The American Legion
Department of Connecticut

Policy Manual

Revised Copy
Approved by D.E.C.
May 16, 2016
THE AMERICAN LEGION
DEPARTMENT OF CONNECTICUT
POLICY MANUAL

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THE AMERICAN LEGION 
DEPARTMENT OF CONNECTICUT

DEPARTMENT POLICY

CODE OF ETHICS

The American Legion Department of Connecticut Code of Ethics is a demonstration of the organization’s commitment to high ethical standards. This code recognizes that an organization is defined by its members and the people who work for it, and that those individuals, officers, staff, and volunteers, must demonstrate their commitment to the core values of integrity, honesty, fairness, openness, respect, and responsibility.

The department’s code of ethics is a part of a larger commitment to ethical practices on the part of the American Legion. The Legion’s values must be supported by policies and procedures that staff and officers follow. The American Legion Department of Connecticut also recognizes the importance of an organizational culture that encourages high ethical standards, and fosters such an atmosphere through the discussion of ethical issues, the promotion of transparency about our work, and the setting of the proper example at the leadership level.

I. Personal and Professional Integrity

All staff, Department Executive Committee members, Commission and Committee chairmen and volunteers of the American Legion Department of Connecticut act with honesty, integrity and openness whenever they represent the American Legion. The American Legion Department of Connecticut promotes an environment that values respect, fairness and integrity.

II. Mission

The American Legion Department of Connecticut has a clearly stated mission and purpose, articulated in the “Preamble to the Constitution of the American Legion”. All of the department’s programs support that mission and all who work for or on behalf of the American Legion Department of Connecticut understand and are loyal to that mission and purpose. The mission is responsive to the constituencies (Legionnaires, veterans, military personnel, children and youth, etc.) and communities served by the American Legion Department of Connecticut, and articulates the department’s commitment to promoting the public good and being of service to society at large.

III. Governance

The American Legion Department of Connecticut, acting through the Department Executive Committee (DEC), is responsible for setting strategic direction of the department and for oversight of the finances, operations, and policies of the American Legion Department of Connecticut. The Department Executive Committee:

- Ensures that its members have the requisite skills and experience to carry out their duties, that all members understand and fulfill their governance duties by acting for the benefit of the American Legion Department of Connecticut and its purpose, and that all members have specified terms of office;
- Approves and enforces a conflict of interest policy that ensures that any conflicts of interest or the appearance thereof are avoided or appropriately managed through disclosure, recusal or other means;
• Is responsible for the hiring, terminating, and regular review of the performance of the Adjutant, and ensures that his/her compensation is reasonable and appropriate;
• Ensures that the Adjutant and staff provide the Department Executive Committee with timely, accurate and comprehensive information so that the DEC can effectively carry out its duties;
• Ensures that the American Legion Department of Connecticut conducts all transactions and dealings with integrity and honesty;
• Ensures that the American Legion Department of Connecticut promotes working relationships with DEC members, department officers, commission and committee chairmen, staff, volunteers, Legionnaires, and other stakeholders that are based on mutual respect, fairness and openness;
• Ensures that the American Legion Department of Connecticut is fair and inclusive in its hiring and promotion policies and practices;
• Ensures that policies of the American Legion Department of Connecticut are in writing, clearly articulated and officially adopted;
• Ensures that the resources of the American Legion Department of Connecticut are responsibly and prudently managed; and
• Ensures that the American Legion Department of Connecticut has the wherewithal to carry out its programs effectively.

IV. Legal Compliance

The American Legion Department of Connecticut is knowledgeable of and complies with all U.S. laws and regulations as well as all laws and regulations of the State of Connecticut.

