



**Southern  
Illinois  
University  
System**

**2026**

# **Ethics Training and Harassment and Discrimination Prevention Training**

*A Southern Illinois University Program for new employees, student workers, non-permanent employees, and employees returning from leave.*

# Introduction to the *Ethics Act* Trainings

The [Illinois State Officials and Employees Ethics Act \(5 ILCS 430/5-10\)](#) (*Ethics Act*) requires university employees to complete, at least annually, two trainings: 1) an ethics training; and 2) a harassment and discrimination prevention training program, conducted by their university. It also requires that new employees complete these trainings within 30 days of the start of employment or appointment. This training program is intended to allow you to meet your obligation to comply with those requirements.

You will be notified by the university each calendar year when you are required to complete *Ethics Act* trainings. Employees include individuals who hold appointments, both paid and unpaid, with the university, as well as members of the Board of Trustees. Employees who do not complete the trainings as directed may be subject to disciplinary action and those who fail to do so in compliance with the law may face administrative fines by the Illinois Executive Ethics Commission (EEC).

As employees of the State of Illinois and its public universities, we share the responsibility to maintain the highest ethical standards to effectively and honestly serve our students and the citizens of Illinois. Understanding our ethical obligations helps us to avoid the risk of misconduct and the appearance of impropriety.

## Training Requirements

- **New Employees:** If you are a newly hired employee, trainings required by the *Ethics Act* must be completed within 30 days of the start of employment by law. **During the first year of employment, employees must complete the *Ethics Act* Orientation, in addition to satisfying the annual *Ethics Act* training requirements.** So, it is possible an employee may complete two ethics-related trainings in their first year of employment.
- **Seasonal/Temporary Employees:** If you are an undergraduate student worker or extra help employee, this training is approved for your annual use.
- **Permanent Employees and Appointees (faculty, staff, etc.):** Permanent employees and appointees must complete an interactive, online course annually during a designated window. The university Ethics Officer will inform you of the required completion dates. The version of training used for new hires, undergraduate student workers and extra help is not a substitute for the interactive online training provided to permanent employees and appointees.

The Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) establishes the hours and training frequency and provides standards to guide the development of the ethics training program. Ethics training is overseen by the OEIG and the EEC in consultation with the Office of the Attorney General. Harassment and discrimination prevention training is overseen by the OEIG and EEC.

## University Compliance and Ethics Office

Each university and state agency has an Ethics Officer who serves as the liaison between the institution, the appropriate Inspector General and the EEC.

Some responsibilities of the university Ethics Officer include: developing and/or administering annual *Ethics Act* trainings; reviewing the Statement and Supplemental Statement of Economic Interests forms for officers and certain other employees; conducting reviews regarding complaints; and providing guidance on interpretation and implementation of the *Ethics Act*. Interpretation of the *Ethics Act* is based on court decisions, Attorney General opinions, and the opinions of the EEC. University Ethics Officer work products are exempt from production in response to *Freedom of Information Act* (FOIA) ([5 ILCS 140/7](#)) requests.

The University Ethics Office is part of the Office of Internal Audit, Compliance and Ethics, which reports functionally to the Board of Trustees and administratively to the University President. The Ethics Officer is located on the Carbondale campus and can be reached at 844-597-6463 or [ethics1@siu.edu](mailto:ethics1@siu.edu). If you call the Ethics Hotline (844-597-6463), you will speak with an Ethics Office staff member who can assist or direct you to the appropriate campus unit. Reports made to the University Ethics Officer are confidential to the extent allowed by law.

For more information on the University Ethics Office, training and other processes, please visit: [www.siusystem.edu/ethics](http://www.siusystem.edu/ethics).

## Executive Ethics Commission (EEC)

The EEC is an independent nine-person commission whose members are appointed by the Governor (5), Attorney General (1), Secretary of State (1), Treasurer (1) and Comptroller (1). The EEC's jurisdiction extends to employees of the executive branch, traditional state agencies and boards, as well as state universities and the regional transit boards and the regional development authorities.

The EEC has a number of responsibilities including conducting hearings and issuing determinations related to the *Ethics Act*, promulgating rules governing the performance of its duties and the exercise of its powers and governing investigations of the Executive Inspectors General, appointing special Executive Inspectors General, providing administrative support services for each independent chief procurement officer, and overseeing training for state employees under its jurisdiction.

The EEC is also responsible for the preparation, redaction and discretionary publication of OEIG and other Executive Inspectors Generals' summary reports, which are an invaluable tool in promoting transparency and deterring future employee misconduct.

For additional information about the EEC or its decisions and procedures, visit the [EEC website](https://eec.illinois.gov/) (<https://eec.illinois.gov/>).

## Office of Executive Inspector General (OEIG)

For university employees, which includes members of the Board of Trustees, the OEIG serves as the Executive Inspector General. This position is appointed by the Governor of the State of Illinois for a term of five years.

The OEIG is an independent oversight agency whose mission is to promote an ethical workforce and enhance good governance in the agencies it oversees. The OEIG primarily does this through its investigations of fraud, waste, abuse, and violations of the *Ethics Act* and other laws, rules, and policies.

The OEIG investigates misconduct by employees of State agencies and boards, State universities, regional transit boards, regional development authorities, and those doing business with those entities. If the OEIG concludes an investigation and determines that there is reasonable cause to believe a violation occurred, it will draft and send a summary report regarding the investigation to the appropriate affected agencies and ultimate jurisdictional authorities.

The OEIG oversees Ethics Act-mandated trainings and makes revolving door determinations. In addition, the OEIG has a Division of Hiring & Employment Monitoring (HEM), which conducts compliance-based reviews of employment procedures and hiring decisions to ensure that they are lawful, merit-based and/or justifiable.

For additional information about the OEIG or its investigative process and procedures, visit the [OEIG website](https://oeig.illinois.gov/) (<https://oeig.illinois.gov/>).

## Part I. Ethics Training

### Gift Ban [5 ILCS 430/10]

The gift ban section of the *Ethics Act* is highly relevant in a university environment. As a result of the university's diverse mission, employees at all levels, including appointees, may be presented with gifts (e.g., gratuity, discount, entertainment, hospitality, loan, forbearance, item having monetary value, honoraria related to employment or position, etc.) from a prohibited source.

