TOWN OF EAST HARTFORD

EMPLOYMENT POLICIES

Town of East Hartford Employment Policies

AMERICAN WITH DISABILITIES ACT (ADA) 4

Continuation Coverage Rights Under COBRA 5

DEROGATORY REMARKS 8

DRESS CODE 9

DRUG & ALCOHOL-FREE WORKPLACE 10

EMERGENCY CLOSING 12

Emergency Evacuation Procedures – Town Hall 13

EQUAL EMPLOYMENT OPPORTUNITY PLAN 15

FAMILY MEDICAL LEAVE 16

HAZARD COMMUNICATION & TRAINING 17

INFORMATION SYSTEMS USE 18

MOTOR VEHICLE USE 28

PERSONNEL COMMUNICATION DEVICES 31

PRIVACY NOTICE - HIPAA 32

SAFETY IN THE WORKPLACE 38

POLICY PROHIBITING HARASSMENT 39

SMOKING IN THE WORKPLACE 42

OFFICIAL SOCIAL MEDIA GUIDELINES **43**

POLICY ON PERSONAL USE OF SOCIAL **45**

MEDIA BY EMPLOYEES **45**

WORKPLACE THREATS AND VIOLENCE **46**

TOWN FRAUD HOTLINE **49**

WHISTLEBLOWER INFORMATION **50**

AMERICAN WITH DISABILITIES ACT (ADA)

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), this notice states to the public that the Town of East Hartford does not discriminate against qualified individuals with disabilities in its services, programs and activities. The ADA requires the Town of East Hartford to ensure that individuals with disabilities have an equal opportunity to participate in all meetings, services, programs and activities, provided such action does not fundamentally alter the nature of its meetings, services, programs or activities, or impose undue financial or administrative burden.

Employment: The Town of East Hartford does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Modifications to Policies and Programs: The Town of East Hartford will, upon request, make reasonable modifications to its policies and programs to ensure that people with disabilities have an equal opportunity to participate in all meetings, services, programs and activities. The ADA does not require the Town of East Hartford to take any action that would fundamentally alter the nature of its meetings, services, programs or activities, or impose undue financial or administrative burden.

Effective Communication: The Town of East Hartford will generally, upon request, provide auxiliary aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Town of East Hartford meetings, services, programs and activities.

The Town of East Hartford will not place a surcharge on individuals or on any group of individuals with disabilities to cover the cost of providing auxiliary aids and services or reasonable modifications of policy.

Anyone requiring an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a meeting, service, program or activity of the Town of East Hartford, should contact the ADA Coordinator as soon as possible but no later than 48 hours beforehand:

Theresa Buchanan
Director of Human Resources
Town of East Hartford
740 Main Street
East Hartford, CT 06108
(860) 291-7222
tbuchanan@easthartfordct.gov

Complaints that a Town of East Hartford meeting, service, program or activity is not accessible to persons with disabilities should be directed to the ADA Coordinator listed above for information about the Town of East Hartford's Grievance Procedure under the Americans with Disabilities Act.

Continuation Coverage Rights Under COBRA

Introduction

We are providing this notice to you because you may have coverage under a group health plan (the Plan) through the Town of East Hartford. This notice has important information about your right to COBRA continuation coverage, which is a temporary extension of coverage under the Plan. This notice explains COBRA continuation coverage, when it may become available to you and your family, and what you need to do to protect your right to get it. When you become eligible for COBRA, you may also become eligible for other coverage options that may cost less than COBRA continuation coverage.

The right to COBRA continuation coverage was created by a federal law, the Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA). COBRA continuation coverage can become available to you and other members of your family when group health coverage would otherwise end. For more information about your rights and obligations under the Plan and under federal law, you should review the Plan's Summary Plan Description or contact Sandra Franklin, Benefits Administrator, Human Resources. **Benefit Strategies** is the COBRA Administrator for the Town of East Hartford. All COBRA election notices will be mailed directly from **Benefit Strategies** when there is a loss of coverage.

You may have other options available to you when you lose group health coverage**.** For example, you may be eligible to buy an individual plan through the Health Insurance Marketplace. By enrolling in coverage through the Marketplace, you may qualify for lower costs on your monthly premiums and lower out-of-pocket costs. Additionally, you may qualify for a 30-day special enrollment period for another group health plan for which you are eligible (such as a spouse's plan), even if that plan generally doesn't accept late enrollees.

What is COBRA continuation coverage?

COBRA continuation coverage is a continuation of Plan coverage when it would otherwise end because of a life event. This is also called a "qualifying event." Specific qualifying events are listed later in this notice. After a qualifying event, COBRA continuation coverage must be offered to each person who is a "qualified beneficiary." You, your spouse, and your dependent children could become qualified beneficiaries if coverage under the Plan is lost because of the qualifying event. Under the Plan, qualified beneficiaries who elect COBRA continuation coverage must pay for COBRA continuation coverage.

If you're an employee, you'll become a qualified beneficiary if you lose your coverage under the Plan because of the following qualifying events:

- Your hours of employment are reduced, or
- Your employment ends for any reason other than your gross misconduct.

If you're the spouse of an employee, you'll become a qualified beneficiary if you lose your coverage under the Plan because of the following qualifying events:

- Your spouse dies;
- Your spouse's hours of employment are reduced;
- Your spouse's employment ends for any reason other than his or her gross misconduct;
- Your spouse becomes entitled to Medicare benefits (under Part A, Part B, or both); or
- You become divorced or legally separated from your spouse.

Your dependent children will become qualified beneficiaries if they lose coverage under the Plan because of the following qualifying events:

- The parent-employee dies;
- The parent-employee's hours of employment are reduced;
- The parent-employee's employment ends for any reason other than his or her gross misconduct;
- The parent-employee becomes entitled to Medicare benefits (Part A, Part B, or both);
- The parents become divorced or legally separated; or
- The child stops being eligible for coverage under the Plan as a "dependent child."

When is COBRA continuation coverage available?

Benefit Strategies will offer COBRA continuation coverage to qualified beneficiaries only after the Town has been notified that a qualifying event has occurred. The Town must notify Benefit Strategies of the following qualifying events:

- The end of employment or reduction of hours of employment;
- Death of the employee or;
- The employee's becoming entitled to Medicare benefits (under Part A, Part B, or both).

For all other qualifying events (divorce or legal separation of the employee and spouse or a dependent child's losing eligibility for coverage as a dependent child), <u>you</u> must notify the Town within 60 days after the qualifying event occurs. You must provide this notice to: Sandra Franklin, Benefits Administrator, Town of East Hartford by phone 860-291-7223; fax 860-291-7224 or email at sfranklin@easthartfordct.gov.

How is COBRA continuation coverage provided?

Once Benefit Strategies receives notice that a qualifying event has occurred, COBRA continuation coverage will be offered to each of the qualified beneficiaries. Each qualified beneficiary will have an independent right to elect COBRA continuation coverage. Covered employees may elect COBRA continuation coverage on behalf of their spouses, and parents may elect COBRA continuation coverage on behalf of their children.

COBRA continuation coverage is a temporary continuation of coverage that generally lasts for 18 months due to employment termination or reduction of hours of work. Certain qualifying events, or a second qualifying event during the initial period of coverage, may permit a beneficiary to receive a maximum of 36 months of coverage.

There are also ways in which this 18-month period of COBRA continuation coverage can be extended:

Disability extension of 18-month period of COBRA continuation coverage

If you or anyone in your family covered under the Plan is determined by Social Security to be disabled and you notify Benefits Strategies in a timely fashion, you and your entire family may be entitled to get up to an additional 11 months of COBRA continuation coverage, for a maximum of 29 months. The disability would have to have started at some time before the 60th day of COBRA continuation coverage and must last at least until the end of the 18-month period of COBRA continuation coverage.

Second qualifying event extension of 18-month period of continuation coverage

If your family experiences another qualifying event during the 18 months of COBRA continuation coverage, the spouse and dependent children in your family can get up to 18 additional months of COBRA continuation coverage, for a maximum of 36 months, if the Plan is properly notified about the second qualifying event. This extension may be available to the spouse and any dependent children getting COBRA continuation coverage if the employee or former employee dies; becomes entitled to Medicare benefits (under Part A, Part B, or both); gets divorced or legally separated; or if the dependent child stops being eligible under the Plan as a dependent child. This extension is only available if the second qualifying event would have caused the spouse or dependent child to lose coverage under the Plan had the first qualifying event not occurred.

Are there other coverage options besides COBRA Continuation Coverage?

Yes. Instead of enrolling in COBRA continuation coverage, there may be other coverage options for you and your family through the Health Insurance Marketplace, Medicaid, or other group health plan coverage options (such as a spouse's plan) through what is called a "special enrollment period." Some of these options may cost less than COBRA continuation coverage. You can learn more about many of these options at www.healthcare.gov.

If you have questions

Questions concerning your Plan or your COBRA continuation coverage rights should be addressed to the contact or contacts identified below. For more information about your rights under COBRA, the Patient Protection and Affordable Care Act, and other laws affecting group health plans, contact the nearest Regional or District Office of the U.S. Department of Labor's Employee Benefits Security Administration (EBSA) in your area or visit www.dol.gov/ebsa. For more information about the Marketplace, visit www.HealthCare.gov.

Keep your Plan informed of address changes

To protect your family's rights, let the Plan Administrator know about any changes in the addresses of family members. You should also keep a copy, for your records, of any notices you send to the Plan Administrator.

Plan contact information

Benefit Strategies 1-888-401-3539
Sandra Franklin, Benefits Administrator, 860-291-7223
Anthem BC/BS of CT 1-800-233-4947
Delta Dental of NJ 1-800-452-9310

DEROGATORY REMARKS

Employees are not permitted to display any phrases or remarks, written or verbal, that are patently derogatory or that may be construed, under a reasonably prudent person standard, as a derogatory in nature anywhere in the workplace.

Employees who do not follow this policy may be subject to disciplinary action as outlined by the employee's bargaining unit contract and/or personnel rules.

DRESS CODE

It is important for all employees to project a professional image on behalf of the Town of East Hartford. The Town expects all employees to maintain a neat, professional and well-groomed appearance at all times. Employees are expected to use good judgement and wear clothing that is appropriate and professional for the type of work they are performing.

