

## Ethics Audit Management Action Plan Update

### A) Integration

Action	Target Completion Date	Status
Integrate Ethics into Corporate Culture action plans that are being developed in 2014	End of 2014	Complete. Ethics has been incorporated into Corporate Culture Action Plans and exists within a key pillar in the strategy- Steadfast Integrity.
Shape interview and reference checking process to include explicit behavioural questions on corporate culture and ethics. This includes support and training if required for hiring managers to hire and manage to this standard	End of 2014	Complete. Employment Services has incorporated interview and reference checking questions that reflect the corporate culture pillars. While there is some choice in the questions asked, every interview must contain two of these questions.
Ensure all employees receive an update on the Code of Conduct Policy in 2014, using existing staff meetings/training sessions	May 2014 EMT; All employees by end of 2014	Extended Management Team (EMT) on May 30 2014 focused on Ethics, and included resource materials and a directive for supervisors to take forward to their staff; HR informed all employees of the updated Code of Conduct through Connections, Supervisor and Above memos. HR staff discussed the Code of Conduct and sign off requirement with the executive of all Unions.
Incorporate ethics into the updated Annual Performance Management Process starting with the roll-out in 2014	End of 2015	Complete. The Code of Conduct is currently a part of the Performance Accountability and Development (PAD) form and a signed copy of the verification form must be included with the PAD

## B) Policy Review

Action	Target Completion Date	Status
Review and update the Employee Code of Conduct Policy for Council approval. Review to set out a timeframe for regular review within the policy and assess roles and responsibilities of Senior Management and Council to ensure they are clear. The policy also needs to ensure that appropriate controls are set out to ensure compliance.	Sept 2014	Complete, approved by Council on September 24, 2014
External review of the Council Code of Conduct Policy to ensure consistency with the Employee Policy. Approval by Council in 2015.	Initiate in Q3 2014, Approval by Council in 2015	To be discussed with new Integrity Commissioner. Review of the Council Code of Conduct is a responsibility of the Integrity Commissioner. The Integrity Commissioner Bylaw, section 7 e) states – <i>Provide advice and recommendations to Council regarding amendments to the Code of Conduct and any other procedures, rules or policies governing their ethical behaviour.</i>
Ensure all employees receive an update on the Code of Conduct Policy in 2014, using existing staff meetings/ training sessions	EMT May 30 2014; all employees by the end of 2014	Extended Management Team (ENT) on May 30 2014 focused on Ethics, and included resource materials and a directive for supervisors to take forward to their staff; HR informed all employees of the updated Code of Conduct through Connections, Supervisor and Above memos. HR staff discussed the Code of Conduct and sign off requirement with the executive of all Unions.
Review and update the Gifts and Hospitality Procedure	Q2 2014	Complete
Review and update the Whistleblower By-Law to ensure consistency with related policy. Review to include establishing related procedures and protocols for gathering reports of suspected non-compliance events	End of 2014 and Council approval in 2015	Review and update of Whistleblower By-law is on hold until new Director of Audit Services is hired. In the interim, a Whistleblower tracking system has been developed and implemented by the Acting Director. The current By-law's reporting requirements will be complied by the Acting Directors. An initial report to disclose the nature, number and outcome of disclosures under the current Whistleblower By-law is anticipated to be presented to the Audit, Finance and Administration Committee in September for activity in May, June and July 2015, with quarterly reports (as required by the current By-law) thereafter until the By-law is reviewed and updated.

Action	Target Completion Date	Status
Develop a procedure for the Code of Conduct Policy to assist with implementation of the policy, including a checklist. This will assist in defining roles and responsibilities of management and Council. The procedure will also help to clarify how controls set out in the policy are monitored and tracked. The procedure will also address the process for employee review and sign off of the policy.	End of 2014	In progress – Procedure was drafted and reviewed by corporate Policy Review Group, edits are being made, will go to SMT for approval in June
Tracking and Reporting – The review of the policies will consider appropriate metrics and reporting processes that demonstrate compliance with the appropriate policy	See Above Dates	In progress, ongoing

### C) Risk Assessment

Action	Target Completion Date	Status
Develop an ethics/compliance risk assessment process so that a consistent approach can be followed by all departments. The development of the process will also consider requirements for training and tools such as checklists. The scope will include both work processes and project management practices how to incorporate checks and controls into these processes.	End 2014	Draft complete; currently under review by corporate Policy Review Group and will be implemented by end of 2015
Complete the risk assessment and development of scenarios across the organization. The outcome of the assessment is to identify risk areas, appropriate controls and metrics to ensure ethics compliance.	End 2015	On target to be completed by end of 2015.
Implementation	As developed in 2015 and ongoing	Not started
Review and Update job descriptions as required based on risk assessments	2016 and ongoing	Not started

#### D) Awareness, Training and Communications

Action	Target Completion Date	Status
Ensure appropriate face to face interaction with ALL City employees and that they receive face to face information on ethics and corporate culture in 2014. This will include expectations for reporting and monitoring under the Gifts and Hospitality Policy. The metric for 2014 is to confirm that all employees have read, understood and signed off on the Code of Conduct Policy	End of 2014	Extended Management Team (EMT) on May 30 2014 focused on Ethics, and included resource materials and a directive for supervisors to take forward to their staff; HR informed all employees of the updated Code of Conduct through Connections, Supervisor and Above memos. HR staff discussed the Code of Conduct and sign off requirement with the executive of all Unions.
Direct Managers and supervisors to Include Ethics as a topic at staff meetings/training on a regular basis, whenever an ethics non-compliance issues arises in the workplace, and at a minimum of once per year.	End of 2014	Completed
Develop training materials so they can be delivered in a brief manner in multiple formats and integrated into existing training and development activities where ever possible, e.g. existing departmental training, existing Management Skills Development modules, Extended Management Team meetings, town hall meetings. Supervisor/Manager specific training will also be developed.	End of 2015	Completed – Corporate New Employee Orientation sessions that occur monthly include training on the Code of Conduct; a Manager Toolkit on Strengthening Ethics and Earning Trust was developed and disseminated to all supervisors and above

Action	Target Completion Date	Status
Review existing training programs to determine how ethics can be integrated.	2015	In progress
Review frequency of training as tools are developed and risk assessments are completed	2016	Not started
Review employee survey and engagement approaches to determine how to evaluate employee awareness of ethics policies	2014	In progress. The on-line training module on Code of Conduct and ethics will include an assessment of employee's understanding. Human Resources is currently looking at inclusion of employee awareness of ethics questions in our corporate measurement model.
Develop an internal communications strategy and tactics (eg. Posting information in workplaces, website, etc.) that can be used to communicate ethics information as well as other key information for employees for implementation in 2015. The plan and tactics will evolve over the next five years.	Q1 2015	In progress
Develop external communication materials so the community is aware of the City's policies and approach and what they can expect from the City.	End of 2015	In progress