Background: This policy provides guidelines for employees’ conduct in areas where there are actual or potential ethical concerns between their public duties and their private interests. The State Board of Education policy on Conflict of Interest and Ethical Conduct can be located at http://www.boardofed.idaho.gov/policies/documents/policies/ii/iiq_conflict_of_interest_and_ethical_conduct_all_employees_1208.pdf item Q.

Point of Contact: Human Resource Services (HRS)

Other LCSC offices directly involved with implementation of this policy, or significantly affected by the policy: President, Provost and Vice President for Student Affairs

Date of approval by LCSC authority: 2/24/2014

Date of State Board Approval: N/A

Date of Most Recent Review: February 2014

Summary of Major Changes incorporated in this revision to the policy: Policy was updated to include confidential report line, Compliance Officer and annual conflict of interest statements.

Policy:

A. General Purpose

Employees of Lewis-Clark State College are expected to conduct themselves in such a way as to strengthen the faith and confidence of the people of Idaho in the integrity of state government and state employees. It shall be a paramount concern of LCSC employees that they engage in no conduct which might reasonably be interpreted as tending to influence or adversely affect the performance of their official duties. This policy provides guidelines for employees’ conduct in areas where there are actual or potential ethical concerns between their public duties and their private interests. Unless the context indicates otherwise, "state employee(s)" shall have the broadest meaning possible within the Executive Department of Idaho State government consistent with Idaho law, and "person" shall include an association, corporation or governmental entity.

1. General Principles of Ethical Conduct

   All employees of Lewis-Clark State College:
   a. Shall not hold financial interest that is in conflict with the conscientious performance of their official duties and responsibilities.
   b. Shall not engage in any financial transaction in order to further any private interest
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using nonpublic information of the State Board of Education or Lewis-Clark State College.

c. Shall put forth honest effort in the performance of their duties.
d. Shall make no unauthorized commitments or promises of any kind purporting to bind
   Lewis-Clark State College.
e. Shall not use their public office for private gain.
f. Shall act impartially and not give preferential treatment to any private or public
   organization or individual.
g. Shall protect and conserve public property and shall not use it for other than authorized
   activities.
h. Shall not engage in outside employment or activities, including seeking or negotiating
   for employment, that conflict with official duties and responsibilities.
i. Shall promptly report potential or apparent violation, waste, fraud, abuse, or corruption
   in accordance with applicable law, policy and conflicts of interest. Such instances
   should be reported to immediate supervisors or the applicable department such as
   Human Resources, Security, Provost, Internal Audit, or Compliance Officer.
   Confidential reports can be made using the Confidential Report Line. Confidential
   reports will be forwarded to the applicable department for follow-up.
j. Shall endeavor to avoid any actions that would create the appearance that they are
   violating the law or the ethical standards of Lewis-Clark State College.
k. Shall avoid conflicts of interest, potential conflicts of interest and circumstances giving
   rise to the appearance of a conflict of interest.

2. Conflict of Interest

A conflict of interest occurs when a person’s private interests compete with his or her
professional obligation to the College to a degree that an independent observer might
reasonably question whether the person’s professional actions or decisions are materially
affected by personal considerations, including, but not limited to, personal gain, financial
or otherwise.

3. Consideration of Transactions

a. In the event that a person subject to this policy is called upon to consider a transaction
   involving Lewis-Clark State College and a person, entity, party, or organization with
   which the person is affiliated, as defined below, that person shall 1) immediately
   disclose fully to the Compliance Officer the precise nature of his or her interest or
   involvement in the transaction and/or the organization, and 2) refrain from
   participating in the college’s consideration of the transaction.
b. Each person subject to this policy shall disclose to the Compliance Officer all
   relationships and business affiliations that reasonably could give rise to a conflict of
   interest because of the employee’s duties and responsibilities. This disclosure
   obligation is ongoing and each employee has a duty to supplement or amend his or her
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disclosure as necessary.

c. For the purposes of this policy, an employee is “affiliated” with an organization if the
person, a member of the person’s immediate family (i.e., spouse, parents, children,
siblings, or the same relationship by marriage), or a person residing in the employee’s
residence or a legal dependent of the employee: 1) is an officer, director, trustee,
partner, employee, or agent of the organization, 2) is either the actual owner or
beneficial owner of more than one percent (1%) of the controlling interest in the
organization, 3) has any other direct or indirect dealings with the organization from
which the employee is materially benefited. It shall be presumed that an employee is
“materially benefited” if he or she receives, either directly or indirectly, money,
services, or other property in excess of one thousand dollars ($1,000) in any calendar
year.

d. All disclosures must be in writing and addressed to the Compliance Officer.

e. All disclosures will be vetted with the President and/or Internal Auditor and/or the
Compliance Committee for final disposition.

f. All faculty and professional staff must complete an annual conflict of interest
statement disclosing potential or apparent conflicts or providing a statement they have
no conflicts to disclose. Signed statements will be kept in employees’ personnel files.

B. Outside Employment

The maintenance of a high standard of honesty, impartiality, and conduct by LCSC employees is
essential to ensure the proper performance of the College and to strengthen the faith and
confidence of the people of the State of Idaho in the integrity of our faculty and staff. The
College recognizes that employees may engage in outside employment of a professional nature,
directly related to the professional or other competencies of the employee. However, no
employee may undertake outside employment that interferes with the employee’s assigned duties
to the College. In all outside employment, the outside employer must be informed that the
employee is acting in a private capacity and that the College is not liable or responsible for the
employee’s performance. All employees must notify their immediate supervisor of outside
employment. All faculty and professional staff must include outside employment on annual
conflict of interest statements.

C. Political Activities

1.0 Employees retain unimpaired all of their individual and political rights of citizenship.
However, employees may not exercise those political rights in the name of Lewis-Clark
State College, or through the use of College facilities, or through the use of forms or other
official stationery of any kind, or in any way that might involve LCSC in partisan political
activity or controversy.

a. LCSC will not prevent, threaten, harass, or discriminate against any employee
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b. Employees are permitted to campaign freely in a manner that does not violate Board Governing Policies and Procedures or applicable provisions of the Idaho Code.

c. Employees may choose to request a leave without compensation in order to campaign for elective office or to serve in an elective office.

D. Loyalty Oaths

No loyalty oath shall be required of any Lewis-Clark State College employee.