



STATE OF CONNECTICUT
DEPARTMENT OF VETERANS AFFAIRS
287 WEST STREET
ROCKY HILL, CT 06067



Thomas J. Saadi
Commissioner

Subject: Policy – Code of Ethics and Employee Conduct

Revised: February 10, 2021 (Updated)

Section 1. INTRODUCTION

The Department of Veterans Affairs (DVA) is committed to adherence by all employees to the highest ethical standards and professional conduct. DVA employees shall conduct themselves in accordance with the Connecticut Code of Ethics for Public Officials and State Employees, Governor Rell's Executive Order No. 1 and the Mission Statement of the DVA. All DVA employees shall strive to deliver Connecticut Veterans the best possible supportive programs and services within the DVA's mission areas in a professional, ethical, and compassionate manner.

All programs and services shall be provided to Connecticut Veterans in an equitable, and unbiased manner in accordance with all applicable laws, regulations, and best practices.

The effective date of this policy is immediately.

Section 2. APPLICABILITY AND VIOLATIONS

- a. The provisions of this policy apply to all DVA employees, and prospective employees shall review this policy prior to accepting a position with the DVA.
- b. It shall be the responsibility of each DVA employee to bring any circumstances that may be or could lead to a violation of the State Code of Ethics or this policy to the attention of their manager/supervisor, the DVA HR Administrator, the DVA Commissioner, and/or the Office of State Ethics immediately. Prospective employees shall disclose any possible violations at the time of offer of employment or as early as possible in the process.
- c. Any conduct in contravention of this policy is strictly prohibited and shall constitute a violation of this policy with the potential of disciplinary action up to and including termination of employment.

Section 3. CODE OF ETHICS

All employees are required to adhere to the State of Connecticut Code of Ethics for Public Officials and State Employees, which can be found on the State of Connecticut website at the following link:

<https://portal.ct.gov/CHRO/Education-and-Outreach/Employees/Code-of-Ethics-for-Public-Officials-and-State-Employees>.

A copy of the Public Officials and State Employees Guide to the Code of Ethics can be found on the State of Connecticut website as follows: <https://portal.ct.gov/-/media/Ethics/Guides/2020/Public-Officials-and-State-Employees-Guide-Rev-January-2020.pdf?la=en>.

Employees may request copies of the guide from the HR Administrator. The principal provisions of the Code of Ethics are as follows:

- a. **GIFTS.** In general, state employees are prohibited from accepting gifts from (1) anyone doing business with, seeking to do business with, or directly regulated by the state employee's agency or department, (2) from persons known to be a registered lobbyist or lobbyist's representative, or (3) from state vendors prequalified under General Statutes § 4a-100 (see the Department of Administrative Services Contractor Prequalification Program website for the list).
- b. **FINANCIAL BENEFIT.** A state employee is prohibited at all times from using his/her office or position for the financial benefit of the employee, certain family members, or that of an associated business.
- c. **OUTSIDE EMPLOYMENT.** A state employee may not accept outside employment which will impair his/her independence of judgment as to official state duties or which would induce the disclosure of confidential information. Generally, outside employment is barred if the private employer can benefit from the state employee's official position or actions.
- d. **FINANCIAL DISCLOSURE.** Certain state employees are required to file a financial disclosure statement with the Office of State Ethics which, with certain limited exceptions, be considered publicly available information.
- e. **POST-STATE EMPLOYMENT.** There may be post-employment restrictions, known as "revolving door" prohibitions. For example, there are restrictions on accepting employment with a party to certain contracts if the state employee was involved in the negotiation or award of the contract; for one year after leaving state service, a former state employee may not represent anyone for compensation before that person's former agency; a state employee may never disclose any confidential information learned during the course of state service for anyone's financial gain; a state employee may never represent anyone other than the state regarding a particular matter in which that employee was personally and substantially involved while in state service and in which the state has substantial interest; certain designated individuals in the state's regulatory agencies may not, for one year after leaving state service, accept employment with any business subject to regulation by their former agency.