Several Directors and employees have approached the Town on the subject of "Casual Fridays". In order to maintain a professional work environment, the following lists are being provided:

Appropriate Casual Dress
Khakis, slacks, dress capris
Collared shirts
Blazers, sport coats (optional)
Sweaters

Inappropriate Dress Includes
Jeans
Sweatshirts or sweatpants
Shorts, mini-shorts, halter tops
T-shirts

Please keep in mind that it is sometimes necessary for employees to wear jeans, work boots or sneakers due to the nature of their jobs. Specifically, Inspectors and Town Engineering staff, as well as employees of the Parks and Recreation Department and Public Works.

This information is meant to be a guide and other attire may be considered appropriate or inappropriate by your immediate supervisor or department head. Also, if complaints or information is received that this general policy is not being followed, we will re-visit this subject.

Thank you for your anticipated cooperation.

DRUG & ALCOHOL-FREE WORKPLACE

In compliance with the "Drug Free Workplace Act of 1988" and to further its commitment to provide a safe drug and alcohol free workplace, the Town hereby re-announces the following:

1. The use, sale, possession or distribution of illegal drugs or the abuse of legal drugs while at work, whether on or off Town-owned property, is strictly prohibited.

2. Alcohol may not be possessed, transferred, sold or used while at work, whether on or off TOWN property.

3. Being under the influence of alcohol or drugs while at work is strictly prohibited. All employees must report to work in a physical and mental condition necessary to perform their jobs without impairment.

4. All applicants for employment may be required to successfully complete a urinalysis drug test as part of the pre-employment screening process. A positive urinalysis test result will be considered sufficient grounds to disqualify an applicant from employment with the TOWN. Prospective applicants who have positive test results may be allowed to reapply for employment with the TOWN after a waiting period of six months, but will be required to successfully complete a urinalysis drug test prior to employment.

5. The TOWN reserves the right to require an employee to undergo a medical evaluation and, when applicable, a urinalysis drug screening test, when there is reasonable suspicion that the employee is working under the influence of drugs or alcohol which may adversely affect such employee's job performance or which could adversely affect the employee's ability to perform his or her job. Involvement in a work-related accident caused by apparent impairment of judgment or physical or mental ability may also result in an employee having to undergo medical evaluation and, where applicable, a urinalysis drug screening. A positive urinalysis test result will be considered sufficient grounds to discipline or terminate an employee.

6. The TOWN also reserves the right to conduct random testing as authorized by Federal or State laws. Employees who are in occupations designated as safety-sensitive occupations by Federal or State laws or regulations may be selected randomly for urinalysis drug testing. Employees who are selected must report as directed for testing. A positive urinalysis test will be considered sufficient grounds to discipline or terminate an employee.

7. Failure to cooperate fully with the requirements of any drug screening test, including accurate completion of the required documentation, may result in discipline or termination of employment.

8. An employee or applicant whose urine test result is positive may request a retest of the original specimen. This request must be submitted in writing to the TOWN within fifteen (15) days. All costs associated with a retest under this program must be prepaid by the employee or applicant, including shipping and handling, transportation and testing.

9. Criminal arrest for drug-related offenses, either on or off the job, generally will not constitute grounds for discipline unless the offense is confirmed by criminal conviction or independent investigation by the TOWN.

10. The legal used of prescribed drugs is permitted on the job if such use does not impair the employee's ability to work safely and does not endanger other employees. Employees must keep all prescribed medicine in the original container, which identifies the drug, date of prescription, dosage and prescribing physician.

11. It is a requirement of the Federal Act that upon receipt of notice of conviction of a drug statute violation committed in the workplace, that the TOWN notifies the Federal Agency providing the grant. The TOWN must give such notice within 10 days, and within 30 days of receiving such notification either take appropriate personnel action against the employee, up to and including termination of employment, or require the employee to participate in an approved drug abuse assistance or rehabilitation program. Personnel action against the employee convicted of a criminal drug statue violation will depend on the nature of the violation, the sentence imposed (i.e. confinement, etc.) and employee work history. However, the employee's failure to notify the TOWN of such criminal drug statute conviction committed in the workplace within 5 days as required by the policy will subject the employee to disciplinary sanctions. Thus, it is required that any employee notify their supervisor or department head of any criminal drug statute conviction for a violation occurring in the workplace no later than 5 days after such conviction.

12. The TOWN is committed to implementing this policy in a fair and equitable manner which promotes a safe and drug-free workplace, respects the dignity and privacy of the individual and respects the safety of our citizens.

13. In keeping with our emphasis on early intervention and treatment for employees who are faced with alcohol and drug-related problems, the TOWN will offer assistance to any eligible employee through our Employee Assistance Program. We encourage employees with a substance abuse problem to avail themselves of this help before disciplinary action becomes necessary. Employees who are in recovery are expected to maintain satisfactory job performance and remain committed to a rehabilitation plan. Employees who successfully complete a rehabilitation program, who remain substance-free, and who have violated no other TOWN policies will not place their employment at the TOWN in jeopardy by reason of substance abuse.

EMERGENCY CLOSING

From time to time the Town of East Hartford's Town Hall and/or other offsite departments may have to close during a regularly scheduled work day due to weather conditions such as snow, ice, etc. Alternatively, closings may also occur due to non-weather related conditions such as power outages, loss of heat/air-conditioning, etc.

Whenever possible, employees will be notified in advance that the East Hartford Town Hall will be closed through an announcement on the radio or by calling 860-291-7200 for a recorded message which will provide current information. WTIC Radio, 1080 AM, is the radio station that is notified, normally between 6:00 and 7:00 a.m. The radio station will announce that the East Hartford Town Hall is closed.

Weather & Non-Weather Related Emergency Closings:

- *As declared by either the State or Federal Government.* All employees are compensated for the regularly scheduled hours they would have worked, but for the closing. Employees who had prescheduled time off or called in sick will not be compensated for "regularly scheduled hours they would have worked".
- *As declared by the Mayor or acting Mayor.* All employees are compensated for the regularly scheduled hours they would have worked, but for the closing. Employees who had prescheduled time off or called in sick will not be compensated for "regularly scheduled hours they would have worked".
- *During times of anticipated or actual inclement weather only.* When employees are reasonably concerned for their own safety, they may use any accrued paid leave owed to them to stay home, arrive late, or leave work early. Alternatively, with the approval of the Department Head and Human Resource Director, employees without any accrued paid leave or sick time may take an unpaid leave of absence.

Alternative to Emergency Closings:

Unless otherwise directed by their Department Head, displaced employees affected by the department or facility closing will be directed to the Community Cultural Center (or some other designated facility) for the purpose of receiving employee training. Employees whose jobs are not impacted by the facility closing will continue their work as scheduled.

Employees who do not wish to receive training may use any accrued paid leave owed to them. Alternatively, with the approval of the Department Head and Human Resource Director, employees without any accrued paid leave or sick time may take an unpaid leave of absence.

Emergency Evacuation Procedures – Town Hall

There may be emergency conditions which will require evacuation of the Town Hall. Activation of the fire alarm will be not only for fire related evacuation but for any other emergency. The following procedures have been developed in case an emergency evacuation is necessary:

1. The fire alarm is a loud blaring horn; if it sounds, evacuate the building immediately, in a safe and orderly fashion.

   The department supervisor, with an appointed back up, will be responsible for seeing that all employees and/or visitors immediately exit through the nearest door.

2. If you see smoke or fire, pull the nearest fire alarm box and immediately exit through the nearest door. The fire alarm pull boxes are located at each exit door.

3. Once outside, gather and stay with other employees in your department so everyone can be accounted for. In absence of the supervisor, a designated backup will take the head count. If an employee is missing, inform a firefighter.

In addition to the procedures above, keep in mind the following:

- **Your own safety** is the Town's number one concern, however, if time allows, close all doors and windows and take the appropriate security measures.

- If a fire alarm has sounded, **do not** use the elevators.

- Ground level employees may exit through open windows if necessary.

- **Do not** use exit doors leading to the courtyard as they are locked from the outside and you will not be able to get back in.

- **Do not** congregate close to the building, as emergency equipment will be arriving.

- **Smoke is a major killer**! If you encounter smoke, crawl along the floor to the nearest exit.

- If there are elderly or handicapped visitors in your department, assist them or get help to assist them in exiting the building. If this cannot be done, close the doors to the room, exit the building and immediately notify a fire fighter as to which room the person is in.

- Be sure to familiarize yourself with the location of exit doors and the location of fire extinguishers.

- Never assume the alarm is a practice drill.

TOWN HALL EMPLOYEES EMERGENCY RELOCATION POLICY

In the event that Town Hall Offices are determined to be unfit working conditions (i.e. power outage, loss of heat/air conditioning, safety issues, etc.), employees will be notified by their immediate supervisors. At this time, the employee will be given the option to either take earned or vacation time or report to a designated area that will be set up for training purposes or emergency telephone or work stations. Employees without any accrued leave may take an unpaid leave.

COMMUNITY CULTURAL CENTER

Assessor's Office
Inspections & Permits
Engineering
Finance Department
Purchasing
Tax Office
Town Clerk's Office
Development
Grants Administration
Health and Social Services

PUBLIC SAFETY COMPLEX

Mayor's Office
Corporation Counsel
Town Council
Human Resources
Data Processing

Employees, whose jobs are not impacted by the office closing, will continue their work as scheduled.

EQUAL EMPLOYMENT OPPORTUNITY PLAN

It is the policy and practice of the Town of East Hartford, Connecticut to recruit and to employ qualified job applicants without discrimination regarding race, color, religion, age, sex, national origin, disability, veteran status or sexual orientation, except in the case of a bona-fide occupational qualification or need. The policy and the obligation to provide equal employment shall include, but not be limited to the following:

1. Recruiting, hiring, training or promoting persons in all job classifications without regard to race, color, religion, sex, disability, veteran status or any other non-job related characteristic.

2. Ensuring that promotion decisions are in accordance with equal employment opportunity requirements by imposing only valid, job-related requirements for promotional opportunities.

3. Ensuring that all personnel actions relating to compensation, benefits, transfer, termination, training and education are administered in a nondiscriminatory manner.

The Town emphasizes this policy to assure compliance with all applicable laws that pertain to equal employment opportunities.

The Town further recognizes that the effective application of this policy is an integral part of its overall personnel administrative process, and that a positive, continuing equal opportunity program for all employees and applicants for employment provides significant value to the Town as a whole. It is the Town's desire that the combination of measurable goals and directed effort will make equal employment opportunities a fact within the Town of East Hartford.

The Town will additionally assert its leadership within the community to achieve full employment and effective utilization of the capabilities and productivity of all persons without regard to race, color, religion, age, sex or disability. The Town recognizes its responsibility and obligation to abide by equal employment opportunity laws as found within federal and state statutes and regulations, executive orders and judicial mandates.

