

# Anti-Corruption

## 204.1 PURPOSE

State MODIFIED

This policy establishes clear standards of conduct to prevent, identify, and address conflicts of interest, corruption, and unethical practices within the Richmond Department of Fire and Emergency Services.

## 204.2 SCOPE

Agency Content

This policy applies to all sworn and civilian personnel, contractors, vendors, consultants, and volunteers engaged in Fire Department business. It does not supersede Administrative Regulation 1.1 (Code of Ethics). It focuses on the mission of the Fire Department and further defines unacceptable practices and methods for identifying and preventing unethical practices.

## 204.3 GUIDING PRINCIPLES

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**Integrity:** All decisions must place the public interest above private interests.

**Transparency:** Procurement and inspection processes must be open, fair, and documented.

**Accountability:** Employees are responsible for reporting conflicts of interest, suspected fraud, or corruption.

**Equity:** All businesses, property owners, and community members must be treated consistently and fairly.

## 204.4 CONFLICT OF INTEREST STANDARDS

State MODIFIED

Employees must avoid any real, potential, or perceived conflict between personal interests and official duties.

- Employees shall not participate in decisions affecting their own financial interests, or those of family, friends, or business associates.
- Secondary employment that overlaps with Fire Department responsibilities must be declared and approved.
- Gifts, benefits, or hospitality from vendors, contractors, or regulated parties are prohibited unless of nominal value.

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- Employees must disclose any conflict or potential conflict to their supervisor and the Professional Standards Office prior to performing any task, inspection, purchase or any other work-related functions. The conflict or potential conflict must be documented and submitted the same day of the occurrence to their supervisor and the Professional Standards Office.

#### **204.5 UNACCEPTABLE BEHAVIORS AND PRACTICES**

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The following are examples of unacceptable behaviors or practices but does not constitute all infractions prohibited by this policy. Any employee's action or behavior that violates the guiding principles or standards of this policy or AR 1.1 may be investigated and disciplined accordingly.

- Accepting bribes, gifts, or favors from vendors or bidders.
- Manipulating bid specifications to favor a particular vendor.
- Selectively providing confidential information to certain bidders.
- Allowing re-submission of bids after reviewing competitor bids.
- Engaging in collusion with contractors or suppliers.
- Approving invoices for goods or services not received.
- Unauthorized use of Department funds, credit cards, or accounts.
- Soliciting or accepting payment, gifts, or favors from property owners, businesses, or contractors in exchange for favorable inspection outcomes.
- Waiving, delaying, or ignoring violations for personal benefit or to benefit associates.
- Targeting or harassing individuals or businesses for personal or political reasons.
- Falsifying or manipulating inspection reports or records.
- Sharing confidential information (e.g., competitor building plans, compliance strategies) outside official channels.

#### **204.6 PREVENTION AND DETECTION MEASURES**

##### **Agency Content**

Procurement Controls: adherence to city procurement standards; separation of duties in purchasing, approval, payment and receiving; audit trails for all transactions.

Inspection Integrity: Random quality assurance audits of inspection reports; mandatory rotation of inspectors to reduce favoritism risk.

Mandatory Declarations: Annual submission of signed code of ethics and conflict of interest disclosure form for all employees in roles that have exercise enforcement of law or fire code or any employees that work in areas that deal with financial aspects of the department (procurement, grants, budget, payroll etc).

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Whistleblower Protection: Confidential reporting mechanisms with protection from retaliation, in compliance with Public Interest Disclosure laws.

Training: Annual mandatory training on ethics, conflicts of interest, and fraud prevention.

#### **204.7 REPORTING AND ENFORCEMENT**

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Suspected violations must be reported to immediate supervisor, the Professional Standards Officer or through the Inspector General's Office confidential reporting system.

All reports will be investigated promptly, impartially, and in compliance with due process.

Violations may result in disciplinary action up to and including termination, civil recovery of losses, and referral for criminal prosecution.

#### **204.8 MONITORING AND REVIEW**

##### **Agency Content**

Internal audit will review procurement and inspection processes annually.

Policy effectiveness will be evaluated bi-annually, with updates incorporating lessons learned, industry best practices, and legal/regulatory changes.

#### **204.9 RELATED POLICIES**

##### **Agency Content**

Administrative Regulation 1.1 Code of Ethics

Administrative Regulation 1.6 Business Conduct

Administrative Regulation 4.21 Anti-Retaliation Policy

Administrative Regulation 5.5 Outside Employment

Administrative Regulation 5.18 Discipline Policy