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HONOLULU  
ETHICS COMMISSION  
RECEIVED  
October 22, 2014

Mr. Charles Totto  
Executive Director  
Honolulu Ethics Commission  
711 S. King St., Room 211  
Honolulu, HI 96813

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Dear Mr. Totto:

Re: Honolulu Ethics Commission Survey – 2014

We recently received a hard copy of the Honolulu Ethics Commission Survey 2014. Before such a survey is sent out to City and County of Honolulu employees, we would appreciate advanced notification and consultation. Such a survey affects employee-employer relations and is subject to consultation under Section 89-9 (c), HRS and Article 4 – Personnel Policy Changes of our collective bargaining agreements.

Many of the questions appear to assume that there are serious ethics problems within City government, which is uncertain. In addition, the questions do not provide clear definitions for the alleged ethics offenses that are supposedly occurring. Without readily understandable definitions and actual examples of questionable ethical conduct, employees may be reporting actions of their co-workers that are not violations of the ethics laws contained in either of the Revised Charter of Honolulu or applicable ordinances.

If the Ethics Commission had conducted a needs assessment to develop and improve upon its training and education programs, we would have no objection to such a survey. We strongly support the ethical conduct of official business by City employees. However, we do not agree with the approach encouraged by this survey. Co-workers turning each other in without the appropriate knowledge and analyzing the context of actions they may consider questionable can create unnecessary dissention and conflict in the workplace. Therefore, the emphasis should be on ethics training and education.

Specifically, how does the Honolulu Ethics Commission intend to use the information collected through the employee survey? For example, will you initiate an investigation based upon responses received from City employees as a result of this survey? Another concern is that the survey indicates the Honolulu Ethics Commission is unable to associate an employee's responses with their identity, but how can employees be sure of that protection? Apparently, the Ethics Commission can identify the department from which a survey was submitted.

We look forward to your response.

Sincerely,

Wilbert Holck  
Deputy Executive Director