

## Municipal/Regional Comparison re Acceptance of Fees, Gifts and Hospitality by Employees

### Quick Summary:

- 5 municipalities do not permit acceptance of gifts or hospitality, period (Greater Sudbury, London, Markham, Oakville, Ottawa).
- Several do not permit the acceptance of gifts or hospitality with exceptions, e.g., holiday party where other organizations are invited, infrequent business lunches, if gift is under \$25, if in the best interest of the City (business-related), moderate hospitality as an accepted courtesy of a business relationship. (Brampton, Cambridge, Durham, Guelph, Halton, Mississauga, Niagara Region, Peel, Richmond Hill, Thunder Bay, Toronto, Windsor).
- Several policies use terms like modest, reasonable, nominal, etc. without defining (Cambridge, Guelph, Halton, Mississauga, Niagara Region, Thunder Bay, Toronto, Vaughan).
- Nominal amounts that are quantified (Cambridge \$25, Halton \$50, Mississauga \$50, Guelph \$100).
- Frequency mentioned as a criteria by several (Brampton, Cambridge, Guelph, Halton, Mississauga, Peel, Thunder Bay, Vaughan).

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<b>Brampton (comparator)</b>	No. No mention of nominal amounts. Limited exceptions noted. Frequency noted, e.g., infrequent business lunches.	<p><b>Code of Conduct:</b> 1. (f) Gifts and Benefits: Gifts should not be solicited by employees. Employees should not allow themselves to reach a position whereby they might be or might be deemed by others to have been influenced in making a business decision as a consequence of accepting hospitality.</p> <p><b>Employee Code of Conduct – Handbook &amp; Guide:</b> We will not accept or provide any gift, benefit or special favour in exchange for special consideration or influence, or where it may be perceived to be in exchange for special treatment.</p> <p><u>Reality Check:</u> In the course or any day to day business, we may be faced with situations that requires us to decide if it is acceptable to receive gifts or benefits from 3<sup>rd</sup> parties. When in doubt, ask yourself the following questions:</p> <ul style="list-style-type: none"> <li>• Will the result in a personal benefit to me or to a member of the public?</li> <li>• Could a co-worker, outside party or media perceive this as unethical?</li> <li>• Was the gift/benefit intended to influence my decision?</li> </ul> <p>If you answered yes, you may be facing a conflict of interest. Any policy requires the use of personal judgement and interpretation. Seek clarification from your supervisor. The best measure for success is, “if in doubt, don’t”.</p>

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		<p><u>Exceptions:</u></p> <ul style="list-style-type: none"> <li>• Attendance at events approved by, or at the invitation of, the Mayor or Council Member, e.g., sponsored charity events.</li> <li>• Golf and other sports entertainment on weekends, on personal time, when paid for by the employee.</li> <li>• Field trips to see City-related projects elsewhere – if hospitality is anticipated, e.g., a meal, the supervisor will evaluate and approve.</li> <li>• Supplier sponsored conferences/seminars/hospitality suites (at conferences) within the GTA where other similar organizations are invited. Hospitality suites permitted if it is a general invitation to the conference attendees.</li> <li>• Infrequent business lunches, except during the blackout periods define in the Purchasing Policy.</li> <li>• Large events with attendance by other organizations, e.g., Christmas parties.</li> <li>• Incidental promotional items, e.g., pens, pencils, mugs.</li> <li>• Fruit baskets/Christmas baskets if made as a common benefit or raffled with proceeds to the United Way.</li> </ul>
<p><b>Cambridge</b></p>	<p>No, unless of a nominal value of \$25 or less. Return gifts over that amount.</p> <p>An employee may, at the expense of the City, purchase a meal for business/professional associates to reciprocate.</p>	<p><b>Code of Conduct</b></p> <p><u>Gifts and Benefits</u></p> <p>Business gifts should be discouraged, unless of a nominal value of \$25 or less. Employees should not solicit or accept any gift, present, favor or any form of entertainment where its acceptance would place the employee under obligation or compromise. Any gifts, payments, tickets or other items exceeding this nominal value should be returned to the sender with an acknowledgement and with reference to this Code of Conduct.</p> <p>Employees should seek guidance from their Director, Deputy City Manager or the City Manager as appropriate if they have concerns or need to clarify if a hospitality event offered is an acceptable business courtesy. Alternatively, the hospitality item may be turned over to the employee’s Deputy City Manager to be made available to all department staff with an acknowledgement to the sender.</p> <p>An employee may, at the expense of the City, purchase a meal for professional or business associates where a City of Cambridge business connection/established business relationship and/or potential relationship exists. The frequency and nature of this hospitality must be deemed appropriate by the Director, Deputy City Manager or the City Manager as an acceptable business courtesy in that staff can reciprocate a similar benefit to the provider. If</p>