**Current vendors, along with their spouses and immediate family members living with the vendor, as well as those who do business or seek to do business with the university, are prohibited sources.** Further, those seeking official action or who have interests that may be substantially affected by the performance or non-performance of the official duties of a university employee or the university are considered prohibited sources.

Under the *Ethics Act* gift ban, university employees are generally prohibited from intentionally accepting or soliciting gifts from prohibited sources. You, as well as any member of your immediate family living with you, must abide by the gift ban when offered a gift from a prohibited source. Gifts are defined in the law as any gratuity, discount, entertainment, hospitality, loan, forbearance, or other tangible or intangible item having monetary value including, but not limited to, cash, food and drink, and honoraria for speaking engagements related to or attributable to government employment or the official position of an employee, member or officer.

Some of the commonly occurring exceptions to this ban are as follows:

- You pay market value for the gift.
- The offering is of educational materials and missions and is all of the following: classified as one that has a close connection to your employment, primarily benefits the public, furthers the university's mission, and is approved in advance of acceptance by the Executive Director of the EEC or a delegate. For the University of Illinois System, Illinois State University, Northeastern Illinois University, Northern Illinois University, and the Southern Illinois University System, this authority has been delegated to the university Ethics Officer.
- The gift is from a relative.
- The offering is provided on the basis of personal friendship, not in expectation of an official act.
- The gifts are from another university employee or an employee of another governmental entity.
- Bequests, inheritances, and other transfers at death.

There are additional exceptions in the [\*Ethics Act 5 ILCS 430/10-15\*](#), but the most frequently occurring exceptions are detailed above.

[Illinois Executive Order 15-09](#) (EO 15-09) further restricts gift acceptance by state and public university employees, prohibiting the solicitation or acceptance of any gift from a prohibited source unless one of the above exceptions is met.

Per EO 15-09, food and beverage provided by a prohibited source may only be accepted when provided as a de minimis meal or refreshment at a business meeting or reception attended by the employee in the course of their official duties. De minimis can be best defined as trivial or insignificant, such as a boxed lunch, sandwich tray, or similar.

Please note, the restrictions identified in EO 15-09 do not apply to students in positions that are exclusive to enrolled students, such as graduate assistants, medical residents, teaching assistants, and undergraduate student workers. They may still accept gifts meeting the *Ethics Act* exceptions [5 ILCS 430/10-15](#), in addition to smaller items from a prohibited source totaling less than \$100 per calendar year, and meals not exceeding \$75 in value per calendar day.

Any gift offered in an effort to influence the official actions of an employee, even if it is permissible by an exception to the gift ban provisions, is inappropriate and possibly illegal and must not be accepted. Call your university Ethics Officer if you have any questions or concerns regarding a gift.

## Corrective Action if a Gift from a Prohibited Source is Unintentionally Accepted

If you unintentionally accept a gift from a prohibited source, you do not violate the law if you promptly do any of the following:

- Return the gift to the giver.
- Donate the gift to an appropriate 501(c)3 charitable organization.
- Make a contribution equal to the market value of the gift to an appropriate 501(c)3 charitable organization.

### Knowledge Check

A department on campus is planning an employee appreciation event and would like to provide gifts and door prizes to employees as part of the event. A department representative contacts several university vendors that frequently do business with the unit to solicit donations to provide large gifts to employees.

#### Is it a violation of the Gift Ban for an employee to contact vendors seeking gifts and donations?

- A. Yes, it is a violation of the Gift Ban to solicit gifts from vendors.
- B. No, it is not a violation of the Gift Ban for an employee to solicit gifts from vendors.

### ***Explanation of the Answer:***

*The correct answer is A, it is a violation of the Gift Ban to solicit gifts from university vendors. Per the Ethics Act (5 ILCS 430/10-10), "...no officer, member, or State employee shall intentionally solicit or accept any gift from any prohibited source..." Executive Order 15-09 goes further, restricting the acceptance of any gifts, regardless of value. A university vendor is considered a prohibited source and is likely the most common example of a prohibited source in the university environment.*

### **Personnel Policies [5 ILCS 430/5-5]**

As a university employee, you are required by law to periodically submit time sheets documenting the time spent each day on official business to the nearest quarter hour. Your department can assist you in explaining the standard practice within your unit. Falsification may be considered fraud and/or theft of resources punishable by discipline up to and including termination.

### **Truthful Oral and Written Statements**

As a university employee, you must be honest and truthful in all communications, regardless of whether they are oral or written. This includes, but is not limited to, all work products, documents, conversations, and electronic communications. To avoid violating any law, rule, or policy, or intentionally committing fraud, be sure to fully review all university documents for accuracy and completion. Knowingly providing false, inaccurate, or incomplete information is punishable up to and including termination of employment.

### **Prohibited Political Activity [5 ILCS 430/5-15]**

The *Ethics Act* goes into significant detail regarding specific political activities that are prohibited. The basic definition of prohibited political activity includes activities in support of or in connection with any campaign for elective office or any political organization, or those activities that are either in support of or in opposition to a referendum question.

University employees are forbidden under the *Ethics Act*, from engaging in prohibited political activity for the benefit of any campaign for elective office or political organization any time we are on university property, using university resources (e.g., computers, networks, or phones), on university time, or acting in our capacity as university employees. The law does not govern our actions outside of university time (uncompensated time, non-workdays, and approved vacation time) and off campus.

Prohibited political activity includes, but is not limited to, soliciting campaign contributions or votes, assisting at the polls, circulating petitions, and hosting rallies for candidates for elective office. Though these activities are not allowable during compensated time, they are permissible if you are outside of that time and are not using university property or resources, such as, but

not limited to, telephones, vehicles, tools, copiers, fax machines, email accounts, and computers.

Additionally, to avoid any misconception of personal views in any way representing the university's position, employees should avoid attending political events in a university-issued uniform.

Additional examples of prohibited activities range from things as simple as placing a campaign contribution jar on an office desk for a candidate's fund, to actively soliciting votes for a candidate, or a political party, while on work time, or using university email to distribute campaign materials or solicit campaign contributions. Additionally, the *Ethics Act* states it is illegal for any supervisor to intentionally misappropriate the services of any university employee by requiring that employee to perform any prohibited political activity as part of their job duties, as a condition of their employment, or during any time off that is compensated by the university (such as vacation, personal, or compensatory time off).