V. Responsible Stewardship

The American Legion Department of Connecticut manages its funds responsibly and prudently. The American Legion Department of Connecticut:

• Spends a reasonable percentage of its annual budget on programs in pursuance of its mission;
• Spends an adequate amount on administrative expenses to ensure effective accounting systems, internal controls, competent staff, and other expenditures critical to professional management;
• Compensates staff, and any others who may receive compensation, reasonably and appropriately;
• Has reasonable fundraising costs, recognizing the variety of factors that affect fundraising costs;
• Does not accumulate operating funds excessively;
• Prudently draws from reserve funds consistent with donor intent and to support the public purpose of the American Legion;
• Ensures that all spending practices and policies are fair, reasonable and appropriate to fulfill the mission of the American Legion; and
• Ensures that all financial reports are factually accurate and complete in all material respects.

VI. Openness and Disclosure

The American Legion Department of Connecticut provides comprehensive and timely information to the public, the media, and all stakeholders and is responsive in a timely manner to reasonable requests for information. All information about the American Legion Department of Connecticut fully and honestly reflects its policies and practices. Basic informational data about American Legion Department of Connecticut, such as the Form 990 and audited financial statements are posted on American Legion Department of Connecticut’s website or otherwise available to the public. All solicitation materials
accurately represent American Legion Department of Connecticut’s policies, practices, and programs. All financial, organizational, and program reports are complete and accurate in all material respects.

VII. Program Evaluation

The American Legion Department of Connecticut regularly reviews program effectiveness, acting through the department’s Internal Affairs Committee, and has mechanisms to incorporate lessons learned. The American Legion Department of Connecticut is committed to improving program and organizational effectiveness and to developing mechanisms to promote learning from its activities and experiences.

VIII. Inclusiveness and Diversity

The American Legion Department of Connecticut is committed to inclusiveness and diversity in its membership, staff, commissions and committees, and Department Executive Committee. The American Legion Department of Connecticut takes meaningful steps to promote inclusiveness in its membership, its recruitment, hiring, retention, and promotion of employees, as well as in its constituencies served (i.e., veteran service programs, youth programs, etc.).

IX. Fundraising

The American Legion Department of Connecticut is truthful in its fundraising solicitation materials. The American Legion Department of Connecticut respects the privacy of individual donors, expends funds consistent with donor intent, and discloses important and relevant information to potential donors. In raising funds from the public, the American Legion Department of Connecticut respects the rights of donors:

- To be informed of the mission of the American Legion Department of Connecticut, the way the resources will be used and its capacity to use donations effectively for its intended purposes;
- To be informed of the identity of those serving on the American Legion Department of Connecticut’s Executive Committee and to expect the Department Executive Committee to exercise prudent judgment in its stewardship responsibilities;
- To have access to the American Legion Department of Connecticut’s most recent audited financial report;
- To be assured their gifts will be used for the purposes for which they were given;
- To receive appropriate acknowledgement and recognition;
- To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by the law;
- To expect professional and respectful conduct from the American Legion Department of Connecticut’s staff;
- To be informed whether those seeking donations are volunteers, employees of the organizations or hired solicitors;
- To have the opportunity for their names to be deleted from mailing lists that the American Legion Department of Connecticut may intend to share; and
- To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

**APPROVAL AND ADOPTION**


-Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
The American Legion Code of Ethics and Conduct ("Code") requires chairpersons, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the American Legion, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable state and federal laws, regulations, and the Department Constitution and By-Laws.

I. Reporting Responsibility

It is the responsibility of all chairpersons, officers, and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

II. No Retaliation

No chairperson, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the American Legion prior to seeking resolution outside the American Legion.

III. Reporting Violations

The Code addresses the American Legion’s open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s immediate supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Internal Affairs Commission Chairperson, the department adjutant, the Personnel Director, or any officer whom you are comfortable in approaching. Supervisors and officers are required to report suspected violations of the Code of Conduct to the Internal Affairs Commission, who has specific and exclusive responsibilities to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable following the American Legion’s open door policy, individuals should contact the Internal Affairs Chairperson directly.