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		the amount is excessive, staff should advise the provider that they are not comfortable with costs associated with the meal and that they would not be able to reciprocate.
<b>Durham</b>	<p>No. All gifts auctioned off for charity. No dining out – employee has to pay their own way and it will not be reimbursed.</p> <p>Participation in events must be approved by Dept Head and employee must use vacation time to attend.</p>	<p><b>Code of Ethics: Gifts and Entertainment</b> 3.06 Employees shall not solicit or accept any gifts, entertainment, payment, fee, service, discount, present or any other favour as a result of their status as an employee of the Region or on behalf of the Region (token gifts following a presentation are exempt). The acceptance of these gifts could place, or appear to place, the employee and/or the Region in a compromising situation. All gifts received from consultants, vendors, suppliers and customers/clients shall be auctioned and proceeds will be donated to the Corporate United Way program.</p> <p>Employees shall decline paid invitations for entertainment including dining out (e.g. as offered by existing or potential external consultants, vendors, suppliers, customers/clients). Participation in such events shall be allowed only if the employee covers all costs of their participation. These costs are not eligible for reimbursement.</p> <p>It is recognized that employees may be invited to participate in events. Participation in such events will require Department Head approval. Employees attending any event will complete the Participation in Events Disclosure/Approval Form prior to the event. Employees shall utilize vacation time to attend the approved event. Type of events may include invitation to a sporting event, charity tournaments and/or entertainment shows.</p>
<b>Greater Sudbury</b>	No. Respectfully decline.	<p><b>Code of Conduct:</b> When acting with integrity, we must: ... respectfully decline gifts, hospitality or entertainment from people who do, or who want to do, business with the City. If you are in doubt or have a question/need guidance, ask your Supervisor or the next level of management for assistance.</p>
<b>Guelph</b>	No. With limited exceptions. Nominal amount of \$100.	<p><b>Code of Conduct</b> <b>2. Receipt of Gifts and Hospitality</b> To preserve the image and integrity of the City, gifts and benefits are not to be accepted by an individual or business. <u>Exceptions</u></p>

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		<p>The City recognizes that moderate hospitality is an accepted courtesy of a business relationship. Accordingly, incidental gifts, hospitality or other benefits associated with an individual's official duties and responsibilities may be accepted provided that such hospitality or other benefits:</p> <ul style="list-style-type: none"> <li>a) are appropriate, a common expression of courtesy or within the normal standards of hospitality and of nominal value (\$100 or less);</li> <li>b) do not put the recipients in a position where they may be or be seen by others to have been influenced in making a business decision as a result of accepting such benefits;</li> <li>c) the frequency and scale of benefits accepted should not be greater than the employee's manager would allow to be claimed on an expense account if it were charged to the City; and</li> <li>d) would not compromise the integrity of the City.</li> </ul> <p>The City recognizes that from time to time, gifts will be donated for special City sponsored events, charitable events or municipal functions. This practice may be reasonable, provided that the gifts are publicly acknowledged and approved by the General Manager, Deputy CAO and/or CAO, or their designate in advance of the receipt of the donated gift.</p> <p>Where an employee is uncertain whether a gift is reasonable to accept, they are to seek guidance from their manager.</p> <p><u>Hospitality</u>  The occasional hospitality for entertainment for business contacts may occur. Such practice may be acceptable provided it can be shown that the interests of the City will be advanced. Such activities must be moderate and reasonable, both in cost and nature, with City participants being fully aware of the business aims involved and provided that at all times the image and integrity of the City are protected.</p> <p>In all cases department General Manager, Deputy CAO or CAO, or their designate must be notified in advance of participating in such business hospitality and/or business. Employees should ask themselves:</p> <ol style="list-style-type: none"> <li>1. Would I be uncomfortable disclosing this gift/benefit/hospitality to my manager?</li> <li>2. Is the gift/benefit/hospitality being offered to me in exchange for a favour or benefit?</li> </ol> <p>Where an employee is uncertain if the hospitality offered is acceptable, they are to seek guidance from their manager.</p>

