

**WELCOME TO THE
ETHICS COMMISSION MEETING**

*As a courtesy and to avoid excessive
noise/feedback, please mute your microphone
except to testify.*



Date: October 21, 2020
Time: 11:30 a.m.
Webex: Meeting No. 268 451 616
(268451616 from phones, video
systems or join by phone
1-408-418-9388)

ORDER OF BUSINESS

I. Call to Order, Public Notice, Quorum



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II. NEW BUSINESS

A. Chair's Report

1. Announcements, Introductions, Correspondence, and Additional Distribution
2. For Action: Approval of Open Session Minutes of September 16, 2020
3. For Action: Approval of Executive Session Minutes of September 16, 2020



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II.B. EXECUTIVE DIRECTOR AND LEGAL COUNSEL'S (EDLC) REPORT

1. Staff Work Reports Summary
 - Sr. Clerks (2/part-time)
 - Legal Clerk III
 - Assoc. Legal Counsel
 - Pro Bono Interns (2/60 hrs each)



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II.B.1. POSITIONS – PENDING APPROVAL

- Asst. EDLC (create/fill)
- Assoc. Legal Counsel (create/fill)
- Private Secretary (create/fill)
- Administrative Specialist (create/fill)
- Investigator (create/fill)
- Training Specialist (create/fill)



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II.B.1. STAFF WORK REPORTS – HIGHLIGHTS SENIOR CLERKS

- CARES Act Funds procurements (2)
- Lobbyists – finishing annual reports; 2021 updates
- Financial disclosures – tracking filings w/ board, commission liaisons; 2021 updates; reviewing, supporting Clerk's Office disclosure process
- Training – completed final reviews of board, commission ethics training platform; DIT deployed
- Drafting SOPs for all processes, developing tracking system for paper-based forms



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II.B.1. STAFF WORK REPORTS – HIGHLIGHTS SENIOR CLERKS

- Updating, uploading website, docushare, social media
- Assisting meeting admin & doc prep, drafting minutes
- Completing advisory opinion compendium
- Assisting investigations (interviews, drafting memos, reports, exhibits)



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II.B.1. STAFF WORK REPORTS – HIGHLIGHTS LEGAL CLERK III

- Meeting administration, processing; managing EC schedule, UIPA log, log, pCard admin
- Updating website, posting newsletters, opinions
- Assisting investigation filings, drafting correspondence, memos, emails, other
- Managing front-office, phones, case/contact intake



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II.B.1. STAFF WORK REPORTS – HIGHLIGHTS INVESTIGATOR (VACANT)

- August 2020 – request to recruit/fill submitted
- Oct 2020 – request approved
- Dept. HR shared qualified list of applicants
- Tweeted, posted position on website



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II.B.1. STAFF WORK REPORTS - HIGHLIGHTS ASSOCIATE LEGAL COUNSEL

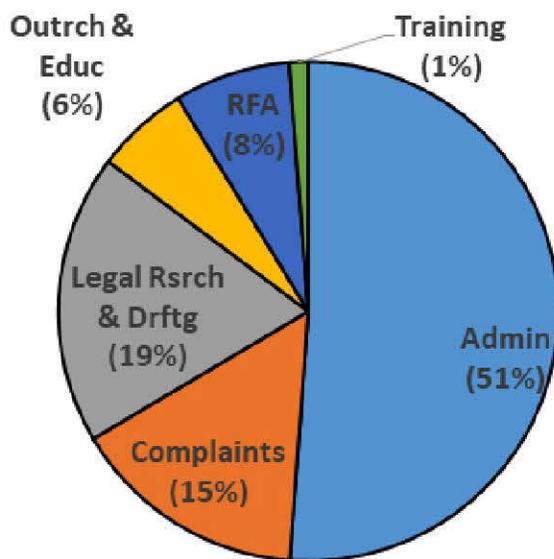
- Implementing online training w/IT
- Maintaining social media presence Twitter
- Investigating, prosecuting, managing complaints
- Hiring, supervising, directing volunteers
- Conducting legal research and drafting
- Providing legal advice



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II.B.1. STAFF WORK REPORTS SUMMARY ASSOCIATE LEGAL COUNSEL



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II.B.2. STATISTICS

a. Website Sessions

- August 2020 – 591 (424 users)
- September 2020 – 710 (504 users)



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II.B.2. STATISTICS

b. Financial disclosure filings

- Working w/ board, commission liaisons
- Reviewing forms, 2021 updates

c. Lobbyist registration, annual report filings

- 2019 annual report, 2020 registrations
- Reviewing forms, 2020 annual report and 2021 registration updates



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II.B.2. STATISTICS

d. Department and Agency Reports for FY19-20 (City's Annual Report)

- Final draft submitted
- Publication – pending



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II.B.3. BUDGET

- a. FY2021 Operating Budget Request
- City unsure of FY2021 budget revenue
 - Admin requested 5–10% cuts
 - ✓ Projected revenue shortfall
 - ✓ -0- transient accommodations tax (TAT)
 - ✓ Use fiscal discipline to re-examine operations
 - ✓ Salary reductions last resort, but not off table



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II.B.4. EDUCATION AND OUTREACH

- a. Ethics Training Program (FY19–FY20)
- Deadline extended to Dec. 31, 2020
 - Board/commission member training
 - ✓ DIT non-domain user interface deployed
 - ✓ Board/commission liaisons to deploy, track member training



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II.B.4. EDUCATION AND OUTREACH (cont'd)

b. E-Newsletter (*the Compass*), Twitter, Website

- Twitter statistics, highlights
(August 2020 to present)
 - ✓ Total tweets – 48
 - ✓ Profile visits – 176
 - ✓ Tweet impressions – 19,169
 - ✓ Followers – 269 (24 new)



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II.B.4. EDUCATION AND OUTREACH (cont'd)

b. E-Newsletter (*the Compass*), Twitter, Website

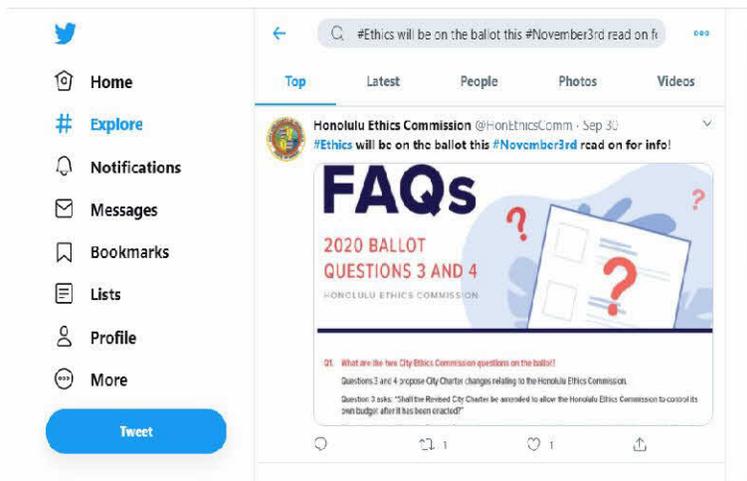
- Top tweets
 - ✓ Innovative #ethics newsletter @nyccoib
 - ✓ Albert Schweitzer Quote
 - ✓ #Ethics will be on the ballot



