

OFFICE OF STATE ETHICS (“OSE”) POLICY STATEMENT ON ETHICS

OSE MISSION STATEMENT

The mission of the OSE is to ensure honesty, integrity and accountability in state government through education, interpretation and enforcement of the State of Connecticut Codes of Ethics.

INTRODUCTION

The OSE is looked to by the State as the authority on the Codes of Ethics (“Codes”) in the State of Connecticut. As such, the employees of the OSE and members of the Citizen’s Ethics Advisory Board (“board”), must observe the highest standards of honesty, integrity and quality of performance on behalf of the State and the communities that are regulated by the OSE. The internal Policy Statement on Ethics (“Ethics Policy”) set forth below, applies to all employees of the OSE and all members of the board, and it shall be the responsibility of each employee and board member to become familiar with, and to comply with it. Evidence of non-compliance or violation of the Ethics Policy may subject the employee or board member to disciplinary action, up to and including dismissal from state service. The Ethics Policy applies to the conduct of employees and board members and is intended to assist in maintaining the highest of standards. The Ethics Policy does not, and is not intended to reiterate all of the provisions contained in the Codes, which provisions are incorporated herein by reference. Nor is the policy intended to supersede or replace any of the provisions of the Codes. Rather, the Ethics Policy highlights some of the major provisions and principles of the Codes, and imposes additional requirements upon OSE employees and board members.

If an employee or board member has any questions about this Ethics Policy, or about its application, such individual should consult with his/her immediate supervisor, the OSE’s Executive Director, or General Counsel. In addition, if there are questions about the application and interpretation of any Codes of Ethics’ provisions, including: gifts, outside employment, post-state employment, accepting a fee or honorarium, necessary expenses, contracting with the State, or any other subject matter contained in the Codes, the employee or board member should contact the OSE’s General Counsel.

OSE ETHICS POLICY

GENERAL CONDUCT

The members of the board and OSE employees shall:

- (1) Observe high standards of conduct so that the integrity and independence of the board and the OSE may be preserved;

- (2) respect and comply with the law and conduct themselves at all times in a manner which promotes public confidence in the integrity and impartiality of the board and the OSE;
- (3) be faithful to the law and maintain professional competence in the law;
- (4) be unswayed by partisan interests, public clamor or fear of criticism;
- (5) maintain order and decorum in proceedings of the board and OSE;
- (6) be patient, dignified and courteous to all persons who appear in board or OSE proceedings and with other persons with whom the members and employees deal in their official capacities;
- (7) refrain from making any statement outside of a board or OSE proceeding, which would have a likelihood of prejudicing a board or OSE proceeding;
- (8) refrain from making any statement outside of a board or OSE proceeding that a reasonable person would expect to be disseminated by means of public communication if the member or employee should know that such statement would have a likelihood of materially prejudicing or embarrassing a complainant or a respondent;
- (9) preserve confidences of complainants and respondents;
- (10) exercise independent professional judgment on behalf of the board and OSE; and
- (11) represent the board and the OSE competently.

CONFLICT OF INTEREST

- (12) No board member or employee of OSE shall knowingly use his/her public office or position, including taking any official action, for the purpose of financially benefiting himself/herself, an immediate family member, a business with which he/she is associated, or an outside employer. If, during the ordinary course of business, the employee or board member is asked to take such action, the board member or employee must disclose the existence of the conflict to his/her supervisor (or to the Chairman of the board in the case of a board member) and formally recuse him or herself from taking any action.
- (13) No board member or OSE employee shall willfully or knowingly use his/her office or position to obtain financial gain for him or herself, his/her spouse, child, child's spouse, parent, brother, sister or a business with which he/she is associated.
- (14) No board member or OSE employee shall willfully or knowingly, in his/her state position or duties, either individually or as a member of a group, directly or indirectly, solicit or accept anything of value, including, a gift (as defined in the Codes of Ethics), loan, political contribution, reward, or promise of future employment based on any understanding that any action, inaction, or judgment would be influenced thereby.

(15) Knowing receipt of any gift (as defined in the Codes of Ethics) by a board member or OSE employee is prohibited if received from any person, group, business or organization that the recipient knows or has reason to know: a) is a registrant, b) is regulated by the OSE, or c) is doing business with, or seeking to do business with the OSE. Any such gift must be immediately refused, returned, reimbursed in full, or turned over to the employee's supervisor (or the Chairman of the board in the case of a board member) for appropriate administrative action, so as not to benefit the employee or board member, or create the appearance of a conflict with, or appearance of influencing the performance of the employee's or board member's duties. Notwithstanding this prohibition, board members and employees may accept items exempt from the definition of "gift" in the Codes of Ethics. Direct any questions regarding what types of items are, or are not, acceptable to OSE's General Counsel.

