

	POLICY PROCEDURE GUIDELINES	POLICY NUMBER: 03.40.00.	PAGE NUMBER: 1 of 4
		SUBJECT: Employee Gift Restrictions Policy	Adopted: 10/24/2016 Latest Revision: Next Review:

03.40.00. POLICY STATEMENT

The Forest Preserves of Cook County (the “District”) recognizes and complies with the Code of Ethical Conduct ordinance. The Code of Ethical Conduct prohibits District officials, appointees and employees from receiving gifts in circumstances that create a conflict of interest or appearance of impropriety. For additional information about what constitutes a prohibited gift under the Code of Ethical Conduct, see **Appendix A** to this Policy. **Appendix A** is included for informational purposes only. For current and up to date information on prohibited gifts, please see the District’s Code of Ethical Conduct or Cook County’s Board of Ethics webpage, <https://www.cookcountyil.gov/agency/board-ethics-1>.

This Policy specifies **additional** restrictions that apply to District employees with respect to receiving gifts.

03.40.01. PURPOSE

This purpose of this Policy is to clarify the District’s position concerning situations not directly referenced, or described, in the Code of Ethical Conduct ordinance.

03.40.02. REFERENCES

The Forest Preserves of Cook County, Code of Ethical Conduct
[\(FPDCC Code Section 1-13: 1-6\)](#)

Cook County Personnel Rules
 Rule 8: Conduct and Discipline of Personnel

Forest Preserves of Cook County
 Employee Handbook: Rules & Regulations

03.40.03. DEFINITIONS

N/A

03.40.04. SCOPE

This Policy applies to all District employees. Violation of this Policy by an employee shall lead to disciplinary action, up to and including termination. Employees who violate this Policy may also be subject to legal actions.

03.40.05. RESPONSIBILITY

District Employees: District employees shall adhere to this Policy.

03.40.06. PROCEDURE

A. Gift Restriction Policy: It is the Policy of the District that employees are prohibited from accepting any gratuities including, but not limited to, cash/checks/money orders, gift cards or alcohol from members of the public who purchase permits, attend events in permitted spaces (including indoor rooms) or otherwise utilize the services of this department.

B. Policy Exceptions: This Policy is not intended to apply to items such as food, t-shirts or other souvenir related items from an event, so long as the food or other item is less than \$75.00. However, any such item must be offered and not solicited.

C. Patron Procedures: Patrons at District indoor events should be advised by the District Event Aide, or other staff liaison, to discard all garbage in the trash and remove all items, including alcohol, from the premises at the conclusion of their event. If the patron refuses to comply, they should be instructed that a clean-up fee will be deducted from their security deposit. The items should then be itemized and immediately discarded. Items should not be removed from District property.

D. Lost & Found Procedures: Items of value left by patrons at outdoor events should be brought to the nearest maintenance division and held for (1) month and then donated or discarded. District employees may not keep any items left on District property.

03.40.07. TRAINING REQUIREMENTS

N/A

03.40.08. ACTION PLAN TO COMMUNICATE/DISSEMINATE

1. This Policy shall be distributed to all District employees.
2. This Policy shall be posted on the District website, Shared Drive, and intranet.



APPENDIX A: OVERVIEW OF THE COOK COUNTY GIFT BAN

TONI PRECKWINKLE
PRESIDENT, COOK COUNTY
BOARD OF COMMISSIONERS

RANJIT HAKIM
EXECUTIVE DIRECTOR



BOARD OF ETHICS MEMBERS
PEGGY DALEY
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OVERVIEW OF THE COOK COUNTY GIFT BAN

The Cook County Gift Ban prohibits County officials, appointees and employees from receiving gifts in circumstances that create a conflict of interest or appearance of impropriety. The Gift Ban generally bars any Cook County official, appointee or employee from soliciting or accepting any gift from any "prohibited source." Ethics Ordinance § 2-574(a). It also bars any "prohibited source" from offering such a gift.

Frequently Asked Questions:

What is a "gift"? The Ban defines "gift" very broadly to include any gratuity, discount, entertainment, hospitality, loan, forbearance, or anything having monetary value, including cash, food/drink, and honoraria for speaking engagements related to or attributable to one's official position.

What is a "prohibited source"? This includes County vendors, prospective vendors, lobbyists, those regulated by County officials, or those seeking official action by the County.

Who is covered by the Gift Ban? The Gift Ban applies not only to County officials, appointees and employees, but also to their spouses and any immediate family members living in their households.

Are there exceptions? Yes. These exceptions include:

- Gifts from relatives or friends based on a personal relationship, unless you have reason to believe that the gift was provided because of your position with the County.
- Any item or items from any one prohibited source during any calendar year having a cumulative total value less than \$100.
- Food/beverages not exceeding \$75/person/day that are consumed on premises where purchased.
- Educational missions (such as conferences) or travel expenses for a meeting to discuss County business. These must be submitted to the Board of Ethics approval in advance.
- Items for which you pay the market value.
- Political contributions or activities associated with a fundraising event.
- **Check the Ethics Ordinance for a complete list of exemptions.**

What Should I Do If I Receive an Improper Gift?

- Return the prohibited gift to its source; or
- Donate the prohibited gift, or an amount equal to the gift's value, to a charity exempt from taxation under Section 501(c)(3) of the Internal Revenue Code;

– AND –

- File a gift disclosure form with the Board of Ethics within 10 days of receipt of the gift.

What Are the Consequences of Violating the Gift Ban? Employees found to have knowingly violated the Gift Ban may be subject to disciplinary action and fines up to \$5,000. Also, those doing business with the County who knowingly violate the Ordinance may have their contracts with the County voided.

What should I do if I have questions about the Gift Ban? Call the Cook County Board of Ethics at (312) 603-4304, or email us at cookcounty.ethics@cookcountyil.gov. We are here to help!