



WAYNE COUNTY POLICY STATEMENT

Title:	Conflict of Interest Policy		
Wayne County Policy #		Date Issued:	10/1/2012
Category:		Date Revised:	4/3/2025
Approved By:	Donna Wilson, Director of Personnel/Human Resources		Page 1 of 5

I. PURPOSE

It is the duty of each public servant in Wayne County to conduct business honestly and ethically at all times, as prescribed in the [Ethics Ordinance](#). Public servants should dedicate themselves to constantly improve the quality of Wayne County services and operations and uphold Wayne County's reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment.

Public servant means an employee or contractor, an elected official or an appointed official of Wayne County, or a member of a Wayne County board or commission, who to the extent provided by law is subject to the County Ethics Ordinance.

Wayne County does not compromise its principles for short-term advantage. The ethical performance of the organization is the sum of the ethics of the employees who work for Wayne County. Thus, all public servants are expected to adhere to the highest standards of personal integrity.

Public servants of Wayne County must never permit their personal interests to conflict, or appear to conflict, with the interests of Wayne County, its residents or affiliates. Public servants must be particularly careful to avoid representing Wayne County in any transaction with others with whom there is any outside business affiliation or relationship, including relatives and domestic partners.

Public servants must avoid using their organizational contacts to advance their private business or personal interests or to secure incompatible employment at the expense of the organization, its residents, or affiliates.

Public servants may not influence hiring decisions where relatives and domestic partners are involved, nor may relatives or domestic partners be hired if it would create either a conflict of interest or a supervisor/subordinate relationship between the public servant and the relatives or domestic partner.

[Wayne County's Ethics Ordinance, No. 2014-734 \(Section 40-1 et seq.\)](#), is founded on basic principles of ethical behavior and are consistent with the County's core values and mission. To achieve our public service and goals, Wayne County must support an internal environment that nurtures and encourages ethical conduct by all its employees, contractors, elected or appointed officials, or a member of any Wayne County Board or Commission, collectively referred to as "public servants."

Public servants of Wayne County hold positions of public trust and share a mutual commitment to ethics in the workplace. It is our duty to continually earn the public's trust by advancing the public interest and refraining from the pursuit of private interests that compete with or are averse to a public servant's duty to the public interest in the exercise of official duties or official actions. We dedicate ourselves to upholding the highest standards of conduct in the performance of our duties by adhering to the following policy provisions:



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II. POLICY PROVISIONS

Each public servant of Wayne County will be provided with a copy of the Ethics Ordinance and this Conflict of Interest policy at the time of hire. Each public servant is required to acknowledge receiving and reading these documents. The public servant is encouraged to contact the Department of Personnel/Human Resources (P/HR) to ask questions or make inquiries about these Ordinance and Policy requirements.

Annual review will be done between March 1st and March 15th of each year, each public servant of Wayne County is required to sign an acknowledgement they have received and read both the Ethics Ordinance and the Code of Ethics Policy and have been given an opportunity to inquire as to their requirements. This acknowledgment, which will be filed within the Department of Personnel/Human Resources.

Each public servant must file within 30 days from time of hire an amended disclosure must be filed within thirty (30) days after the public servant, or their relative or domestic partner, becomes employed by or acquires a substantial financial interest in a county business as defined by the Ethics Ordinance.

Each public servant's conflict of interest disclosure information is publicly available on the Wayne County website [Transparency in Government](#) under Conflict of Interest Disclosure Form Section or <https://www.waynecounty.com/coireports>. The Department of Personnel/Human Resources will keep copies of all filings for at least three (3) years.

It is the policy of Wayne County to maintain a working environment to require employees to follow ethical behavior and business dealings. Should this not occur promptly and remedial corrective action up to including discharge will occur. There is an obligation to the residents of Wayne County and others to maintain the highest ethical standards.

III. REVIEW

1. Within thirty (30) days of hire or at the completion of the annual Conflict of Interest Disclosure period, the Department of Personnel/Human Resources will review and any form that includes a disclosure of a potential or actual conflict of interest to the Department Director or Elected Official.
 - A. The Department Director or Elected Official will review and respond to the Department of Personnel/Human Resources within thirty (30) days.
 - B. The written response must include one of the following statements and/or action steps:
 - The disclosure does not present a conflict.
 - The disclosure does present a conflict that can be remedied and include what action was taken after consultation with the employee.
 - The disclosure creates a conflict that cannot be remedied after consultation with the employee and notification has been provided to the Director of



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- Personnel/Human Resources so the matter could not be resolved. The Director will provide further action consistent with the Ethics Ordinance and any civil service or applicable collective bargaining agreement.
2. Within thirty (30) days of hire or at the completion of the annual Conflict of Interest Disclosure period, P/HR will review and will provide notice of any non-filers to the appropriate Department Director or Elected Official.
 - A. The Department Director or Elected Official will review and respond to P/HR within 30 days.
 - B. The written response must include one of the following statements and/or action steps:
 - Non-filer has subsequently filed.
 - Non-filer is no longer a public servant of Wayne County.
 - Any remedy for any non-filers including action consistent with the Ethics Ordinance and any civil service or applicable collective bargaining agreement.

