, other remuneration, or financial consideration for services as an employee, consultant, advisor, officer or board member of any business.
4. Employee. “Employee” shall include all full-time and part-time employees of the College (excluding adjunct instructors).
5. Immediate Family. “Immediate family” refers to an employee’s spouse, domestic partner, parents, children, grandchildren, grandparents, mother-in-law, father-in-law, brother-in-law, sister-in-law, step-parent or step-children.
6. Consensual Relationships. “Consensual Relationships” of concern to Lakeshore Technical College are those relationships of a romantic or sexual nature entered into by an employee of the College, in which the parties involved have consented, but where there is or appears to be a conflict of interest or a power differential.