

## 1.0 Purpose and Need

As a public body, gaining and keeping the trust of the public is paramount. HRSD Commissioners and employees are committed to maintaining high ethical standards in every aspect of their business as members of a public body. As a political subdivision of the Commonwealth, HRSD Commissioners and employees are committed to complying in that regard to all applicable laws and regulations governing ethics and conflicts of interest. **This policy is applicable to all HRSD employees.** Additionally, specific disclosure requirements are hereby established for HRSD Commissioners and employees in HRSD Positions of Trust.

## 2.0 Definitions

**HRSD Commissioner** – A non-salaried citizen member of the HRSD Commission

**HRSD Positions of Trust** – Positions requiring annual disclosure filing

- General Manager
- Director of Communications
- Director of Engineering
- Director of Finance
- Director of Information Technology
- Director of Operations
- Director of Talent Management
- Director of Water Quality
- Director of Water Technologies and Research
- Special Assistant for Compliance Assurance
- Chief of Procurement
- Real Estate Manager

**Gift** – Any goods, meals, services, loans, tickets to events, greens fees, travel, lodging or similar items with monetary value or discounts, favors, gratuities, hospitality, forbearance, etc. This includes prizes awarded from drawings or similar games of chance at events attended in an official capacity. This also includes wreaths, candy, cookies, fruit baskets, etc., whether addressed to an individual or to HRSD.

**Not a Gift** – For the purposes of this policy the following are not considered gifts:

- Offer of a ticket, coupon, admission or pass if such item is **not** used
- Honorary degrees
- Food or beverage consumed and mementos received at an event at which an individual is performing official duties or is a speaker
- Registration or attendance fees (not travel costs) at an event at which individual is a speaker
- Unsolicited awards of appreciation or recognition (plaque, trophy, wall or desk memento)
- Gifts from relatives or Personal Friends
- Travel paid for by the government
- Travel, meals and activities directly associated with and paid for by a professional association that HRSD pays dues to on behalf of the agency or individual as part of their official duties
- Scholarships awarded competitively
- Travel related to an official meeting of HRSD

**Widely Attended Event** – An event to which at least 25 persons have been invited or there is a reasonable expectation that at least 25 persons will attend the event and the event is open to individuals (i) who are members of a public, civic, charitable or professional organization, (iii) who are from a particular industry or profession, or (iv) who represent persons interested in a particular issue.

**Immediate Family** – Includes spouse and any other person who resides in the same household and who is a dependent of the Commissioner or employee.

**Personal Friend** – An individual whose relationship with an HRSD employee or Commissioner pre-dates employment/appointment with HRSD and the relationship has a history of gift exchange or with whom a personal relationship developed totally unrelated to the employee's or Commissioner's position with HRSD.

### **3.0 Guiding Principles**

HRSD Commissioners and employees shall conduct themselves beyond reproach. Improprieties or the appearance of improprieties will not be tolerated. All prohibitions herein apply to Commissioners, employees and their immediate families.

**Adopted: October 27, 2015**

**Revised: June 27, 2017**  
**Effective: July 1, 2017**

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Soliciting, accepting or receiving any Gift from a lobbyist, lobbyist's principal or any entity or person seeking to contract with HRSD is prohibited subject to exemptions for Gifts from relatives or Personal Friends.

Personal interest in any contract with HRSD other than the employee's own employment contract is prohibited. Where such interest pre-exists, it shall be disclosed and the Commissioner or employee shall refrain from voting on or acting on behalf of HRSD in any manner in relation to the contract.

Participation in a transaction with HRSD if the employee has a personal interest in the transaction is prohibited. Such interest shall be disclosed and the Commissioner or employee shall refrain from voting on or acting on behalf of HRSD in any manner in relation to the transaction.

Engaging in transactions (beyond those associated with connection, payment or maintenance of a sewer service account or related activities available to all HRSD customers) with HRSD for a period of six months post employment or appointment is prohibited.

Food, beverages, mementos, entertainment or the cost of admission may be accepted when such a Gift is accepted or received while in attendance at a Widely Attended Event and is associated with the event. Commissioners and employees in HRSD Positions of Trust must disclose Gifts received at Widely Attended Events in excess of \$100 pursuant to Section 4.0.

Gifts received without specific recipients identified shall be returned whenever practicable. If not practicable to return, perishable gifts may be shared with the entire work center. Non-perishable gifts shall be collected and distributed to local charities as appropriate.

#### **4.0 Procedures**

HRSD Commissioners and employees in HRSD Positions of Trust as defined herein shall file disclosure forms as specified in the *Code of Virginia* prior to assuming his or her position and then annually as required. The report on the previous 12 months from January 1 to December 31 may not be dated or filed prior to January 1.

- Commissioners shall file the form found in Virginia Code § 2.2-3118
- Employees in HRSD Positions of Trust shall file the form found in Virginia Code § 2.2-3117

**COMMISSION ADOPTED POLICY**  
*Ethics*



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- Employees who are designated as "Acting" in a Position of Trust in excess of 60 days shall file the form found in Virginia Code § 2.2-311 prior to assuming his or her position. Employees in an "Acting" position at the time of the filing deadline shall also file the required forms.
- Any disclosure forms to be filed with HRSD shall be maintained by the Commission Secretary as public records for a period of five years.
- This policy is effective beginning January 1, 2016.

**5.0 Responsibility and Authority**

This policy shall be reviewed annually by the Operations and Nominations Committee and revised as required to conform to current law and regulations and changes in positions designated as HRSD Positions of Trust.

Approved:

Handwritten signature of Frederick N. Elofson in black ink.

Frederick N. Elofson, CPA  
Commission Chair

6/27/17

Date

Attest:

Handwritten signature of Jennifer L. Cascio in black ink.

Jennifer L. Cascio  
Commission Secretary

6/27/17

Date