



Office of
Ethics and
Compliance

Code of Ethics

Helping you stay on the right path.

Revised January 2019

VISION

To be the premier community where people choose to live, work and play.

MISSION

The Mission of Sarasota County Government is to be the most livable and best managed community in the country, providing quality services, programs, and facilities that reflect the goals of the community.

VALUES

As Sarasota County employees, WE are committed to demonstrating each one of these values at all times.

RESPECT

WE demonstrate mutual respect through our professionalism, courtesy and appreciation for diversity.

ACCOUNTABILITY

WE are individually and collectively responsible for our actions as stewards of the public's trust.

INTEGRITY

WE adhere to ethical principles, demonstrating mutual respect and conducting ourselves with honesty and sincerity.

QUALITY

WE take pride in providing quality public service with passion, innovation and excellence.

TEAMWORK

WE foster a collaborative environment that values creativity, sharing information and ideas, and working together to solve problems and accomplish goals.

TRUST

WE seek mutual purpose, honor commitments, and use our skills, knowledge and abilities in a way that builds confidence and loyalty.

A Message from the County Administrator

From the firefighters and lifeguards who keep us safe, to the librarians who help us discover new worlds and the historians who preserve Sarasota County's past, county employees have been working since 1921 to make this an award-winning community. Early founders like Bertha Palmer and John Hamilton Gillespie understood what a special place this is, and many modern residents continue to rank their quality of life here as excellent.

Sarasota County Government is the caretaker of an important legacy. We are entrusted with the public's welfare, safety and quality of life; and we are accountable for ensuring that the public receives our highest quality service. We must also ensure that we merit their trust, and strive to have the best interests of the county and the public in mind when acting in our official public capacity. This requires self-reflection, empathy and moral reasoning.

Sarasota County's Code of Ethics helps guide our decision-making as we administer the county's resources on behalf of the residents and visitors who rely on us. Because the guide may not answer every question you have, the Ethics and Compliance Office (ECO) is just a phone call or email away. You should feel free to discuss the provisions contained in the code with your supervisor and/or the ECO.



WHEN IN DOUBT, **REACH OUT!**

Office of Ethics and Compliance



Ethics and Compliance Officer

Bonnie Silvestri

Ethics and Compliance Helpline:

941-861-5858

A PUBLIC TRUST



Sarasota County Commission employees are agents of the public they serve and hold their positions for the benefit of the public. To promote the public interest and maintain the public's trust, employees must:

- (a) Dedicate themselves to effective and democratic local government by responsible leadership and professional management of county business at all levels.
- (b) Maintain a constructive, creative, and practical attitude toward local governmental affairs and a deep sense of social responsibility as a trusted public servant.
- (c) Comply with all federal, state and local laws and regulations, contractual obligations, as well as policies established by the county commission and county administrator.
- (d) Be responsible stewards of the taxpayers' funds by always using county funds and resources in the most efficient, effective manner possible.

“You will never be lonely on the right path because the truth itself is the best companion a person can ever have!”

— Mehmet Murat ildan

MISUSE OF POSITION

It is prohibited for any county employee to use or attempt to use his/her position, or any property or resource, that may be within the employee's trust, to secure special privileges, benefits or exceptions for the employee or others.

We're citizens too

You should have the same expectations of excellent service as anyone else when using county resources. Be a good steward of taxpayer resources.

Perception is reality

Be careful to avoid even the **appearance** of misuse of county resources for your own benefit.



Q&A

Q: If I have a side business as a real estate agent, can I hand out my county business cards to potential clients?

A: No. You also may not email county contacts regarding your outside real estate business.

UNAUTHORIZED COMPENSATION



No employee or employee's spouse or minor child shall, at any time, accept any compensation, payment, or thing of value **when the employee knows, or with the exercise of reasonable care should know** that it was **given to influence** an employee's official actions.

Well done!

Citizens often want to thank employees for a job well done. If offered, politely refuse a tip or thank-you gift. An email or phone call to your supervisor is a good way for them to express their appreciation.

Q&A

Q: A vendor whose contract I manage has offered me a part-time job with the firm. May I accept it?

A: No. Accepting this position would create the appearance that the vendor offered you the position to influence your judgment in managing the contract, regardless of whether that was the vendor's intention.

GIVING AND RECEIVING GIFTS

What kind of gifts can I receive?

It is okay to accept gifts such as t-shirts, pens, trade show bags, drawings or raffles, and all other “trinkets” at county-sponsored or approved events, provided that the items are offered to all attendees.