Section 4. EMPLOYEE CONDUCT

- a. All employee behavior, conduct, and language shall be of a professional, ethical, and responsible manner with all DVA employees demonstrating respect for their colleagues, supervisors, Veterans, and the public.
- b. All employees shall treat Veterans receiving services from the DVA in a compassionate and respectful manner. Any suspected or observed abuse or neglect of a Veteran must be immediately reported to an appropriate supervisor or manager. Employees may not record any video or take photographs of any DVA Veterans without prior authorization and consent.
- c. Employees shall not engage in any unprofessional or illegal behavior on and off duty that could negatively reflect on the DVA or conflict with the Department's mission of "Serving Those Who Served."
- d. Employees shall notify the DVA Human Resources Office immediately if they are arrested or charged with a criminal violation of law.
- e. Employees shall report to work on-time to their assigned locations as scheduled and ready to perform their required duties. Employees shall be awake, alert, attentive and medically fit while on duty. Sleeping or inattentiveness while on duty is prohibited. Employees shall return from breaks on time.
- f. Employees at worksites where there are continuous operations may not leave at the end of their shift without being properly relieved of duty. There are circumstances in which employees may be mandated to work overtime.
- g. Employees' clothing and personal grooming shall be appropriate to their work assignments, safety and surroundings as determined by a DVA manager or the manager's designee.
- h. Employees shall perform work in conformance with safety regulations and approved safety standards. Any safety hazard shall be reported to the employee's immediate supervisor or the supervisor's designee as soon as possible.
- i. Any employee injury shall be reported to the employee's immediate supervisor at the time the injury occurs or before the employee goes off duty. Appropriate forms shall be completed by the employee's supervisor and submitted immediately to the DVA Human Resources Office.
- j. Employees shall not engage in activities while on duty that constitute a distraction such as use of personal cell phones or devices, reading material, etc. . . . or otherwise engage in behavior that interferes with the employee's ability to perform job duties or that may endanger the safety or welfare of any Veteran, DVA Staff or member of the public.

- k. Insubordination, which for the purposes of the Department, means the refusal or failure to carry out a direct, job-related work order given by a DVA supervisor, manager or administrator who has appropriate authority, is prohibited.
- l. Employees in positions that require licensure or certification are responsible for meeting the requirements to maintain such licensure or certification. These licensed or certified employees also are required to attend and participate in any assigned in-service training and meet all requirements of the training, including providing any required signatures to acknowledge receipt of such training and any materials provided.
- m. Employees are prohibited from smoking in any DVA facility, building or enclosed structure. Employees may smoke only in outside designated smoking areas as approved by the Commissioner.
- n. Employees may not bring illegal drugs or alcohol to any worksite. Employees may not use, consume or be under the influence of illegal drugs or alcohol while on duty or at any worksite. Employees are required to comply with the current Connecticut's Policy for a Drug-Free Workplace.
- o. Employees who, for legitimate health reasons, bring prescription or over-the-counter medication to work shall be responsible for keeping it secured. Employees shall inform their supervisor of any side effects that they may experience at work due to taking or discontinuing such medication.
- p. Employees may not conduct personal business while on duty or use any state property for personal use or personal monetary gain on or off duty.
- q. All verbal or physical fighting, obscene, harassing or abusive language or behavior, inappropriate teasing, horseplay, intimidation, direct or implied threats, even those made in a joking manner, are prohibited. Direct or implied threats may include, but are not limited to, harassing behaviors conducted by employees outside of the workplace via electronic or social media.
- a. In accordance with federal and state law, all forms of harassment or discrimination are prohibited, including those based on a person's race, color, religious creed, age, sex (pregnancy/familial status or sexual harassment), workplace hazards to reproductive systems, marital status, national origin, ancestry, physical disability (including blindness), past or present mental disability, sexual orientation, intellectual disability, learning disability, prior conviction of a crime, genetic information, gender identity or expression, veteran status, and retaliation for previously opposed discrimination or coercion.
- r. In addition to this policy regarding employee conduct, employees must adhere to the following DVA Policies which impact the DVA work environment: Sexual

Harassment Prevention Policy, Prevention of Workplace Violence, Hostile Work Environment, and Affirmative Action Plan Policy Statement.

Section 5. STATE PROPERTY AND RECORDS

- s. Employees must abide by all state and federal confidentiality and privacy laws and regulations, including but not limited to the federal Health Information Portability and Accountability Act, as amended (“HIPAA”). Employees shall not discuss or disclose any confidential information except in accordance with state and federal laws and regulations and only when authorized by an appropriate DVA supervisor, manager, or administrator.
- t. Employees shall not falsify any DVA information, records, program data or reports, including, but not limited to, information concerning an individual’s eligibility to receive services from the Department, or employee records including, but not limited to, attendance or injury reports, or any other work-related document.
- u. Employees shall not remove any property, records or other materials belonging to the state or the DVA from DVA grounds and worksites without proper authorization.
- v. Theft of funds or other property by an employee from the state, the DVA, any Veteran or co-worker is prohibited and may result in criminal prosecution.
- w. All equipment and resources belonging to the state and the DVA are for use in the conduct of official business only and shall not be used for personal benefit or to conduct personal business of any kind.
- x. Employees shall be responsible for all materials and equipment assigned to them. Employees shall report lost, damaged or stolen state or DVA property, including keys, immediately to their supervisor. Unauthorized duplication or possession of any DVA or facility key by an employee is prohibited. Employees who separate from DVA employment shall return all keys, ID cards or any other state or DVA property in their possession to their supervisor or other designated DVA employee not later than the employee's last workday.

Section 6. POLITICAL ACTIVITIES

- a. While state employees have the right to express political views and participate in political campaigns, a state employee is prohibited at all times from using his/her office or position directly or indirectly to endorse a candidate for political office or to endorse a political party.
- b. State employees are prohibited from engaging in political activities while on duty and are prohibited from using any state resources for political purposes including state email accounts, state-issued mobile phones and computers whether on or off duty.