IV. Compliance Officer

The Internal Affairs Commission is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code shall advise the Department Executive Committee and Department Commander of all findings. The Internal Affairs Commission Chairperson has direct access to the Department Executive Committee and shall report annually at the Department Convention on compliance activity. The Internal Affairs Chairperson is designated by the Department Commander.
V. Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

VI. Confidentiality:

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

VII. Handling of Reported Violations

The Internal Affairs Chairperson will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

APPROVAL AND ADOPTION


-Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
THE AMERICAN LEGION
DEPARTMENT OF CONNECTICUT

DEPARTMENT POLICY

DOCUMENT RETENTION POLICY

The American Legion Department of Connecticut recognizes the importance of maintaining records for many reasons, including, but not limited to, the following:

- Maintain a record of the structure of The American Legion Department of Connecticut.
- Document Department Executive Committee decisions and activities
- Maintain The American Legion Department of Connecticut policies
- Maintain a record of federal and state tax filings and important supporting information
- Maintain a record of financial statements and budgets and supporting information, to monitor budgetary and financial results and activities, and to identify sources of receipts
- Identify donations and to maintain required documents
- Maintain personnel and employment records
- Maintain records of all contracts or other documents creating legal obligations or potential legal liabilities, including insurance contracts, vendor contracts, personal services contracts, leases and other properly related contracts, as well as notices of any legal processes involving The American Legion Department of Connecticut.

The American Legion Department of Connecticut's goal is to maintain such documents for a time period defined at a minimum by law, but otherwise for as long as such documents create an important historical record of The American Legion Department of Connecticut's activities or may be relevant to The American Legion Department of Connecticut's business needs, legal obligations, or any litigation or investigation.

I. Method of Retention
   A. The American Legion Department of Connecticut may maintain records in electronic form or paper or in any other safe and reliable manner.
   B. Records shall be stored in a secure location, which may be in the The American Legion Department of Connecticut offices or in a storage facility or other location.
   C. The American Legion Department of Connecticut shall maintain a record of where records are stored or located so that they may be accessed within a reasonable period of time.

II. Document Destruction, Including Prohibition on Document Destruction
   A. Documents not covered by this policy shall be destroyed when no longer useful to The American Legion Department of Connecticut and such files should be periodically reviewed to prevent duplication.
   B. Documents covered by this policy must be maintained for the period established in this policy, at a minimum, but may be maintained for a longer period of time.
   C. Documents may not be destroyed and must be preserved and not altered in any manner if The American Legion Department of Connecticut knows or has been informed that they may be relevant to an investigation by any government entity or to litigation or potential litigation.
III. Internal Affairs Commission Authority

A. The Internal Affairs Commission is authorized and directed to take steps to reasonably implement this policy and shall report to the Department Executive Committee on any issues, resource constraints, or concerns related to implementation of this policy.

B. The Internal Affairs Chairperson shall notify the Department Executive Committee, the Adjutant and the Treasurer of any additional document retention requirements mandated by law, and they are directed to implement such requirements upon such notification, even if not included in this policy.

C. The Internal Affairs Commission may, by administrative policy and without Department Executive Committee authorization, with proper notification to the Department Adjutant and Treasurer, mandate additional document retention requirements, as long as such requirements are not more restrictive than this policy.

IV. Compliance Officer

The Internal Affairs Commission is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at their discretion, shall advise the Department Executive Committee and Department Commander of all findings. The Internal Affairs Commission Chairman has direct access to the Department Executive Committee and shall report annually at the Department Convention on compliance activity. The Internal Affairs Chairperson is designated by the Department Commander.

V. Documents that must be maintained and retention periods

A. Legal structure of The American Legion Department of Connecticut

   i. Articles of Incorporation and any amendments
   ii. Annual filing with the Secretary of State
   iii. By-Laws and any amendments
   iv. IRS letter recognizing The American Legion Department Connecticut tax exempt status

   Permanently

B. Department Executive Committee membership, decisions and activities

   i. Minutes of Department Executive Committee meetings
   ii. Financial statements and budgets approved by the DEC
   iii. List of DEC members, contact information, and their terms
   iv. Annual Conflict of Interest disclosure statements

   Permanently
   Permanently
   Permanently
   7 years

C. American Legion Department of Connecticut policies and administrative policies

   i. American Legion policies, including record of effective dates, Amendments and revisions
   ii. Administrative policies, including record of effective dates, Amendments and revisions

