



United States Department of the Interior Office of the Secretary



What Role Do HR/Employee Relations Specialists Play in an Agency's Ethics Program?

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HR/ER Specialists are management consultants – that is their role in accordance with the Federal Labor Management Relations Statute and is usually reflected as such in Agency policies. Treat the HR/ER team as an extension of management. **HR can be a partner with Ethics Officers** –

- Know who your HR partners are
- Be accessible to answer questions
- Encourage engagement with your HR Office to proactively prevent violations
- Provide your HR Office with Ethics materials that can be included in New Employee Packages

Develop a process for identifying OGE-450 filers (and others) that includes your HR partner

Develop a reporting infrastructure to address issues –

- Ask your Agency to identify primary HR points of contact that you can reach out to when you observe or receive reports of violations
- Work with those primary HR contacts to ensure two-way communication on issues
- Do not by-pass your HR partners
- Have a feedback mechanism for closure of reported issues

HR Process for Addressing Ethics Violations

- HR receives a report of incident (thru varying avenues – supervisors, employees, customers, IG Office, *Ethics Office*, etc.)
- HR works with management to develop fact finding (obtain witness statements, documentation, determine what happened, etc.)
- HR researches the situation, including researching laws and regulations to identify violations and historical disciplinary/adverse actions regarding penalty consistency (*may seek Ethics Office guidance*)
- HR advises management on what steps to take (range from informal action such as verbal or written counselings to removals) [usually seeks advice from Agency Solicitor]
- Management makes decision on what action is taken (*may seek Ethics Office guidance*)
- HR helps management develop final documentation (written counselings, proposal and decision letters) (*may seek Ethics Office guidance*)
- Actions are filed in Employee Relation Case files for progressive discipline or other future reference
- HR provides employees with information about their rights in the event they observe or report an ethics violation (*may seek Ethics Office guidance*)
- In addition to addressing specific violations, HR provides interpretations and guidance to management & employees on ethics-related topics. Some typical examples are: gifts, selling items on government property, political pictures during election periods, nepotism, perceptions of ethics violations (*may seek Ethics Office guidance on all of the above*)