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II.B.4. EDUCATION AND OUTREACH (cont'd)



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II.B.4. EDUCATION AND OUTREACH (cont'd)

c. Poster

- Addresses known issues
- Posted in Dept. of Environmental Services (ENV), various locations
- Developing other posters to discourage behavior



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II.B.4.c. POSTER (NEW)

WARNING

IT IS ILLEGAL TO:

- Scavenge anything from City property
- Allow businesses to dispose waste for free
- Accept gifts
- Fundraise or conduct any personal business on City property
- Steal fuel, gas, or any other resource from the City
- Allow illegal dumping of any type of waste
- Deliberately delay work or increase your overtime hours by parking on the side of road to burn time
- Falsify or misrepresent records (timesheets, work logs, doctor's notes)



Report violations to the Integrity Hotline at
1-877-365-OAHU (6248) or www.honolulu.ethicspoint.com
 You do not need to leave your name.

BE AWARE OF THE CITY STANDARDS OF CONDUCT



Honolulu Ethics Commission
 925 Dillingham Blvd., Suite 150 | Honolulu, HI 96817
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www.honolulu.gov/ethics | @HonEthicsComm

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II.B.5. LEGISLATION AND ELECTION 2020

- a. Honolulu Ethics Commission's implied authority to inform the public about Charter amendments on a general election ballot
- b. FAQs: 2020 Ballot Questions 3 & 4
 - Cmmr. Kanda, EDLC, ALC, Pro Bono Intern
 - Posted on website, distributed via Webmaster



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II.B.5. LEGISLATION AND ELECTION 2020

- c. Advisement re: private donations for inaugural expenses, AO 2013-03
- Proactive not reactive
 - Letter sent to councilmembers-elect (2), candidates (10)



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II.B.6. EDUCATION OPPORTUNITIES

- a. Society of Corp. Compliance and Ethics (SCCE)
19th **Virtual** Annual Compliance & Ethics Institute (Sep. 14-16, 2020) – report
- b. Council on Governmental Ethics Laws 42nd
Virtual Annual Conference (Dec. 13-16, 2020) - registration open, free for Ethics Commission members, staff



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II.B.7. PERSONAL USE OF SOCIAL MEDIA BY CITY EMPLOYEES

FOR DISCUSSION:

- a. Personal use of social media by city employees policy (Hon. Dept. HR, June 17, 2019)
- b. Political Activity – Social Media Guide (Phila. Board of Ethics, September 7, 2020)



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III. EXECUTIVE SESSION DETERMINATION

A. For Discussion and Action:

Should the EC exercise its discretion to consider whether there is probable cause to believe that a city employee violated Revised Charter of Honolulu Sect. 11-104



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IV. EXECUTIVE SESSION

A. For Decision:

Whether there is probable cause to believe that a city employee violated Rev. Charter of Honolulu Section 11-104
[pursuant to HRS §§ 92-5(a)(2), 92-5(a)(4)]



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V. STRATEGIC PLANNING

A. Permitted Interaction Group (PIG) – Report on Gifts Research, No Gifts Legislation

- Chair Marks, VChair Monk, Cmmr. Suemori
- Gifts research – report
- No gifts approach – legislation



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VI. ADJOURNMENT

Next Meeting: December 16, 2020

Website: www.honolulu.gov/ethics Email: ethics@honolulu.gov

 Twitter: @HonEthicsComm



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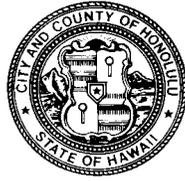
Agenda Item II.A.2.

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[Open Session Minutes of
September 16, 2020
Commission Meeting]

**ETHICS COMMISSION
CITY AND COUNTY OF HONOLULU**

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PHONE: (808) 768-9242 • FAX: (808) 768-7768 • EMAIL: ethics@honolulu.gov • INTERNET: www.honolulu.gov/ethics



KIRK CALDWELL
MAYOR

JAN K. YAMANE
EXECUTIVE DIRECTOR
AND LEGAL COUNSEL

ETHICS COMMISSION
CITY AND COUNTY OF HONOLULU

Date and Place: September 16, 2020
Webex Video Conferencing
Meeting Number (Access Code): 268 451 616
Meeting Password: None (268 451 616 from phones and video systems)
or join by phone 1-408-418-9388

Present: Hon. Victoria Marks (ret.), Chair
David B. Monk, Vice Chair

Hon. Riki Amano (ret.), Commissioner
Lynette Lo Kanda, Commissioner
Michael A. Lilly, Esq., Commissioner
Hon. Allene R. Suemori (ret.), Commissioner

Jan K. Yamane, Executive Director and Legal Counsel (EDLC)
Laurie A. Wong-Nowinski, Associate Legal Counsel (ALC)
Alyson Wong, Legal Clerk III (LC III)
Kristie E.L. Kato, Sr. Clerk (Sr. CLK)

Moana Yost, Deputy Corporation Counsel,
Department of the Corporation Counsel (COR)

Deborah Halbert, Volunteer U.H. Law student
Mallory Hee, Volunteer U.H. Law student

Sandy Ma, member of the public
Gary, member of the public
Citizen, member of the public

Excused: Peter S. Adler, Commissioner

MINUTES OF THE ETHICS COMMISSION MEETING

I. Call to Order, Public Notice, Quorum

Chair Marks called the meeting to order at approximately 11:33 a.m., declaring quorum with all Commissioners present via Webex except for Commissioner Adler.

II. New Business

A. Chair's Report

1. For Action: Approval of Open Session Minutes of August 19, 2020

Commissioner Amano made and Commissioner Suemori seconded a motion to approve the open session minutes of August 19, 2020. The motion carried unanimously.

2. For Action: Approval of Executive Session Minutes of August 19, 2020

Commissioner Suemori made and Commissioner Amano seconded a motion to approve the executive session minutes of August 19, 2020. The motion carried unanimously.

B. Executive Director and Legal Counsel's Report

1. CARES Act Funds – Protective and Office Equipment – Update

The EDLC stated that staff continues to order office supplies and equipment using CARES Act Funds. The items received have been installed and distributed in the office.