**Prohibited Offer or Promise:** University employees or a candidate for executive or legislative branch office may not promise anything of value related to university business or state government in consideration for a contribution to a political committee, political party or other entity that has as one of its purposes, the financial support of a candidate for elective office. If you are offered anything of value for your engaging in prohibited activity, such offer must be reported to the university Ethics Officer or the OEIG.

- **What is "anything of value related to university business"?**

Examples of this include job positions or appointments at the university, promotions, salary increases, the award of a contract, title changes, increased paid time off, or other employment benefits.

**Contributions on University Property:** Per [section 5-35](#) of the *Ethics Act*, political campaign contributions may not be intentionally solicited, accepted, offered or made on state or university property by public officials, state or university employees, candidates for elective office, lobbyists, officers, employees, or agents of any political organization.

- **What is "state or university property"?**

Any building or portion of a building owned or exclusively leased by the State of Illinois or the university. This includes an office of the state or university within a privately owned office building.

- **What is NOT "state or university property"?**

Any portion of a building that is rented or leased from the state or university by a private person or entity is not state or university property. For example, a privately owned restaurant within a state/university building or a private party being held in a

part of a state/university building that the private person has rented for the evening would not be considered state or university property.

An inadvertent solicitation, acceptance, offer, or making of a contribution is not a violation of the law if reasonable and timely action is taken to return the contribution to its source.

### Knowledge Check

The labor union that represents several university employees has chosen to support a candidate for elective office whose platform and political goals are closely aligned with those of the union. A university foreman, who is also actively involved in the union, has been selling tickets and collecting money for an upcoming fundraiser for the candidate in the foreman's office during lunch and breaks. The foreman is also pressuring his staff to purchase a ticket to attend the fundraiser, claiming their jobs depend on it.

**Is it considered prohibited political activity for the foreman to sell tickets and collect money for a political fundraiser event in the workplace?**

- A. Yes, collecting political contributions in the workplace is a violation of the Ethics Act.
- B. No, since the collections are being made during lunches and breaks, this is not a violation of the Ethics Act.

*Explanation of the Answer:*

*The correct answer is A, collecting political contributions in the workplace would be a violation of the prohibited political activities provisions of the Ethics Act, even if they are conducted during lunch or on work breaks. The law prohibits the offer, solicitation, acceptance or making of political contributions on state property, which includes university offices and workspaces. In addition, the foreman cannot require a subordinate to participate in a prohibited political activity as a condition of their continued employment as this too would be considered a violation of the law.*

### Public Service Announcements [5 ILCS 430/5-20]

The Ethics Act discusses public service announcements as they relate to certain officials and members of the General Assembly. Universities receive state funding and as such, are prohibited from using the proper name, image, or voice of any executive branch constitutional officer or member of the General Assembly in any advertisements, broadcasts aired on radio or television, printed in a newspaper or magazine or on a bulletin board or electronic message board. Additionally, executive branch constitutional officers or members of the General Assembly may not appear, by name or image, in any promotional items, such as bumper stickers, lapel pins, buttons, magnets, stickers, or other similar materials, that are not in furtherance of the person's official duties, if any portion of the advertising is paid for using state funding.

## Rights and Responsibilities in Investigations

University employees who become involved in an investigation conducted by the OEIG have both rights and responsibilities.

As a university employee, you have an obligation to cooperate in OEIG investigations. You must participate in interviews as requested, tell the truth, and not withhold information. Intentional omissions and knowingly making false statements can be considered failing to cooperate in investigations. Failing to cooperate in investigations may impede investigations and is a serious violation of the *Ethics Act* and Executive Order 16-04. This means you must be truthful in all communications, whether oral or written, and respond to the best of your knowledge and ability, even if the answer is that you simply don't know.

Penalties for failing to cooperate in investigations may include disciplinary action, dismissal, and fines for violating the *Ethics Act*.

## Whistleblower Protection [5 ILCS 430/15]

The *Ethics Act*, the [Illinois Human Rights Act \(775 ILCS 5/6-101\)](#), the *Whistleblower Act* (740 ILCS 174), Executive Order 16-04 and university policy, are designed to protect employees who, in good faith, report or threaten to report an act or omission they believe to be a violation of law, policy, or procedure.

## Protected Activities [5 ILCS 430/15-10]

The university or an employee of the university cannot retaliate against you for engaging in any of the following protected activities:

- Disclosing or threatening to disclose to a supervisor or a public body, any practice, activity, or policy of a state or university employee or state agency or university that the employee reasonably believes is in violation of a law, rule, or regulation.
- Providing information to or testifying before a public body about any violation of the law, rule, or regulation, by any officer, member of the General Assembly, university or state employee, state agency, or the university.
- Assisting or participating in a proceeding to enforce the *Ethics Act*.

## Retaliation [5 ILCS 430/15-5]

Under the *Ethics Act*, retaliatory action is defined as reprimand, discharge, suspension, demotion, or denial of promotion or transfer, or change in the terms or conditions of employment of any state employee, which is taken in retaliation for involvement in a protected activity. It is not retaliation if the employer can demonstrate, by clear and convincing evidence, the same personnel action would have been taken even in the absence of the protected activity.

Any employee experiencing retaliation should report to their supervisor, university Ethics Officer, or can report to the OEIG.

Under the *Ethics Act*, any employee who commits retaliation in violation of the *Ethics Act* may be subject to discipline or discharge.

Under the [Whistleblower Act \(740 ILCS 174/20\)](#), an employer may not take retaliatory action against an employee for an employee's disclosure of information to a government or law enforcement agency if the employee has a good faith belief that the information discloses a violation of a state or federal law, rule, or regulation.

If an employer retaliates against an employee in violation of these laws, the employee may bring a civil action against the employer that may result in: reinstatement of employment and seniority rights; back pay, with interest; and, compensation for any damages including litigation costs, expert witness fees, and reasonable attorney's fees, among other remedies.

Often, there are situations that do not meet the criteria for retaliation that reveal an issue or concern that should be addressed on behalf of an employee. Human Resources or another university unit may be more appropriately equipped to address these concerns. Employees with concerns of potential retaliation can contact their university Ethics Officer for further guidance.

