





Hamilton

# INFORMATION REPORT

<b>TO:</b>	Chair and Members of Governance Review Sub-Committee
<b>COMMITTEE DATE:</b>	September 9, 2022
<b>SUBJECT/REPORT NO:</b>	Code of Conduct and Conflict of Interest Education and Communications (HUR22011 / CM22018) (City Wide)
<b>WARD(S) AFFECTED:</b>	City Wide
<b>PREPARED BY:</b>	Nenzi Cocca (905) 546-2424 Ext. 3924
<b>SUBMITTED BY:</b>	Lora Fontana Executive Director Human Resources (signed by Jodi Koch – Acting ED)
<b>SIGNATURE:</b>	
<b>SUBMITTED BY:</b>	Janette Smith City Manager
<b>SIGNATURE:</b>	

## COUNCIL DIRECTION

N/A

## INFORMATION

In response to recent Fraud and Waste investigations, a review of the City’s Code of Conduct, with a particular focus on the Conflict of Interest provisions, has been initiated. This Report will provide an update on Senior Leadership Team’s actions, with support from Human Resources, to improve adherence and education related to the Code of Conduct.

Trust and confidence in City government continues to be a priority, and in continued support of these efforts, there is opportunity to ensure all City employees have a clear

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OUR Vision: To be the best place to raise a child and age successfully.

OUR Mission: To provide high quality cost conscious public services that contribute to a healthy, safe and prosperous community, in a sustainable manner.

OUR Culture: Collective Ownership, Steadfast Integrity, Courageous Change, Sensational Service, Engaged Empowered Employees.

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understanding of the City's Code of Conduct. Through improved education and communication, with a particular focus on the associated Conflict of Interest provisions, Senior Leadership has engaged the assistance of Human Resources to initiate the following;

- Provide accessible on-line training to all City Employees regarding the Code of Conduct and Conflict of Interest. Developed by Human Resources in collaboration with the Procurement and Audit teams, employees will learn about the Code of Conduct and each of the Schedules including Conflict of Interest, provided with real-life examples, complete assessments to ensure understanding, and receive a certificate of completion. Training will be required on an annual basis.
- HR will develop a series of educational memos that will focus specifically on Conflict of Interest related scenarios. This includes providing examples demonstrating employee expectations, with Frequently Asked Questions (FAQs) that will address the most common questions and concerns raised by employees.
- Ensure that the Code of Conduct is reviewed and updated to align with current best practices. The Code of Conduct Policy and related Schedules will be reviewed and edited for clarity and conciseness to ensure employees can understand their responsibilities quickly and clearly. The Conflict of Interest Disclosure form will also be amended to make it easier for employees and their immediate supervisors to identify situations that require disclosure and document efforts made to mitigate or eliminate real or perceived Conflicts of Interest.
- Establish a centralized reporting system for Conflicts of Interest and other Code of Conduct matters. The tracking system will be used to compile annual statistics regarding Conflict of Interest disclosures and identify trends to inform future training and communication strategies and improve compliance and adherence to the Policy. Identified trends specific to a section, or audit findings that warrant a targeted training or communication plan, will be provided through customized workshops and additional learning opportunities.

**APPENDICES AND SCHEDULES ATTACHED**

N/A