   Permanently
   Permanently
D. Financial statements, budgets, tax returns, and important supporting information

   i. Federal and state annual tax returns and any amendments  7 years
   ii. Business records that support federal and state annual returns  7 years
   iii. Financial reviews by outside CPAs or audited financial  10 years
        Statements of The American Legion Department of Connecticut
   iv. Documents that establish the American Legion Department of Connecticut’s sources of receipts for tax and other purposes  7 years

E. Donations

   i. Records of all donations, names and contact information for Donor, any limitations on use, and disbursements  7 years

F. Other

   i. Personnel and employment records  Permanently
      a. Employee Termination  10 years unless claim is filed
   ii. Position descriptions  10 years
   iii. Expired Contracts or other documents creating legal obligations  10 years after Expired or potential legal liabilities, including insurance contracts, vendor contracts, personal services contracts, leases and other property related contracts as well as notices of any legal processes involving The American Legion Department of Connecticut.
   iv. In Effect Contracts  see above

APPROVAL AND ADOPTION


-Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
THE AMERICAN LEGION
DEPARTMENT OF CONNECTICUT

DEPARTMENT POLICY

SEXUAL HARASSMENT POLICY

The American Legion, Department of Connecticut will not tolerate verbal or physical conduct by any employee that is inappropriate, offensive and discriminates against any co-workers, visitors, or others associated with the Legion, on the basis of any legally protected status, or which harasses, disrupts or interferes with another’s work performance or which creates an intimidating, offensive or hostile working environment.

Discrimination or harassment can take many forms. It may be, but is not limited to: words, conduct, adverse job action, signs, jokes, pranks, intimidation, physical contact, or violence. While all forms of discrimination and harassment based on an employee’s legally protected status are prohibited, including but not limited to any adverse job action or intimidation based on race, color, age, religion, gender, national origin, disability status, marital status, veteran’s status or sexual orientation, it is the Legion’s policy to emphasize that Sexual Harassment is illegal and prohibited by both CT State and Federal law.

In order to maintain a work organization that is free from any form of sexual harassment, the Legion puts all employees including Legion officials, department heads and supervisors on notice that sexual harassment of employees is prohibited.

Specifically, it is contrary to the Legion’s policies for any employee to sexually harass another employee by, including but not limited to:

(1) Unwelcome sexual advances, propositions or flirtations;

(2) Unwelcome attention of a sexual nature such as degrading comments, suggestive or lewd remarks, propositions, jokes, tricks or noises;

(3) Unwanted hugs, touches, kisses or requests for sexual favors;

(4) The threat or suggestion that continued employment, advancement, assignment or earnings depend on whether or not the employee will submit to or tolerate harassment;

(5) Retaliation for complaining about sexual harassment.

(6) Creating a work environment in which conduct of a sexual nature substantially interferes with an individual’s work performance or creates an atmosphere intimidating, hostile or offensive to employees.

All employees are further advised that sexually explicit or sexually offensive material has no place within the Legion’s facilities. Such material may not be posted, displayed, or even possessed within the facility. Possession of such material, even if it is not posted or publicly displayed, will be considered a violation of Legion policy and will subject the individual to disciplinary action, including discharge and possible criminal prosecution. Please be advised that any type of unlawful harassment, sexual or otherwise, will carry the same treatment as stated for Sexual Harassment.
Any employee who believes that the actions or words of a supervisor, fellow employee or any outside party in the workplace constitute unwelcome harassment or unlawful discrimination has a responsibility to report such conduct or immediately complain to his or her immediate supervisor should his/her direct requests that the conduct cease, be ignored. If an employee is uncomfortable raising his or her complaint with someone to whom he/she reports, or if the complaint involves someone in his or her direct line of command, then that employee should bring a complaint to the Department Head, Commander and/or, or other such Chairperson, or supervisor. As this can be a very disturbing situation, any complainant may bring a trusted friend with them to report the complaint if they choose to, no matter who they report the complaint to.