## Knowledge Check

An employee has an approved remote work arrangement that allows them to work remotely three days a week between the hours of 8:30 AM and 5:00 PM. Recently, the unit initiated discipline for the employee due to failure to complete work assignments in a timely manner. The office policy states if discipline is implemented, an employee's remote working privilege is revoked. In accordance with that policy, the employee's remote working privileges were revoked when the discipline was issued.

A few months earlier, the employee had participated in an OEIG investigation by being interviewed and providing information about their supervisor's alleged misuse of university resources. The employee feels the discipline and the termination of their remote working privileges are in retaliation for reporting their supervisor's misconduct.

### **Is the revocation of remote working privileges retaliatory?**

- A. No, as the unit policy requires revocation of remote work arrangements if discipline is issued.
- B. Yes, since the employee participated in an OEIG investigation, their terms and conditions of employment cannot be changed in any way, including revocation of remote work arrangements.

*Explanation of the Answer:*

*The correct answer is A, No, the revocation of remote work privileges is not considered retaliation since the unit's policy requires the revocation of remote work arrangements if discipline is issued. Though the employee had been involved in the protected activity of participating in an OEIG investigation, it does not absolve that employee from other disciplinary action for their own policy violations, nor does it invalidate a unit policy regarding remote work arrangements.*

## Reporting Violations of the *Ethics Act*, Rule, Regulation, or Policy

If you witness misconduct or have evidence of it, you should [are required by [Executive Order 16-041](#)] report it to the proper authorities.

To report misconduct or a non-emergency violation of law, rule, or regulation, or agency policy to the OEIG, you can do so via:

- [OEIG website](#),
- toll-free hotline at 866- 814-1113,
- telecommunications device for the deaf at 888-261-2734, or
- mailing a completed complaint form to: Office of Executive Inspector General for the Agencies of the Illinois Governor, Attention Complaint Division, 69 West Washington Street, Suite 3400, Chicago, Illinois 60602.

You may report alleged violations to the OEIG anonymously.

## [Official Misconduct \[720 ILCS 5/33-3\]](#)

The Illinois *Criminal Code* of 2012 indicates that any public officer or employee commits misconduct when, in their official capacity, they:

- Intentionally or recklessly fail to perform a mandatory duty as required by law; or
- Knowingly perform an act which the employee knows to be forbidden by law to perform; or
- Intentionally perform an act in excess of the employee's lawful authority with intent to obtain a personal advantage for themselves or another; or
- Solicit or knowingly accept a fee or reward for the performance of an illegal act.

Any employee or public officer convicted of violating any provision of the Illinois *Criminal Code* outlined in the paragraph above commits a Class 3 felony.

If anyone attempts to improperly influence your official actions as a state public university employee (e.g., bribery or solicitation misconduct), especially if there is an attempt to have you or another employee act in a manner that is unlawful or is in violation of university policies, it is your responsibility to immediately report this matter to the appropriate authorities.

Bribery is when a benefit, property or personal advantage is promised or offered with an intent to influence the performance or job-related decisions of an employee.

Solicitation misconduct is when an employee solicits or receives contributions from a person engaged in a business or activity over which the employee has regulatory or licensing authority.

In certain instances, failure to report a violation can place an employee in violation of the law as well. Specifically, bribes must be reported to the Illinois State Police, and failure to report may result in possible criminal charges.

## Revolving Door Prohibition [5 ILCS 430/5-45]

The revolving door provisions apply to all employees but generally impact a small number of university employees annually. Under the *Ethics Act*, if during the year preceding departure of state/university employment, an employee participated personally and substantially in awarding of contracts or change orders to vendors with a cumulative value totaling \$25,000 or more, or the fiscal administration of such contracts, the employee, spouse, or any immediate family member living with the employee, is prohibited from accepting non-state employment from that vendor for a one-year period immediately following termination of state/university employment.

By law, there are two groups of employees primarily subject to the revolving door restrictions.

- The President and members of the Board of Trustees (referred to as H-list parties).
- Employees in positions the university has identified as having the authority to participate personally and substantially in contracting decisions, or the fiscal administration of contracts (referred to as C-list employees). If you are a C-list employee, you will be/would have been notified of this status by your university Ethics Officer and you will/would have confirmed, in writing, your receipt of the notification.

H-list parties are prohibited from accepting employment or receiving compensation or fees for services from certain individuals or entities for a full year after ending their university position. This restriction is in place regardless of whether the H-list party was involved in the contract decision or not.

C-list employees must go through a determination process with the OEIG before accepting the employment offer. More information regarding the determination process, decisions, appeal options, and forms for submitting notification to the OEIG regarding a non-state/university employment offer may be found at the [OEIG website](#). OEIG determinations may be appealed to the EEC within 10 calendar days by the person subject to the determination or the Attorney General. OEIG determinations are not considered final until the EEC has made a determination or the 10-day window to appeal the OEIG's determination has expired.

## Revolving Door-Related Penalties

If an employee accepts non-state employment in violation of the revolving door prohibitions, they may commit a Class A misdemeanor and be subject to significant fines up to 3 times the total annual compensation that would have been obtained in violation of these provisions. C-list employees may also face an additional fine of up to \$5,000 issued by the EEC if they fail to notify the OEIG of their job offer before accepting it.

### Knowledge Check

A university employee who has not been identified as a C-list employee based on their normal job responsibilities has been asked to consult on a vendor contract that will exceed \$25,000, due to their expertise in a given area. The employee participates personally and substantially in selecting the vendor for this single contract. Six months after the vendor begins working with the unit under the contract, they offer the university employee a position with their company. The employee resigned from the University and accepted the job offer from the vendor.

#### Could this represent a violation of the Revolving Door prohibition?

- A. Yes, because the employee participated personally and substantially in the selection of this vendor less than 12 months before accepting the job offer.
- B. No, since the employee is not on the C-list, they cannot violate the Revolving Door Prohibition.

#### *Explanation of the Answer:*

*The correct answer is A, yes, this could represent a violation of the Revolving Door Prohibition. Though C-list employees are specifically identified as needing to seek a determination based on their roles with the university, the Revolving Door Prohibitions apply to all university employees. Per the Revolving Door Prohibitions section of the [Ethics Act \(5 ILCS 430/5-45\)](#), if, during the year preceding departure of state or university employment, an employee participated personally and substantially in the awarding of contracts or change orders to vendors with a cumulative value totaling \$25,000 or more, they are prohibited from accepting non-state employment from that vendor for a one-year period immediately following termination of state or university employment unless a determination is made allowing them to accept the employment. Even though they are not required to do so, employees who are not on the C-list can still seek a determination from the OEIG before accepting nonstate or non-university employment to ensure they avoid potentially violating the Revolving Door Prohibitions.*

## Statement of Economic Interests [5 ILCS 420]

The Statement of Economic Interests form is an online disclosure required by the Illinois *Governmental Ethics Act* to be filed with the Office of the Secretary of State. A select population

of Southern Illinois University employees is required to submit this form by May 1st annually. Those individuals required to file are notified early each spring.

