

# What and What Not to Include in an Ethics Policy

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- Assign Responsibilities
- Document Process
- Document Prohibited Conduct
- Inform Stakeholders



## Ethics Policy Objectives

**Policy or Code?**

- Responsibilities:
  - To Report
  - To Cooperate
  - To Investigate
  - To Respond



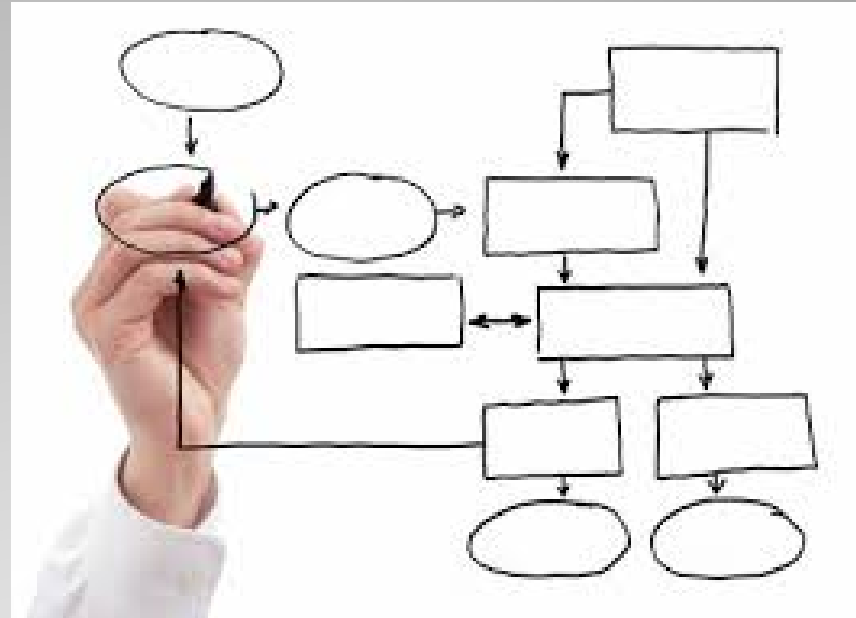
# Fundamentals

- Anonymity
- Confidentiality
- Whistleblower Protection



**Fundamentals**

- Process



- Sanctions

- Access to records

# Fundamentals

- Misuse of resources
- Misuse of position/information
- Conflicts of Interest
- Representation of Others
- Acceptance of Gifts



**Prohibited Conduct**

- Allowance for De Minimis Violations
  - Too trivial or minor to merit consideration



- Flexibility
- High Level Officials

**Additional Considerations**



- Inconsistent Application
- Overly Restrictive or Vague Language
- Technical Jargon

Elucidate  
~~Streamline~~  
~~Demystify~~  
**Simplify**

**What Not To Include**

- City of Toronto
  - Anti-Fraud Policy
- City of Albuquerque
  - Inspector General and Whistleblower Ordinances
- City of Chicago
  - Governmental Ethics Ordinance

**Good Examples**

- City of Toronto - Anti-Fraud Policy

Pros:

- Good description of responsibilities
- Great accounting for allegations against high level officials
- Addresses confidentiality

Cons:

- Documented in Policy not Code
- Definitions lacking



**Good Examples**

- City of Albuquerque - Inspector General and Whistleblower Ordinances

Pros:

- Documented in Code
- Addresses Responsibilities of IG
- Confidentiality/Public Records

Cons:

- Focused only on IG
- Process not discussed sufficiently

**Good Examples**

- City of Chicago - Governmental Ethics Ordinance

Pros:

- Documented in Code
- Thorough descriptions of everything
- Positive Code of Conduct

Cons:

- Voluminous
- Prioritizes Law Enforcement

**Good Examples**

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