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<b>Halton (comparator)</b>	No. Nominal amount \$50, infrequent, no tickets	<p><b>Code of Conduct:</b> Employees must refuse gifts, hospitality or other benefits that could influence or be perceived to influence their judgement and performance of official duties from persons, groups or organizations having dealings or potential dealings with the Region.</p> <p>Employees must not solicit gifts, hospitality or other benefits that could influence or be perceived to influence their judgement and performance of official duties from persons, groups or organizations having dealings or potential dealings with the Region.</p> <p>Employees may accept common expressions of courtesy that do not cause suspicion about the objectivity and impartiality of the employee, would not compromise the integrity of the Region and;</p> <ol style="list-style-type: none"> <li>1) are of a nominal value not to exceed fifty dollars (\$50);</li> <li>2) occur on infrequent and exceptional basis; and</li> <li>3) are not ticket(s) to an entertainment event including sporting events, concerts, or other similar activities.</li> </ol> <p>All gifts, hospitality or other benefits must be reported immediately to the employee's Department Head. The propriety of gifts, hospitality or other benefits that do not meet the above criteria should be assessed on a case-by-case basis by the Department Head. The Department Head may determine that the gift is appropriate in all of the circumstances. In the event that the gift is inappropriate, the Department Head may require that a gift be given to charity or take other action as may be appropriate under the circumstances.</p>
<b>London (comparator)</b>	No.	<p><b>Code of Ethics:</b> <u>4.1.5 Compensation or Business Gifts and Benefits</u> - The compensation an employee is paid is intended to remunerate them for service to the City. An employee will not solicit, accept, arrange to accept, give, or request to be given a reward, gift, present, favour, advantage, benefit, or any form of entertainment or other compensation which a reasonable person would perceive as influencing the past, current and/or future performance of the employee's duties or business relationships with the City. City employees who receive a gift in the performance of their duties will immediately advise their Manager.</p>
<b>Markham (comparator)</b>	No.	<b>Code of Ethics and Conduct Policy</b>

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		<p>Employees shall not solicit, accept or condone the solicitation or acceptance of any gift, favour or form of entertainment and/or hospitality from any person or corporation having dealings with the City whereby the acceptance of such could reasonably be construed as being given in anticipation or recognition of special consideration by the City.</p>
<p><b>Mississauga (comparator)</b></p>	<p>No. Limited exceptions. Nominal amount of \$50.</p>	<p><b>Conflict of Interest:</b> <u>Acceptance of Gifts, Hospitality, Benefits or Favours</u> - Employees must avoid being influenced and they must avoid the appearance of being influenced. An employee must not accept any gifts, hospitality, benefits or favours from any person or organization whose business or financial interests may be impacted in any fashion by the employee in the course of the exercise of the employee's Corporate duties, or where acceptance could be construed as being given in anticipation of future special considerations or recognition of past consideration by the City.</p> <p>The City will tolerate the acceptance of gifts, hospitality, benefits or favours only when they can be viewed to be within the boundaries of generally accepted business practices. With respect to acceptable practice during an acquisition process, refer to the Purchasing By-law, Section 6 - Conflicts of Interest.</p> <p>An employee who is in doubt about whether they should accept a gift, benefit or favour should politely decline or pay for their own entertainment.</p> <p>Acceptable business practices are as follows:</p> <ul style="list-style-type: none"> <li>• Occasional business meals</li> <li>• Gifts of a nominal value (\$50 or less)</li> <li>• Nominal gift or fee for speaking engagement</li> <li>• Social or charity event of nominal value where there is value in attending, etc.</li> </ul> <p>Business Meals: From time to time, it may be necessary to conduct a business meeting over a meal. Employees may accept occasional business meals from a person doing business with the City or seeking to do business with the City.</p> <p>Social/Charity Events and Functions:</p>