The Illinois *Governmental Ethics Act* identifies certain categories of individuals who are required to file a Statement of Economic Interests form (Statement), including but not limited to: members of the Board of Trustees; deans, directors, and department heads; persons who have supervisory authority over, or direct responsibility for the formulation of contracts; persons who supervise 20 or more university employees; and employees who have responsibility with respect to the procurement of goods and services.

The *Ethics Act* requires that university Ethics Officers review certain employee Statements prior to submitting them to the Secretary of State for filing and this is managed through the online filing process. For more detail, please contact your university Ethics Officer. You may also refer to Section 4A-101 of the Illinois *Governmental Ethics Act*.

[Illinois Executive Order 15-09](#) also requires this population to file a Supplemental Statement of Economic Interests form online with the EEC. The Supplemental Statement does NOT require university Ethics Officer review and is due May 1st annually. The Supplemental Statement of Economic Interests should be filed with the EEC and not the Secretary of State.

## Procurement Communications Reporting [30 ILCS 500/50-39]

Illinois procurement laws require university employees to follow specific processes and requirements to protect the integrity of the procurement process.

To provide greater transparency in state procurement matters, university employees who are personally and substantially involved in communications related to a purchasing decision that could materially impact the outcome of an active procurement matter, may have an obligation to document that communication in the web-based Procurement Communications Reporting System (PCRS).

There are some exceptions that do not require documentation in the PCRS system, including, but not limited to, any communication held in or posted to a public forum including posting on the Illinois Procurement Bulletin, communications that are privileged, protected, or confidential by law, or are about general procedural steps. For more information on the reporting process, please contact your university Ethics Officer.

Any university employee who suspects collusion or other anticompetitive practice among any bidders, offerors, contractors, or employees of the state, must notify the Attorney General, the OEIG, and the Chief Procurement Officer. Additionally, any chief procurement officer, state purchasing officer, designee, or executive officer who willfully compromises the fairness or integrity of the procurement or contract process may be subject to immediate dismissal and possible criminal prosecution.

State employees, including public university employees, cannot be involved in the negotiation of contracts with any firm, partnership, association or corporation where the state employee currently has a contract for future employment or is contracting or negotiating their own future employment.

### Penalties within the *Ethics Act* [5 ILCS 430/50]

Employees who violate the *Ethics Act* may be penalized both internally and externally. Within the university, penalties may include administrative action up to and including termination of employment. Externally, the EEC may levy administrative fines of up to \$5,000 for certain violations of the *Ethics Act* or issue injunctive relief up to and including discharge of a state employee. Criminal or illegal acts, such as bribery or official misconduct, may result in criminal prosecution.

## **Part II. Harassment, Sexual Harassment, and Discrimination Prevention Training**

### **Harassment and Discrimination**

The *Ethics Act* states all persons have a right to work in an environment free from sexual harassment. Additionally, all employees and appointees are prohibited from sexually harassing any person, regardless of their employment relationship or lack thereof.

The [\*Illinois Human Rights Act \(775 ILCS 5\)\*](#) as well as other laws and university policies prohibit harassment and discrimination on the basis of someone's actual or perceived membership in one or more of the following protected classes (as defined by the *Illinois Human Rights Act*):

#### **Marital Status**

The legal status of being married, single, separated, divorced, or widowed.

#### **Sex**

The status of being male or female.

#### **Sexual Orientation**

The actual or perceived heterosexuality, homosexuality, bisexuality, or gender-related identity, whether traditionally associated with the person's designated sex at birth or not.

#### **National Origin**

The place in which a person or one of his or her ancestors was born.

#### **Order of Protection Status**

A person protected under an order of protection issued pursuant to certain statutes, or an order of protection issued by a court of another state.

#### **Citizenship Status**

The status of being: (1) a born United States (U.S.) citizen; (2) a naturalized U.S. citizen; (3) a U.S. national; or (4) a person born outside the U.S. and not a U.S. citizen who is lawfully present and who is protected from discrimination under a federal law.

#### **Age**

The chronological age of a person who is at least 40 years old. In the case of training and apprenticeship programs, age means a person who is 18 but not yet 40 years old.

#### **Pregnancy**

Pregnancy, childbirth, or medical or common conditions related to pregnancy or childbirth.

#### **Disability**

A determinable physical or mental characteristic of a person, including one that necessitates the person's use of a guide, hearing or support dog, the history of such characteristic, or the perception of such characteristic by the person complained against, which may result from disease, injury, congenital condition of birth or functional disorder and which characteristic is unrelated to the person's ability to perform the duties of a particular job or position. This also includes unlawful discrimination against an individual because of the individual's association with a person with a disability.

#### **Religion**

All aspects of religious observance and practice, as well as belief, unless an employer demonstrates that he or she is unable to reasonably accommodate an employee's or prospective employee's religious observance or practice without undue hardship on the conduct of the employer's business.

#### **Race**

Includes traits associated with race, including, but not limited to, hair texture and protective hairstyles such as braids, locks, and twists.

<u>Military Status</u>	<u>Family Responsibilities</u>
A person's status on active duty in or status as a veteran of the armed forces of the U.S., status as a current member or veteran of any reserve component of the armed forces of the U.S., or status as a current member or veteran of the Illinois Army National Guard or Illinois Air National Guard.	An employee's actual or perceived provision of personal care* to a family member (an employee's child, stepchild, spouse, domestic partner, sibling, parent, mother-in-law, father-in-law, grandchild, grandparent, or stepparent).
<b><u>Unfavorable Military Discharge</u></b>	*activities to ensure that a covered family member's basic medical, hygiene, nutritional, or safety needs are met, or to provide transportation to medical appointments, for a covered family member who is unable to meet those needs himself or herself. Also includes being physically present to provide emotional support to a covered family member with a serious health condition who is receiving inpatient or home care
<b><u>Work Authorization Status</u></b>	<b><u>Reproductive Health Decisions</u></b>
The status of being a person born outside of the U.S., and not a U.S. Citizen, who is authorized by the federal government to work in the United States.	A person's decisions regarding the person's use of: contraception; fertility or sterilization care; assisted reproductive technologies; miscarriage management care; healthcare related to the continuation or termination of pregnancy; or prenatal, intranatal, or postnatal care.