This current EEOC policy is effective as of January 1, 2017

Marcia A. Leclerc

Mayor Marcia A. Leclerc

FAMILY MEDICAL LEAVE

The Town will comply with the terms of the Federal Family Medical Leave Act. These terms include but are not limited to the following:

1. Under circumstances described below, employees will be eligible for up to 12 weeks of paid or unpaid family and medical leave in a twelve-month period. Pursuant to Federal Law, employees may choose, or employers may require the employee to use, accrued paid leave to cover some or all of the FMLA time taken. In addition, employees may choose, or employers may require, the substitution of accrued paid vacation or personal leave for any of the situations covered by FMLA.

2. Events which qualify employees for such unpaid leave are:

   - Birth or adoption of a child or placement of a child in the employee's home for foster care.
   - A serious health condition, as defined by FMLA, of the employee, employee's spouse, employee's parent or child.
   - For a qualifying exigency arising out of the fact that the employee's spouse, civil union partner, son, daughter, or parent is on covered active duty or called to covered active duty status in support of a contingency operation as a member of the reserve components, or a retired member of the Regular Armed Forces or Reserve, or a Regular Armed Forces member who is in active duty in a foreign country or who is called to such duty.
   - To care for a covered service member with a serious health injury or illness if the employee is the spouse, civil union partner, son, daughter, parent, or next of kin of the service member.

3. To qualify for FMLA leave, employees requesting such leave must explain the reason for the leave in writing to the Human Resources Department so that the Town can determine if FMLA qualified leave will be granted.

4. The Town may require medical certification to document the reason for the leave, where provided by law.

5. The Town will notify the employee in writing before the leave begins that the leave has been designated as FMLA leave and will be deducted from the allowable maximum.

6. During the period of FMLA-qualified leave, the employee shall retain medical benefits at the same level as before the leave. The Town will continue to pay the premium as before the leave. The employee shall make premium share contributions for health insurance directly to the Town when on unpaid leave.

7. Employee may be required to provide a "fitness for duty" certification upon return to work.

HAZARD COMMUNICATION & TRAINING

The U.S. Department of Labor's Occupational Safety and Health Administration have issued regulations concerning hazardous substances in the workplace. These regulations often referred to as the Hazard Communication Standard; establish requirements for chemical manufacturers and for employers who use chemical products in their workplace. ConnOSHA has adopted these regulations for municipalities.

The requirements are intended to ensure that the hazards of all chemical substances are evaluated, and that information regarding potential hazards is made available to employees who may use or come in contact with these substances. Both the Town Emergency Manager and your department will maintain Material Safety Data sheets (MSDS) for hazardous materials which may be present in your area. These forms for your review and you are encouraged to review them.

Your employers are required to provide you with proper information and training regarding any hazardous chemical substances in your workplace. The responsibility for ensuring that you receive this information and training rests with your department director.

INFORMATION SYSTEMS USE

Purpose:
To establish rules of conduct for use of all Town of East Hartford Information Systems, including but not limited to, telephone (land line and cellular), voice mail, facsimile machines, computers, electronic mail, Internet access, and network access privileges provided by the Town of East Hartford (the "Town of East Hartford Information Systems" or "Town's Information Systems"). This policy applies to the use of Town of East Hartford Information Systems at all locations. Town of East Hartford Information Systems covered by this policy include those that are entirely owned and operated by the Town of East Hartford. Town of East Hartford Information Systems shall also include information system(s) or application(s) owned by third parties and utilized by the Town or any of its employees or agents.

Officials and employees of the town, wherever situated, should at all times be aware that the Town of East Hartford reserves the right to monitor for any purpose email messages, Internet use, other electronic files created by employees and all other components of the Town's Information Systems to ensure compliance with this policy. Telephone use may be monitored on a user-by-user basis for appropriate cost controls. Random monitoring may also be conducted in addition to any specific monitoring deemed necessary by upper management. The Town's Information Systems may be monitored by using computers, and/or telephones, wires, cameras, electromagnetic, photo-electronic or photo-optical systems. The posting of this notice constitutes the prior written notice required by section (b) (1) of Connecticut General Statute 31-48d. No further notice will be given.

At no time shall the Town of East Hartford's Information Systems be used outside the scope of the provisions of these policies. These policies are implemented to protect the Town of East Hartford, its employees and our systems from damage or liability.

Conditions to Authorization:
Employees are authorized to use the Town of East Hartford's Information Systems as assigned and in accordance with the terms and conditions of this Information Systems Use Policy. If an employee violates this policy, the employee's authorization is deemed to be immediately revoked, without notice. An employee's authorization to use the Town of East Hartford's Information Systems is contingent on his or her continued compliance with all conditions.

Use:
The Town of East Hartford's Information Systems are carefully managed to allow employees access to resources needed to carry out the business of the Town of East Hartford. This access is maintained to comply with security policy best practices and Town, State and Federal regulations and laws.

Passwords:
For security, passwords will be required to be changed on a regular basis. The Town of East Hartford's Information Systems shall use and enforce the following secure password attributes:

Passwords shall be a minimum length of eight (8) characters.
Passwords shall not be a dictionary word or proper name.

Passwords and Usernames shall not be the same.
Passwords should not be older than 90 days.
Passwords, if written down, should not be kept in plain sight.
Passwords shall not be transmitted in clear text outside the Town's Information Systems.

Password change notifications will be automated by the Town's Information Systems. Ample warning of an expiring password will be given.

Password sharing between members of the Town of East Hartford is strictly prohibited. In no event will any personnel give their password to anyone else in order to counter the security measures in place on the network. No individual shall access the Town of East Hartford Information System with any account, logon, username or password, other than that which was issued them by the appropriate systems administrator. Use of another individual's credentials to access any Information System is strictly prohibited. Such actions undermine the overall security and integrity of the network and its data. The exception is action taken under the direction of a System's Administrator in order to troubleshoot or maintain a system. Also, files may be shared by copying them to an area that is shared on the network for access by multiple users.

In the event that any person needs a change in access to network resources, programs, or data, such will be obtained through proper application for that access through the chain of command. Within one business day after written approval is received from the appropriate authority, the Systems Administrator will grant the approved user the appropriate access rights for their job function.

Excessive Use:
Users must avoid excessive use of the Town's Information Systems. Excessive use means use that is disproportionate to that of other users, or is unrelated to Town-related needs, or that interfere with other authorized users. The reasonableness of any specific use shall be determined by the Systems Administrator or Department Head, in context of relevant circumstances.

Email:
Officials and employees of the town, wherever situated, should be aware that the town has the ability and right to monitor messages sent and/or received via voicemail and/or electronic mail (e-mail). See "Monitoring" in this policy.

The Town of East Hartford's email system is to be used for conducting the business of the Town of East Hartford. The email system cannot be used to transmit, access, or download offensive, fraudulent, or defamatory images or text, including but not limited to pornography, off-color jokes, discriminatory materials or anything that may be construed as harassing or offensive to others at any time.

The email system cannot be used, at any time, for chatting, sending or propagating jokes, or creating or responding to chain mail or SPAM.

Occasionally "Read Receipts" are requested in response to an email. Any prompts for read receipts, from any employee of the Town of East Hartford, shall not be denied. Read receipts are a useful business tool which aid in management and accountability for all.

Email requires extensive network capacity. Sending unnecessary email, or not exercising constraint when sending large files, or sending to a large number of recipients consumes network resources that are needed for critical Town business. When the Town of East Hartford grants an individual employee access to the network, it is the responsibility of the employee to be cognizant and respectful of network resources.

When sending or replying to email – make sure you are sending to an individual when you want to send to an individual and a group when you want to send to a group. It is best to address directly to and individual(s) or sender(s). Check carefully, the "To" and "From" before sending mail. It can prevent unintentional errors. Emailing large distribution lists (i.e., Town Hall Personnel, Police Department Personnel and Fire Department Personnel) are strictly reserved for business use and only with approval of the System Administrator or your Department Head.

"Excessive Use" of the email system shall not be permitted. (See excessive use defined above).

The Town of East Hartford's email system employs a content filter and virus scanner to protect the system and its users from inappropriate material and/or viruses. Should a valid email be blocked or quarantined, notify your supervisor or system administrator and an attempt to recover the email will be made.

Avoid opening any email attachment you receive unless the attachment is business related, is clearly identified, and you expected it from the sender. Do not click on web links (URL'S) unless the link is business related, is clearly identified, and you expect it from the sender. When in doubt, contact the sender by phone to verify the source and content of the attachments or links before you open or click on them. Delete any email containing attachments or links which are from unknown sources or which cannot be verified by the sender.

When sending an attachment to an email you are preparing, include a description of the attachment content, including the file name and approximate file size and attempt to notify the recipient of your pending delivery. Should you have any reason to believe your PC has been affected by a virus, notify your system administrator immediately.

Despite the existence of any passwords, employees should not assume that any electronic communication is private. It is not and can be monitored at any time without further notice.

Be aware; MAIL ON THE INTERNET IS NOT SECURE. Never include in an email message anything that you want to keep private and confidential because email is sent unencrypted and is easily read. In some circumstances, email may be subject to disclosure in court or administrative proceedings or under Freedom of Information laws.

Be aware if you send anything but plain ASCII text as email. Recipients may not have the ability to open your documents (i.e., Word or VISO documents).

You may want to include a signature (an identifier that automatically appends to your email message) that contains the method(s) by which others can contact you. (Usually your email, address, phone number, fax number, etc.)

For important items, you may want senders know you have received their email, even if you cannot respond in depth immediately. They need to know their email is not lost.

Internet:

Officials and employees of the town, wherever situated, should at all times be aware that the town has the ability and right to monitor internet usage. See "Monitoring" in this policy.

Access to the internet is provided to enhance your capability to perform your Town responsibilities, so its use is permitted strictly and solely for use related to job function. Improper use of this facility will result in Internet service removal and possible disciplinary action. Town of East Hartford computers are the property of the Town of East Hartford and must not be used for any prohibited purposes.

"Excessive Use" of Internet access shall not be permitted. (See excessive use defined above).

The Town of East Hartford's Internet Access system employs a content filter and virus scanner to protect the system and its users from inappropriate material and/or viruses. Should a valid website be blocked, notify your supervisor or systems administrator and if appropriate, the access will be arranged.

Town staff requiring Internet accesses provided as part of their job function and normal duties shall be provided access upon request to designated Systems Administrator(s) and Department Heads.