2. Education and Outreach

- a. University of Hawai'i at Mānoa, Richardson School of Law – Fall 2020 Pro Bono Interns – Update

The ALC stated that the Commission is very fortunate to have two outstanding UH law students volunteering with us as part of their 60 hour pro bono requirement at the law school. The ALC introduced Mallory Hee, a 4th year evening student, and Deborah Halbert, PhD, a 3rd year evening student. The ALC stated that staff and interns have been meeting on a weekly basis and asked each volunteer to explain what they have been working on.

Ms. Hee stated that she is working on informing and educating the public with FAQs on the Commission's two ballot measures; she will also be working on a research memo regarding the Commission's implied authority to inform and educate the public about the ballot measures.

Ms. Halbert stated that she will be researching peer jurisdictions and legislative history on the city's gift laws in order to implement the Commission's zero-tolerance gift policy. She will be attending the Permitted Interaction Group meeting to present her findings for discussion.

Chair Marks thanked Ms. Halbert and Ms. Hee for volunteering.

Sandy Ma asked Ms. Hee if her research will be published.

Ms. Hee confirmed that it will be published.

III. Executive Session Determination

- A. For Discussion and Action: Should the Ethics Commission Exercise Its Discretion to Consider in Executive Session a Motion to Adopt Advisory Opinion No. 21-1

Sandy Ma asked Chair Marks if Advisory Opinion No. 21-1 will be about a broad policy change.

Chair Marks explained that the Advisory Opinion is about the investigation and recommended discipline of a single employee who used a city vehicle for personal purposes.

Vice Chair Monk asked Chair Marks to estimate the time Commissioners and staff will be in executive session.

Chair Marks estimated that executive session won't take longer than 15 minutes.

Vice Chair Monk made and Commissioner Suemori seconded a motion that the Ethics Commission exercise its discretion to consider in Executive Session a motion to adopt Advisory Opinion No. 2021-1. The motion passed unanimously.

Commissioner Amano made and Commissioner Kanda seconded a motion to enter Executive Session. The motion passed unanimously.

- IV. Executive Session (The following agenda items will be reviewed in executive session pursuant to Section 92-5(a)(2), Hawaii Revised Statutes (HRS), to consider the hire, evaluation, dismissal, or discipline of an officer or employee or of charges brought against the officer or employee, where consideration of matters affecting privacy will be involved; or Section 92-5(a)(4), HRS, to consult with the Commission's attorney on questions and issues pertaining to the Commission's powers, duties, privileges, immunities and liabilities.)

- A. For Action: Motion to Adopt Advisory Opinion No. 2021-1

At 11:59 am, the Commission returned to Open Session. Chair Marks stated for the record that Commissioner Suemori did not participate in executive session due to technical difficulties. She also noted that Commissioner Suemori was not present for the remainder of the meeting.

Chair Marks reported that during Executive Session, the Commission unanimously adopted Advisory Opinion No. 2021-1 regarding the proposed discipline of a city employee.

Commissioner Amano asked Chair Marks if it would be appropriate to notice the appearance of “Citizen” on Webex.

Chair Marks acknowledged that Citizen, Sandy Ma, Gary, and Deputy COR Yost were present.

V. Adjournment

A. Next Meeting: October 21, 2020

At approximately 12:01 p.m., Commissioner Amano made and Vice Chair Monk seconded a motion to adjourn the meeting. The motion carried unanimously.

DRAFT

Agenda Item II.B.5.b

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[FAQs: 2020 Ballot
Questions 3 and 4]

FAQs

2020 BALLOT QUESTIONS 3 AND 4

HONOLULU ETHICS COMMISSION



Q1. What are the two City Ethics Commission questions on the ballot?

Questions 3 and 4 propose City Charter changes relating to the Honolulu Ethics Commission.

Question 3 asks: “Shall the Revised City Charter be amended to allow the Honolulu Ethics Commission to control its own budget after it has been enacted?”

Question 4 asks: “Shall the Revised Charter be amended to require ethics commission staff to be appointed based on merit principles, but exempt them from the civil service position classification plan, and to have the salaries of all ethics commission staff set by the ethics commission, subject to specified limitations?”

Q2. Why are there two questions on the ballot, instead of one?

Ballot questions start out as “resolutions” introduced by the City Council. The Council passed two Commission-related resolutions to change the Charter—Reso 19-331 (on Commission budget flexibility) and Reso 20-83, FD1 (on ethics staff positions and salaries).

Q3. What is the purpose of Question 3?

Question 3 would give the Commission budget flexibility and independence after the Council approves and appropriates funds annually. The Commission would use the funds to carry out its city ethics duties and fulfill its strategic plan of increasing ethics staff.

Q4. What is the purpose of Question 4?

Question 4 would allow the City Ethics Commission to create the staff positions it needs and set staff salaries, within limits.

Q5. Why is a vote needed?

City law requires that citizens vote to change the Charter.

Q6. How will City residents benefit if the ballot questions pass?

The Commission would have greater independence and enhanced capability to do its job—to ensure that city officers and employees demonstrate the highest standards of ethical conduct so the public may have trust and confidence in the integrity of government.

Q7. Will this give the City Ethics Commission flexibility?

Yes. If Question 3 is passed, the Commission will have greater budget flexibility and independence to use funds approved by Council to carry out its ethics duties. If Question 4 is passed, the Commission will be able to create the ethics staff positions it needs and set staff salaries, within limits.

Q8. How many positions does this agency have now?

The City Ethics Commission currently has five full-time positions.

Q9. Does Question 4 take Commission staff out of the Civil Service regulations?

No, Commission staff are not currently civil service employees. Staff are “exempt” employees, meaning that the Commission may hire and terminate staff at any time without cause.

Question 4 does not change this status.

Q10. How do the proposed changes affect the Commission’s budget?

The proposed changes give the Commission more independence and control over its budget.

Q11. What percentage of votes is needed for this to pass?

A majority of votes is needed for each question to pass.

Q12. How are blank votes counted?

Blank votes are not counted as either yes or no.

Q13. Is this the first time either issue has been introduced to the general public for a vote?

Yes.

Q14. Who introduced Resolution 19-331, the basis for Question 3, and why?

Councilmember Tommy Waters introduced the resolution out of a desire to support the City Ethics Commission and to promote and reinforce the idea that ethics should be a priority for the City and County of Honolulu.

Q15. If these questions pass, when would the changes take effect?

Question No. 3 on the Commission’s budget would take effect on July 1, 2021.

Question No. 4 on ethics staff positions and salaries would take effect on January 1, 2021.

Q16. What does the City Ethics Commission do?

The Commission ensures that all of Honolulu’s approximately 10,000 elected leaders, appointed officials, and employees understand and follow the highest ethical standards of conduct governing their work for the public. The Commission educates, advises, and enforces city ethics laws and lobbyist regulations.

Q17. What’s the difference between the Honolulu Ethics Commission and the Hawaii State Ethics Commission?

