



WS 17-07
February 22, 2017
Contract Management
Expires: Continuing

To: All Contractors

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Subject: Workforce Solutions Code of Conduct

Purpose

We are replacing issuance WS 16-04 and re-publishing the Workforce Solutions Code of Conduct.

Background

Since 2007, Workforce Solutions has in place a code of conduct and a set of basic standards for several areas of professional behavior.

The code does not supersede or replace existing contractual requirements regarding conflicts of interest, confidentiality and access to customer information, data integrity, or prevention of fraud and abuse.

Code of Conduct

The Gulf Coast Workforce Board, its staff and Workforce Solutions contractors and their staff maintain the highest standards of integrity in conducting our business. We are committed to innovation, productivity, accountability and results in all that we do.

We recognize our responsibility as part of the public workforce system to ensure the integrity of public funds and to avoid favoritism and questionable or improper conduct.

We carry out all aspects of our business in an impartial manner, free from efforts to gain personal, financial or political benefit. We avoid situations that could give the appearance that any decision is influenced by prejudice, bias, special interest or desire for personal gain.

We also strive to deliver the highest quality service to our customers, helping area employers solve their workforce problems and our area residents build careers so that both can compete in the global economy.

Implementing the Code

Contractors will make sure that they implement this code of conduct, and contractual requirements concerning conflicts of interest, confidentiality and access to customer information, data integrity and prevention of fraud and abuse, with their own internal policies and procedures.

These must include, at a minimum, the following:

- Policies and procedures that address contractor staff accessing financial aid for their personal use. These policies will at least include the requirement that employees disclose to their manager the intention to apply for Workforce Solutions Financial Aid and that employees may not apply at their place of work.
- Policies and procedures that address delivery of financial aid to contractor staff relatives, friends, or individuals with whom staff have a business relationship. These policies will at least include the requirement that no staff member may authorize, disburse or deliver financial aid, subcontracts or any other service of substantive value to a relative of any degree, personal or family friends or individuals with whom the staff member has a business relationship.
- Policies and procedures that require contractor staff to disclose to their management outside employment and/or business relationships with any customer, supplier or vendor.
- Policies and procedures that govern a contractor's employment of family members. These policies will at least include the requirement that staff may not make decisions about or authorize the hiring of family members or directly or indirectly supervise them. This requirement must also extend to any individual with whom the staff member has a business relationship.

Contractors will make sure that they discuss the code and these requirements with each of their staff members at least annually, as well as requirements covering confidentiality and access to management information systems, data integrity, other conflict of interest requirements and prevention of fraud and abuse.

Designated board staff, including quality assurance monitors and or the Board's financial monitors may ask to review a contractor's policies and its annual disclosure documentation at any time.

Action

1. Make sure that your organization has written policies and procedures in place that implement the Code of Conduct and all contractual requirements regarding conflicts of interest, confidentiality and access to customer information, data integrity, and prevention of fraud and abuse.
2. Make sure that each staff member receives, reads and understands the code and your policies and procedures to promote the highest standards of ethical, professional conduct throughout our system.
3. Make sure each staff member signs the [Code of Conduct](#) at hire and annually in October. For 2017, staff should sign the Code of Conduct no later than February 28, 2017.
4. Each organization is responsible for retaining signed Code of Conduct forms. Workforce Solutions monitoring team will review to ensure staff signed the form.

Questions

Staff should ask questions of their supervisors first. Direct questions for Board staff through the [Submit a Question](#) link.