IV. GUIDANCE

The Ethics Board is available to render an advisory opinion regarding whether a disclosure presents a conflict of interest under the Ethics Ordinance. In the event that the Ethics Board determines that the Ethics Ordinance was violated, the positive determination and all findings of fact shall be reported as follows:

1. If a classified employee is involved in the county, the positive determination and findings of fact shall be reported to the employee; the appropriate Department Director or Elected Official, Department of Personnel/Human Resources for application of appropriate discipline as provided by any applicable collective bargaining agreement or civil service rules.
2. If a contractor is involved, the positive determination shall be forwarded to the contractor; the appropriate Department Director or appropriate Elected Official, the Department of Management and Budget Director, Purchasing Director and Department of Personnel/Human Resources Director, for review of the appropriate steps permitted under the contract and shall be available on the Wayne County website.
3. If an appointee is involved, the positive determination shall be forwarded to the appointee; appropriate Department Director or Elected Official, Department of Personnel/Human Resources Director; for disciplinary consideration, as appropriate.
4. If an Elected Official is involved, the positive determination and finding of fact shall be forwarded to the Elected Official and shall be available on the Wayne County website.



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V. ENFORCEMENT

This Conflict of Interest - Ethics policy applies to all employees of Wayne County and the Ethics Ordinance applies to all public servants of Wayne County.

The Department of Personnel/Human Resources is responsible for the communication of the Ethics requirements and in obtaining acknowledgments of the annual conflict of interest disclosures from public servants pursuant the Wayne County Ethics Ordinance.

In addition to disciplinary action up to and including termination of employment, a public servant may also be subject to civil or criminal penalties for violations of the Ethics Ordinance, as permitted by law.

VI. DISCLAIMER

If this Policy conflicts with federal or state law, the applicable law prevails over this Policy. If in direct conflict with any Wayne County Ordinance, the Ordinance prevails over this Policy. In the event that any provision of this Policy is in conflict with the terms and conditions of an existing CBA, the terms and conditions of the CBA prevail. On matters where a CBA is silent, the provisions of this Policy shall apply. If in direct conflict with other internal or departmental policies, this Policy prevails unless otherwise directed by the Director of Personnel/Human Resources or designee. This policy revision shall replace any previous policies published under the same title and/or number.

VII. RELATED DOCUMENTS

- a. Civil Service Rules and Regulations
- b. Collective Bargaining Agreements
- c. Wayne County Charter
- d. Ordinance – Ethics No. 2014-734
(Section 40-1 *et seq.*)
- e. Ethics Acknowledgement
- f. Ordinance – Ethics in Public Contracting
- g. Work Rules
- h. Code of Conduct Policy
- i. Wayne County Employee Handbook
- j. Fraud Ordinance and related policies
- k. Political Activities Policy
- l. The Personnel/Human Resources Code of Ethics Policy
- m. The Policy on Outside Employment
- n. The Policy of Criminal Charges Against Employees
- o. The Conflict of Interest Policy
- p. The Code of Conduct Policy
- q. The Non-Solicitation Policy
- r. The Leave of Absence Policy for Political Candidates
- s. The Confidential Information Policy
- t. The Acceptance of Gifts Policy
- u. The Vehicle Use Policy
- v. The Credit Card Policy
- w. The Internet & Email Usage Policy



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VIII. REVISION HISTORY

ACTION	DATE	BY WHOM	REASON
Created	10/1/2012	Tish King, P/HR Director	New Policy as aligned to Ordinance
Revised	6/30/2013	Tish King, P/HR Director	Format
Revised	2/05/2016	Steve Mahlin, P/HR Director	Updated policy
Revised	3/1/2023	Donna Wilson, P/HR Director	Updated policy
Revised	2/17/2025	Donna Wilson, P/HR Director	Updated policy
Revised	4/3/2025	Donna Wilson, P/HR Director	Updated policy