

**COLUMBIA COLLEGE CHICAGO
CODE OF CONDUCT POLICY**

**Effective: October 26, 2006
Reviewed: August 3, 2009**

1. Institutional Compliance

The College and its employees will abide by all federal, state and local laws.

(1) Drug-Free Workplace – employees will adhere to the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act of 1989.

(2) Health Insurance Portability and Accountability Act (HIPPA) – the College Health Plan is required to maintain the privacy of “protected health information” which includes any identifiable information obtained from employees or others that relates to their health, their health care or payment for their health care.

(3) Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA) – continuation coverage can become available to employees and family members if loss of health coverage would occur. This information is included in the Plan Document/Summary Plan Description.

(4) Illinois Unemployment Insurance Act – provides partial protection to employees against the loss of wages while out of work due to lack of opportunities.

(5) Family and Medical Leave Act (FMLA) – the law contains provisions on employer coverage, employee eligibility for the law’s benefits, entitlement to leave, maintenance of health benefits during leave, job restoration after leave, notice and certification of the need for FMLA leave and protection for employees who request or take a FMLA leave.

(6) Newborns and Mothers Health Protection Act – group health plans and health insurance issuers may not restrict benefits for any hospital length of stay in connection with childbirth for the mother or newborn child to less than 48 hours following a vaginal delivery or less than 96 hours following a cesarean section.

(7) Women’s Health and Cancer Rights Act of 1998 – provides certain benefits for mastectomy related services. This information is included in the Plan Document/Summary Plan Description.

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2. Confidentiality

Information about the College, students, employees, suppliers or vendors is considered confidential and should be divulged only to individuals within the College with a need to know and with appropriate authorization.

(1) Student information – employees that have access to student information or are required to release student information should abide with the stated Family Educational Rights and Privacy Act (FERPA) guidelines.

(2) Employee information – all records and files maintained by the College are confidential and are not to be disclosed to anyone outside the College without expressed permission by the employee, Office of Human Resources, General Counsel's Office or as directed by a court order.

(3) Propriety information – employees that have access to College information such as, but not limited to, business strategies, negotiations or contracts should not use this information improperly or disclose this information to anyone outside the College.

3. Standards of Conduct

So that College operations may run orderly and efficiently, employees are required to maintain proper standards of conduct at all times. Employees are expected to comply with established College rules and also observe all other proper standards of conduct. If an employee fails to maintain proper standards of conduct or violates any of the following rules, the employee will be subject to disciplinary action up to and including termination. The following list includes examples of unacceptable behavior within our workplace. This list is not meant to be all-inclusive.

Inefficient or careless performance of duties;

Failure to adhere to departmental notification procedures when the employee is unable to report to work;

Organizing of or participating in any gambling activity on College property;

Solicitation by an employee of another employee in work areas during assigned work time.

Working time is all time when an employee's duties require that he or she be engaged in work tasks but does not include an employee's own time such as meal periods, rest periods and time before or after scheduled work hours;

Selling of chances, merchandise, tickets, lotteries or similar commercial sales on College property during work time;

Distribution of unauthorized literature, pamphlets or the like in working areas or during working time or the use of telephone, e-mail or interoffice mail for such distribution;

Any misrepresentations in applying for a leave of absence or for any other time off;

Falsifying or giving false information on College records such as employment applications, time sheets, travel expense reports or other College documents;

Sleeping on the job or leaving the job without authorization;

Foul or abusive language directed at any employee of the College, students or other persons conducting business with the College;

Excessive absenteeism and/or tardiness;

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Standards of Conduct (continued)

