

## 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 with all applicable laws and regulations governing ethics and conflicts of interest. **This policy is applicable to all HRSD employees.**

## 2.0 Definitions

**Conflict of Interest** – A situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.

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

**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 or event coordinator
- 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
- Travel, lodging, meals, activities and logo clothing and related similar items associated with recruitment activities for permanent employment outside of HRSD while employed in an intern position

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

***Intern Positions*** – On-the-job experience for high school students, college and university students, or post-graduate adults, hired on a part-time seasonal or part-time temporary basis.

***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.

***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, (ii) who are from a particular industry or profession, or (iii) who represent persons interested in a particular issue. Golf outings are never considered a widely attended event or a part of a widely attended event.

### **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.

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 or benefit from 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 where the employee has a personal interest in or may benefit from 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 (excluding those associated with connection, payment or maintenance of a sewer service account or related activities available to all HRSD customers) with HRSD is prohibited for a period of six months post employment or appointment (excluding employees in intern positions).

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.

Gifts received without specific recipients identified shall be returned whenever practicable. If return is not practicable, 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**

This policy shall be communicated and provided to all HRSD Commissioners and employees upon commencement of appointment/employment and an acknowledgement of such shall be retained permanently in each employee's personnel file [Enterprise Resource Planning (ERP) System]. Commissioners' acknowledgements shall be retained by the Commission Secretary.

HRSD Commissioners or employees who have a personal interest in a company doing business with HRSD, or believe they have any other conflict requiring disclosure, shall disclose those interests immediately upon discovery of the personal interest in a company doing business with HRSD or other potential conflict. The Conflict of Interest Disclosure Form will include name and address of company doing business with HRSD, name and position of person at the company, as well as start and end date of the conflict.

HRSD Commissioners or employees who receive gifts at widely attended events that exceed \$100 in value shall disclose those gifts within 60 days of receiving a qualifying gift. The Gift Disclosure Form will include the name of the company/vendor giving the gift, estimated value and date received.

Employee disclosure forms will be available in the ERP system. HRSD Commissioner disclosure forms shall be obtained through, filed with and retained by the Commission Secretary. All disclosure forms may be reviewed by legal counsel.

Training on the Ethics Policy shall be provided to all HRSD employees on a biannual basis with records of attendance maintained in the ERP system. Training on the Ethics Policy will be provided to HRSD Commissioners at time of appointment and periodically thereafter.


**COMMISSION ADOPTED POLICY**  
*Ethics*




Adopted: October 27, 2015	Revised: March 26, 2019 Effective: April 1, 2019	Page 4 of 4
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**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.

Approved:  3/26/19  
Frederick N. Elofson, CPA  
Commission Chair  
Date

Attest:  3/26/19  
Jennifer L. Cascio  
Commission Secretary  
Date