The Honolulu Ethics Commission is the City and County of Honolulu’s ethics watchdog agency for city officers and employees. The Hawaii State Ethics Commission is the State of Hawaii’s ethics watchdog agency for state officers and employees.

Q18. Where can we get more information?

For more information on the Honolulu Ethics Commission, go to the Honolulu Ethics Commission website:

<http://www.honolulu.gov/ethics>

To look up Resolutions 19-331 (on Commission budget flexibility) and 20-83, FD1 (on ethics staff positions and salaries), go to the Honolulu City Council website: **<http://www.honolulu.gov/council>**

Honolulu Ethics Commission

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808.768.9242 • ethics@honolulu.gov



@HonEthicsComm

Agenda Item II.B.7.
Page 3
[Q&A - Social Media]

Ethics and City Employee Use of Social Media – Q&A

[NOTE: Questions submitted by Ms. Choon James.]

Q1. Where is the line of demarcation between a councilmember's (CM's) paid city staff and campaign staff?

Individuals may be both a CM's city staff and campaign staff, but must separate city and campaign roles. City resources cannot be used for campaign purposes. Self-policing and supervision is required.

Q2. Is a paid staff member using a private iphone/laptop at City Hall for private campaigning acceptable because it is not city equipment?

City staff should not campaign in city facilities during city hours, even if using private equipment.

Q3. What is the approximate amount of working hours expected of a paid staff job at city hall for city-related responsibilities?

The Ethics Commission does not have jurisdiction over this issue.

Q4. Should a paid staff member take a leave of absence without pay if working on the private campaign of a city council member?

City employees should take vacation leave or, if they do not have vacation leave, leave without pay if they want to campaign during their regular city work hours.

Q5. What is legal? What is legal may not be ethical.

The Ethics Commission enforces the Standards of Conduct, Article XI of the Revised Charter of Honolulu.

Q6. Should a time log for CM staff be expected like how the EC has required EC staff to keep time?

The Ethics Commission does not have jurisdiction over this issue.

Q7. Should a CM's paid staff disclose their work status while campaigning for a candidate including on social media?

The City's social media policy prohibits the use of city email, phone number or city information to register or engage in the use of social networks primarily used for personal use. C&C Honolulu Personnel Manual, Personal Use of Social Media by City Employee (June 17, 2019) (Social Media Policy). The Honolulu Ethics Commission does not have a separate social media policy but may review other jurisdiction's policies for guidance. For example, the Philadelphia Board of Ethics Social Media Guidance **prohibits** creating political content that identifies an employee's city title, or position in text or images including in a handle, user name, or profile picture.

Q8. Should a CM's paid staff that uses different personal social media aliases disclose they are the paid staff of the councilmember?

The City's social media policy prohibits the use of city email, phone number or city information to register or engage in the use of social networks primarily used for personal use. C&C Honolulu Personnel Manual, Personal Use of Social Media by City Employee (June 17, 2019) (Social Media Policy). The Honolulu Ethics Commission does not have a separate social media policy but may review other jurisdiction's policies for guidance. For example, the Philadelphia Board of Ethics Social Media Guidance **prohibits** creating political content that identifies an employee's city title, or position in text or images including in a handle, user name, or profile picture.

Q9. Should cyberbullying be allowed by paid city staff on social media?

City employees must abide by the City’s respectful workplace policy, which prohibits bullying other employees, supervisors, managers, or a member of the public in a **workplace** environment. C&C Honolulu Personnel Manual, Respectful Workplace Policy (April 2, 2018).

Q10. Should a CM use C&C Honolulu resources to send an email blast to all Oahu residents, without specific requests for information from residents at large?

It depends on the content of the communication. A councilmember may send a city email from city equipment to Honolulu residents if the content of the email is reasonably related to the councilmember’s job duties.

Q11. Should the Ethics Commission urge city hall personnel to “delete campaign emails and unsubscribe from campaign distribution lists” on their city email account? Would this be considered tampering with evidence or removing public information that clamps down on open and transparent government?

City resources, including city email, cannot be used for campaign purposes. The Ethics Commission advises employees to delete unsolicited campaign communication and unsubscribe from the campaign distribution list. The Ethics Commission does not have jurisdiction over whether this would be considered “tampering with evidence” or evading the open records law.

Q12. Should public distributions of official reports from CMs be expected to be accurate and factual? If gross misrepresentations are found, should a CM offer a correction, like in a newspaper?

The Ethics Commission does not have jurisdiction over this issue.

Q13. Should city council staff member take a leave of absence without pay when they are a major player in a private campaign?

City employees should take vacation leave or, if they do not have vacation leave, leave without pay if they want to campaign during their regular city work hours.

Q14. Should the Ethics Commission and City Council review and update their policies to provide clear and ethical guidelines for today’s campaigning options?

The Ethics Commission will discuss this issue at its October 21, 2020, meeting.

Agenda Item II.B.7.a.

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**[Personal Use of Social
Media by City Employees
Policy]**

DEPARTMENT OF HUMAN RESOURCES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET 10TH FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 768-8500 • FAX: (808) 768-5563 • INTERNET: www.honolulu.gov/hr

KIRK CALDWELL
MAYOR



CAROLEE C. KUBO
DIRECTOR
NOEL T. ONO
ASSISTANT DIRECTOR

June 17, 2019

MEMORANDUM

TO: All Department and Agency Heads

FROM: Carolee C. Kubo, Director 
Department of Human Resources

SUBJECT: Personal Use of Social Media by City Employees Policy

Effective July 1, 2019, the Personnel Manual will be updated to include the new Personal Use of Social Media by City Employees Policy.

Enclosed is a copy of the new policy. An electronic copy of the policy will also be available in the Personnel Manual on the Department of Human Resources' website, www.honolulu.gov/hr, under the "Online Resources" section.

Thank you.

Enclosure

cc: All Departmental Administrative Services Officers

Title:	PERSONAL USE OF SOCIAL MEDIA BY CITY EMPLOYEES	
Purpose:	To provide policy and guidelines on Employees' personal use of social media.	
Issued by:	Employment and Personnel Services	Date: July 1, 2019
References:	Revised Charter of the City and County of Honolulu (RCH) § 6-1105.2; Revised Ordinances of the City and County of Honolulu (ROH) § 2-6; Civil Service Rules § 2-3; Hawaii Revised Statutes (HRS) § 76-13 and § 76-17(b)	

I. POLICY

The City and County of Honolulu (City) is committed to providing a respectful and professional work environment and does not tolerate the use of social media to create a hostile work environment or which violates Federal or State privacy laws as it relates to the employee's employment with the City. The purpose of this policy is to provide employees with guidelines on the personal use of social media in connection with employment, including the employee's job. This policy is not intended to restrict an employees' rights under Hawaii Revised Statutes Chapter 89-3. Employees shall comply with this policy and other applicable policies, rules, and directives of the City and County of Honolulu and State and Federal laws.