All department heads will be provided full Internet access privileges.

Employees will be provided Internet access privileges based on business needs. Request for internet access should be brought to your supervisor detailing demonstrated need. If approved by the supervisor, the supervisor will submit the request to their system administrator. Access will then be issued if network resources allow.

Additional staff may be granted expanded Internet access rights upon request to the designated system administrator(s) and subsequent approval by the Mayor. All requests should identify a strong need for the expanded access and sound reason(s) why access cannot be gained by use of the department head's system. For example, a remote physical location may make use of the Department Head's system impractical.

Visiting pornographic sites or viewing pornographic materials on the Town's Internet System is prohibited and will result in discipline or termination. Accidental access to an adult, gaming or otherwise inappropriate site should immediately be reported to their designated Systems Administrator(s) so that all links to the sites may be removed from the computer.

The Town Internet system should not be used for visiting unauthorized sites, except where access to such site is used with prior system administrator approval for research purposes.

The downloading or passing along of offensive materials will result in discipline or termination.

No one may download software from an outside source without prior approval from their system administrator.

Hardware:

No one may tamper with, install, or remove any computer, network device, equipment, hardware, wiring, etc. connected to any of the Town of East Hartford's Information Systems without the approval from their systems administrator. No one will install any computer, network device, equipment, hardware, wiring, etc. without the approval and assistance of their systems administrator.

Software:
No one may uninstall, disable or interfere with any program or utility running on any of the Town of East Hartford's Information Systems without prior authorization from their systems administrator.

To prevent contamination of the Information System, no employee may download or install software from any source without prior authorization from the Systems Administrator. Any and all software loaded on any computer must be registered to the Town of East Hartford and is the sole property of the Town of East Hartford. Authorization may be obtained by contacting the Systems Administrator. (See Software Piracy and the Law, attached.)

Electronic Files:
All users should be aware that any electronic file created on the Town of East Hartford system can be restored and viewed as necessary. For this reason, no Town of East Hartford computer may be used for creation of a type of file that has been prohibited from viewing in any other part of the system.

Removable Media:
Be aware that any removable media (floppy disks, CDROM's, DVD's, USB drives, etc.) may contain viruses. Use of any removable media must be approved by your system administrator.

Telephone, Facsimile and Voicemail:
Prohibitions on Internet and email services such as use of inappropriate language, access to pornographic sites, and use for personal commercial endeavors also apply to the use of the telephone system, facsimile system, voice mail system and all other systems considered by the Town to be part of the Town of East Hartford's Information Systems.

Monitoring:
The Town of East Hartford may monitor email messages, Internet use, electronic files created by employees and all other components of the Town's Information Systems to ensure compliance with this policy. Telephone use may also be monitored on a user-by-user basis for appropriate cost controls. Random monitoring may be conducted in addition to any specific monitoring deemed necessary by upper management. The Town of East Hartford's Information Systems may be monitored by using computers, and/or telephones, wires, cameras, electromagnetic, photo-electric or photo optical systems. The posting of this notice constitutes the prior written notice required by Section (b)(i) of Connecticut General Statutes Section 31-48(d), No further notice will be given.

Harassment:
The Town's Information Systems may not be used for transmitting, retrieving, or storing any communications of a harassing nature or material that are pornographic, obscene or X-rated. Harassment of any kind is prohibited. The Town's harassment policy applies in full to all of the Town of East Hartford's Information Systems.

Discrimination:
The Town of East Hartford's Information Systems may not be used for creating, transmitting, retrieving or storing any communications of a discriminatory nature. The Town's discrimination policy applies in full to all of the Town of East Hartford's Information Systems.

Defamation:
Any messages or information sent by an employee to another individual within or outside the Town via the Town email or Internet systems (including bulletin boards, online services or Internet sites) are statements that reflect on the Town. Therefore, any communication defaming another person, group or organization is strictly prohibited.

Copyright and Trademark:
Employees may not transmit copy, retrieve or forward copyrighted or trademarked material that does not belong to the Town using the Town's email or Internet system. Every employee who obtains access to other companies' or individuals' materials must respect all copyrights and trademarks and may not copy, retrieve, modify or forward copyrighted or trademarked materials, except with written permission of the copyright or trademark holder.

Confidential Business Information:
All communications sent by employees via the Town's email or Internet system may not disclose any confidential or proprietary information. With proper permission from management, employees may send selected information in an encrypted form. Any encryption programs must be approved by the Town of East Hartford.

Unwanted Correspondence:
If an employee receives unsolicited email from outside the Town that appears to violate the Town's policy, the employee should notify his or her supervisor immediately.

Physical Security:
Proximity Card Readers are installed at various Town facilities within the Town of East Hartford. These devices provide a higher degree of physical security and accountability to more sensitive locations. Employees shall use their Proximity Card to access any areas secured by Proximity Card Readers.

Use of a key to "bypass" the Proximity Card Reader is prohibited, with the exception of emergencies. Use of a key to bypass a reader must be reported to your supervisor with explanation of emergency. The notified supervisor shall document the emergency and advise their Division/Department Head.

Network Security:
The data on our network represents a substantial investment in labor and dollars and is to be protected at all times. These security policies are in effect in order to preserve the integrity of our data.

User Responsibility:
User responsibility refers to the obligation of the end user to immediately inform their designated system administrator(s) whenever they accidentally encounter a possible "security flaw" or "access risk" to the network; for example, a user having the ability to access another users account, or access data they know they have no authority to access.

System Backups:
Daily backups are performed in order to protect the data. The Systems Administrator(s) will set a schedule for such backups in order to preserve and protect the data as is reasonable, while minimizing interference with users' regular work schedule as much as possible.

Vendors/Contractors:
All vendors or contractors requiring access to the Town of East Hartford's Information Systems shall be referred to the particular department's System Administrator. The System Administrator will assure that the vendor's hardware, software or network access are of secure design and cause no unnecessary security issues.

Outside Agency Systems:
The Town of East Hartford's Information Systems Use Policy governs employees use for accessing an outside Agency's system. The user shall also follow the policies and guidelines of the outside Agency as trained or certified while accessing that resource.

Outside Agency Applications Include:

POLICE DEPARTMENT
CROG
- **Captain/Bluelink**
  - Requires training
  - Guaranteed messages need supervisor approval (to be documented in the message)
- **PSA**
  - Requires training

COLLECT
- **NCIC**
- **NLETS**
- **SPBI**
- **FIREARMS**
  - No Internet web or email access on COLLECT device
  - Requires training and certification

CJIS
- **OBTS**
  - No web browser or email application open concurrently with OBTS application on device
  - Any print out to be pre-approved by supervisor
  - Requires training and certification

Cogent Livescan
- Requires training

HEALTH DEPARTMENT
Connecticut Immunization Registry (CIRTS)
- Training
- Restricted access privileges (HIPPA)

URS (HIV Tracking)

Training
Restricted access privileges (HIPPA)

REGISTRARS OF VOTERS
ConnVERSE (Connecticut Voter Registry)
Training
Restricted access privileges limited by physical bandwidth to the registry

TOWN CLERK
ConnVERSE (see Registrars of Voters)

Connecticut Vital Records Registry
Training
Restricted access privileges

Violations:

Any employee who violates these rules or otherwise abuses the privilege of the Town of East Hartford's Information System will be subject to corrective and/or disciplinary action up to and including termination. All employees are subject to Connecticut General Statutes, 53a-251 through 53a-256 and any other law or regulations concerning computer crime.

Employees who violate this policy may be subject to disciplinary action up to and including discharge.

Glossary:

Pornographic: any content that is obscene or is intended to excite lascivious feelings. This includes subject matter dealing with any type of sexual act, human or animal and includes all types of communications.

Discriminatory: any statement, message image or content used to denigrate or demean another human being by reason of race, creed, religion, national origin, gender, sexual orientation, age or disability.

Malware: (for "malicious software") is any program or file that is harmful to a computer user. Thus, malware includes computer viruses, worms, Trojan horses, and also spyware, programming that gathers information about a computer user without permission.

Systems Administrator (SA): Designated System Administrator(s) are responsible for protecting and facilitating the Information Systems of the Town of East Hartford and thus for developing and adjusting Information Policies and Procedures as needed. The primary goal is to provide optimum security balanced with ease of use as much as possible, implementing new technologies and techniques when reasonable. The SA has the authority to make necessary decisions on security, configuration, implementation and policies and procedures based on his/her technical expertise.

Software Piracy and the Law

What is the law regarding software piracy? *Most people would never consider stealing something that did not belong to them. Bust those who copy software without authorization are, in fact, stealing someone else's property ¬¬– their intellectual property. And, they are breaking the law.*

Software development involves a team effort that blends the creative ideas and talents of programmers, writers, and graphic artists. And like most creative works, such as books, music and films, computer software is protected by U.S. copyright laws, U.S. code Title 17 and 18.

When you purchase software, you do not become the owner of the copyright. Rather, you are purchasing the right to use the software under certain restrictions imposed by the copyright owner, typically the software publisher. These rules are described in the documentation accompanying the software – the license. Most often, it states that you have the right to load the software onto a single computer and make one backup copy. If you copy, distribute or install the software in ways that the license prohibits, whether you are swapping disks with friends and coworkers or participating in widespread duplication, you are violating federal copyright law. Even if you only help someone else make unauthorized copies, you are still liable under the copyright law.

Many businesses, both large and small, face serious legal risks because of software piracy. Under the law, a company can be held liable for its employees' actions. If an employee installs unauthorized software copies on company computers or acquires illegal software through the Internet, the company can be sued for copyright infringement. This is true – even if the company's management was unaware of the employee's actions.

To make or download unauthorized copies of software is to break the law, no matter how many copies are involved. Whether you are casually making a few copies for friends, loaning disks, distributing and/or downloading pirated software via the Internet, or buying a single software program and then installing it on 100 company computers, you are committing a copyright infringement. It doesn't matter if you are doing it to make money or not – you are exposing yourself to serious civil and potentially even criminal penalties. For example, individuals using the Internet to sell or distribute pirated or counterfeit software programs through online auctions and "warez" sites may be criminally prosecuted, even if they do not profit from the illegal activity.

What are the penalties for pirating software?
Software theft is stealing. If you or your company would be caught copying software, you may be held liable under both civil and criminal law.