## Harassment Defined (775 ILCS 5/2-101)

Harassment means any unwelcome conduct on the basis of an individual's actual or perceived race, color, religion, national origin, ancestry, age, sex, marital status, order of protection status, disability, military status, sexual orientation, pregnancy, unfavorable discharge from military service, citizenship status, work authorization status, or family responsibilities that has the purpose or effect of substantially interfering with the individual's work performance or creating an intimidating, hostile, or offensive working environment. For harassment, working environment is not limited to a physical location an employee is assigned to perform his or her duties.

Examples of conduct that could amount to harassment if based on a person's actual or perceived membership in one or more protected classes include:

- offensive jokes;
- slurs;
- epithets or name calling;
- physical assault(s);
- threats;
- intimidation, ridicule or mockery;
- insults or put-downs;
- offensive objects or pictures;
- deliberate touching, leaning over, or cornering;
- offensive looks or gestures; and/or
- letters, telephone calls, personal e-mails, texts, or other materials of an offensive nature.

## Knowledge Check

Employee A wears their hair in a natural afro. In the past few weeks, a small group of employees have developed a habit of pressing and patting Employee A's head each time they pass Employee A's workstation. Employee A often moves their body away from their colleagues, trying to avoid the contact, and appears annoyed. Employee A is offended and feels objectified but has tried to ignore the behavior to maintain workplace relations. Employee A is confident their coworkers can tell how much the constant touching of their hair upsets Employee A based on their reaction, but for weeks, they have continued to pat Employee A's head. Today, Employee A specifically asked their colleagues not to touch their hair. In response, the other employees laughed, indicating touching the afro was good luck and continued to pat Employee A's head throughout the day.

### Is this behavior considered harassment?

- A. Yes, this behavior is unwanted, recurring, hostile, and based on a protective class and would be considered harassment.
- B. No, this behavior is an example of coworkers just messing around and would not be considered harassment.

#### *Explanation of the Answer:*

*The correct answer is A, yes, this behavior could be considered harassment because the behavior is recurring and unwanted and creating a hostile and offensive working environment. This is an example of harassment based on race because the employees are singling out a colleague with a unique hairstyle customary to their race. The Illinois Human Rights Act defines race as including traits associated with race like hair texture.*

## Sexual Harassment 5 ILCS 430/5-65(b)

Sexual harassment means any unwelcome sexual advances, requests for sexual favors, or any conduct of a sexual nature when:

1. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. The phrase "working environment" is not limited to a physical location an employee is assigned to perform his or her duties and does not require an employment relationship.

Under the *Illinois Human Rights Act*, if the employer becomes aware of the harassing behavior and fails to take reasonable corrective measures, they will be held responsible for the sexually harassing or harassing behavior of a non-employee, non-managerial employee, or non-

supervisory employee. Sexual harassment of or by non-employees, such as contractors and consultants, is also prohibited.

## Types of Sexual Harassment

Quid pro quo and hostile work environment are two types of sexual harassment. They are described as follows:

- Quid pro quo sexual harassment occurs when a manager or supervisor uses as a basis for employment decisions affecting the subordinate, whether the subordinate submitted to or rejected unwelcome sexual advances, requests for sexual favors, or conduct of a sexual nature.
- Hostile work environment sexual harassment occurs when unwelcome sexual advances, requests for sexual favors, or any conduct of a sexual nature has the purpose or effect of substantially interfering with an individual's work performances or creating an intimidating, hostile, or offensive working environment.

Sexual harassment is not limited to overt sexual advances and requests to engage in sexual acts. Examples of behavior that might be sexually harassing include:

- actual or attempted rape or sexual assault;
- pressure for sexual favors;
- deliberate touching, leaning over, or cornering;
- sexual looks or gestures;
- letters, telephone calls, personal e-mails, texts, or other materials of a sexual nature;
- pressure for dates;
- sexual teasing, jokes, remarks, or questions;
- reference to an adult as a "girl," "hunk," "doll," "babe," or "honey";
- whistling at someone;
- sexual comments, innuendos, or stories;
- work discussions turning to sexual topics;
- sexual fantasies, preferences, or history being asked about;
- sexual comments about a person's clothing, anatomy, or looks;
- kissing sounds, howling, and smacking lips;
- talking about, telling lies, or spreading rumors about a person's personal sex life;
- neck and/or shoulder massage;
- touching an employee's clothing, hair, or body;
- hanging around a person uninvited;
- hugging or kissing;
- patting, stroking, or pinching;
- touching or rubbing oneself sexually in the presence of another person;
- standing close to or brushing up against a person;
- looking a person up and down;
- sexually suggestive posters, cartoons, websites, or magazines displayed in the workplace or shown to someone;
- playing sexually suggestive or graphic videos or music; and
- making sexual gestures with hands or through body movements

Sexual harassment is not just something that occurs in person and can involve activities online or through electronic communications. Examples of behaviors that can constitute unwelcome sexual conduct include but are not limited to:

- requests/demands for sex;
- sexually graphic or inappropriate pictures;
- sexually graphic or inappropriate videos;
- sexually offensive language or comments;
- unwanted flirting;
- unwanted requests for dates; and
- cyber stalking

## Knowledge Check

Two employees who dated previously and have remained friends over the years both work in the same department at the university. Recently, one of the employees, Employee A, has expressed an interest in rekindling their dating relationship with Employee B, and has been sending text and other communications to Employee B, reminiscing about their prior relationship. Employee B has repeatedly indicated they are not interested in anything more than friendship. The pressuring of Employee B to go on dates has been going on for months and now, Employee A has escalated their efforts by increasing their presence and communications with Employee B. Employee A has even begun showing pictures and sharing stories of their dating days with other staff in the unit, who have now joined forces to attempt to peer pressure Employee B into giving Employee A another chance. This behavior has made Employee B very uncomfortable and Employee B has trouble focusing at work and dreads being in the office. These advances also impact Employee B's workday because they spend a great deal of time fending off advances from Employee A and identifying new and different ways to navigate the workspace to avoid any unnecessary encounters with Employee A.