(16) No OSE employee or board member shall, while employed as such, or serving on the board, solicit any person or entity regulated by the OSE for employment, or enter into an employment relationship of any kind with any such person or entity, if such employment could reasonably be expected to violate the Code of Ethics. Any OSE employee or board member who seeks to enter into a non-state employment relationship with any person or entity regulated by the OSE shall, prior to any meaningful negotiation for such employment, inform the Executive Director (or the Chairman of the board) of such intent, who may seek the advice of the General Counsel on the matter.

(17) No board member or OSE employee shall accept other employment which will either impair his independence of judgment as to his official duties or employment or require him, or induce him, to disclose confidential information acquired by him in the course of and by reason of his official duties.

(18) If an employee or board member receives money, expenses, reimbursement or other remuneration for work-related travel, workshops, conferences, seminars or speaking engagement attendance from a source that is not the Office of State Ethics, the state, or his or her union, the employee or board member must immediately report such receipt to the Executive Director.

(19) If any employee or board member seeks to receive money, expenses, reimbursement or other remuneration for work-related travel, workshops, conferences, seminars or speaking engagement attendance from any source that is a non-government agency, group, business or professional organization or individual(s), the employee or board member must disclose such intent in advance of the function to the Executive Director, and prior to the employee's or board member's receipt of any payment. Receipt of any money, expenses, reimbursement or other remuneration by the employee or board member for attendance at the function shall be solely at the discretion of the Executive Director after review and consideration of all relevant state law and agency ethics policies.

(20) The OSE will make reasonable efforts to ensure that any and all individuals, licensees, vendors, businesses, groups, organizations and other parties doing or seeking to do business with, or receiving business contracts or the services of the agency, are aware of the Ethics Policy, which prohibits OSE employees and board members from accepting gifts, financial benefit or outside employment. Each employee and board member should make reasonable effort to convey this information to the above-referenced parties at such time of their interaction with the parties.

(21) Employees and board members shall not willfully or knowingly interfere with existing lobbying contracts, or solicit new lobbying contracts with the intent to benefit another lobbyist.

STATE EQUIPMENT

(22) No board member or OSE employee shall willfully or knowingly use, distribute or neglect any state equipment, vehicle, badge, identification, supplies or materials for non-state purposes in violation of state policy. Please note personal or non-state related long distance calls must be charged to personal calling cards or home numbers.

CONFIDENTIAL INFORMATION

(23) Much of the information received at or in the possession of the OSE is confidential. Employees and board members shall not willfully and knowingly disclose confidential information, as defined by Regulations of Connecticut State Agencies § 1-81-15(a), including the identity of the subject of an ethics enforcement action, whether available from computer printouts, computer terminals, investigative or client records, or any other source, except when directly connected to enforcement actions, or the execution of other agency functions, and then only as authorized by law, and only to persons authorized to receive such information. For example, disclosure of the identity of anyone who is the subject of an ethics enforcement action by the OSE is strictly prohibited except in rare, specified circumstances. If you ever have questions as to whether information may, or may not, be disclosed, immediately contact your supervisor or the OSE General Counsel prior to taking any action that may risk disclosure.

REQUIREMENT TO FILE STATEMENT OF FINANCIAL INTERESTS (SFI)

(24) (a) No later than May first of each year, all board members and those employees so designated by the Executive Director as required filers must file an annual SFI for the previous year. Each board member and employee so designated is personally responsible to accurately complete and timely file his/her SFI. Failure to do so will subject the individual to fines imposed by the OSE of up to \$10 per day for each day the statement is late (up to \$10,000 per violation), and may also subject the individual to disciplinary action by the OSE.

(b) Board members and designated employees joining the OSE after March thirty-first of any year must file an SFI for the preceding year within thirty days of assuming board membership or employment with the OSE.

(c) A board member or employee who has been designated as an SFI filer and who leaves his/her position at the OSE during the course of the year must also file an SFI covering that portion of the year during which such individual held his/her office or position. The OSE is required to notify such individuals no later than thirty days after they leave their office or position, and the individuals must file the SFI within sixty days after they receive the notification.

MANDATORY ETHICS TRAINING

(25) Board members and OSE employees are required to have yearly training on the Code of Ethics for Public Officials.

ACKNOWLEDGEMENT OF RECEIPT

I have read the above Ethics Policy and agree to abide by its terms.

ETHICS POLICY RECEIVED BY: _____ (Print name)

_____ (Signature)

_____ (Date)

Revised November 2011