If the copyright owner brings a civil action against you, the owner can seek to stop you from using its software immediately and can also request monetary damages. The copyright owner may choose between actual damages, which includes the amount it has lost because of your infringement as well as any profits attributable to the infringement and statutory damages, which can be as much as $150,000 for each program copied. In addition, the government can criminally prosecute you for copyright infringement. If convicted, you can be fined up to $250,000, or sentenced to jail for up to five years, or both.

In addition to legal consequences, using copied or counterfeit software also means:

- Greater exposure to software viruses, corrupt disks or otherwise defective software

- Inadequate or no documentation and no warranties
- Lack of technical product support available to properly licensed users
- Ineligibility for software upgrades offered to properly licensed users

What are your responsibilities as a software user?
Your first responsibility is to purchase only legitimate software products. Make sure you get genuine disks, manuals and license documentation. Avoid loose or hand-labeled disks or software offered at prices that are "too good to be true." Be wary of unscrupulous Internet vendors, who advertise attractive deals on "genuine" software that was overstocked or otherwise discounted for inventory reasons. Remember that a high percentage of software sold on online auctions is illegal.

Next, install and use your software in accordance with the license agreement. Since these agreements differ from publisher to publisher, you need to read them carefully. When someone else installs the software, be sure that individual provides you with proof that the product is fully licensed. If you have outsourced your information technology needs to a consultant or application service provider, you are still responsible for compliance. Software piracy is not a victimless crime. Piracy denies the software developer its rightful revenue and harms consumers and the industry as a whole.

All software developers, both big and small, spend years creating software. A portion of every dollar spent in purchasing original software is funneled back into research and development, so that newer, more advanced software can be produced. When you purchase illegal or counterfeit copies, your money goes straight into the pockets of software pirates.

What is the economic impact of software engineering?
In the United States, 22 percent of all computer software is unlicensed. The Business Software Alliance (BSA) estimates that in 2003 the industry lost $6.5 billion in revenue in the United States alone due to software theft. But software piracy's damaging economic impact is not only confined to the software industry. In fact, software piracy has an effect on the economic health of the nation as a whole, including jobs, wage and tax revenue losses.

What more can you do to prevent piracy?
For more information about software piracy, to obtain a free software management guide or to report piracy, call the toll-free BSA antipiracy hotline at 1-888-NO–PIRACY or log on at www.bsa.org

This information was sourced by the Business Software Alliance.
Business Software Alliance
1150 18th Street, NW
Suite 700
Washington DC 20036

Updated & Revised by Sergeant Gary Willett – EHPD
Revised by Attorney Richard Gentile – Assistant Corporation Counsel
06/18/2005

MOTOR VEHICLE USE

I. Purpose

The purpose of this policy is to establish standard requirements and procedures for Town of East Hartford employees who are assigned a town-owned or leased vehicle in the course of providing Town services and conducting Town business. The policy is intended to ensure the safety and well-being of Town employees, to facilitate the efficient and effective use of Town resources, to minimize the Town's liability exposure, to monitor the use of town-owned vehicles, which includes the use of electronic motor vehicle monitoring devices, and to comply with Internal Revenue Service regulations relating to Town vehicle usage. Motor Vehicle Use by the Mayor is governed by Town Ordinance and Town Charter.

II. General Provisions

- All employee operators of Town vehicles must possess a valid operator's license and provide a copy of their current license to their department head on an annual basis. Individual Departments may do more frequent visual checks. Employees are responsible for notifying their supervisor if their license is suspended or if there are any violations or infractions received while in possession of or while operating a Town vehicle. In the event of a suspension, vehicle use privileges will be suspended and/or permanently terminated.
- All employees and Town business travelers must wear seat belts and obey traffic laws. Parking fines and other violations are the personal liability of the operator.
- In case of an accident, the employee shall notify the nearest police department and his/her supervisor.
- Employees must comply with any preventative maintenance programs and must keep the vehicle free of litter and debris. The physical appearance of the vehicle must create a good impression. Each employee assigned a vehicle shall conduct a daily inspection to assure it is in safe running condition before operating.
- Drug and alcohol use is prohibited at all times. Improper or unsafe operation is prohibited.
- All Directors who have employees, who drive Town vehicles or personal vehicles on Town business, shall provide written documentation that they have distributed and discussed this Motor Vehicle Policy with them. A completed copy of the attached template must be sent to Human Resources for placement in each respective employee's official personnel file. Additionally, a copy should be kept at each department.

III. Assignment and Use

A. General Employees

The assignment of Town vehicles shall require the approval of the employee's supervisor and Director. Vehicles used for commuting need written approval from the mayor. The Town reserves the right to review the continuing need for any vehicle assignment.

The following criteria must be met for employee's assigned Town vehicles to have commuting privileges.

- Employees with responsibility for on-going and recurring time critical emergency responses requiring direct transportation to the site of the emergency and/or specialized equipment kept in the Town vehicle.
- Aside from providing Town services and conducting Town business, Town vehicles used for commuting may be used for de Minimis personal errands during workdays only while traveling between work and home, pursuant to Internal Revenue Services (IRS) regulations. The IRS may amend these regulations from time to time.
- For employees who fall within the provisions of the Internal Revenue Code, the Town will comply with the IRS regulations regarding the reporting of income. Since the only authorized non-business use is commuting and de Minimis personal errands, the Town will use the commuting valuation method to report income. This method will use a $3.00 per day for each commuting day as the amount of untaxed income reported to regulators and any other regulation requirements regarding employer provided vehicles.
- Besides "on the clock" full and part time employees and Town business travelers, there are to be no other occupants in a Town vehicle at any time. Employees are the only ones allowed to operate the vehicle.
- Exclusive assignment of a vehicle to an employee with non-commuting privileges should be justified. If that employee is on vacation, the keys should be left with the Department Director for other usage. No distinct criteria for permanent assignment is provided, however, Department Heads should use their best judgment when deciding on exclusive assignment. Employees who may use a Town vehicle under applicable terms of their collective bargaining agreement.

B. Public Safety Employees

The Police Chief, Deputy Police Chiefs, Fire Chief and Assistant Fire Chief have unrestricted personal use of their assigned vehicles and no restrictions as to who may be transported. Canine handlers are allowed personal use of their assigned vehicles as determined by the Police Chief. Aside from providing Town services, other vehicles used for commuting may be used for de Minimis personal errands during workdays only while traveling between work and home. Public Safety vehicles are excluded from the IRS commuting regulations. Unless written approval is received by the Mayor, no other personal use of Town vehicles is allowed and no passengers are allowed other than those associated with Town business. When vehicles are responding to an emergency, absolutely no civilians shall be allowed in the vehicle.

IV. <u>Complaints</u>

All complaints concerning Town vehicles, drivers or passengers shall be immediately investigated by the Department Director to which the vehicle is assigned. The results of the

investigation shall be reported promptly in writing to the Director of Human Resources. The report shall contain:

1. Name, address and phone number of the complaint
2. Summary of the complaint
3. Investigative findings
4. Any remedial action taken
5. Name and operator's license number of the driver.

If the complaint involves a safety issue, the report must be sent to the Risk Manager.

V. Reimbursement for use on personal vehicles

The use of privately owned vehicles in connection with official Town business during normal duty hours is authorized. Mileage reimbursement is permitted with rates subject to current IRS regulations or contract language. A mileage request form needs to be completed and submitted to Finance for review and payment. All personal vehicles used for business must have current liability insurance in force per state law and a valid insurance card must be carried.

This personal automobile policy will be primary in the case of a motor vehicle accident. The Town does have excess liability in case damage and/or awards exceed their primary policy limit.

This policy, which may be reviewed annually and updated when necessary, shall supersede any other Town policy on "Motor Vehicle Use".

PERSONNEL COMMUNICATION DEVICES

The Town of East Hartford strives to maintain a safe work environment for its employees while fostering an efficient and effective workplace. To accomplish this goal, the Town of East Hartford has instituted the following policy to take effect immediately.

- All Personnel Communication Devices ("PCD's") (i.e. cellular phones, digital communication devices, pagers, etc.) are furnished to certain employees in connection with their job duties. The Town of East Hartford requires the safe use of its PCD's by employees while conducting business.
- With the exception of Public Safety employees, the Town of East Hartford does not permit employees to drive while using PCD's. Should employees need to make or receive a call while driving, they should locate a lawfully designated area to park and make the call. At the Department Head's discretion, a voicemail account may be set up for employees to answer calls at a later time when they are not driving.
- No employee shall conduct Town business on any cell phone while driving at any time, nor should they use a cell phone while operating a Town owned or leased vehicle. Emergencies are the only exception. An emergency is defined as a condition of imminent peril and/or risk of physical danger to oneself or another person.
- Employees need to limit personal use of their cellular telephone in the same way they need to limit their personal use of their office telephone. Cell phone usage will be monitored for abuse of excessive personal use. Personal long distance calls are prohibited.
- The use of PCD's for illegal transactions, harassment or obscenity is strictly prohibited.
- Any violation of this policy will subject the employee to discipline up to and including termination.
- This policy, which may be reviewed annually and updated when necessary, shall supersede any other Town policy on cell phone use.

PRIVACY NOTICE - HIPAA

Background: The Health Insurance Portability and Accountability Act of 1996 (HIPAA) requires health plans to notify plan participants and beneficiaries about its policies and practices to protect the confidentiality of their health information. This document is intended to satisfy HIPAA's notice requirement with respect to all health information created, received, or maintained by the Town of East Hartford and East Hartford Board of Education group health plan with Anthem Blue Cross and Blue Shield, Delta Dental of NJ, Benefit Strategies and HSA Bank (the "Plan"), as sponsored by The Town of East Hartford and East Hartford Board of Education (the "Municipality").

The Plan needs to create, receive, and maintain records that contain health information about you to administer the Plan and provide you with health care benefits. This notice describes the Plan's health information privacy policy with respect to your Medical, Prescription Drug, Dental, Vision, and/or Health Care Flexible Spending Arrangement (FSA), Health Spending Account (HSA), Health Reimbursement Account (HRA) benefits. The notice tells you the ways the Plan may use and disclose health information about you, describes your rights, and the obligations the Plan has regarding the use and disclosure of your health information. However, it does not address the health information policies or practices of your health care providers.

Town of East Hartford and East Hartford Board of Education's Pledge Regarding Health Information Privacy

The privacy policy and practices of the Plan protects confidential health information that identifies you or could be used to identify you and relates to a physical or mental health condition or the payment of your health care expenses. This individually identifiable health information is known as "protected health information" (PHI). Your PHI will not be used or disclosed without a written authorization from you, except as described in this notice or as otherwise permitted by federal and state health information privacy laws.

