



CONNECTICUT DEPARTMENT OF TRANSPORTATION

POLICY STATEMENT

POLICY NO. F&A-10A
July 7, 2016

SUBJECT: Code of Ethics Policy Supplement

This policy supplements and reaffirms the Department's Code of Ethics Policy (F&A-10).

In order to establish and maintain high standards of integrity and quality of performance for all employees, it is the policy of the Department that all employees immediately disclose situations where the employment of one of their family members could conflict with the employee's role for the Department. To implement this policy, each employee was expected to have completed the Family Member Employment Disclosure Form (attached) by November 1, 2015, or thereafter all new hires complete the form upon being hired. Department employees are required to send the completed Family Member Employment Disclosure Form to Human Resources and give a copy to his/her manager.

After completing an initial Family Member Employment Disclosure Form, there are three other situations that will require an employee to fill out a new Family Member Employment Disclosure Form, as follows:

- The Department employee changes jobs or units, if the change could trigger a conflict of interest with the employee's family members' employment;
- The Department employee is assigned to work on a matter which involves the employer of one of his/her family members;
- The Department employee learns that one or more of his/her family members has had a change of employment which could create or eliminate a conflict of interest. This includes: (1) a change of the family member's role for his/her employer, such as a promotion to an officer, director, partner or principal with the firm; (2) the family member obtaining employment with a contractor, consultant or vendor that is doing business with, or seeking to do business with, the Department; and (3) the family member leaving his or job with a Department contractor, consultant or vendor.

If an employee has a change in supervisor, it is the employee's responsibility to share their current Family Member Disclosure Form promptly with their new supervisor.

Disclosure shall be made on the attached Family Member Employment Disclosure Form at the time the employee learns of the basis for disclosure. For purposes of this Policy and completion of the Family Member Employment Disclosure Form, the term "family member" is broader than other Department policies and includes the employee's spouse or domestic partner, child (including stepchild), brother, sister (including stepbrother, stepsister, half-brother, and half-sister), mother, father, or brother-in-law, sister-in-law, mother in-law, or father-in-law (collectively "family member").

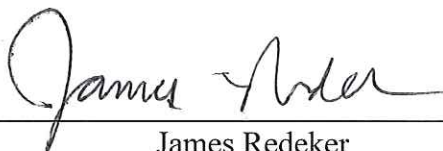
Department employees must disclose when any family member is working for a contractor, consultant or vendor that is doing business with, or seeking to do business with, the Department of Transportation. This disclosure is required whether or not the family member is actually working on any matter involving the Department.

Upon receipt of a disclosure form revealing that a Department employee's family member is working for a firm with which the employee is expected to work in his/her state job, the employee's manager will consult with the Department's Ethics Compliance Officer, or her designee, and a representative of Human Resources, and together they will make a determination about whether the Department employee may continue to work on the matter involving his/her family member's employer and document the reasons for such decision. The Department employee's ability to continue to work on that project will depend on what the Department employee's role in the matter is and the family member's ability to obtain financial gain as a result of the matter involving the Department.

If the employee is permitted to work on a matter involving the employer of his/her family member, that determination shall be revisited if circumstances of the employee's role in the matter *or* the role of his/her family member changes. Such manager shall consult with the Ethics Compliance Officer's Designee (Alice M. Sexton) and a representative of Human Resources to document any change in circumstances and/or any change in decision.

The Department expects that all employees will comply with all laws and policies regarding ethical conduct. Violation of the law may subject an employee to sanctions by the Department and/or authorities outside the Department. Whether or not another authority imposes such sanctions, the Department retains the independent right to review and respond to any alleged ethics violation by its employees. Violations of this policy or any ethics policy or statute, as construed by the Department, may result in disciplinary action up to and including dismissal from State service.

(This Policy Statement supersedes Policy Statement No. F&A-10A, dated 09/01/15.)



James Redeker
Commissioner

Attachment

cc: Office of State Ethics

**DEPARTMENT OF TRANSPORTATION
FAMILY MEMBER EMPLOYMENT DISCLOSURE FORM**

For purposes of Policy Statement No. F&A-10A and this Form, the term “family member” is broader than other Department policies, and includes a Department employee’s spouse or domestic partner, child (including stepchild), brother, sister (including stepbrother, stepsister, half-brother, and half-sister), mother, father, brother-in-law, sister-in-law, mother in-law, and father in-law.

In accordance with Policy Statement No. F&A-10A, I hereby advise the Department that to the best of my knowledge:

1. I have no family member who is employed by a contractor, consultant, or vendor that does business with, *or* is seeking to do business with, the Department (collectively “Contractor”), and so signify by checking this box and signing below:

OR

2. A. One or more of my family members are employed by a Contractor (as defined immediately above in no. 1) as disclosed below:

Name of Family Member	DOT Employee’s Relationship to Disclosed Family Member	Name of Contractor, Consultant, or Vendor	Family Member’s Title or Role at Contractor, Consultant or Vendor

2. B. (Check one) As of today’s date (when signed below):

- a. _____ I am working on a matter that involves one or more of the employers of my family member disclosed above.
- b. _____ I am **not** working on a matter that involves one or more of the employers of my family member disclosed above.

I understand that the filing of this Disclosure with the Office of Human Resources, and a copy with my manager, does not relieve me of any obligations I have to comply with the Code of Ethics for Public Officials.

Signed: _____ Date: _____

Employee’s Printed Name: _____

Supervisor’s Printed Name: _____

ORIGINAL TO BE FILED WITH HUMAN RESOURCES AND A COPY TO BE GIVEN TO AND KEPT ON FILE BY THE EMPLOYEE AND THE EMPLOYEE’S MANAGER