

LEGAL

1. **REASON FOR ISSUE:** To establish Department of Veterans Affairs (VA) policy regarding personal relationships between supervisors and subordinates that are either prohibited or discouraged in order to promote a professional and positive work environment.
2. **SUMMARY OF CONTENT/MAJOR CHANGES:** This change updates Part X of VA Handbook 5025, Legal, regarding personal relationships between supervisors and subordinates in the workplace to make administrative edits and an update in the Discouraged Relationships section. The pages in this handbook replace the corresponding page numbers in VA Handbook 5025, Part 7. These changes will be incorporated into the electronic version of VA Handbook 5025, Legal, that is maintained on the [Office of the Chief Human Capital Officer SharePoint](#) and the [VA Publications website](#).
3. **RESPONSIBLE OFFICE:** Office of Human Resources and Administration (HRA) (006), Office of the Chief Human Capital Officer (OCHCO) (05).
4. **RELATED DIRECTIVES:** VA Directive 5025, Legal.
5. **RESCISSIONS:** VA Handbook 5025, Legal, Part X, Personal Relationships Between Supervisors and Subordinates in the Workplace, dated January 15, 2026.

BY DIRECTION OF THE SECRETARY OF VETERANS AFFAIRS:

/s/
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Assistant Secretary for
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CONTENTS

[PART I.](#) EMPLOYEE RESPONSIBILITIES AND CONDUCT

[PART II.](#) ETHICAL CONDUCT

[PART III.](#) POLITICAL ACTIVITY

[PART IV.](#) ANNUAL ETHICS TRAINING AND REQUIRED ETHICS NOTICES

[PART V.](#) EMPLOYMENT OF RELATIVES

[PART VI.](#) CLAIMS AGAINST THE GOVERNMENT

[PART VII.](#) EMPLOYEE LIABILITY

[PART VIII.](#) EMPLOYEE ORGANIZATIONS AND ACTIVITIES

[PART IX.](#) LIMITATIONS ON REMUNERATED OUTSIDE PROFESSIONAL
ACTIVITIES OF INCUMBENTS OF CERTAIN VETERANS HEALTH
ADMINISTRATION POSITIONS

[PART X.](#) PERSONAL RELATIONSHIPS BETWEEN SUPERVISORS AND
SUBORDINATES IN THE WORKPLACE

PART X. PERSONAL RELATIONSHIPS BETWEEN SUPERVISORS AND SUBORDINATES IN THE WORKPLACE

1. **PURPOSE.** Establishes policy regarding personal relationships between supervisors and subordinates that are either prohibited or discouraged in order to promote a professional and positive work environment. Public service is a public trust and management officials are expected to uphold ethical principles by avoiding conflicts of interest and the appearances thereof. This policy supersedes but does not negate any actions taken or pending pursuant to VA Notice 24-17. For marital and familial relationships, refer to VA Handbook 5025, Part V, Employment of Relatives, for guidance.
2. **DEFINITIONS.**
 - a. **Conflict of Interest** exists when an employee's personal interests or relationships conflict with the faithful and objective performance of their official duty. When supervisors and subordinates are involved in certain types of personal relationships, there is a potential for a conflict of interest, loss of impartiality, and unfairness that negatively impacts the morale, workplace environment, and efficiency of the service.
 - b. **Employees** means all individuals receiving a VA appointment (paid and unpaid) and individuals who do not receive a VA appointment and are performing VA work under the supervision of a VA employee. This may include, but is not limited to, student interns and volunteers.
 - c. **Higher-level Supervisor** means a supervisor or manager in the chain of command who is higher in authority than the employees who are engaged in a personal relationship.
 - d. **Supervisor** means any individual having authority to hire, reassign, promote, reward, discipline, suspend, or remove an employee. It also includes those employees who have the authority to rate or measure performance or provide employment references.
3. **PROCEDURES.**
 - a. **Conflict of Interest:** Supervisors have a responsibility to avoid conflicts of interest, including the appearance of a conflict between their professional responsibilities and their personal relationships with subordinates, to maintain their professionalism, impartiality, and fairness.
 - b. **Expectations:** Employees must conduct themselves in a manner that contributes to a work environment that is respectful and productive.
 - c. **Prohibited Relationships.** In accordance with [5 C.F.R. § 2635, Subparts D and E](#), supervisors are prohibited from entering into the following relationships with

subordinates because of the likelihood that they will create real or perceived conflicts of interest, disrupt the workplace, and negatively impact the efficiency of the service.

