



## Ethical Leadership FAQs

FREQUENTLY ASKED QUESTIONS (FAQs)	RESPONSE
<p>May public employee or official have an outside business or employment?</p>	<p><b>Yes, provided that outside business or employment does not have contracts with government they serve. If it does, person will need to request a waiver and confirm that there is no conflict of interest or incompatibility. Sec 40-4(a)(1-4)(c)(1)(2)(7). Also must request approval for outside employment.</b></p>
<p>Must I identify myself when I make an ethics allegation?</p>	<p><b>Yes. The ordinance requires that you submit your complaint in writing, provide your name, address, phone number and sign before a notary. The form is available on the website. You can also request an advisory opinion if you have a question re: conduct and the ordinance. This request can be anonymous and can be made on the website, waynecounty.com. When you open website, click on Ethics Board, and click Complaint to obtain form or Contact to ask question. Sec 40-7(c)(1).</b></p>
<p>Can I get in trouble for filing an ethics complaint?</p>	<p><b>No. The policy prohibits the County from discharging, threatening, or discriminating against you because you file a complaint, because you are preparing to file a complaint, or because you participate in the investigation of a complaint. However, the policy also prohibits filing a complaint to harass or injure another public employee, or filing a complaint (or helping someone else file a complaint) that is untrue - the County will not defend you from a lawsuit for slander or libel if you file or help to file a complaint in those circumstances. Sec 40-7(d); Sec 40-8.</b></p>
<p>I'm a county employee who deals with residents every day. One of my regular customers brings me a Meijer gift card for</p>	<p><b>No. You cannot accept a gift of any value given to you because of the way you perform your duties as a public employee. This</b></p>

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excellent service. Can I accept the Meijer gift card? How about a bottle of wine?	includes “thank you” gifts. Sec 40-4(b)(1). <b>No.</b>
If offered a job, can I go work for a current County vendor?	<b>Depends. See Sec 40-4(a)(1-4) addressing Conflict of Interest and Sec 40-4(c)(1-7) addressing Incompatible Employment. If he or she is a county elected officer there are restrictions or unless granted a waiver, a public servant who is on the contract managers list shall not be nor agree to become the paid employee of or independent contractor to a county business.</b>
Can a vendor give me tickets (i.e. Tigers, concerts) as a gift?	<b>No. Unless you pay fair market value for the tickets or if they are complimentary tickets or admission to events in support of non-profit or charitable organizations. Sec 40-4(b)(1)(2)(a-k).</b>
If invited to a Holiday Party by a vendor, may I attend?	<b>Must consider circumstances of the invitation. Anything provided by an individual on the basis of a personal friendship should be OK unless the public servant has reason to believe the benefit is being provided because of the employment position of public servant. Must consider: (1) history of relationship, (2) is this a business event that vendor claims tax deduction or reimbursement or personal, and (3) is invitation provided to others in same position. Sec 40-4(b)(1)(2)(a-k).</b>
Am I allowed to answer questions that my friends or neighbors may have about how to do business with the County?	<b>County employees are prohibited from discussing information that is not a matter of public knowledge. You can discuss your general knowledge about County procedures, processes, and practices that you’ve learned as a result of being a County employee. Sec 40-3 (“confidential information” defined).</b>
I work at the Guardian Bldg. and I just learned that my spouse’s grandfather is the sole owner of a janitorial service and is bidding on a County cleaning project on the other side of the City. Is this an issue under the policy and is there any action I should take?	<b>Your spouse’s grandparent is a “relative” under the policy. Grandpa has a “substantial financial interest” in the janitorial service because he is the sole owner. You would have a conflict of interest in the bidding – you could not participate on the selection committee to award the contract, you should</b>