II. DEFINITIONS

Social Media: All means of communicating or posting information or content of any type on the Internet, including, but not limited to, posting to one's own or another entity's personal website, blog, social networking or affinity website, web bulletin board, or chat room.

City Resources: Any form of property or information that is owned by the City or paid for with City funds, including, but not limited to, City-issued electronic equipment (e.g., desktop computers, laptop computers, smartphones, tablets, etc.), City paid time, and City e-mail addresses. Refer to the Honolulu Ethics Commission's "Guidelines on the Use of City Resources" for more information.

III. GENERAL GUIDELINES

A. Use of Personal Social Media Accounts by City Employees

1. Employees' activities on personal social media accounts shall comply with all applicable City policies, rules, and directives and City, State, and Federal laws. Applicable City policies, rules, directives, and laws include, but are not limited to:
 - a. Acceptable Usage of Information Technology Resources
 - b. Workplace Violence Prevention Policy
 - c. Sexual Harassment Policy
 - d. Respectful Workplace Policy

- e. Revised Ordinances of Honolulu
- f. Revised Charter of Honolulu
- g. Administrative Directives

Employees should carefully read and ensure that their postings are consistent with these policies, rules, directives, and laws.

2. Personal use of social media on City resources is prohibited.
3. Employees shall not use their City e-mail address, City telephone number (including City-issued cellular phone numbers), or any other types of City information (e.g., City mailing addresses) to register for and/or engage in the use of social networks, blogs, or other online accounts maintained primarily for personal use.
4. Employees shall not use their personal social media accounts for work-related purposes.
5. Each employee is solely responsible for all personal content posted on social media. Any personal social media use that interferes with the employee's job performance or the performance of other employees, or that otherwise adversely affects customers, suppliers, or others who work on behalf of the City, may result in disciplinary action in accordance with applicable Civil Service Rules and Collective Bargaining Agreement terms.
6. When using personal social media accounts, employees should be aware of the following prohibitions:
 - a. Do not disclose confidential City, departmental, and/or agency information.
 - b. Never represent yourself as a spokesperson for the City or for any City agency unless authorized. This prohibition also includes using or posting images of the City's seals or logotypes or of other City employee without express consent from the City or the other City employee(s).
 - c. Do not disclose information about items in litigation or about claims that could be brought against the City.
 - d. Do not disclose nonpublic information of any kind. If you are unsure of what constitutes "nonpublic" information, consult with your department head or your Public Information Officer.

IV. DUTIES AND RESPONSIBILITIES

A. Department of Human Resources

1. Update this policy as needed.
2. Provide this policy to new City employees during New Employee Orientation.
3. Provide assistance to departments and agencies in addressing employee violations of this policy, as requested.

B. City Departments and Agencies

1. Communicate the contents of this policy to all employees.
2. Communicate to all employees the type of information that constitutes confidential City, departmental, and/or agency information.
3. Ensure compliance with this policy.
4. Properly investigate possible violations of this policy and take appropriate action.

C. Employees

1. Refrain from using personal social media accounts in a manner that would violate this policy or any other City policies and rules. Failure to comply with this policy may be cause for appropriate disciplinary action in accordance with applicable Civil Service Rules and Collective Bargaining Agreement terms.

Agenda Item II.B.7.b.

Page 3

[Political Activity – Social
Media Guide (Board of
Ethics, City of
Philadelphia)]



Board of Ethics
CITY OF PHILADELPHIA

Political Activity



Regulation 8
Effective Sept. 7, 2020

Social Media Guide



What's inside?

There are many ways that you may interact with social media as a City employee or officer – including when you are engaging in political activity!

This guide provides a brief overview of the political activity rules, describes common situations where these rules apply on social media, and gives examples of both permissible and prohibited conduct. More detail about the political activity rules can be found in [Regulation 8](#).

What is Political Activity?

Political activity is activity directed toward the success or failure of a political candidate, campaign, or partisan political group.

The political activity rules apply differently to different groups of City officers and employees. This guide addresses Groups 1, 2, & 3. You can find more information about these groups in our handy [explainer](#).

1

Most officers & employees in the Administrative & Executive Branches
Members of Boards & Commissions that exercise significant powers of government

2

Employees & officers of the City Commissioners, District Attorney, Police, Sheriff, & Board of Ethics

3

City Council Staff

4

Members of Advisory Boards & Commissions

Political Activity Rules

What is permissible?

All City officers & employees may:

- ✓ Vote in an election
- ✓ Register as a member of a political party
- ✓ Campaign for or against legislation or issues
- ✓ Donate to a candidate, party, or political group*
- ✓ Attend a political fundraiser or rally as a spectator
- ✓ Display a campaign sign in your yard
- ✓ Talk about your personal political opinions

Group 1 may also...

- ✓ Volunteer for non-local campaigns

Group 3 may also...

- ✓ Volunteer for any campaign, including in a management role

What is prohibited?

No City appointed officer or employee may...

- ✗ Engage in political activity while
 - on duty;
 - in uniform;
 - using City title or status;
 - using City resources;
 - in City office space
- ✗ Raise funds for a political purpose
- ✗ Run for office while holding a City position

Group 1 also may not...

- ✗ Take on a management role in a campaign, party, or partisan group

Group 2 also may not...

- ✗ Take on a management role in a campaign, party, or partisan group
- ✗ Volunteer for any candidate or campaign

Political Activity on Social Media

Political activity on social media is generally **permitted**, but **NOT** if you are:

- ▶ on duty
- ▶ in uniform
- ▶ using your City title or position
- ▶ using City resources
- ▶ in City Hall or City office space

You may not...

- ▶ engage in political activity using any City-owned or City-operated social media account, or any account that presents itself as being for official City business
- ▶ use social media to create, promote, or share content related to political fundraising
- ▶ create political content that identifies your City title or position in text or images including in a handle, username, or profile picture

You are not responsible for removing social media content created by others, or that you created before your City service.

Your office may have additional rules about the use of personal and official social media accounts.

Key Considerations

Know your profile; know your platform

Social media platforms often include information from your user profile in content you create. For example, a profile photo typically appears as part of each post. Some platforms automatically include your job title or employer when you create content.

Including your City title or position in a social media profile may limit your ability to engage in political activity using that account because your City title or status cannot be part of content you create that contains political activity.

It is **your responsibility** to know how each social media platform displays your profile information and to be aware of any changes.

You may have to choose between using your City title in a profile and using that account for political activity.

