

ETHICS COMMISSION

Tuesday, January 27, 2026 at 5:30 PM
Anita LaChance Conference Room 209,
City Hall, 2nd Floor.



MEMBERS

Carolyn Braun
Peter Goldman
Jennifer Goodwin
William Hayward
Maria Maffucci
Rosemary Paine
Jennifer Wriggins

The Ethics Commission will conduct this meeting in person in The Anita LaChance Conference Room 209, City Hall, 2nd Floor

PUBLIC COMMENT INFORMATION:

To submit written public comment on an agenda item, email ethics@portlandmaine.gov. Submissions must be received by 12:00 pm the day before the Ethics Commission meeting to guarantee their inclusion in the agenda packet. All submissions must include the commenter's name and legal address. To help ensure your comment is submitted for the correct item, please include the name of the agenda item (see below).

AGENDA:

1. **Call to Order**
2. **Roll Call**
3. **Approval of Minutes from Previous Meeting**
4. **Unfinished Business**
 - i. Confidentiality Policy
5. **Hour Mark-10 Minute Recess**
6. **New Business**
7. **Next Meeting Date**
8. **Adjourn**

CITY OF PORTLAND, MAINE

CONFIDENTIALITY POLICY

Introduction

Everyone who lives or works in Portland has the right to trust that their government will serve them honestly, fairly, and with equity. They must be able to rely on City personnel to place the public interest – the community’s interest – ahead of their individual advancement and interests, whether financial or personal.

On this score, City personnel¹ have a duty to preserve Confidential Information and protect it from unauthorized disclosure.

1. **Confidential Information.**

a. **Disclosure Prohibited.** The unauthorized disclosure of the City’s Confidential Information to outsiders or using Confidential Information for personal profit or advantage is prohibited.

b. **Definition of Confidential Information.** “Confidential Information” shall mean any information in the City’s possession or control, or that comes into the City’s possession or control during or following the term of any City personnel and their association with the City, of any kind and in any form relating to any aspect of the City’s business, projects, plans, affairs, products, or services that is not generally known which, by its disclosure, would give the disclosing party a personal or competitive advantage. By way of illustration only and not as a limitation “Confidential Information” includes strategies, designs, drawings, sketches, models, prototypes, patterns, notes, memoranda, letters, emails, papers, charts, data, documentation, code, firmware, formulae, discussions, plans, software, programs, algorithms, know-how, branding and/or marketing materials, and information developed by the City or developed by third parties for the City or submitted by them to the City and any documents or things marked “CONFIDENTIAL”.

c. **Non-fixed Media.** Confidential Information can and often does exist in forms not fixed in any medium, such as conversations and discussions. To be clear, *it is the content of the information, not its form, that determines*

¹ As used in this Policy the word “personnel” means any person who acts for or on behalf of the City regardless whether they are paid or unpaid, elected or appointed or voluntary.

whether the information is Confidential Information. When in doubt whether the information is Confidential Information, City personnel should treat the information as Confidential Information.

d. **Irreparable Harm.** All City personnel acknowledge that the Confidential Information is the valuable property of the City and is a valuable trade secret of the City. All City personnel further acknowledge that any disclosure or unauthorized use of the City’s Confidential Information will cause irreparable harm and loss to the City, or to the party entrusting the Confidential Information to the City, for which monetary damages would be inadequate compensation.

e. **Duty of Confidentiality.** All City personnel understand and agree that by executing this Confidentiality Policy they are entering into a special relationship with the City imposing a duty of confidentiality upon them.

2. **Insider Information.** “Insider Information” is a form of Confidential Information. Insider Information is non-public information which comes to City personnel during their employment or during the course of their association with the City. City personnel shall not use any Insider Information, or reveal it to others who may use it, in connection with business transactions related to the City or contemplated by the City. This applies not only to non-public information relating to the City, but also to non-public information relating to third parties such as individuals or businesses.

* * *

All City personnel who sign this Confidentiality Policy understand and agree that, by signing below, they have read and understood this Policy and have agreed to its provisions, terms and conditions.

SIGNATURE: _____

NAME: _____

TITLE: _____

DATE: _____