Privacy Obligations of the Plan

The Plan is required by law to:

- make sure that health information that identifies you is kept private;
- give you this notice of the Plan's legal duties and privacy practices with respect to health information about you; and
- follow the terms of the notice that is currently in effect.

How the Plan May Use and Disclose Health Information about You

The following are the different ways the Plan may use and disclose your PHI:

- **For Treatment.** The Plan may disclose your PHI to a health care provider who renders treatment on your behalf. For example, if you are unable to provide your medical history as

the result of an accident, the Plan may advise an emergency room physician about the types of prescription drugs you currently take.

- **For Payment.** The Plan may use and disclose your PHI so claims for health care treatment, services, and supplies you receive from health care providers may be paid according to the Plan's terms. For example, the Plan may receive and maintain information about surgery you received to enable the Plan to process a hospital's claim for reimbursement of surgical expenses incurred on your behalf.

- **For Health Care Operations.** The Plan may use and disclose your PHI to enable it to operate or operate more efficiently or make certain all of the Plan's participants receive their health benefits. For example, the Plan may use your PHI for case management or to perform population-based studies designed to reduce health care costs. In addition, the Plan may use or disclose your PHI to conduct compliance reviews, audits, actuarial studies, and/or for fraud and abuse detection. The Plan may also combine health information about many Plan participants and disclose it to the Municipality in summary fashion so it can decide what coverages the Plan should provide. The Plan may remove information that identifies you from health information disclosed to the Municipality so it may be used without the Municipality learning who the specific participants are.

- **To the Town of East Hartford and East Hartford Board of Education.** The Plan may disclose your PHI to designated Municipality personnel so they can carry out their Plan-related administrative functions, including the uses and disclosures described in this notice. Such disclosures will be made only to the Town of East Hartford and East Hartford Board of Education's Personnel Director ("the Plan Administrator") and/or the members of the Town of East Hartford and East Hartford Board of Education's Benefits Department. These individuals will protect the privacy of your health information and ensure it is used only as described in this notice or as permitted by law. Unless authorized by you in writing, your health information: (1) may not be disclosed by the Plan to any other Municipality employee or department and (2) will not be used by the Municipality for any employment-related actions and decisions or in connection with any other employee benefit plan sponsored by the Municipality.

- **To a Business Associate.** Certain services are provided to the Plan by third party administrators known as "business associates." For example, the Plan may input information about your health care treatment into an electronic claims processing system maintained by the Plan's business associate so your claim may be paid. In so doing, the Plan will disclose your PHI to its business associate so it can perform its claims payment function. However, the Plan will require its business associates, through contract, to appropriately safeguard your health information.

- **Treatment Alternatives.** The Plan may use and disclose your PHI to tell you about possible treatment options or alternatives that may be of interest to you.

- **Health-Related Benefits and Services.** The Plan may use and disclose your PHI to tell you about health-related benefits or services that may be of interest to you.

- **Individual Involved in Your Care or Payment of Your Care**. The Plan may disclose PHI to a close friend or family member involved in or who helps pay for your health care. The Plan may also advise a family member or close friend about your condition, your location (for example, that you are in the hospital), or death.

- **As Required by Law**. The Plan will disclose your PHI when required to do so by federal, state, or local law, including those that require the reporting of certain types of wounds or physical injuries.

Special Use and Disclosure Situations

The Plan may also use or disclose your PHI under the following circumstances:

- **Lawsuits and Disputes.** If you become involved in a lawsuit or other legal action, the Plan may disclose your PHI in response to a court or administrative order, a subpoena, warrant, discovery request, or other lawful due process.

- **Law Enforcement.** The Plan may release your PHI if asked to do so by a law enforcement official, for example, to identify or locate a suspect, material witness, or missing person or to report a crime, the crime's location or victims, or the identity, description, or location of the person who committed the crime.

- **Workers' Compensation.** The Plan may disclose your PHI to the extent authorized by and to the extent necessary to comply with workers' compensation laws other similar programs.

- **Military and Veterans.** If you are or become a member of the U.S. armed forces, the Plan may release medical information about you as deemed necessary by military command authorities.

- **To Avert Serious Threat to Health or Safety**. The Plan may use and disclose your PHI when necessary to prevent a serious threat to your health and safety, or the health and safety of the public or another person.

- **Public Health Risks.** The Plan may disclose health information about you for public heath activities. These activities include preventing or controlling disease, injury or disability; reporting births and deaths; reporting child abuse or neglect; or reporting reactions to medication or problems with medical products or to notify people of recalls of products they have been using.

- **Health Oversight Activities.** The Plan may disclose your PHI to a health oversight agency for audits, investigations, inspections, and licensure necessary for the government to monitor the health care system and government programs.

- **Research.** Under certain circumstances, the Plan may use and disclose your PHI for medical research purposes.

- **National Security, Intelligence Activities, and Protective Services**. The Plan may release your PHI to authorized federal officials: (1) for intelligence, counterintelligence, and other national security activities authorized by law and (2) to enable them to provide protection to the members of the U.S. government or foreign heads of state, or to conduct special investigations.

- **Organ and Tissue Donation.** If you are an organ donor, the Plan may release medical information to organizations that handle organ procurement or organ, eye, or tissue transplantation or to an organ donation bank to facilitate organ or tissue donation and transplantation.

- **Coroners, Medical Examiners, and Funerals Directors**. The Plan may release your PHI to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or to determine the cause of death. The Plan may also release your PHI to a funeral director, as necessary, to carry out his/her duty.

Your Rights Regarding Health Information about You

Your rights regarding the health information the Plan maintains about you are as follows:

- **Right to Inspect and Copy.** You have the right to inspect and copy your PHI. This includes information about your plan eligibility, claim and appeal records, and billing records, but does not include psychotherapy notes.

  To inspect and copy health information maintained by the Plan, submit your request in writing to the Plan Administrator. The Plan may charge a fee for the cost of copying and/or mailing your request. In limited circumstances, the Plan may deny your request to inspect and copy your PHI. Generally, if you are denied access to health information, you may request a review of the denial.

- **Right to Amend.** If you feel that health information the Plan has about you is incorrect or incomplete, you may ask the Plan to amend it. You have the right to request an amendment for as long as the information is kept by or for the Plan.

  To request an amendment, send a detailed request in writing to the Plan Administrator. You must provide the reason(s) to support your request. The Plan may deny your request if you ask the Plan to amend health information that was: accurate and complete, not created by the Plan; not part of the health information kept by or for the Plan; or not information that you would be permitted to inspect and copy.

- **Right to an Accounting of Disclosures.** You have the right to request an "accounting of disclosures." This is a list of disclosures of your PHI that the Plan has made to others, except for those necessary to carry out health care treatment, payment, or operations; disclosures made to you; or in certain other situations.

To request an accounting of disclosures, submit your request in writing to the Plan Administrator. Your request must state a time period, which may not be longer than six years prior to the date the accounting was requested.

- **Right to Request Restrictions.** You have the right to request a restriction on the health information the Plan uses or disclosures about you for treatment, payment, or health care operations. You also have the right to request a limit on the health information the Plan discloses about you to someone who is involved in your care or the payment for your care, like a family member or friend. For example, you could ask that the Plan not use or disclose information about a surgery you had.

  To request restrictions, make your request in writing to the Plan Administrator. You must advise us: (1) what information you want to limit; (2) whether you want to limit the Plan's use, disclosure, or both; and (3) to whom you want the limit(s) to apply.

  Note: ***The Plan is not required to agree to your request.***

- **Right to Request Confidential Communications**. You have the right to request that the Plan communicate with you about health matters in a certain way or at a certain location. For example, you can ask that the Plan send you explanation of benefits (EOB) forms about your benefit claims to a specified address.

  To request confidential communications, make your request in writing to the Plan Administrator. The Plan will make every attempt to accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

- **Right to a Paper Copy of this Notice.** You have the right to a paper copy of this notice. You may write to the Plan Administrator to request a written copy of this notice at any time.

Changes to this Notice

The Plan reserves the right to change this notice at any time and to make the revised or changed notice effective for health information the Plan already has about you, as well as any information the Plan receives in the future. The Plan will post a copy of the current notice in the Municipality's Benefits Office at all times.

Complaints

If you believe your privacy rights under this policy have been violated, you may file a written complaint with the Plan Administrator at the address listed below. Alternatively, you may complain to the Secretary of the U.S. Department of Health and Human Services, generally, within 180 days of when the act or omission complained of occurred.

Note: ***You will not be penalized or retaliated against for filing a complaint.***

Other Uses and Disclosures of Health Information

Other uses and disclosures of health information not covered by this notice or by the laws that apply to the Plan will be made only with your written authorization. If you authorize the Plan to use or disclose your PHI, you may revoke the authorization, in writing, at any time. If you revoke your authorization, the Plan will no longer use or disclosure your PHI for the reasons covered by your written authorization; however, the Plan will not reverse any uses or disclosures already made in reliance on your prior authorization.

Contact Information

If you have any questions about this notice, please contact:

Theresa Buchanan, Director of Human Resources
Town of East Hartford and EH Public Schools
Group Health Plan Administrator
740 Main Street
East Hartford, CT 06108
860.291.7222

Notice Effective Date: May 9, 2006
Updated: August 2020

SAFETY IN THE WORKPLACE

It has always been a priority of the Town to supply the necessary equipment and operational practices and policies to carry out jobs and provide against any workplace hazards.

Managers and supervisors are responsible for maintaining safe and healthy work conditions and for the implementation of all safety programs within their departments. Employees are expected to follow safe work practices and procedures and take an active role in protecting themselves, fellow workers and the general public. It is also important to report any potential hazard or conditions that could put employees at risk. You can report such observations to the appropriate Department Head, Risk Manager or Safety Committee Representative (List of current members is available in Human Resources).

No job is so important that we cannot take the time to perform it safely. Working together we can make the Town a safer and more efficient workplace for all employees and residents.

Thank you for your cooperation.

POLICY PROHIBITING HARASSMENT
INCLUDING SEXUAL HARASSMENT

The Town of East Hartford is committed to providing a working environment in which all people are treated with respect. Accordingly, the Town will not tolerate harassment, including sexual harassment, of its employees by any person, including any supervisor, co-worker, contractor, vendor or member of the public. Such conduct is prohibited whether it occurs in the workplace, at work assignments outside of the workplace, at Town-sponsored functions or elsewhere. Violation of this Policy may result in discipline, up to and including discharge. This Policy supersedes any previous Town policies on harassment.