County employees or their family members may not accept any compensation, payment, or thing of value when the employee knows, or should have known, that it was given to influence an employee’s official actions. (See Administrative Directive 9.06).

Discounts may be okay.

HOT TIP!

As long as a discount is available to **all employees, it is acceptable.** If you are offered a discount, be sure to fill out the form on the Ethics and Compliance portal of EmployeeNet (Employee Discount page), and check back regularly to learn about other employee discounts.

Q&A

- Q: I have a free work-related event coming up where lunch is provided to all attendees. Can I accept lunch at the event?
- A: Yes. You may accept food and beverage at a meeting, conference or event where attendance is in the county’s interest and it would assist in your official duties. Gift questions are not always clear, so when in doubt, reach out!

MISUSE OF CONFIDENTIAL INFORMATION

No employee shall disclose or use information for personal gain or benefit (or for the personal gain or benefit of any other person or business entity), if that information is not available to the general public, and was gained by reason of the employee's official position.

You may not use confidential information to benefit yourself or others.

Even after leaving county employment, you may not share information deemed confidential if you learned it by virtue of being a county employee.

Protect confidential information

You may have access to social security numbers, medical information, home addresses and personal financial information. **Always be alert that this confidential information must be strictly guarded.**



Q&A

Q: Can I tell a friend who is a regular vendor for the county that a bid is coming out and what the county is looking for, so he or she can provide the lowest bid?

A: No. This would give your friend an unfair advantage over other bidders. You can't use your position for the benefit of another person or business.

POLITICAL ACTIVITIES

Participating in political activities is a fundamental principle of a democratic society, and county employees are encouraged to participate in the political process. As representatives of the county, employees should use good judgment in exercising these rights. **Employees are prohibited from the following:**

- (a) Engaging in activities that could undermine public confidence in Sarasota County Government, such as campaigning while on duty or while dressed in official county attire or attire bearing a county logo, or using county email for political purposes. Additionally, employees must refrain from displaying buttons, signs, decals, or other support for a political party or candidate for public office, in their work space or on their person, during county business hours.
- (b) Running as a candidate as defined by Section 97.021 of the Florida Statutes, for elective public or political office while in the employment of the county.
- (c) Using the authority of their county position to secure support for or oppose any candidate, party, or use any promise of reward or threat of loss to encourage or coerce any employee to support or contribute to any political issue, candidate or party.

HOT TIP!

Use care with social media.

You may express political opinions in your personal social media account on your own time. Personal political views should not be expressed when speaking or writing as a representative of the county, including county social media accounts.

Q&A

Q: May I canvas my neighborhood with a petition to protect the wetlands near my home?

A: Yes, you are a citizen and are permitted to speak out on issues of importance to you; however, **you must** circulate the petition on your own time and in no way represent that you are speaking on behalf of the county. Be careful that you do not create the **appearance** that you represent the county **and above all** do not reveal any confidential information in your advocacy. Remember that the Ethics and Compliance Office is a great resource to help you make decisions related to political activities.

OUTSIDE EMPLOYMENT

Employees may not engage in outside employment during their assigned county business hours. They are strictly prohibited from using county resources, including but not limited to, county uniforms, computers or business cards on behalf of an outside employer, customer or client.

Employees may not have or hold any employment or contractual relationship with any business entity or any agency that is subject to the regulation of, or is doing business with their departments or divisions. Contact the Ethics and Compliance Office to discuss possible exemptions to this rule.

Employees may not have or hold any employment or contractual relationship that will create a continuing or frequently recurring conflict between their private interests and the performance of their public duties, or that would impede the full and faithful discharge of their public duties.

Complete an Outside Employment Form

Employees engaged in outside employment must complete an outside employment form. If you are unsure about whether you need to complete the form, contact the ECO.

**HOT
TIP!**

Your county job comes first.

You may accept outside work only if it does not conflict with regularly assigned county business hours or shifts.

Q&A

Q: I have been offered a part-time job to work two nights a week at a local department store. Can I accept the job?

A: Yes, provided that 1) you receive the proper approvals on the outside employment form; 2) the job hours do not conflict with your county job; and 3) you refrain from using any county resources when moonlighting.