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		<p>In general, invitations or tickets from those currently doing business with the City (e.g., vendors; developers; contractors), those who may wish to do business with the City in the future, or any corporation or organizations currently in negotiations or discussions with the City or currently part of any regulatory process, investigation or penalty should be declined.</p> <p>Invitations or tickets to social/charity events and functions may be accepted if they meet one or more of the following criteria:</p> <ul style="list-style-type: none"> <li>a) The employee is one of many employees with similar municipal roles to attend the event (i.e., the invitation is being extended to the broader public sector or a specific professional audience)</li> <li>b) There is value in attending (i.e., the event/function will offer the opportunity to gather information relevant to the attendee's specific role/responsibility)</li> <li>c) The purpose of the event/function is information sharing or customer/partner appreciation where there may be an expectation that invited staff will attend as a representative of the City</li> <li>d) Staff in attendance are there to represent or promote the City. For example, staff in a leadership role or in divisions such as the Economic Development Office, Tourism Mississauga, and the Planning &amp; Building Department, may accept invitations or tickets from stakeholders and/or strategic partners, (e.g.) local business associations, local non-profit or charitable organizations, other public sector agencies or local community groups and in some cases corporations, where attendance by relevant City staff is deemed to be part of their role and/or business responsibilities in advancing the interests of the City of Mississauga</li> <li>e) The source of the invitation or tickets does not pose a real or perceived conflict of interest, and/or</li> <li>f) The employee will receive no personal gain or benefit in attending in their role as a representative of the City</li> </ul> <p>Any tickets in categories (a) to (f) above that are of more than a nominal value may require increased scrutiny by the employee to ensure that no real or perceived conflict of interest exists. If in doubt, employees should either decline the invitation or purchase a ticket if attendance is deemed suitable. Legitimate business expenses will be reimbursed in accordance with the City's policies dealing with expense reimbursement.</p> <p><b>Gifts of a Nominal Value</b></p> <p>Individual employees may accept an occasional gift that is offered as a common expression of courtesy or is within the normal standards of hospitality, provided the gift has a nominal value of \$50 or less. Gifts of cash may never be accepted.</p> <p>Gifts that exceed a nominal value or numerous, cumulative gifts of nominal value from the same source, must be refused or returned to the sender. Gift baskets, boxes of chocolates and the like may be accepted on behalf of all</p>

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		<p>employees within a work group, even if the gift exceeds a nominal value, provided that appropriate action is taken to ensure that no individual employee can be seen to have a real or perceived conflict of interest. For example, the gift may be opened and shared with all members of the work group or used in support of a charitable cause. Gift items such as art may also be forwarded to the applicable department for inclusion as a corporate donation, in accordance with the City's donation policies.</p> <p>Where an employee has accepted an invitation to an event/function, the employee may keep any gifts/prizes won that are of a nominal value.</p>
<p><b>Niagara (comparator)</b></p>	<p>No. Limited exceptions. Nominal amount.</p>	<p><b>Code of Conduct</b> Employees shall not seek or accept any gifts, entertainment, payments for services, valuable privileges, etc., or other favours from any external person or business organization except as provided below:</p> <ul style="list-style-type: none"> <li>i) acceptance of promotional items at a nominal dollar value;</li> <li>ii) attendance at social events where: <ul style="list-style-type: none"> <li>a. the event is attended by a broad range of the sponsoring organization's customers or professional association members and does not specifically cater to the Region;</li> <li>b. there is no actual, potential or apparent conflict of interest, and;</li> <li>c. permission to attend has been granted by the department Commissioner.</li> </ul> </li> <li>iii) charitable donations or fundraising for the benefit of the community; and;</li> <li>iv) sponsored community/professional events e.g., educational days.</li> </ul> <p>Gifts that do not meet the criteria in (i) above (i.e., entertainment tickets / vouchers) that are given directly to Niagara Region employees for personal use should be returned to sender or redirected with the sender's approval to a charity or non-profit community association of their choice. Employees should communicate the sensitivity of public perception to these individuals. Suppliers should be informed of this policy.</p>
<p><b>Oakville</b></p>	<p>No.</p>	<p><b>Code of Conduct:</b> <u>Gifts and gratuities</u> We will not accept or provide any gift, benefit or favour in exchange for special consideration or influence, or where it may be perceived to be in exchange for special treatment. What does this mean? Employees must not give or receive gifts if in doing so there is a perception that their decisions are being influenced or their integrity appears to be compromised.</p>