Confidentiality at the time of reporting the incident will be preserved to the maximum extent possible. However, all allegations of unlawful harassment and discrimination must be investigated promptly. In this regard, the reporting employee, the alleged harasser or discriminator and any other employees aware of the incident are required to treat this information in a confidential manner.

The Legion will take prompt action upon the receipt of a complaint of unlawful harassment or discrimination. Any employee determined to have committed unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including discharge. Moreover, any individual who makes unwelcome advances, threatens or in any way discriminates or harasses another employee based on a legally protected status may be personally liable for monetary damages for such actions and their consequences, in addition to disciplinary action and/or discharge.

The Legion will not tolerate the taking of any reprisal/retaliation against an employee who files a complaint of unlawful harassment or discrimination and such reprisal/retaliation could result in disciplinary action or discharge.

Similarly, The Legion will not tolerate any false complaints of harassment or discrimination, and that conduct could also result in disciplinary action or discharge.

**APPROVAL AND ADOPTION**


-Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
SOCI AL SECURITY PRIVACY PROTECTION POLICY

This Social Security Privacy Protection Policy applies to U.S. Social Security Numbers (SSNs) that The American Legion obtains in the course of service our people. Safeguarding the personally identifiable information that we collect from our employees, vendors, officials, and others is important to us. We use systems, policies, and procedures to protect personally identifiable information, including SSNs, from loss, misuse, or alteration. Specifically, our policies mandate the following with respect to protecting the confidentiality of sensitive personally identifiable information we have collected, including SSNs:

• Such information should be collected only when necessary to conduct business effectively and its use limited to the stated or reasonably implied purposes for which it was collected. For example, we collect SSNs to support legal and regulatory requirements and to fulfill our human resources needs.

• Access and/or disclosure of such information must be restricted to employees, agents, and authorized third parties who have a legitimate business need for access. We may disclose such information to other third parties as legally required.

• Such information must be stored and transmitted in a safe and secure manner. To the extent SSN data is collected over the public Internet, encryption is required.

• All data containing such information, whether hard copy or electronic, must be destroyed securely in a manner that protects the confidentiality of the underlying data.

• Unlawful or improper use or disclosure of SSN information is prohibited. Those who violate this Policy are subject to disciplinary action, up to and including discharge.

APPROVAL AND ADOPTION


Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
At The American Legion, Department of Connecticut, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

This policy applies to all employees/elected officials, etc. who work for The Legion and supervisors should use the supplemental Social Media Management Guidelines for additional guidance in administering the policy.

I Guidelines

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else’s web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with The Legion, as well as any other form of electronic communication. The same principles and guidelines found in The Legion’s policies and three basic beliefs apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees (etc.) or otherwise adversely affects, vendors, elected officials, or people who work on behalf of The American Legion may result in disciplinary action up to and including discharge.

II. Know and follow the rules

Carefully read these guidelines, and the Department’s Code of Ethics and Sexual Harassment Policies to ensure your postings are consistent with these policies. 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 you to disciplinary action up to and including discharge.

III. Be respectful

Always be fair and courteous to fellow employees, vendors, elected officials, or people who work on behalf of The Legion. Also, keep in mind that you are more likely to resolve work related complaints by speaking directly with your co-workers or your supervisors/department heads than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage fellow employees, vendors, elected officials, or people who work on behalf of The American Legion, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone’s reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.
IV. Be honest and accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about The Legion, fellow employees, vendors, elected officials, or people who work on behalf of The American Legion.

V. Post only appropriate and respectful content

Maintain the confidentiality of The Legion’s private or confidential information. Confidential information may include processes or technology. Do not post internal reports, policies, procedures or other internal confidential communications.

Respect financial disclosure laws. If the information is not deemed “public record”, it is illegal to communicate it.

Do not create a link from your blog, website or other social networking site to a Legion website without identifying yourself as an employee of The American Legion, Department of Connecticut.