### **Would this scenario be considered workplace sexual harassment?**

- A. Yes, the repeated unwelcome advances and the impact of Employee A's actions on Employee B in the workplace is creating a hostile work environment for Employee B.
- B. No, since Employee A and Employee B previously dated and had a relationship outside of the place of employment, there is no evidence to support workplace sexual harassment.

### *Explanation of the Answer:*

*The correct answer is A, yes, this scenario would likely constitute an example of workplace sexual harassment. The sexual advances from Employee A are both unwelcome and have the effect of creating an intimidating and hostile environment. Employee B feels very uncomfortable at work and other staff pressure employee B creating an intimidating environment that Employee B dreads. Employee B is spending extra time and energy trying to physically and communicatively avoid Employee A and is having trouble focusing at work. A person can be a*

*victim of sexual harassment by someone they previously dated, if the conduct of a sexual nature is unwelcome and has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.*

## Unlawful Discrimination

Unlawful discrimination is discrimination against a person because of his or her actual or perceived:

- race
- color
- religion
- national origin
- ancestry
- age
- sex
- marital status
- order of protection status
- disability
- military status
- sexual orientation
- pregnancy
- reproductive health decisions
- unfavorable discharge from military service
- work authorization status
- citizenship status
- family responsibilities

\*\*Nothing contained in the *Illinois Human Rights Act* may be construed to obligate an employer, employment agency, or labor organization to make accommodations or modifications to reasonable workplace rules or policies for an employee based on family responsibilities, including accommodations or modifications related to leave, scheduling, productivity, attendance, absenteeism, timeliness, work performance, referrals from a labor union hiring hall, and benefits, as long as its rules or policies are applied in accordance with the *Illinois Human Rights Act*. Further, nothing contained in the *Illinois Human Rights Act* [775 ILCS 5/2-104\(E\)](#) prevents an employer from taking adverse action or otherwise enforcing reasonable workplace rules or policies related to leave, scheduling, productivity, attendance, absenteeism, timeliness, work performance, referrals from a labor union hiring hall, and benefits against an employee with family responsibilities as long as its policies are applied in accordance with *Illinois Human Rights Act*."

Definitions are as provided within the [Illinois Human Rights Act at 775 ILCS 5/1-103](#) and [5/2-102](#) and **are listed in detail in the Harassment and Discrimination header at the start of this section.**

Discrimination is considered unlawful if, based on a person's actual or perceived membership in one or more of the protected classes outlined previously, an employer takes action involving:

- recruitment
- hiring
- promotion
- selection for training or apprenticeship
- renewal of employment
- discharge
- discipline
- tenure of terms
- privileges
- other conditions of employment

The *Illinois Human Rights Act* also prohibits other discriminatory acts in employment, including:

- prohibiting employees from speaking their native language, when unrelated to work duties;
- certain immigration-related practices. For example, it is a civil rights violation for an employer to use more or different documents than are required under certain federal laws or to refuse to honor documents that on their face appear to be genuine;
- imposing conditions that would require an employee to violate a sincerely-held religious practice. For example, not allowing an employee to wear religious clothing or accessories in the workplace;
- failing to offer employees reasonable accommodations related to pregnancy or childbirth;
- discrimination based on age in training and apprenticeship programs; and
- using artificial intelligence to discriminate on the basis of protected classes or using zip codes as a proxy for protected classes.

Unlawful discrimination occurs when an employer takes a discriminatory employment action because of an applicant's or employee's actual or perceived membership in one of the protected classes above. However, it does not prevent an employer from taking employment action for another reason unrelated to an applicant's or employee's membership in a protected class.

### Knowledge Check

Employee A is a long-term employee within the unit who has taken two pregnancy leaves in the past five years and has recently announced they are pregnant with another child. Employee A is an outstanding employee, having consistently received top ratings on their annual performance reviews. Employee A recently applied for a promotion within the unit and are the preferred candidate for the position. During discussions within the hiring committee, one member raised concerns that, if hired, Employee A may end up on maternity leave within months of beginning the new position.

**Would considering the candidate's pregnancy in a promotional decision be considered unlawful discrimination?**

- A. Yes, consideration of pregnancy in the evaluation of an employee for a promotion would be unlawful discrimination.
- B. No, an employee's potential inability to perform their job duties as a result of a pregnancy or maternity leave should be considered when evaluating them for a potential promotion.

*Explanation of the Answer:*

*The correct answer is A, yes, this would be considered unlawful discrimination. An employee may not be overlooked for a promotion or position due to pregnancy or possible maternity leave.*

## Reporting Sexual Harassment, Harassment, and/or Discrimination

Any employee who witnesses, is subjected to, or becomes aware of sexual harassment, harassment, and/or discrimination should immediately report the incident. That report can be made to the employee's supervisor, university Ethics Officer, the OEIG, and/or the Illinois Department of Human Rights (IDHR).

Earlier in this training, you were provided with information regarding the OEIG and how to contact their office. "Harassment" and "unlawful discrimination" are not specific violations of the *Ethics Act*, regardless, the OEIG does investigate those allegations, along with sexual harassment, which is an *Ethics Act* violation. As mentioned previously, the OEIG can be reached via:

- toll-free hotline at 866-814-1113,
- the [OEIG website](https://oeig.illinois.gov/) (<https://oeig.illinois.gov/>),
- a telecommunications device for the deaf at 888-261-2734, or
- mailing a completed complaint form to: Office of Executive Inspector General for the Agencies of the Illinois Governor, Attention Complaint Division, 69 West Washington Street, Suite 3400, Chicago, IL 60602

Remember, as discussed earlier, you may always contact your university Ethics Officer at [ethics1@siu.edu](mailto:ethics1@siu.edu) to report a concern.

If you choose to make a report to your supervisor, your supervisor may have an obligation to inform the applicable SIUC Office of Equity and Compliance or SOM Human Resources.