What is "Sexual Harassment"?

Sexual harassment is a form of sex discrimination that is illegal under both Connecticut and federal law. Sexual harassment has been defined as any unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature where:

- Submission to such conduct is made either explicitly or implicitly a term or condition of a person's employment;
- Submission to or rejection of such conduct by a person is used as the basis for employment decisions affecting that person; or
- Such conduct is so severe or pervasive that it unreasonably interferes with a person's work performance or creates an intimidating, hostile, or offensive working environment.

Although not a complete list, the following are examples of behavior that can be sexual harassment:

- Explicit or implied requests for sexual favors in return for promised or actual job benefits, such as favorable reviews, promotions, increased wages or benefits, or continued employment;
- Unwelcome physical contact, such as touching, patting, pinching, or brushing against a person's body;
- Unwelcome sexual propositions;
- Suggestive comments or sexually oriented innuendoes, teasing or jokes;
- Comments about a person's body, sexual activities, sexual prowess or deficiencies;
- Foul or obscene body language or gestures;
- Sexually suggestive sounds or leering;
- Displays of foul, obscene or sexually explicit printed or visual material;
- Sending or viewing foul, obscene or sexually explicit jokes, pictures, or other material by email or the Internet.

The offender or victim can be either a man or a woman and can be of the same or opposite sex. Moreover, non-sexually explicit conduct can also be sexual harassment if it creates a hostile working environment (*e.g.*, conduct or comments that suggest a particular gender is not welcome in the workplace).

Other Types of Prohibited Harassment

In addition to sexual harassment, this Policy also prohibits harassment based on race, color, religion, age, marital status, national origin, ancestry, disability, veteran status, genetic make-up, sexual orientation and any other characteristic protected by law.

Some examples of conduct that may be harassment include, but are not limited to:

- Comments, jokes, or the use of terminology that ridicules or demeans a person's race, ethnicity, religious beliefs or practices, accent, sexual orientation or any other protected characteristic;
- Displays of printed or visual material that demeans or ridicules a person's race, ethnicity, religious beliefs or practices, accent, sexual orientation or any other protected characteristic;
- Sending or viewing jokes, pictures, or other material by email or the Internet that demeans or ridicules a person's race, ethnicity, religious beliefs or practices, accent, sexual orientation or any other protected characteristic.

Reporting Harassment

1. Victims of Harassment: If you believe that you are being harassed, you should promptly notify any of the following people: any Supervisor; your Department Director; the Director of Human Resources (860-291-7222) or the Mayor (860-291-7200). You should report even single instances of harassment. Moreover, you are not limited to filing an internal harassment complaint under this Policy.
2. Employees Who Witness Harassment: Any employee who witnesses harassment or becomes aware that another employee has been harassed is strongly urged to report the conduct to any of the four individuals listed above.
3. Supervisors and Directors: Any Supervisor or Director who receives a complaint or report of harassment, or who believes that an employee, contractor, vendor or member of the public is engaging in conduct that may be harassment, must immediately notify the Director of Human Resources (860-291-7222) or the Mayor's Office (860-291-7200). Directors and Supervisors also should take the appropriate interim steps to stop the offending behavior while the report is being processed, such as separating the alleged offender and victim. Ignoring such conduct may result in discipline, up to and including discharge.

Investigating Complaints

All reports of harassment will be promptly and thoroughly investigated by the appropriate Town official(s). Reports of harassment will be treated as confidentially as possible without hindering the investigation, which means that information will be revealed on a "need-to-know" basis and/or as required by law. The Town will take appropriate steps to protect employees from retaliation.

Corrective Action

If the investigation confirms that harassment has occurred, the Town will take appropriate corrective action. Corrective action may include discipline, up to and including discharge. Harassment also may result in criminal and civil penalties.

<u>Note:</u> As part of its harassment prevention strategy, the Town will also use corrective action to stop less severe forms of inappropriate or offensive behavior <u>before</u> they rise to the level of harassment.

No Retaliation

The Town will not tolerate retaliation against any employee who reports harassment or who participates in any investigation of alleged harassment. Employees should report all instances of retaliation to any Supervisor; their Department Director, the Director of Human Resources or the Mayor. Supervisors and Directors who receive reports of retaliation must immediately notify the Director of Human Resources or the Mayor. Violation of this section may result in discipline, up to and including discharge.

False or Malicious Complaints

The Town also may discipline/discharge any person who knowingly makes a false or malicious complaint or harassment.

January 23, 2017

Mayor Marcia A. Leclerc

Date

SMOKING IN THE WORKPLACE

It is the Policy of the Town of East Hartford to provide a healthy working environment for its employees and visitors. Accordingly, smoking is prohibited in the following areas:

- Within any building or facility, or portion of any building or facility, owned, leased or operated by the Town;
- In any outdoor area within 50 feet of Town building or facility entrances, exits, balconies, ramps, fire escapes, air intakes and windows;
- Within any Town vehicle at any time

Department Directors may limit smoking to a specific outdoor smoking area that complies with all of the provisions of this Policy. Such designated smoking areas must be clearly marked* and must contain an appropriate receptacle for disposing of cigarette butts. Employees must properly dispose of cigarette butts.

Violations of this Policy may be reported to the Director of Human Resources or the Risk Manager. Failure to comply with this Policy may result in discipline, up to and including discharge.

**Signs must be posted to designate the boundaries of nonsmoking and smoking areas. Letters on signs should be made of lines one-half-inch thick and 4 inches high.*

OFFICIAL SOCIAL MEDIA GUIDELINES

PURPOSE

This policy establishes guidelines for the establishment and use of social media by the Town of East Hartford, its boards and commissions, officers, officials and employees.

The intended purpose of Town of East Hartford ("Town") social media sites is to disseminate information from the Town, about the Town, to its residents and local businesses.

The Town of East Hartford has an overriding interest and expectation in deciding what is "spoken" on behalf of the Town on Town social media sites. Any information disseminated on Town social media sites is public information.

For purposes of this policy, "social media" is understood to be content created by individuals using accessible, expandable, and upgradable publishing technologies, through and on the Internet. Examples of social media include but are not limited to, Facebook, Twitter, LinkedIn, Instagram, Pinterest, Snapchat and Flickr. For purposes of this policy, "comments" include information, articles, pictures, videos or any other form of communicative content posted on a Town of East Hartford social media site.

GENERAL POLICY

Use of Official Social Media

The establishment and use by any Town department or Town Board or Commission of Town social media sites are subject to approval by the Office of the Mayor. The Mayor's designated communications officer will oversee and coordinate all official social media communications. All Town social media sites shall be exclusively administered by Town department employees or Town Board or Commission Members. Use of Town social media sites by Town boards and commissions, officers, officials and employees must also be in compliance with the Town Information Systems Use Policy, the East Hartford Social Media Policy and the Town of East Hartford Code of Ethics.

The Mayor shall approve all department employees to be designated as social media editors or content creators. All content development and communication with residents through the Town social media platforms shall be conducted by these employees under the supervision of the Mayor or his/her designee.

When posting information on any of the Town's social media sites, the designated employee should at all times follow established content and content review guidelines as directed by the Mayor. Content should be respectful and professional. Employees representing the Town via Town social media must conduct themselves at all times as a representative of the Town and in accordance with all Town policies.

In all instances, when the designated employee posts to social media or responds to a comment in his or her capacity as a town employee, they should do so in the name of their respective department and

shall not share personal information about himself or herself, or any other Town employees. Board or Commission members may not comment on pending applications, open business, or approvals before their body, other than to indicate the date and time of a public hearing or meetings.

Town social media sites should make clear that they are maintained by the Town and that they follow East Hartford's Social Media Policy. A link to the policy shall be prominently posted.

Wherever possible, Town social media sites should link back to the official Town of East Hartford website for forms, documents, online services and other information necessary to conduct business with the Town of East Hartford.

The Mayor, or his/her designee, will monitor content on Town social media sites to ensure adherence to these guidelines, the Social Media Policy and the interests and goals of the Town of East Hartford.

The Town reserves the right to restrict or remove any content that is deemed in violation of these guidelines, East Hartford's Social Media Policy, or any applicable law. Any content removed based on these guidelines must be retained by the Town's Information Technology Manager or his/her designee for a reasonable period of time in compliance with the Connecticut State Library's State Agencies Records Retention Disposition Schedule and any other applicable laws, including the time, date and identity of the poster, when available.

All Town social media sites shall adhere to applicable federal, state and local laws, regulations and policies. The Town reserves the right to limit communication and posting and/or maintain a record of all such activities on social media as required/necessary to comply with these laws.

Town social media sites are subject to the Connecticut Freedom of Information Act. Any content maintained in a social media format that is related to Town business, including a list of subscribers, posted communication and communication submitted for posting, may be a public record subject to public disclosure.

A public record may not be destroyed if any litigation, litigation hold notice, administrative review, or other action involving the communication is initiated before the record has been disposed of, even its retention period has expired. The public record must be retained until the completion of the action, the resolution of all issues that arise from the action and approval by the Corporation Counsel's Office. In the event a litigation hold notice or order related to social media networking exists or is anticipated, then such notice or order shall supersede the minimum retention period as listed on the Connecticut State Library's State Agencies' Records Retention/Disposition Schedules.

TOWN OF EAST HARTFORD POLICY ON PERSONAL USE OF SOCIAL MEDIA BY EMPLOYEES

The Town does not restrict the right of its employees to exercise free speech however, employees are strictly forbidden from speaking in their official capacity or acting as a spokesperson for the town on any social media or internet site without the express permission of the Mayor.

Employees may not disclose the organization's confidential or protected information, including, but not limited to, town data, documents, emails, photographs, or similar information. Any posts by employees pertaining to confidential or protected information on social media or electronic forums will result in disciplinary actions.

Employees should avoid identifying themselves as town government workers, when posting on personal social media sites, particularly if their social media or on-line activities are inconsistent with, or could negatively impact the Town. Employees never have permission to speak on behalf of the town via social media without the consent of their Department Director or the Office of the Mayor. If the content of an employee's posts is related to their work for the town, employees should clearly indicate that their posts are their own opinion and do not reflect the positions or opinions of the Town of East Hartford.

If an employee participates in political and other public activities on their own time, they should not identify themselves as a Town representative without the prior approval of the Mayor or the Mayor's designee.