Express only your personal opinions. Never represent yourself as a spokesperson for The Legion. If The Legion is a subject of the content you are creating, be clear and open about the fact that you are an employee (etc.) and make it clear that your views do not represent those of The Legion, fellow employees, vendors, elected officials, or people who work on behalf of The American Legion, Department of CT.

If you do publish a blog or post online related to the work you do or subjects associated with The Legion, make it clear that you are not speaking on behalf of The Legion. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of The American Legion, Department of CT.”

VI. Using social media at work

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your supervisor, department head, etc. Do not use The Legion email addresses to register on social networks, blogs or other online tools utilized for personal use.

Under no circumstances should a supervisor/department head, require an employee to provide their password for their personal social media site, or should they require an employee to log into the site so the supervisor can view the site! Retaliation is prohibited.

The American Legion, Department of CT prohibits taking negative action against any employee (etc.) for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee, (etc.) who retaliates against another associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including discharge.

VII. Media contacts

Employees should not speak to the media on The Legion’s behalf without express authority from the supervisor/department head or his/her designee. All media inquiries should be directed to employee’s supervisor/department head.
For more information

If you have questions or need further guidance, please contact your Personnel Committee or Department Adjutant.

APPROVAL AND ADOPTION


 -Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
THE AMERICAN LEGION
DEPARTMENT OF CONNECTICUT

DEPARTMENT POLICY

COMPENSATION POLICY

Annual Performance Review and Evaluation

Every employee's job performance will be reviewed on an annual basis and measured against job requirements and skills listed in each employee's Job Description. These reviews must be completed prior to July 31st of each calendar year.

Each employee will be evaluated on progress made toward attainment of individual and Department goals assigned and agreed upon in concert with his/her supervisor.

In addition to the customary performance review annually, supervisors also provide frequent, objective feedback to employees throughout the year concerning ongoing job performance. This counseling may be informal or presented in a more formal written format depending on the facts and the circumstances at issue.

Employee Performance Reviews

Performance reviews will be conducted with new employees at the end of the first six months of employment.

Performance reviews for all full-time and part-time employees will be conducted annually to:

- Provide a uniform and timely method for supervisors to objectively (in accordance with the employee's Job Description) evaluate the performance of those employees reporting directly to them.
- Provide effective and specific communication between an employee and his/her supervisor regarding job performance during the evaluation period.
- Evaluate and discuss the employee's contribution to the attainments of individual and unit goals during the preceding year.
- Set individual performance and training goals for the ensuing year.

The purpose of performance evaluations is to assist an employee in evaluating his/her level of performance and to identify areas, if applicable, where the employee needs to direct his or her attention in order to achieve and sustain an acceptable level of performance. Each performance review includes an evaluation of the employee's progress toward meeting individual goals agreed upon for the evaluation period just completed. Additionally, every performance review will quantify and rate each employee's contribution toward the attainment of individual and unit goals.

The justification for each rating is intended to be specific, factual, objective, quantifiable, and deal with demonstrated performance and conduct. This applies equally to commendable performance and to substandard performance.

In addition to the customary performance review annually, supervisors also provide frequent, objective feedback to employees throughout the year concerning ongoing job performance. This counseling may be informal or presented in a more formal written format depending on the facts and the circumstances at issue.
Performance Evaluation

Each Job Description forms the objective basis on which each employee is evaluated annually, although other factors, such as attainment of goals, are also considered.

Each employee is evaluated on performance criteria; however, the character of those criteria may vary according to an employee's level of responsibility and Job Description. Certain performance criteria are common to all:

- Job Knowledge
- Quality of Work
- Dependability/Reliability
- Initiative

The following ratings are augmented by overall written documentation explaining the reason the ratings were awarded. The overall documentation is intended to be specific, factual, objective, and quantitative to the extent possible, recognizing that subjective assessment of various performance criteria is usually also necessary. The numerical value assigned to the performance evaluation will be used to determine merit pay increases.

The ratings are:

1 - Employee’s performance usually/always met and occasionally exceeded the requirements of the job description, with numerous or especially significant incident(s) of noteworthy accomplishment(s)

2 - Employee’s performance usually/always met and occasionally exceeded the requirements of the job description, with incident(s) of noteworthy accomplishment(s).