Know your candidates

Group 1 may volunteer in support of candidates for **non-local office**. Involvement in campaigns for the following **local offices** is still prohibited:

- ▶ Mayor
- ▶ City Council
- ▶ City Commissioner
- ▶ District Attorney
- ▶ City Controller
- ▶ Sheriff
- ▶ Register of Wills
- ▶ Philadelphia Court of Common Pleas Judges
- ▶ Philadelphia Municipal Court Judges
- ▶ Elected officers at City polling places (Judge of Elections, Majority & Minority Inspector)
- ▶ PA House & Senate Districts including any part of the City

Case Study: Public Policy Advocacy vs. Political Activity

The American Medical Association tweets a link to an open letter advocating for the wearing of masks by the public.

City Account

You are a City employee or officer managing an official City social media account.

You may retweet the AMA's post from an official City Twitter account without violating the political activity rules.

Personal Account

You are an off-duty City employee or officer on your personal social media account.

You may retweet the AMA's post from an official City Twitter account without violating the political activity rules.

The AMA's letter about mask-wearing addresses a public policy issue, not the success or failure of a candidate, political campaign, political party, or partisan political group. As a result, retweeting the AMA's message is not political activity and is, therefore, permissible from either a City or personal social media account.

Case Study: Sharing Candidate Content

Dr. Sarah Smith, a candidate for state representative from a district in Philadelphia, tweets about the AMA's open letter in support of mask-wearing.

City Account

You are a City employee or officer managing an official City social media account.

You may not retweet the AMA's post from an official City Twitter account. Using a City account to **promote content from a candidate** for any elected office – whether local or non-local – is prohibited.

While the AMA's message is about public policy, a candidate's involvement makes this political activity.

Personal Account

You are an off-duty City employee or officer on your personal social media account.

You may "like" or retweet Dr. Smith on your own initiative so long as you do not use your **City title or position**. Unless you are in Group 3 (City Council Staff), however, you may not participate in Dr. Smith's campaign – including by promoting content at the request of the campaign – because Dr. Smith is running for **local office**.

Case Study: Sharing News & Opinion Articles

Veterinarian Dr. John Jones writes an Inquirer op-ed about cat grooming. The piece mentions a presidential candidate's recent comments about cat hygiene and concludes that the candidate's position on cat grooming disqualifies them from holding office and/or endorses their opponent.

City Account

You are a City employee or officer managing an official City social media account.

You may not share Dr. Jones' op-ed, because posting the article would be **supporting or opposing a candidate** and therefore prohibited on a City account.

Personal Account

You are an off-duty City employee or officer on your personal social media account.

If you are in Groups 1 or 3, you may post the op-ed even though it supports or opposes a presidential candidate so long as you do not use your **City title or position**. This is permissible because it involves a **non-local office**.

If the article also included a request to contribute to a campaign or PAC, sharing it would be **political fundraising** and, therefore, prohibited regardless of your Group or the elected office sought.

Case Study: Whiskers4PA

The poster is in **Group 1**. This post raises several potential problems under the political activity rules.

Username & profile pic announce status as City worker

Posted while at work



Ian ***works4PHLGov*** Smith is at City Hall

Monday at 10:05 am • 

Vote Whiskers for PA Supreme Court! Comment or inbox me for volunteer opportunities!! ***Political views are my own and do not reflect official endorsement of Whiskers4PA***

Disclaimer does not protect against ethics violations



Solicits political contributions

JUSTICEWHISKERS4PA.COM

Who has more experience judging you than a cat? Donate now!

   87

21 Comments 10 Shares

 Like

 Comment

 Share

 Buffer



Write a comment...



Press Enter to post.

Case Studies: Promoting Campaign Events

You are in Group 1 and volunteering for a non-local campaign. You are asked to post an invite to a meet-the-candidate happy hour on your personal social media accounts. The invite lists suggested contribution amounts.

While volunteering for a non-local campaign is generally permitted for members of Group 1, posting an invitation that requests political donations crosses the line into soliciting political contributions. It would not matter whether a donation was required – any involvement in asking for a political contribution is prohibited. You also would not be able to assist with or staff this event.

You are in Group 3 and working on your Councilmember's re-election campaign. You post two flyers on your personal social media accounts. The first flyer advertises an upcoming candidates' forum where tickets are not required for admission. The second flyer advertises a campaign fundraising dinner with ticket prices ranging from \$50 to \$500 dollars.

If you are off-duty and your social media accounts do not include your City title or status, you would be permitted to post the first flyer about the forum. However, you would not be able to post the second flyer for the campaign dinner because any involvement in asking for a political contribution is prohibited. You also cannot sell tickets to the dinner or collect monetary donations.

Permitted Activity



You may share a photo of protestors with a caption, "I stand with them."

So long as you are NOT:

- On duty
- In uniform
- Using City resources
- Using your City title
- In City office space

You may post a selfie wearing a political party button.

You may retweet a tweet by a candidate for the U.S. Senate and like an Instagram post made by a mayoral candidate.

You may comment, "I agree!" on a post that says vote in support of a State Representative's campaign.

Prohibited Activity



You use your City title in your profile headline on LinkedIn, but because that headline accompanies almost every action, you may not post messages on LinkedIn supporting a candidate.

Your shirt has “City of Philadelphia - Office of the Mayor” on the pocket. You cannot upload a picture to your Instagram story of you wearing the shirt at a rally opposing a candidate.*

You manage your office Twitter account. You cannot like a candidate’s tweet from that account.

You may not retweet a celebrity’s endorsement of a candidate with the hashtag #DonateNow.

You work for the Streets Department and volunteered to work on your cousin’s campaign for county office in Jersey. You cannot Instagram yourself handing out lawn signs while wearing your City uniform.*

**Political activity while in uniform or using your City title/status is prohibited even if you do not post about it on social media.*

Agenda Item V.A.

Page 3

[Memo re City & County
Gifts Policy]

October 7, 2020

To: Honolulu Ethics Commission
From: Debora Halbert, Pro Bono Intern
RE: City and County Gifts Policy

Research Question:

I was tasked with finding *any* city or county that has implemented a “zero tolerance” gift policy.

Research Methodology:

This report reviewed city/county ethics codes, primarily sorted by states with “no cup of coffee” ethics provisions. These included New Jersey, Florida, and Kentucky, among others. Additionally, Google searches under “zero tolerance,” and “no cup of coffee,” were conducted. A more targeted search of municipal codes via Lexis-Nexis for gifts policies was also conducted. There are over 3,000 municipalities in the United States and a thorough search of gifts policies would require more time.