PROHIBITED FINANCIAL AND BUSINESS INTERESTS



- (a) No employee shall have any interest, financial or otherwise; or directly or indirectly, engage in any business transaction or professional activity; or incur any obligation of any nature which conflicts with the proper discharge of the employee's duties in the public interest.
- (b) Any employee who is, or becomes, an officer, director, partner, proprietor, associate, or general agent or member of, or who owns or acquires a financial interest in any corporation, partnership, limited partnership, proprietorship, firm, enterprise, franchise, association, trust or other business entity, which is subject to the regulation of, or which has business transactions or commitments with the county, shall submit written notification to his or her manager and the Ethics and Compliance Office. This written notification shall disclose the nature and extent of the relationship and financial interest the employee holds with the entity.
- (c) No employee acting in an official capacity for the county shall, either directly or indirectly, purchase, rent or lease any realty, goods, or services from any business entity in which the employee or employee's spouse or child has an ownership interest more than 5 percent.
- (d) No employee, acting in a private capacity, shall rent, lease, or sell any realty, goods or services to the county.

Q&A

Q: Can my spouse who owns a landscaping company bid on a county contract?

A: Possibly, as long as you have nothing to do with awarding or overseeing the contract in your county position, and you seek approval from your supervisor and the Ethics and Compliance Office.

VOLUNTEERING AND FUNDRAISING

Volunteering/serving on not-for-profit boards/fundraising

- (a) Sarasota County is a charitable community that values service and volunteerism. Employees are encouraged to volunteer for not-for-profit organizations, including associations relating to their professions.
- (b) County employees must not use their position, county property, and/or county work time to benefit not-for-profit organizations or associations. In certain limited circumstances and **only with prior supervisory approval**, county employees may participate in volunteer activities during county time, provided the supervisor believes those activities, such as attending professional association meetings, are in the county's best interest.
- (c) County employees are **strictly prohibited from soliciting contributions** during work time on behalf of not-for-profit organizations or associations, other than United Way, which is a county-approved charitable organization.

Which code of ethics should I follow?

Many county employees are members of professional organizations that may have their own ethics codes. The Sarasota County Code of Ethics is a benchmark for your county employment. If you have stricter rules as a member of your profession, don't hesitate to contact the Ethics and Compliance Office with any questions about which to follow.



Q&A

Q: Can I ask my co-workers to sponsor me in a run/walk for United Way?

A: Yes, United Way is a county-approved charitable organization, so county employees may raise funds on its behalf. However, you should not solicit co-workers for other organizations, such as Girl Scouts or American Red Cross, while you are at work.

REPORTING ETHICS AND COMPLIANCE CONCERNS



- (a) You are encouraged to report suspected ethics or compliance concerns, waste or abuse of county resources to your supervisor, the Ethics and Compliance Office (the “ECO”) or both, depending on the circumstances.
- (b) The ECO is a neutral place ready and able to discuss any ethics or compliance concerns or issues of waste or abuse of county resources. The ECO will make every effort to maintain the confidentiality of the employee.
- (c) Employees making a report in good faith, or cooperating in an investigation, shall not suffer any form of retaliation.
- (d) Any suspicion of fraud should be reported directly to the Sarasota Clerk of the Circuit Court and County Comptroller, Internal Audit Department, Office of the Inspector General, or through the fraud hotline, toll-free at 855-506-0304. Reports may be made anonymously.

Any ethics and compliance concerns should be directed to **941-232-0744** or **ethics@scgov.net**.

“I think that ethical behavior is another feature of the kind of inner discipline that leads to a happier existence.”

– Dalai Lama

AUTHORITY AND ENFORCEMENT

- (a) Sarasota County Commission Resolution 2015-035 sets forth direction to the county administrator to facilitate a strategic and organization-wide system to ensure legal and ethical compliance in providing quality service and stewardship.
- (b) The Code of Ethics for public officers and employees as set forth in Part III of Chapter 112, Florida Statutes, applies to all employees and sets forth a baseline of requirements. Where the county Code of Ethics has stricter requirements, employees must adhere to this code. Additionally, county employees may have professional association or licensing ethics requirements, which may impose requirements beyond the county Code of Ethics.
- (c) Questions regarding compliance with the Code of Ethics are handled by the Ethics and Compliance Office, in consultation with the county attorney and Human Resources as needed. In most cases, violations of the Code of Ethics will be addressed by the department director with assistance from Human Resources. Where a violation has been found, discipline can range from corrective counseling to termination.
- (d) In addition to corrective action where there has been a violation of the Code of Ethics, it may be in the best interest of the county for the employee to engage in actions necessary to repair any harm resulting from the violation, such as apologizing to any injured party. Where there has been a violation of the public's trust, employees are required to take the necessary steps to attempt to regain public confidence.

**"Live so when your children think of
fairness and integrity, they think of you."**

– H. Jackson Brown, Jr.



**"Wisdom is knowing the right path to take.
Integrity is taking it."**

— M.H. McKee



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