Purpose
To guide division staff in avoiding conflicts of interest and to establish formal procedures for review of situations in which such conflicts may arise.

Related Policies
Department of Human Resources Policy 5.2: Conflicts of Interest Arising From Employment
Department of Human Resources Policy 5.6: Employee Conduct
Department of Human Resources Policy 5.7: Political Activity
Department of Human Resources Policy 11.5: Income from Outside Sources (Moonlighting)
Department of Human Resources Policy 11.6: No Solicitation Policy

Policy
This policy applies to all employees of the Family Services Division, including: full time, part time, interim, limited service, temporary, and permanent positions. The policy does not apply to contract employees of the department or division unless specifically noted.

All division employees should be aware of situations in which conflicts of interest may arise, or could be perceived to arise, and take steps to minimize that conflict. Employees will discuss any questions about conflict of interest with their supervisor.

Examples of conflict of interest situations include:
- Engaging in activities that are, or could be, in conflict with assigned duties as a state employee (either due to the nature of activity or its interference with carrying out duties as a state employee);
- Using one’s position as a state employee to benefit from information or advantage decision-making authority over a person or an issue;
- Having a personal interest in any business transaction within their sphere of interest in state government; or
- Having a private business relationship that conflicts with their public duties.

When a conflict of interest waiver is required by this policy (described below), the employee will request a waiver and abide by the decision.
Income from Outside Sources (Moonlighting)

Employees in the classified service shall not have a personal interest in any business transaction within their area of influence in state government nor shall they have any private business relationship that may conflict with their public duties. This does not prohibit the following:

- Participation in the affairs of charitable, religious, non-profit education, public services, political, or civic organizations; or
- Awards for meritorious public contributions given by public service or civic organizations

Employees who participate or volunteer time to such organizations will take steps to minimize any conflict of interest that may arise. For example, employees who volunteer their time to a local board of a non-profit agency should excuse themselves from discussions of actual or potential contracts with the department or division.

Employees considering outside employment should consult with their agency/department personnel officer after first receiving approval from the Deputy Commissioner of the Family Services Division. With approval of the Deputy Commissioner, the personnel officer should then consult with Employee Relations Division of the Department of Personnel before commitments are made by employees.

Acceptance of Honoraria

Speeches and presentations which are related to state business and are delivered by a state employee to community and professional organizations will be made without charge. Employees may receive compensation or honoraria paid for public appearances or services unrelated to their official duties. Compensation or honoraria paid to the employees for teaching or for appearances related to the employee’s official responsibilities may be accepted if approved by the Deputy Commissioner of the Family Services Division.

Personal Relationships

Employees will not engage in personal relationships with clients, including dating and sexual relationships. Employees will carefully consider the potential conflict of interest, real or perceived, that may be created through any relationship they may have with former clients. Employees will consider the impact this conflict of interest may have on their current ability to perform their work-related duties. Employees will avoid personal relationships with employees they supervise, as such relationships may create an actual or perceived conflict with assigned duties.
It is the general policy of the state that no one will be employed in the same department, institution, or organizational unit that employs a relative. In addition, it is the general policy of the state that no one will be employed in the same department, institution, or organizational unit as a person with whom he or she resides, or the relative of a person with whom he or she resides.

If the following situations exist or become true, this information must be shared with the employing department/division:

- Employees become the relative (by marriage or civil union) of another employee;
- Employees become the domestic partner of another employee; or
- Employees begin to reside with another department employee.

They will not be required to leave state employment solely as a result of that change in circumstances.

Employees requesting a waiver of this general policy must make the request to the Family Services Division Deputy Commissioner. If approved by the Deputy Commissioner, the Deputy Commissioner will make a request for a waiver to the Commissioner of Personnel.

**Care of Children in DCF Custody**

The division is responsible for taking steps to ensure decisions about the placement of children and youth are made in a manner that does not place parents and caretakers at a disadvantage or create a conflict as the division works toward reunification.

Family Services Division employees may not provide care in their homes for children in DCF custody. Employees may not have children in DCF custody in their homes for any purpose related to their employment.

Children in DCF custody will not be placed in foster care, kinship care, or respite care with the employees of DCF Family Services Division co-located contractors or other contractors with a close working relationship with the office that may create an actual or perceived conflict of interest.

The Family Services Division Deputy Commissioner may grant waivers of this policy in exceptional circumstances. Employees or contractors granted a waiver may receive compensation according to the applicable policies. A district office other than the one in which the person is employed or works will provide casework services to support the child’s placement.
Foster Parents Hired as Division Employees or Contractors

Foster parents who are hired as state employees or contractors by the division may maintain their license and continue to foster the child/youth presently in their home. The division will not make any additional placements with this foster parent while they are employed by the division or as a contractor with the division.

Foster Parents Employed by Other Divisions of the Department

Division staff will notify their assigned policy and operations manager when placing a child or youth in DCF custody into the home of other department staff (ESD, CDD, OCS, OEO, and DDS).