- Smoking in any area within any College building;**
- Failure to obey College rules regarding confidentially, proprietary information and conflict of interest;**
- Insubordination (refusing to carry out the instruction of your supervisor or arguing with your supervisor);**
- Conduct that is disruptive or destructive toward fellow employees, students or the College;**
- Possession or carrying of weapons, firearms or explosives on College property;**
- Engaging in activities involving the unauthorized use, sale, transfer, conversion or defacement of College property or a other employee's personal property;**
- Intoxication (under the influence of), possession, sale or attempted sale, purchase or attempted purchase of alcohol or illegal, dangerous or restricted drugs/substances on College property or any participation in or encouragement of the above;**
- Posting of unauthorized items or removal of approved items from College bulletin boards;**
- Off duty conduct that adversely affects the employee's or College's integrity, reputation or credibility;**
- Fighting with, threatening or intimidating any other person, including fellow employees, on College premises or connected with College business;**
- Sexual harassment or other types of harassment or discrimination;**
- Unauthorized contact with or disclosure of information to the media;**
- Falsely stating or making claims of injury;**
- Removing without authorization College property, records or other materials or other employee's personal property;**
- Release of confidential information about the College, students or employees and violating conflict of interest rules;**
- Violation of any College policy, rule or procedure;**
- Any conduct deemed by the College to be contrary to its best interests.**

4. Conflict of Interest

The College adheres to the highest principles of business ethics in conducting its affairs. College representatives are expected to avoid activities which are in conflict or which may give the appearance of being in conflict the College's interests and/or principles. These activities include, but are not limited to:

- (1) Transactions/Arrangements with an Outside Vendor – this policy is to protect the College when an employee, within their assigned responsibilities, enters into a transaction or arrangement with an outside vendor that might benefit the employee's interests over the interests of the College.**
- (2) Other employment by staff – staff are not permitted to perform other jobs (for personal gain or benefit) during their assigned work hours.**

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Conflict of Interest (continued)

(3) **Adjunct teaching by FT staff** – full time staff are not permitted to teach during their assigned work hours with limited exceptions that would benefit the College. This policy does not apply to a full time staff position where teaching is part of their written job description and compensation for adjunct teaching is included in their full time staff salary.

(4) **Personal investments or holdings** – employees should not have any personal investments or holding in outside entities that the employee has a business relationship with which could influence a decision or action contrary to the best interests of the College.

(5) **Outside Board positions** – employees should not hold any board position with an outside entity (a) that the employee has a business relationship with which could influence a decision or action contrary to the best interests of the College or (b) may be in a competitor with the College.

5. Protection of Assets

Employees should strive to preserve and protect all College assets by making prudent and effective use of these resources.

(1) **Personal use** - College assets should not be used for private business or an employee's personal gain. Reasonable personal use is permitted or if prior permission is obtained from an immediate supervisor.

(2) **Use for others** – College assets should not be used for another College employee's personal benefit or for others outside the College.

(3) **Possession** - all employees are prohibited from the unauthorized possession, use or control of College equipment, supplies, materials, services or similar types of assets.

6. Relationship with Outside Lenders-Student Loans

Suggestions or recommendations regarding outside lenders (for private loans) should be in the best interests of the student or parent without any regard to the College.

(1) **Revenue sharing** – the College is prohibited from receiving anything of value from an outside lender in exchange for some advantage sought (pay to get on a school's preferred lender list) by the lender.

(2) **Gifts** – employees are prohibited from taking anything of more than nominal value (including trips) from an outside lender, guaranty agency or loan servicer.

(3) **Contracting Arrangements** – employees are prohibited from receiving anything of value for serving on an outside lender's advisory board or consulting.

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Relationship with Outside Lenders-Student Loans (continued)

- (4) Recommended/Suggested Lenders** – employee suggestions or recommendations regarding outside lenders must be based solely on the best interests of the student or parent without regard to the financial interests of the College.
- (5) Lender options** – employees must inform students that they have the right to select any outside lender.
- (6) Loan Resale Disclosure** – no lender may appear on a preferred lender list (NO preferred lender lists are currently in use) if the lender has an agreement to sell its loans to other lenders without disclosing this fact.
- (7) Outside Lender Reference to College** – lender employees should never identify themselves to students or parents as College employees or affiliated with the College. The College should not request or accept any assistance from a lender with call center staffing or office staffing.
- (8) Funds for private loans** – employees may not request or accept offers of funds for private loans. This includes any offer of funds for loans to students at the institution, including funds for any opportunity loan pool, in exchange for providing concessions or promises to the lender for a specific number of loans, or inclusion on a preferred list.