Brief Overview:

- There has been a movement towards what are called “no cup of coffee” ethics rules, mostly at the state level.
- Included in the table below are the jurisdictions identified so far where a gifts policy could be interpreted as being closest to “zero tolerance.” Also included are several other sample policies to demonstrate the range of limits that can be found across the U.S.
- Links to access the relevant documents and/or language are included in the table below.
- The most restrictive policies seek to eliminate potential influence from lobbyists or others doing business with the city.
- Even when described as zero-tolerance, rules tend to allow for nominal gifts, thus all policies reviewed had exceptions.
- Nominal is generally defined as an amount between \$5 and \$25. The vast majority of ethics rules allowed for some gifts with the smallest dollar amount being \$5 and the larger being \$100.
- All policies reviewed included language about perception of impropriety as a factor for if a gift can be accepted.
- In some cases, cities and counties had more restrictive ethics codes than their states required. State level gift restrictions, compiled and managed by the National Conference of State Legislatures can be found here: <https://www.ncsl.org/research/ethics/50-state-table-gift-laws.aspx>

Codes, links, and available documents related to zero tolerance gifts policy:

City/County	Scope of Rule	Links
Gloucester County, New Jersey	[T]he Board of Chosen Freeholders finds that the most appropriate interpretation of the Code of Ethics with regard to the solicitation or acceptance of gifts is to take a “zero tolerance” position. This position may succinctly be described as providing that no County officer or employee shall accept any gift, favor, service or other thing of value related in any way to the County officer’s or employee’s public duties.	<p>Announcement of zero tolerance policy: http://www.gloucestercountynj.gov/news/displaynews.asp?NewsID=380&TargetID=1</p> <p>Human Resources manual defining zero tolerance policy (2008): http://www.gloucestercountynj.gov/civica/filebank/blobdownload.asp?BlobID=4434</p>
Broward County, Florida	<ul style="list-style-type: none"> • Elected officials cannot accept gifts over \$5 from a lobbyist, vendor, contractor. • Can accept non-perishable gifts if notify giver of zero tolerance policy and then place in a public area. • Can accept typical beverages or snacks if attending a conference or meeting in an office. • County administrator may via executive action exempt specific officials from the zero tolerance policy. • In 2015 loosened zero tolerance to allow for \$5 limit. <p>Sec. 1-19. - Code of ethics for elected officials.</p> <p>(1) Acceptance of Gifts.</p> <p>a. No Elected Official or relative, registered domestic partner, or governmental office staff of any Elected Official, shall accept any gift, directly or indirectly, with a value in excess of \$5.00, from lobbyists registered with the governmental entity on whose behalf they (or their registered domestic partner or relative) serve, or from any principal or employer of any such registered lobbyist, or from vendors or contractors of such governmental entity. In order to effectuate this provision, no</p>	<p>Broward County Gift Policy: https://www.broward.org/InspectorGeneral/Ethics/Documents/20160412GiftsTri-fold.pdf</p> <p>Broward County Municipal Code Sec. 1-19: Code of Ethics for Elected Officials https://library.municode.com/fl/broward-county/codes/code_of_ordinances?nodeId=PTIICOOR_CH1AD_ARTIIBOCO_CO_S1-19COETELOF</p> <p>Broward County Policy https://www.broward.org/OpenGovernment/Documents/2010-64.pdf</p> <p>Broward County Ethics Homepage: https://www.broward.org/InspectorGeneral/Ethics/Pages/default.aspx</p> <p>Broward County News Article on Ethics Restrictions (2015)</p>

	<p>lobbyist shall engage in any lobbying activity prior to registering as a lobbyist with the applicable governmental entity. For purposes of this paragraph, neither Broward County, any municipality within Broward County, or any other governmental entity shall be considered a registered lobbyist, a principal or employer of a registered lobbyist, or a vendor or contractor of any governmental entity within Broward County.</p> <p>b. Elected Officials may accept gifts from other sources given to them in their official capacity, where not otherwise inconsistent with the provisions of Chapter 112, Part III, Florida Statutes, up to a maximum value of \$50.00 per occurrence. Gifts given to an Elected Official in his or her official capacity up to \$50.00 in value are deemed to be de minimis. A governmental entity giving a gift to its own Elected Official shall not be considered a gift from an "other source" for purposes of the \$50.00 limitation.</p> <p>c. The \$50.00 limitation does not apply to gifts given to Elected Officials in their personal (nonofficial) capacity. Such gifts are still subject to the reporting requirements of Section 112.3148, Florida Statutes.</p> <p>d. Notwithstanding the foregoing, to the extent not prohibited by Florida law and subject to the reporting requirements of Section 112.3148, Florida Statutes, nothing in this section shall prohibit Elected Officials from participating in any public service announcement.</p> <p>e. When not otherwise permitted by this part (c)(1), "Acceptance of Gifts," the following items may be accepted to the full extent permissible under state law:</p> <p>1. Items customarily given to express condolences or sympathy, such as flowers, food items, or cards, given to an Elected Official in connection with the death or significant injury or illness of the Elected Official or an immediate family member of the Elected Official;</p>	<p>https://www.sun-sentinel.com/local/broward/fl-ethics-code-rewrite-20151208-story.html</p>
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	<p>2. Training, including the payment or reimbursement of expenses incurred in connection therewith, provided the training relates to the Elected Official's public service. The receipt of such training is deemed to directly benefit the public on whose behalf the Elected Official serves;</p> <p>3. Nonalcoholic beverages; and</p> <p>4. Admission tickets to charitable events available to the public, provided that any Elected Official or governmental office staff of the Elected Official who receives such tickets shall:</p> <p>a. Within fifteen (15) days after receiving such tickets, files for public inspection a disclosure form stating the name of the donor, the value of the tickets received, and the date and location of the event; and</p> <p>b. Within thirty (30) days after the event, reimburses the donor for the value of the food and beverages consumed by the person(s) using the tickets.</p> <p>§ Sec. 26-73 Code of Ethics (county employees).</p> <p>a) Solicitation or Acceptance of Gifts.</p> <p>(1) County employees shall not solicit or accept any gift, regardless of value, in their official capacity as employees, nor shall they solicit or accept any gift in either an official or personal capacity that may be reasonably perceived to be given to encourage or discourage them from taking any action in connection with their County employment.</p> <p>(2) Notwithstanding the prohibition contained in paragraph (1), the County Administrator (or his or her designee) may, by administrative order, authorize the acceptance of meals, refreshments, and other gifts by designated County employees as specified below. The County Administrator shall publish a list of designated County employees who, incident to attending functions or traveling in their official</p>	
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	<p>capacities, may be offered meals, refreshments, or other gifts. Except where prohibited under state or federal law, these designated employees may accept such meals, refreshments, or other gifts in compliance with conditions the County Administrator may establish by administrative order, including the following:</p> <ul style="list-style-type: none">a. Employees may accept meals, refreshments or other gifts upon determining that their non-acceptance would be detrimental to the interests of the County;b. All gifts of a non-perishable nature that are received shall be deemed accepted by employees on behalf of the County, and the County Administrator (or his or her designee) shall determine how to use the gift for a public purpose or otherwise how to dispose of the gift; andc. Employees shall, within thirty (30) days after receipt, inform the County Administrator, or her or his designee, in writing, of the nature of the gift and the name of the donor. <p>(3) Notwithstanding the prohibition contained in paragraph (1), employees may accept unsolicited perishable gifts delivered to them at their County office provided they:</p> <ul style="list-style-type: none">a. Promptly notify the donor in writing of the County's no-gift policy; andb. Keep the perishable items in a common area of the County office where the items may be consumed by any County employee or member of the public visiting the office. <p>(4) Notwithstanding the prohibition contained in paragraph (1), County employees who attend a conference, or visit any non-County office or premises, may accept beverages and snack items customarily made available to other attendees or visitors.</p>	
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	(5) Notwithstanding the prohibition contained in paragraph (1), to the extent not prohibited by Florida law and subject to the reporting requirements of Section 112.3148, Florida Statutes, nothing in this section shall prohibit employees from participating in any public service announcement.	
Alameda/ Oakland, CA	<p>2.02.170 - Interest in contracts—Receipt of commissions or <i>gifts</i>.</p> <p>“No officer or employee shall receive any commission, money, <i>gift</i>, or thing of value, or derive any profit, benefit or advantage, directly or indirectly, from or by reason of any dealings with, or service for the county, by himself or otherwise, except his lawful compensation as such officer or employee.”</p> <p>Zero tolerance but may accept “token” gifts that can be shared.</p>	<p>Gifts Policy Brochure: https://www.acgov.org/gsa/documents/codeofethics.pdf</p> <p>Municipal Code: https://library.municode.com/ca/alameda_county/codes/administrative_code?nodeId=TIT2AD_CH2.02GEADRU_2.02.170INCOECCOGI</p> <p>Office of Acquisition Policy https://www.acgov.org/gsa/departments/oap/documents.htm</p>
Atlanta, Georgia	<p>Sec. 2-817. - Prohibition on giving or receiving gratuities.</p> <p>(a) No official or employee shall accept any gratuity as defined in section 2-801(g).</p> <p>(b) No person, business, or other entity shall give or convey to any official or employee a gratuity as defined in section 2-801.</p> <p>(Ord. No. 2002-27, § 1, 4-10-02)</p> <p>“Sec. 2-818. - Solicitation.</p> <p>No official or employee shall solicit or accept anything of value, in any form whatsoever, calculated to influence a vote, decision, or the exercise of official authority in any manner involving the city; provided, however, nothing in this section shall prohibit any official or employee from accepting a gift on behalf of the</p>	<p>Ethics website: https://www.atlantaethics.org/code-of-ethics-4/ethics-issues/gifts-a-gratuities</p> <p>Code citation: Article VII, Division 2, Sec. 2-818: https://library.municode.com/ga/atlanta/codes/code_of_ordinances?nodeId=PTII_COORENOR_CH2AD_ARTVIIIFEM_DIV2STCO</p>