Section 7. MOTOR VEHICLES

- a. Employees who operate any motor vehicle while on state business or on state property shall do so in accordance with all applicable state laws, regulations, policies, and procedures. This includes, but is not limited to, possessing a valid operator's license, obeying speed limits and other posted traffic and parking signs, using seat belts, and driving in a safe manner.
- b. Employees shall park vehicles only in designated areas.
- c. Employees who operate state-owned vehicles as part of their job duties shall immediately notify their supervisor and the HR Administrator of any change in their driver's license status. Employees are personally responsible for paying any motor vehicle fines incurred while at work or while operating a state-owned vehicle and may be subject to DVA disciplinary action for motor vehicle violations.
- d. Employees are responsible for keeping state-owned vehicle keys secure at all times. Employees shall turn off a vehicle's engine, remove the keys from the ignition, and take the keys when leaving the vehicle. Employees shall not transport unauthorized passengers while at work or while operating a state-owned vehicle.
- e. Smoking is prohibited in state-owned vehicles.

Section 8. REPORTING VIOLATIONS

- a. Any employee who has knowledge of a violation of this policy should immediately report the information to a supervisor verbally and file a follow-up written complaint with that supervisor. Upon receipt of the initial verbal report, the supervisor shall inform the Safety and Security Department immediately by calling (860) 616-3612. If the employee does not feel comfortable reporting the information directly to the supervisor, or if the supervisor is allegedly involved in the violation, the employee may report the information directly to Safety and Security and alternatively, employees may contact the HR Administrator directly at 860-616-3630.
- b. Reports may also be made anonymously by calling 860-616-3612 and following the instructions provided in the voicemail to leave an anonymous report.
- c. Security Department personnel shall immediately notify the Director of Safety and Security of all reports of violations of this policy.
- d. Failure of any employee to report a known violation may result in disciplinary procedures.
- e. There may be circumstances where the confidentiality of persons reporting a policy violation cannot be guaranteed unless it is that of a witness filing an anonymous report pursuant to the procedure set forth herein.

- f. The DVA prohibits retaliation against any employee for the good faith reporting of a violation of this policy; however, any employee who knowingly provides false or misleading information in reporting a violation of this policy may be subject to disciplinary proceedings up to and including possible termination of employment.
- g. Director of Safety and Security shall notify the Department of Human Resources of all complaints of violations of this policy.

Section 9. INVESTIGATION OF VIOLATIONS

- a. The Department of Safety and Security shall investigate all reports of violations of this policy.
- b. All employees are expected to cooperate with any investigation conducted by the DVA or its authorized agents involving violations of this policy. Any employee who intentionally impedes or willfully fails to cooperate in an investigation may be subject to disciplinary proceedings up to and including possible termination of employment.
- c. The Department of Safety and Security shall report its findings to the Department of Human Resources and, if requested, to the Commissioner.
- d. Any employee found to be in violation of this policy will be subject to appropriate disciplinary action up to and including termination. Each violation of this policy will be evaluated, and an appropriate remedy will be determined based on the nature of the act or conduct, duration, totality of circumstances and prior violations.

Section 10. ADDITIONAL POLICIES AND WORK RULES APPLY

- a. This policy is not meant to be an all-inclusive code of all expectations of employee conduct and expectations in the workplace. Other policies and work rules apply, including but not limited to, those expectations contained in collective bargaining agreements or policies surrounding employee schedules, requests for leave, documentation, etc.
- b. This policy does not include the entire list of violations. DVA employees are expected to comply with this policy and all other policies, rules, regulations, and federal and state laws applicable to employees' conduct and the workplace environment. Employees who do not comply are subject to disciplinary action for any such violations.
- c. Additional work rules or policies may be established by the Commissioner to meet special requirements of the DVA as circumstances require.

Section 11. EDUCATION AND TRAINING

- a. All employees are required to attend training as directed by the DVA Commissioner. Training is mandatory for all employees and must be completed at least once annually or as otherwise directed by the HR Administrator or the Commissioner.
- b. This policy shall be reviewed annually by each DVA employee. Employees are required to acknowledgment review and receipt of this policy annually.
- c. Information regarding this policy shall be posted across the campus in locations visible to DVA employees.
- d. As this policy is a general overview, questions should be directed to DVA HR Administrator, Bethanne Watts at (860) 616-3630, who is the DVA's Agency Ethics Liaison Officer. Questions about State Code of Ethics may also be directed to the Office of State Ethics directly at (860) 263-2400.

INSTRUCTION: This policy is to be posted in prominent areas accessible to all employees of the DVA.

Issued:



Bethanne Watts
HR Administrator

February 10, 2021
Date

Approved:



Thomas J. Saadi
Commissioner

February 10, 2021
Date