NORTHWEST OREGON WORKS	**POLICY B02: CODE OF CONDUCT**
	EFFECTIVE DATE: 5/19/2016
	❒ **NEW** ☒ **REVISED**

PURPOSE
This Code of Conduct implements and interprets State and Federal requirements governing Northwest Workforce Development Area.

EFFECTIVE DATE
This policy shall take effect upon adoption by the Northwest Oregon Workforce Consortium (NOWC) and the Oregon Northwest Workforce Investment Board doing business as Northwest Oregon Works (NOW or Workforce Board).

DEFINITIONS
The term "immediate family" means a spouse, parent, in-law, guardian, child, brother, sister, foster child, grandchild, grandparent, or other person to whom the official is not related but who resides in the same household. The relatives listed above need not reside in the same household to be included as immediate family.

TRUST
Officials shall treat their position as a public trust.

A. NOW powers and resources are to be used for the benefit of the public rather than for personal benefit.

B. Officials shall establish and implement policies in good faith, as equitably and economically as possible, regardless of their personal views.

C. "Whistle blowing" is appropriate in the event of unlawful or improper actions. Anyone who observes significant unlawful or improper actions by an official is expected to report them. Customarily, the actions are reported to the official's supervisor. If the supervisor appears to be involved in the improper actions, the report can be made to a higher level, to the NOW's Executive Director or to the Chairs of NOW and NOWC. It is improper to harass or punish individuals who seek accountability through whistle blowing.

D. Citizens shall have a fair and equal opportunity to express their views to officials. Often it is impossible for an official to talk personally with every concerned citizen, but obtaining an appointment or a chance to speak at a Workforce Board meeting should not appear to depend upon friendship or animosity.

E. Officials shall not give the appearance of impropriety. Officials should not accept any personal gift, meal or entertainment valued at $50.00 or more. The official should consider the decisions he or she may have to make and shall exercise conservative judgment. The key question for an individual official is, "By accepting this gift/meal/entertainment am I giving preferential treatment to the gift giver, or am I giving the appearance to reasonable people of giving favor to the individual?" If the answer is "yes" to either question, then the official should not even accept a gift below the $50.00 threshold.

   Officials may accept gifts for the benefit of the NOW, and may be guests at conferences or other work-related activities. For example, gifts as part of a company grant or giving program should be accepted, and shall become the property of the NOW. Gifts for employee awards, volunteers, and community cooperation are allowed. Donations to NOW programs are also allowed and encouraged.

F. Officials shall devote NOW resources, including paid time, equipment, computers, supplies, and capital assets, to the public benefit. Time paid for by funds is intended only for NOW business. Supervisors should not ask subordinates to perform personal services. Office supplies are for NOW use only.

   NOW may adopt procedures allowing for limited personal photocopies and telephone calls to be made under specified circumstances. This procedure may also permit limited completion of personal tasks on computers.

   Officials should not use NOW letterhead or refer to their public position when requesting personal benefits or resolving personal disputes.

OBJECTIVITY

All NOW decisions shall be based on the merits of each issue. Judgment shall be independent and objective.

A. Officials shall avoid bias or favoritism, and shall respect cultural differences as part of decision-making and the conduct of workforce area business.

B. Intervention on behalf of constituents or friends is limited to assuring fairness and clarifying policies or improving service to citizens. Officials should avoid giving citizens any reason to believe they would receive better or different services if they had a personal connection with the official.

ACCOUNTABILITY

Open government allows citizens to make informed judgments and to hold officials accountable.

A. Officials shall exercise their authority in open meetings supported by public records subject to the normal and usual exceptions, including but not limited to 1) pending or threatened litigation, 2) personnel decisions, and 3) contract negotiations where disclosure of the NOW's position may inflate costs.

B. Each official is encouraged to improve NOW systems by identifying problems and proposing improvements. NOW employees who believe a policy or practice is not achieving its stated purpose, is creating unintended harm, or is inefficient, should express such concerns to their supervisor and should suggest possible improvements. NOW managers should share "big picture" information with their subordinates and reward suggestions for improvement.

C. NOW systems shall be self-monitoring, with procedures in place to ensure appropriate actions. Managers should make sure their practices for purchasing, contracting, and hiring include routines that elicit fair choices and assure protection of assets. Such routines include checklists, separation of duties, bank account reconciliations, and reports to management.

D. Any official's immediate family shall not receive preferential treatment in employment or in the receipt of workforce services. NOW's service providers shall adopt and shall comply with nepotism provisions no less restrictive than this paragraph.

E. No official shall also be a workforce area contractor, subcontractor or vendor without full disclosure and authorization from NOW. This section shall not apply to Workforce Board members who 1) are salaried officials for public or nonprofit entities, or who serve on the boards of such entities, and 2) who provide vendor services to workforce area clients utilizing the same rates as for the general public. For example, the Workforce Board need not approve Community College tuition arrangements merely because a Community College President sits on the Workforce Board.

F. NOW's Executive Committee may not represent, serve on the board of, or work for a public, private for profit or nonprofit workforce contractor or subcontractor. Workforce Board members should be especially careful to disclose and avoid conflict of interest situations.

LEADERSHIP

A. Officials shall obey both the letter and the spirit of all laws and regulations.

B. Leadership shall facilitate, rather than block, open discussion. Officials have an ethical obligation to avoid behavior such as strained interpretation of rules, refusal to return telephone calls to a specific person, or arbitrarily delaying a decision.

C. NOW units, committees and work/action teams are encouraged to develop Code of Conduct training, and enforcement procedures.

INFORMAL OR FORMAL OPINIONS

An informal or formal opinion concerning a given conflict of interest or ethical situation may be requested. Such requests should be directed to NOW's Executive Director or, if the situation involves the Executive Director, to the Workforce Board or the NOWC Chair.

SANCTIONS

Officials are subject to sanctioning by vote of NOW or NOWC, up to and including dismissal. Individuals and entities may also be barred from doing business with the NOW.

NOW employees and contractors are also subject to sanctions under the appropriate procurement and personnel policies and contract provisions. To the extent that this Code of Conduct and NOW's procurement and personnel policies or contract provisions overlap or are perceived to conflict, the most restrictive interpretation shall apply.