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	not discuss the bidding with anyone, and the policy requires that you advise your supervisor. If the contract is awarded to your spouse's grandfather, you would have to disclose that on your annual disclosure form. Sec 40-3 ("relative" and "substantial financial interest" defined); Sec 40-4(a).
What is the separation of political/campaign activity and Wayne County activity? Should the two be completely separate?	Yes, the two are completely separate. A public servant is prohibited from engaging in political campaign activities during hours for which public servant is paid by County. Sec 40-4(g)(1-4). The ordinance provides penalties for violating this prohibition.
Who is the ombudsman for reporting Ethics issues or potential violations?	Ethics questions can be sent directly to the Ethics Board via the website requesting an advisory opinion if a public servant has a concern regarding their conduct. Go to waynecounty.com, click Ethics Board icon. This request can be anonymous. Ethics complaints can be filled out on a form from the website and notarized before filing with the Board. The Wayne County Ombudsman can be reached at 313-224-0846 for general questions or requests for assistance. The Wayne County Prosecutor has a hotline for reporting criminal violations at 313-224-8477.
I receive an unsolicited email at work encouraging me to support a candidate for public office. Can I forward this email to several of my friends to solicit support for the candidate?	No. Sec 40-4(g)(1-4) prohibits you from engaging in political campaign activity during hours when paid by the county. There are penalties for violating this section.
What are the penalties for violating the Ethics Ordinance?	Sec 40-10(a-d) provides that criminal and civil penalties apply under state law for violations of state law as well as a civil infraction punishable by fine of \$500 and costs. In addition, disciplinary action including censure, reprimand, removal, dismissal, or discharge are possible.
I am a huge music fan. A vendor offers me two tickets to my favorite concert, valued at \$250 each. Can I accept these tickets if I pay market value for them?	Yes. Sec 40.4(b)(2)(c) exempts from gift restrictions anything for which the public servant pays fair market value for.

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In a competitive bidding process, a bidder asks me for guidance of how low its bid must be to be selected. Do you need to report this inquiry to anyone?	<b>It is a conflict of interest if you use confidential information for this person's benefit. Sec 40.4(e)(1-3). To protect yourself, you should advise the bidder to contact the Director of Purchasing and to disclose this request to your supervisor.</b>
Does the Ethics Ordinance require disclosure of gifts from vendors to family members of employees?	<b>Employees are not allowed to accept a gift from another person for themselves or for a relative or domestic partner. The employee should disclose to supervisor and/or ethics board if gift is given to family members to influence decision or because of position of employee. Sec 40-4 (b)(1)(2)(a-k).</b>
Can I have lunch with a vendor?	<b>Yes. However, food or refreshments are allowed but not more than \$75.00 per person per transaction, or \$150.00 total per year from any one business or concessionaire. The food or refreshments must be consumed on premises where purchased, prepared or catered. Records should be kept to document these meals. Sec 40-4(1)(2)(f).</b>
A vendor offers to pay my travel costs and/or hotel and food to attend a trade conference sponsored in part by the vendor and its organization. May I attend?	<b>No. Gifts and gratuities are prohibited. The exception is if the event is related to official business of the county in connection with the event and the public is invited. Sec 40-4(1)(2)(j).</b>
A vendor at a health care conference provides free calendars and book bags with the name of the vendor's organization. Can I accept these?	<b>If these materials have only nominal value (not more than \$75.00 per person per transaction, or \$150.00 total per year from any one business or concessionaire) then it would be acceptable as long as unsolicited. See Sec 40-3("nominal value" defined); 40-4(1)(2)(h)(k).</b>
How do I know who is a lobbyist? Can I go to lunch with a lobbyist? What should I be careful about when talking to a lobbyist?	<b>A lobbyist is an individual retained or employed to induce or influence county decisions made by employees. An existing county vendor could be lobbyist. All lobbyists are required to register with the Ethics Board and employees are required to verify with the Board that the lobbyist is registered before continuing conversations with them. The employee should document these</b>

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	conversations and not discuss anything that is not a matter of public knowledge. Except for food and beverages expenses that cannot exceed \$100.00 annually, all other monetary or non-monetary gifts or gratuities are prohibited. Sec 40-3(definition of a "lobbyist"); Sec 40-6(a-c).