3 - Employee’s performance usually/always met and occasionally exceeded the requirements of the job description.

4 - Employee’s performance usually met and occasionally exceeded the requirements of the job description; however, performance was significantly deficient in some respect(s).

NI - Employees performance requires significant improvement to meet the requirements for this position.

Once the performance review has been completed and discussed with the employee, both the employee and supervisor will sign the review.

Performance reviews will be forwarded to the Personnel Committee for review when determining merit pay increases. Such salary increases, if granted, will be based on the funding available and must be approved by the Finance Commission and the Department Treasurer. Merit pay increases must be approved by the Department Executive Committee upon recommendation of the Personnel Committee in consultation with the Finance Commission and the Department Treasurer.

**APPROVAL AND ADOPTION**


-Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
THE AMERICAN LEGION
DEPARTMENT OF CONNECTICUT

DEPARTMENT POLICY

◆ CONFLICT OF INTEREST ◆

This Conflict of Interest Policy governs the activities of Chairmen, Officers and Employees of the American Legion, Department of Connecticut. Questions about the policy should be directed to the Internal Affairs Commission. It is the duty of all chairmen, officers and employees to be aware of this policy and to identify conflicts of interest and situations that may result in the appearance of a conflict and to disclose those situations, conflicts or potential conflicts to your immediate supervisor, Internal Affairs Commission or Internal Affairs Chairman.

This policy provides guidelines for identifying conflicts, disclosing conflicts and procedures to be followed to assist the American Legion, Department of Connecticut manage conflicts of interest and situations that may result in the appearance of a conflict.

I. What is a Conflict of Interest

A conflict of interest arises when a chairman, officer or employee has a personal interest that conflicts with the interests of The American Legion, Department of Connecticut or arise in situations where a chairman, officer or employee has divided loyalties (also known as a “duality of interest”). The former can result in situations that result in inappropriate financial gain to persons in authority at The American Legion, Department of Connecticut, which can lead to financial penalties and violations of IRS regulations. Similarly, situations or transactions arising out of a conflict of interest can result in either inappropriate financial gain or the appearance of a lack of integrity in The American Legion, Department of Connecticut’s decision-making process. Both results are damaging to The American Legion, Department of Connecticut and are to be avoided.

II. Who might be affected by this policy

Typically persons who are affected by a conflict of interest policy are the Organizations chairman, officers and employees. In some cases a donor could also be in a conflict situation. The American Legion, Department of Connecticut takes a broad view of conflicts and chairman, officers and employees are urged to think of how a situation/transaction would appear to outside parties when indentifying conflicts or possible conflicts of interest.

III. Disclosure of Conflicts

Chairmen, officers and employees will annually disclose and promptly update any disclosures previously made to the Internal Affairs Commission on an Annual Conflict Disclosure Questionnaire form provided by the Organization that requests them to identify their interests that could give rise to conflicts of interest, such as a list of family members, substantial business or investment holdings, and other transactions or affiliations with businesses and other organizations or those of family members as well as other nonprofit organizations.

Chairman, officers and employees are also urged to disclose conflicts as they arise as well as to disclose those situations that are evolving that may result in a conflict of interest. Advance disclosure must occur so that a determination may be made as to the appropriate plan of action to manage the conflict. Chairman and officers should disclose to the Department Commander and employees should disclose to their supervisor as soon as they become aware of the conflict/potential conflict or appearance of a conflict exists.
IV. Procedures to manage conflicts

For each interest disclosed, the full Internal Affairs Commission shall convene to determine whether The American Legion, Department of Connecticut should:

- A. Take no action
- B. Decide on what action to take
- C. Refrain from taking action and otherwise avoid the conflict.

In most cases the broadest disclosure possible is advisable so that decision-makers can make informed decisions that are in the best interests of The American Legion, Department of Connecticut.

