



Standards of Conduct

Administrative Regulation | Ethics & Political Activity | #16.02

Effective Date: September 6, 2021

Revised Date: June 30, 2025

Supersedes: September 6, 2021

Note: Terms that are ***bolded and italicized*** the first time they appear in this regulation are defined below. After the first occurrence, defined terms appear in *italics only*.

Purpose

This regulation establishes the City's expectations for ethical conduct and compliance with Oregon Government Ethics Law. It provides guidance on avoiding personal financial gain or avoidance of personal cost through City service and outlines requirements for identifying, disclosing, and resolving conflicts of interest.

Scope

This regulation applies to all employees, officers, volunteers, interns, councilors, or ***agents*** of the City (hereafter referred to as employee).

Policy

This regulation is not intended to be comprehensive and cover every example. Employees must comply with Oregon Government Ethics Law and are encouraged to consult the Oregon Government Ethics Commission (OGEC) and the City Attorney for guidance.

Each employee represents the City and is responsible for demonstrating high ethical standards through their actions. Oregon Government Ethics law restricts some choices, decisions or actions of ***public officials***.

Employees are prohibited from using their position to obtain a personal financial benefit or to avoid a personal expense. Conflicts of interest must be disclosed and addressed promptly as they arise.

Some departments may have policies that are more restrictive than this administrative regulation or state law. Employees are expected to comply with their department's policies, as well as this regulation and state law.

This regulation addresses the following standards of conduct:

- ***Conflicts of Interest***
- ***Outside Employment***
- ***Conversion of City Property for Private Use***
- ***Use of Position***
- ***Use of Confidential or Insider Information***

Procedure

1. Reporting and Resolving Conflicts of Interest

A. Disclosure Obligation

- a. Employees must not participate in any City decision, recommendation, approval, or action in which they have an **actual** or **potential** financial interest.
- b. Employees must disclose the full nature and extent of any such interest.

B. Uncertainty About Conflicts

- a. If an employee is unsure whether a conflict exists, the employee must discuss the situation with their supervisor.
- b. A conflict may exist even if a similar situation was previously unaddressed.

C. Written Disclosure and Resolution

- a. If a *conflict of interest* is identified, the employee must draft a memo outlining the *conflict of interest* and submit it to their supervisor.
- b. The supervisor will acknowledge the *conflict of interest* in writing and determine how it can be resolved.
- c. The employee and supervisor may work together to determine how to dispose of the *conflict of interest*.
- d. A copy of the disclosure and the supervisor's written acknowledgement shall be placed in the employee's personnel file.

D. Resolution Measures

- a. Resolutions may require one or more of the following:
 - (1) Removal from participation in the matter;
 - (2) Return of any benefit received;
 - (3) Modification of duties; and/or
 - (4) Reporting to the Oregon Government Ethics Commission.

E. Reporting Ethics Concerns

- a. An employee who has knowledge or concerns regarding alleged ethics violations by another employee or volunteer should notify their supervisor, manager, or Human Resources.
- b. Employees who report concerns in good faith are protected from retaliation.

2. Outside Employment

A. **General Standard**

- a. Employees may engage in *outside employment* or income-producing activities provided such activities do not violate this regulation or Oregon Government Ethics Law.

B. **Improper Influence Prohibited**

- a. Employees may not solicit or accept offers of future employment based on the understanding that the offer is influenced by the employee's official actions.

C. **Prohibited Outside Employment**

- a. Employees may not engage in *outside employment* that involves:
 - (1) Use of City time, facilities, equipment, supplies, *confidential information*, or the employee's position;
 - (2) Performance of work subject to control, inspection, review, or audit by the department or a state agency; or
 - (3) Receipt of compensation for duties the employee is required to perform as part of City employment.

D. **Leave Limitations**

- a. ***Personal leave of absence*** for will not be approved for the purpose of engaging in *outside employment*.

E. **Disclosure Requirements**

- a. Employees must submit a written disclosure regarding *outside employment* to their Department Director before employment begins.
- b. The disclosure must identify any *actual or potential conflicts of interest*.
- c. If a conflict exists, a written mitigation plan is required and may be revised or revoked at any time.
- d. Employee must update the disclosure annually or sooner if any circumstances change.

3. Conversion of City Property for Private Use

- a. Employees may not use City-owned equipment, facilities, materials, or other City services for private purpose except in ways generally available to the public and subject to the same fees and conditions.
- b. Employees may not salvage or claim items left or abandoned on City property or during City-sponsored events, such as the annual "Spring Clean-up Event."

4. Use of Position

- a. Employees must not use their position to obtain financial benefit unavailable but for their City role. This prohibition applies to actions benefiting the employee, **relatives, household members**, or associated businesses.
- b. Prohibited conduct includes, but is not limited to, using City authority, recommendations, purchasing power, time, or resources for personal gain.
- c. Employees may not accept discounts, preferential pricing, rewards, or personal benefits arising from City vendor relationships, including frequent flyer miles or loyalty points generated through City business.
- d. Employees must promptly report to their supervisor any remuneration received from individuals or businesses that conduct business with the City.

5. Use of Confidential or Insider Information

- a. Employees must protect *confidential* and non-public *information* and exercise discretion in its use and disclosure.
- b. Employees must not:
 - (1) Disclose *confidential information* without authorization;
 - (2) Use *confidential information* to secure future employment or financial gain;.
 - (3) Use *confidential information* obtained during City employment for personal benefit after separation; or
 - (4) Share non-public information with others who may benefit from it.
- c. Employees involved in surplus property auctions or administration may not bid on items when they possess non-public information and may not use others to bid on their behalf.
- d. Family members residing in the employee’s *household* are also prohibited from bidding when the employee has administrative involvement.

Definitions

Term:	Definition
<i>Conflict of Interest:</i>	<i>As defined under OGE 244.020 includes two types of conflict:</i> <i>Actual Conflict of Interest:</i> An action or decision that results in a private pecuniary benefit or detriment to the employee, a relative, or an associated business. <i>Potential Conflict of Interest:</i> An action or decision that could result in a private pecuniary benefit or detriment.

Conversion of City Property for Private Use:	Use of public property, funds, or services under City control for private benefit.
Personal Leave of Absence:	Unpaid leave as defined in the City's Leave of Absence Administrative Regulation.
Member of Household:	Any person who resides with the employee.
Outside Employment:	Any compensated or potentially compensated work not part of the employee's City duties.
Public Official:	As defined according to Oregon Revised Statutes (ORS) 244 as "any person who is serving the State of Oregon or any of its political subdivisions or any other public body of the State as an officer, employee, agent, or otherwise and irrespective of whether the person is compensated for such services."
Agent:	An individual performing governmental functions on behalf of the City.
Relative:	As defined in ORS 244.020.
Use of Confidential or Insider Information:	Use of non-public information for personal benefit or gain.
Use of Position:	Use of a City role or title for private gain or to imply governmental endorsement.

Related Resources

Administrative Regulations:

- [Gifts & Gratuities](#)
- [Leave of Absence](#)

Forms:

- [Outside Employment Request](#)

Online Resources:

- [Oregon Government Ethics Commission \(OGEC\)](#)
- [Oregon Government Ethics Laws](#)
- [Guide for Public Officials](#)