

Thank you to everyone who participated and are thoughtfully working to amend the City of Stamford's Code of Ethics. It is a critical document as it speaks to accountability between the public and city officials. It also gives city employees and elected officials the roadmap they need to ensure they operate in a proper manner. All of which will lead to the trust of our community.

After reading the proposed ordinance amending Chapter 19 of the Code of Ethics, following are my questions and observations. Thank you for taking the time to consider them. I am readily available to discuss them if you like.

A four-year gap in "follow-up" ethics training appears to be too long. City employees and elected officials should be highly sensitized to ethical behavior and requirements. The suggestion here is that it be done on an annual basis for all city and elected officials including a renewal of their certification. Timely communication / reminders are key.

Within the ethics certification and training, is there a signed acknowledgment (annual is recommended) by the city employee or elected official that they have received, read, understand, and will abide by the Code of Ethics?

What does the ethics training program look like for city employees and elected officials? If it is only done only on-line where someone could simply click through the training, then it might be better done in person.

Does the Board of Ethics work with the Director of Human Resources in preparing and overseeing the City's Ethics Training Program? Where is the oversight to ensure that the program is being properly administered?

For new city employees or elected officials – ethics training "shall be required promptly following the official appointment..." The thought here is that this should be better defined. Within 30 days? Maybe 60 days? This would help to emphasize the importance of ethical behavior to all new hires or elected officials.

Should the Code of Ethics speak to social media? What someone may or may not say regarding their employment or service with the City of Stamford? For example, an employee should not speak on social media about a purchase acquisition they are negotiating for the City. Or they should not speak about an HR matter. Maybe the Code of Ethics does and I did not see this?

Should there be a set time as to when the Code of Ethics will be reviewed and amended as necessary? Every three years? Five years? This may be helpful in staying current and not having to go through substantive overhauls.

Within the Code of Ethics, should there be a defined time frame as to when Board vacancies must be filled? So as to prevent long standing open vacancies which can hamper the Board's effectiveness and diversity of thought and input, should there be a finite amount of time that the mayor has to nominate someone to the Board of Ethics? If the mayor does not fill that vacancy within a defined time, that responsibility might then go elsewhere with a set deadline?

Regarding the CT statute on party restrictions. Is it possible that this creates a roadblock in filling vacancies? For the Board of Ethics especially, party affiliation should never be a consideration in how it operates. Is there any way around this restriction?

Were any members of the Board of Ethics, current and / or past members, consulted when reviewing the Code of Ethics and in preparing the draft amendments?

Thank you for taking the time to read my comments and questions.

Kind regards,

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