	<p>city which is properly reported to the board of ethics and the department of administrative services for addition to the inventory of property of the city.”</p> <p>(Ord. No. 2002-27, § 1, 4-10-02)</p> <p>No Gifts with eleven exceptions.</p> <p>“The Code of Ethics bans anything of value given by or received from a prohibited source. There is no de minimis exception for gifts.”</p> <ul style="list-style-type: none"> • Reasonable meals at public events • Gifts to the city • Holiday gift rule – but only on behalf of the city and when modest and shared with the public of office. • Awards, plaques, certificates, mementos, novelties, or similar items given in recognition of public service; • Nominal gifts from representatives of other governments; • Gifts from family members; and • Campaign contributions. 	
Denver, CO	<p>Cannot accept a gift if (1). You are in a position to take direct official action toward the giver, AND (2). The giver has or is about to have a business, contract, or regulatory relationship with the city.”</p> <p>There are exceptions including:</p> <ul style="list-style-type: none"> • \$300/year from same donor but must be reported. • “Gifts while visiting other places, or hosting visitors from other places, when it would be a breach of protocol to refuse the gift.” 	<p>2018 Ethics Handbook: https://www.denvergov.org/content/dam/denvergov/Portals/5/documents/Codes/ethicsHandbook_2018.pdf</p>
Flagler Beach, FL	<p>§ Sec. 2-32 Gift policies for employees.</p> <p>The city's gift policy is as follows:</p>	<p>Source: Lexis-Nexis.</p>

	<p>(1) Employees shall not accept gifts, favors, rewards, promise of future employment, service, gratuities, loans, or anything else of value, offered because of employees' position with the city. This limitation is not intended to prohibit the acceptance by employees of articles of negligible value given in appreciation. However, if a gift could be perceived as being given with an understanding that a future action or judgment of the employee will be influenced thereby, the employee shall not accept the gift, favor, gratuity, or loan.</p> <p>(2) Any gift received by an employee other than that of negligible value and which is intended as an expression of appreciation to the city shall be deemed to be the property of the city and shall be treated as public property. All such gifts shall be deemed to have been accepted in the employee's capacity as a public employee on behalf of the city. The employee shall submit the gift to the city manager or designee. However, if a gift could be perceived as being given with an understanding that a future action or judgment of the city or employee would be influenced thereby, the employee shall not accept the gift, favor, gratuity, or loan.</p> <p>(3) This gift policy shall not prohibit employees from accepting invitations to functions which they attend as invited guests because of their employment with the city. Food and beverages served to the larger group attending such function shall be considered of negligible value regardless of their estimated cost. However, nothing in this subsection shall modify the reporting requirements of F.S. ch. 112. If an attendance at the function could be perceived as being given with an understanding that a future action or judgment of the city or employee would be influenced thereby, the employee shall not accept the invitation.</p> <p>(4) The term "negligible value" for the purpose of this policy is defined to be twenty-five dollars (\$25.00) or less.</p>	
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	<p>(5) The term "gift" shall have the meaning ascribed to it in F.S. 112.312. Gifts do not include those benefits, expenses, gifts, and items set forth in F.S. 112.312(12)(b).</p>	
<p>Nassau County (2018)</p>	<p>No gifts via executive order to any member of the executive staff. Underlying county policy prohibits gifts over \$75.</p>	<p>Nassau County (2018) https://www.nassaucountyny.gov/CivicAlerts.aspx?AID=6029</p> <p>Executive Order: https://www.nassaucountyny.gov/DocumentCenter/View/22790/EXECUTIVE-ORDER-2-2018-Zero-Tolerance-Gift-Policy?bidId=</p> <p>Underlying Gifts policy: https://www.nassaucountyny.gov/DocumentCenter/View/27426/Plain-Language-Guide-for-Gifts-Favors-and-Tips?bidId=</p>