- When the conflict involves a decision-maker, the person with the conflict must fully disclose the conflict to all other decision-makers. That person shall not be involved in the decision of what action to take, but may serve as a resource to provide other decision-makers with needed information.
- In some cases the person with the conflict may be asked to recuse him/herself from sensitive discussions so as not to unduly influence the discussion of the conflict.
- In all cases, decisions involving a conflict will be made only by disinterested persons.
- The Internal Affairs Chairman will monitor proposed or ongoing transactions of The American Legion, Department of Connecticut for conflicts of interest and disclose them to the Internal Affairs Commission as appropriate, whether discovered before or after the transaction has occurred.

V. Gifts, Gratuities and Entertainment

Accepting gifts, entertainment or other favors from individuals or entities can also result in a conflict or duality of interest when the party providing the gift/entertainment/favor does so under circumstances where it might be inferred that such action was intended to influence or possibly would influence the interested person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value which are not related to any particular transaction or activity of The American Legion Department of Connecticut.

VI. Confidentiality

Each Chairman, committee member, officer and employee shall exercise care not to disclose confidential information acquired in connection with disclosures of conflicts of interest or potential conflicts, which might be adverse to the interests of The American Legion Department of Connecticut. Furthermore, chairmen, committee members, officers and employees shall not disclose or use information relating to the business of The American Legion Department of Connecticut for their personal profit or advantage or the personal profit or advantage of their family member(s).
VII. Review of policy

Each Chairman, officer and employee shall be provided with and asked to review a copy of this policy and to acknowledge in writing that he or she has done so.

- Annually, not later than August 1 for continuing positions or 30 days after appointment for newly appointed positions, each chairman, officer and employee shall complete a disclosure form identifying any relationships, positions or circumstances in which he/she is involved that he or she believes could contribute to a Conflict of Interest. Such relationships, positions or circumstances might include service as a chairman, officer, employee or consultant to another nonprofit organization or ownership of a business that might provide goods or services to The American Legion Department of Connecticut. Any such information regarding the business interests of a chairman, officer, employee or family member thereof, shall be treated as confidential and shall generally be made available only to the Internal Affairs Commission, except to the extent additional disclosure is necessary in connection with the implementation of this policy.

- This policy shall be reviewed periodically by the Internal Affairs Commission. Any changes to the policy shall be communicated to the Department Executive Committee and after approval shall be communicated to all chairmen, officers and employees.

APPROVAL AND ADOPTION

- Approved and recommended for adoption by the Department Internal Affairs Committee at its regularly scheduled meeting held in Rocky Hill, CT on December 15, 2011.

- Adopted by the Department Executive Committee at its regularly scheduled meeting held in Rocky Hill, CT on January 20, 2012.


-Adopted by the Department Executive Committee at its regularly scheduled meeting held in Lebanon, CT on May 16, 2016.
I acknowledge that I have received and reviewed a copy of The American Legion Department of CT, Policy Manual. I understand that it is my obligation to familiarize myself with and abide and comply with all of the policies and procedures set forth therein. I further understand that the Legion has the right to change, delete, add to, suspend, or discontinue any of its policies and procedures at any time without prior notice, and that if the Legion so exercises this right and I remain employed thereafter, I will abide by, and comply with, all of the Legion’s policies and procedures which are then in effect.

________________________________________ (employee)

on ____________________________ (date)

____________________
Employee Signature
Basic Conflict of Interest Disclosure Form

Date: ______________

Name: ________________________________________________________

Position (Chairperson/officer/employee) _________________________________

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between The American Legion Department of Connecticut and your personal interests, financial or otherwise:

_______ I have no conflict of interest to report

_______ I have the following conflict of interest to report (please specify other nonprofits and for-profit boards you (and your spouse) sit on, any for-profit business for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any business you or a family member own):

1. _____________________________________________________________

2. _____________________________________________________________

3. _____________________________________________________________

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Conflict of Interest policy of The American Legion Department of Connecticut.

Signature: ___________________________ Date: ________________________

Please Return to Department Adjutant:

The American Legion
Attn: Department Adjutant
P.O. Box 208
Rocky Hill, CT 06067