Town Employees must at all times follow the Town of East Hartford Employment Policies including, but not limited to, the Code of Ethics, American with Disabilities Act (ADA), Derogatory Remarks, Drug & Alcohol-free Workplace, Equal Employment Opportunity Plan, Information Systems Use, Personnel Communication Devices, Privacy Notice-HIPAA, Policy Prohibiting Harassment, and Workplace Threats and Violence when engaging in both personal and professional online and social media communications. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject the employee to disciplinary action up to and including termination.

These guidelines may be revised at any time, as may be reasonable under the circumstances.

WORKPLACE THREATS AND VIOLENCE

Zero Tolerance Policy

The Town of East Hartford will not tolerate acts of threats of violence, the possession, carrying, brandishing or use of weapons and/or dangerous instruments, and/or the threatened or actual destruction, damage or theft of property, in our workplace by employees, the general public, or anyone who conducts business with the Town.

Definitions

The following definitions apply for purposes of this Policy:

- *"Act of Violence"* means aggressive or unwanted physical contact between individuals, including but not limited to pushing, shoving, punching, striking, pinching, biting, kicking, spitting, throwing objects, wrestling and slapping.

- *"Threat of Violence"* means a threat of immediate or future harm made seriously or in jest, whether verbally, in writing or by an individual's conduct or physical gesturing. Examples of threats include "if you make that decision, I will have to hurt (or kill) you" or "I'm going to beat the hell out of you." Also included in this definition are implied threats made seriously or in jest, whether verbally or in writing or by an individual's conduct or physical gesturing, that a reasonable person would construe as coercive, intimidating, menacing or intended to provoke a fight. Finally, this definition includes behavior that a reasonable person would perceive as obsessively directly (*e.g.*, intensely focused on a grudge or romantic interest in another person) and reasonably likely to result in harm to a person or property, including but not limited to "stalking".

- *"Weapon"* includes, but is not limited to explosives, firearms (including replicas and models), whether loaded or unloaded, ammunition, knives, blackjacks, batons, metal knuckles, martial arts devices (*e.g.* throwing stars, tonfas, sais, nunchakas, etc.) and electronic defense devices (*e.g.* stun guns and tasers).

- *"Dangerous Instrument"* means any device, article or substance, which, under the circumstances in which it is used, attempted or threatened to be used, is capable of causing death or serious injury, including but not limited to vehicles, box cutters, flashlights, hatchets, baseball bats, canes, hammers, screwdrivers and other tools or equipment.

- *"Destruction, Damage or Theft of Property"* includes, but is not limited to, property crimes such as vandalism, sabotage and theft.

- *"Workplace"* includes an employee's immediate and/or assigned workplace (whether or not on Town property) and all Town property, including buildings, grounds, parking areas and vehicles.

Reporting

- **DIAL 9-1-1 IF THERE IS AN IMMEDIATE EMERGENCY**

- If you are the victim of behavior that you believe violates this Policy, or if you witness such behavior, immediately inform any supervisor, your department head, and/or the Department of Human Resources. Conduct that violates this Policy often constitutes a crime that should also be reported to the Police.

- Any supervisor or department head who witnesses conduct that he or she believes violates this Policy, or who receives a report of such conduct must immediately inform the Department of Human Resources, and, if appropriate, the Police Department.

Investigation

All reports of conduct that violates this Policy will be taken seriously and will not be dismissed as merely being "horseplay", "joking", "blowing off steam", and/or "venting". All such reports will be promptly investigated by the Town. The alleged violator(s) will be immediately removed from Town property pending completion of the investigation and possible disciplinary action.

Disciplinary Action

Employees who are found to have violated this Policy will be subject to discipline, up to and including discharge from Town service. Violator(s) also may be subject to criminal penalties.

No Retaliation

The Town will not tolerate retaliation against any employee who in good faith reports conduct that he or she believes violates this Policy or who participates in any investigation of such conduct. Employees should report all instances of retaliation to any supervisor, their department head, or the Director of Human Resources. Supervisor and Directors who receive reports of retaliation must immediately notify the Director of Human Resources. Violation of this section may result in discipline, up to and including discharge.

Exceptions

Sworn police personnel and/or employees whose assigned jobs require them to carry and use weapons are exempted from the portions of this Policy concerning such weapons and should refer to applicable regulations concerning this issue.

Malicious or Intentionally False Reporting

The Town also may discipline/discharge any person who knowingly makes a false or malicious complaint under this Policy.

Protective Orders

Employees may sometimes be involved in personal disputes that escalate to the point that injunctions or restraining orders and other court orders are sometimes obtained. We request that employees include their work address, as well as their resident in that order. Employees should inform their

supervisor, department head and the Department of Human Resources of such orders and provide a description of the individual cited therein. Even in cases where the employee has not secured a court order but fears for his/her safety, we request that the employee notify the police department immediately and inform his/her supervisor as soon as practicable.

Preventative Action

The Town reserves the right to take action designed to prevent threats from being carried out, and/or acts of violence or life threatening situations from occurring, including but not limited to the use of involuntary transfers. Within 90 days of such transfer, the Town will reevaluate the need to keep the employee in the new position and take appropriate action.

Unemployment Compensation

Employees discharged for violation of this Policy will be considered to have engaged in "willful misconduct" within the meaning Section 31-236(a) (2) (B) of Connecticut's unemployment compensation statutes. It is the Town's policy to contest eligibility for unemployment compensation benefits where a former employee has been discharged for such willful misconduct.

TOWN FRAUD HOTLINE

THE TOWN OF EAST HARTFORD

is committed to maintaining high integrity.

If you are aware of incidents, issues, or concerns regarding the organization, please consider reporting them to management.

Anonymous and confidential reports can be submitted online at:

www.FRAUDHL.com

Examples of issues and concerns you should report:

- Embezzlement or misappropriation
- Accounting errors, omissions, or misrepresentations
- Financial statement fraud
- Internal control problems
- Bribery, kickbacks, and corruption
- Falsification of contracts, reports, or documents
- Identity theft and security of personal information
- Theft of inventory, assets, or intellectual property
- Violation of the law or company policy
- Ethics violations or misconduct
- Conflicts of interest
- Discrimination
- Harassment
- Self-dealing
- Misuse of company property
- Vandalism and sabotage
- Workplace violence or retaliation
- Substance abuse
- Privacy and HIPAA compliance
- Unfair labor practices

Do you have an issue or concern to report?

Use our independent third-party ***anonymous*** and ***confidential*** reporting service. You will need to reference our *Company ID* when reporting incidents or concerns:

EASTHARTFORD

Reports can be submitted at **www.FRAUDHL.com** 24-hours a day using the secure online reporting form or by calling or faxing to the toll-free number 1-855-FRAUD-HL

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Department of Justice
Office of the Inspector General

WHISTLEBLOWER INFORMATION

for
Department of Justice Contractors, Subcontractors & Grantees

> Employees of Department of Justice contractors, subcontractors and grantees perform an important service by reporting what they reasonably believe to be evidence of wrongdoing.

Whistleblowers perform an important service to the Department of Justice (DOJ) and the public when they come forward with what they reasonably believe to be evidence of wrongdoing. They should never be subject to reprisal for doing so.

Federal law protects federal employees against reprisal for whistleblowing. In addition, under the National Defense Authorization Act of 2013 (NDAA), it is illegal for an employee of a Federal contractor, subcontractor, or grantee to be discharged, demoted, or otherwise discriminated against for making a protected whistleblower disclosure. Also, under Presidential Policy Directive (PPD-19), an action affecting access to classified information cannot be taken in reprisal for protected whistleblowing.

The Department of Justice Office of the Inspector General (DOJ OIG) has jurisdiction to investigate allegations of reprisal for whistleblowing by employees of DOJ contractors, subcontractors, and grantees. Information on how to report suspected reprisal to the OIG is available at: https://oil.justice.gov/hotline/.

What is a whistleblower?

A whistleblower is an employee of a Federal contractor, subcontractor, or grantee who discloses information that the individual reasonably believes is evidence of:

- Gross mismanagement of a Federal contract or grant;
- A gross waste of Federal funds;
- An abuse of authority relating to a Federal contract or grant;
- A substantial and specific danger to public health or safety; or
- A violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant.

To whom must the disclosure be made to be protected?

To be protected under the NDAA, a disclosure regarding a DOJ contract, subcontract, or grant must be made to one of the following:

- A member of Congress, or a representative of a committee of Congress;
- The OIG;

- The Government Accountability Office (GAO);
- A Federal employee responsible for contract or grant oversight or management at DOJ;
- An otherwise authorized official at DOJ or other law enforcement agency;
- A court or grand jury; or
- A management official or other employee of the contractor, subcontractor, or grantee who has the responsibility to investigate, discover, or address misconduct.

(Disclosures involving classified information should be made in accordance with otherwise applicable law, and individuals should consult with the OIG to ensure that such disclosures are made appropriately).

What can I do if I believe retaliation has occurred?

Employees of contractors, subcontractors, or grantees may file a complaint under the NDAA with the OIG, which will investigate the matter unless the OIG determines that the complaint is frivolous, fails to allege a violation of the prohibition against whistleblower reprisal, or has been addressed in another proceeding. If the OIG finds that retaliation has occurred, it can recommend that the Department order the contractor, subcontractor, or grantee, to take remedial action, such as reinstatement of back pay.

Also, if you are an employee of DOJ or of a DOJ contractor, subcontractor, or grantee and you suspect that a personnel action or an action affecting access to classified information has been taken against you in reprisal for making a disclosure of wrongdoing, you may report it to the OIG.

Nothing in a non-disclosure agreement should be interpreted as limiting your ability to provide information to the OIG.

For further information about whistleblower rights and protections, please see the Whistleblower Protection on the OIG's website at: https://oil.justice.gov/hotline/whistleblower-protection.htm

Note: the OIG does not have authority to investigate EEO complaints. For such matters, please refer to the DOJ Equal Employment Opportunity Office, website https://justice.gov/jmd/eeos. If you wish to make a whistleblower disclosure or report reprisal for doing so outside DOJ, you may contact the U.S. Office of Special Counsel, website https://osc.gov.

How can I report wrongdoing to DOJ OIG?

If you know about waste, fraud, abuse, misconduct, or whistleblower reprisal relating to a Department of Justice (DOJ) employee, program, contract, or grant you may report it to the OIG through the following:

Website: https://oig.justice.gov/hotline

Hotline: (800) 869-4499

Fax: (202) 616-9881

Mailing address:
U.S. Department of Justice
Office of the Inspector General
Inspections Division
1425 New York Avenue, N.W., Suite 7100
Washington D.C. 20530-2001