Information about how to make a report of misconduct to the OEIG and your university Ethics Officer, which would include sexual harassment, harassment, and discrimination, is detailed in Part I of this training. The OEIG maintains the confidentiality of the identity of all complainants, unless the individual consents to the disclosure or the law otherwise requires the disclosure of their name. [\(5 ILCS 430/20-90\)](#)

The IDHR is a state agency that administers the *Illinois Human Rights Act*. Individuals can report an allegation of sexual harassment, harassment, and/or discrimination to the IDHR by filing a charge within 2 years of the alleged incident. The [IDHR website](https://dhr.illinois.gov/) (<https://dhr.illinois.gov/>), provides additional information about harassment and discrimination, filing a charge, the process for investigating and resolving an allegation, and other frequently asked questions. Filing a charge with IDHR is not a confidential process.

The IDHR operates a helpline for reporting sexual harassment and discrimination. The helpline number is 1-877-236-7703. All communication submitted to the IDHR through the helpline, including by Internet, is confidential and exempt from disclosure under the *Freedom of Information Act*. Subsequent information submitted to IDHR, such as the [Complainant Information Sheet](#) or other communication, may not remain confidential. Employees can access the Complainant Information Sheet obtained on the [IDHR website](#). The form itself requires detailed information, including contact information, employer information, and the most recent date of the alleged conduct.

A person filing a charge may also provide witness information and copies of relevant documents. If you prefer to file a complaint in person, offices are available as follows:

<b>Chicago</b>	<b>Springfield</b>	<b>Marion</b>
555 West Monroe Street	524 S. 2 <sup>nd</sup> Street	2309 W. Main St.
Suite 700	Suite 300	Marion, IL 62959
Chicago, IL 60661	Springfield, IL 62701	618-993-7463
312-814-6200	217-785-5100	866-740-3953 (TTY)
866-740-3953 (TTY)	866-740-3953 (TTY)	

## Whistleblower Protection

In addition to the [Ethics Act \(5 ILCS 430/15\)](#), the [Whistleblower Act \(740 ILCS 174\)](#), [Executive Order 16-04](#), and university policy, the [Illinois Human Rights Act \[775 ILCS 5/6-101\(A\)\]](#) also protects employees who, in good faith, report or threaten to report an act or omission they believe to be a violation of law, policy, or procedure.

## Retaliation

Under the [Whistleblower Act \(740 ILCS 174/15\)](#), an employer may not take retaliatory action against an employee for disclosing or threatening to disclose information to a government or law enforcement agency information related to an activity, policy, or practice of the employer, where the employee has a good faith belief that the activity, policy, or practice of the employer (i) violates a state or federal law, rule, or regulation or (ii) poses a substantial and specific danger to employees, public health, or safety.

The [Illinois Human Rights Act](#) provides it is a civil rights violation to retaliate against a person who opposes that which they reasonably and in good faith believe to be unlawful discrimination, harassment, or sexual harassment [\[775 ILCS 5/6-101\(A\)\]](#).

Under the *Ethics Act*, “retaliatory action” means reprimand, discharge, suspension, demotion, denial of promotion or transfer, or change in the terms or conditions of employment of an employee that occurs in retaliation for an employee’s involvement in the protected activities outlined in Part 1 (Whistleblower Section) of this training. [5 ILCS 430/15-5](#). Please refer to Part 1 for further discussion about retaliation and employee protections.

## Penalties

There are serious consequences for engaging in unlawful discrimination, sexual harassment, and harassment, which may include being disciplined or terminated for violating the law or agency policies. Sexual harassment, harassment and unlawful discrimination can also be punishable with fines or penalties imposed by a state or federal agency or court. Any person who violates the *Ethics Act*'s prohibition on sexual harassment may be fined up to \$5,000 per offense by the EEC.

Engaging in sexual harassment, harassment, unlawful discrimination, and/or retaliation can subject an individual to proceedings before the Illinois Human Rights Commission or state or federal courts. For example, individuals can file a state or federal suit against the person or entity and if they prevail, they may be entitled to one or more of the following remedies:

- Actual damages for injury or loss, including emotional damages
- Attorneys' fees and costs
- Backpay
- Obtaining a cease and desist order
- Fringe benefits
- Hiring
- Reinstatement
- Promotion
- Prejudgment interest

Any person who intentionally makes a false report to the OEIG, EEC, or to certain law enforcement agencies or officials is guilty of a misdemeanor, and the EEC may levy a fine of up to \$5,000 for intentionally obstructing or interfering with an OEIG investigation, or making a false, frivolous, or bad faith allegation of harassment, discrimination, or sexual harassment.

If you have any questions or concerns, you can always contact your university Ethics Officer.

## Thank You for Your Compliance!

Thank you for completing your ethics training and harassment and discrimination prevention training as required by the *Ethics Act*. As we wrap up today's training, it is important you keep in mind the concepts learned today to help you not only stay compliant with the *Ethics Act* and other related laws and policies, but also to do your part in promoting a work environment that is free of fraud, waste, abuse, harassment, corruption, and other undesirable and damaging behaviors.



Southern  
Illinois  
University  
System

**2026**  
**Ethics Training and Harassment and  
Discrimination Prevention Training for New  
Employees, Student Workers, Non-Permanent  
Employees and Employees Returning from Leave**

I certify that I have carefully read and reviewed the content of, and completed, the 2026 Ethics Training and Harassment and Discrimination Prevention Training for new employees, student workers, non-permanent employees and employees returning from leave. Furthermore, I certify that I understand that my failure to comply with the laws, rules, policies, and procedures referred to within this training course may result in disciplinary action up to and including termination of university employment/appointment, administrative fines, and possible criminal prosecution, depending on the nature of the violation.

Name (Last, First, Middle Initial):

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Signature:

---

Today's Date:

---

Date of Birth (MMDD only):

---

Dawg Tag/University Identification Number:

---

To be properly credited for training completion, please complete and return this signature page to the following:

**SIUC Student Employees:**

Student Employment (Career Dev. Center)  
Mail Code 4703  
1263 Lincoln Dr Ste 110  
Student Services Building  
Carbondale IL 62901

**SIUC Employees**

(including GA, UGA, Extra Help, Volunteers):  
Human Resources  
Mail Code 6520  
900 S Normal Ave  
Woody Hall 1<sup>st</sup> Flr  
Carbondale IL 62901

**SOM Employees:**

SIU School of Medicine  
Office of Human Resources  
Mail Code 9601  
327 W Calhoun Rm 104  
Springfield IL 62794-9601