- (1) **Business/Financial:** This policy prohibits business or financial relationships between supervisors and subordinates, such as entering into a landlord-tenant relationship, lending money, and sales where money is paid back over time. One-time transactions, such as the sale of an automobile or a piece of furniture, may be allowed, but only after the supervisor involved in the pending transaction receives written approval from his/her servicing Office of General Counsel (OGC) Ethics Official (See [5 C.F.R. § 2635, Subparts D and E.](#))
- (2) **Temporary Duty Travel/Lodging:** During government travel, shared living arrangements are prohibited between supervisors and subordinates, such as overnight stays at personal residences and shared hotel accommodations. During temporary duty travel, shared living arrangements between supervisors and subordinates, such as overnight stays at personal residences and shared hotel room accommodations, are prohibited unless required by operational need and approved by the higher-level supervisor.

d. **Discouraged Relationships.** While not strictly prohibited, the following relationships between supervisors and subordinates are discouraged because these types of relationships can create real or perceived bias or unfairness or may negatively impact employee morale and disrupt the workplace.

- (1) Dating relationships, such as romantic or intimate relationships, or relationships that are sexual in nature. These types of relationships also have the potential to raise Equal Employment Opportunity concerns, including but not limited to allegations of sexual harassment and/or a hostile work environment.
- (2) Personal services, such as babysitting, pet sitting, catering, or cleaning.
- (3) Traveling together for personal or family vacations.
- (4) Outside-of-work activities, such as golf, hunting, fishing, or game night, when invitations to participate are not extended to all subordinates.

e. **Responsibilities.**

- (1) Human Resources (HR) Officers:
 - (a) Must ensure human resources specialists provide technical assistance and support to supervisors and employees to ensure compliance with this policy.

- (b) Upon notification, manage, decrease, or eliminate potential risks associated with personal relationships prohibited or discouraged by this policy by working with the higher-level supervisor and OGC, if needed, to ensure appropriate action is taken.
 - (c) As appropriate, develop, conduct, or coordinate training on conflicts of interest related to personal relationships between supervisors and subordinates.
- (2) OGC must provide substantive legal advice on any legal and ethics questions, including when a potential violation of this policy is reported to a VA official.
 - (3) Supervisors must ensure that their relationships with subordinates do not raise concerns about favoritism, bias, and conflict of interest. Supervisors must either prohibit or discourage such relationships to promote a professional and positive work environment. Supervisors should consult with HR staff and OGC, as needed, to resolve inappropriate personal relationships between supervisors and their employees and mitigate any adverse impacts on the work environment.
 - (4) Employees must review and comply with this policy and work with their supervisory chain of command to resolve any personal relationships prohibited or discouraged by this policy.

f. **Reporting requirements.**

- (1) Supervisors should notify their higher-level supervisor if there is an emerging relationship before it evolves into a prohibited or discouraged relationship. This will allow proper mitigation and negate the potential for subsequent disciplinary or adverse action.
- (2) Supervisors engaged in personal relationships prohibited or discouraged by this policy must immediately disclose the relationship in writing to their higher-level supervisor.
- (3) The higher-level supervisor, when notified, must:
 - (a) Report the relationship to their servicing HR office;
 - (b) Immediately provide guidance to the supervisor on this policy and process;
 - (c) Consult with HR to determine whether the relationship violates this policy and how to resolve it;

- (d) Take immediate interim measures, as needed, to mitigate or eliminate any real or perceived conflicts of interest, bias, or unfairness; and
 - (e) As needed, conduct a prompt, objective, and thorough administrative inquiry, to determine if any inappropriate action(s) or policy violations occurred as a result of the relationship. If additional investigation is warranted, the higher-level supervisor should initiate an administrative investigation under VA Directive and Handbook 0700. If the higher-level supervisor learns of any potential harassment, they must report it to their Harassment Prevention Coordinator and follow the procedures in VA Directive and Handbook 5979. If there is evidence of senior leader misconduct, the higher-level supervisor should consult with the Office of Accountability and Whistleblower Protection in accordance with VA Directive 0500, Investigation of Whistleblower Disclosures and Allegations Involving Senior Leaders or Whistleblower Retaliation.
- g. **Resolution of issues.** The HR specialist and the higher-level supervisor will work together to determine the appropriate actions to eliminate the potential risks associated with any reported personal relationships. Appropriate action may include but is not limited to:
- (1) Reassignment to sever the supervisory relationship;
 - (2) Recusal of the supervisor from all official matters affecting, or appearing to affect, the employee; and
 - (3) If the supervisor cannot amicably come to a decision, offering the option of termination of the relationship or resignation from employment.
- h. **Disciplinary/Adverse Action.** Violations of this policy, including a failure of a supervisor to report a relationship, may result in appropriate action up to, and including, removal from Federal service.