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		<p>Why is this important? Although most gifts come with no strings attached, there is always the chance that something is expected or perceived to be expected in return. Things to do</p> <ul style="list-style-type: none"> <li>• Decline cash tips or in kind gifts</li> <li>• Decline gifts that could be viewed as an exchange for a favour</li> <li>• Decline gifts from potential vendors or interested parties during or in anticipation of the purchasing or tendering process</li> <li>• No honorarium or fee for speaking engagements</li> <li>• If unsure, decline the gift or ask your supervisor.</li> </ul>
<b>Ottawa (comparator)</b>	No.	<p><b>Code of Conduct</b> Employees are not allowed to accept gifts, hospitality or entertainment from people who do, or want to do, business with the City. <u>Integrity</u> - As public servants, we have to do our jobs with the City of Ottawa’s best interests in mind, not our own. We have to do our jobs without bias, without favour and without allowing outside interests to conflict with work decisions. We do not accept gifts, hospitality or entertainment from people who do, or want to do, business with the City. <u>Questions to ask:</u> Am I putting my own interests before the City’s? Would I make the same decision if my managers, the public or the media were watching me? Will I owe someone a favour if I do this? Would I be offered this if I weren’t an employee of the City?</p>
<b>Peel Region (comparator)</b>	No. Limited exceptions. Prior approval required.	<p><b>Code of Conduct</b> <u>5. Gifts and Entertainment – Employees’ Responsibility</u> Employees shall not seek or accept any gifts, entertainment, payments, fees, services, valuable privileges, or other favours from any person or business organization that has dealings with the Region, except as provided for herein, such as employees may entertainment usually associated with accepted business practices if it is infrequent, legitimately serves a definite business purpose, and is appropriate to the business responsibilities of the individuals involved.</p>

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		<p>Staff may participate in a client/supplier sponsored event (e.g., dinner, golf tournament, conference) when there is a valid business purpose and it is approved by the Department Head. When these events are paid for by the supplies staff must seek Department Head approval prior to accepting such invitations. Employee attendance may be sponsored by the Region at the discretion of the Department Head, or the employee may elect to attend at their own cost on their own time.</p>
<p><b>Richmond Hill (comparator)</b></p>	<p>No. Limited exceptions. Prior approval required.</p>	<p><b>Code of Conduct Policy Gifts, Benefits and Hospitality</b></p> <p>Employees must make workplace decisions based on an impartial and objective assessment of each situation, free from influence of gifts, favours, hospitality and entertainment. Employees must avoid the reality and appearance of impropriety with organizations and people with whom they deal.</p> <p>In order to preserve the image and integrity of the City, business gifts are prohibited except as follows:</p> <ol style="list-style-type: none"> <li>a. The normal exchange of gifts between friends;</li> <li>b. Gifts received in connection with municipal twinning (Lakeland etc.);</li> <li>c. Gifts received for services to professional organizations or non-profit groups;</li> <li>d. Token gifts of exchange as part of protocol;</li> <li>e. Normal presentation of gifts to persons participating in public functions.</li> </ol> <p>Gifts received by a Department (or section, division or other separate sector of a Department, as the case may be – the “work unit”) may be accepted provided the nature of the gift is in keeping with this policy. Any such gifts should be shared amongst staff in that work unit where possible. For example, flowers received should be displayed in the main lobby of the department, items in a fruit basket should be made available to all staff in that work unit.</p> <p>Gifts that are received that are not in keeping with this policy should be returned to the sender wherever possible citing this policy. Alternatively, at the discretion of the Commissioner or City Manager, gifts received may be contributed to a raffle where proceeds are donated to a registered charity or City sanctioned event. A letter outlining the actions taken by the City shall be sent to the sender of the gift by the Commissioner or designate.</p> <p>The City recognizes that moderate hospitality is an accepted courtesy of a business relationship but any hospitality accepted should fall within the following criteria:</p> <ol style="list-style-type: none"> <li>a. Recipients do not allow themselves to reach a position whereby they might be or be deemed by others to have been influenced in making a business decision as a consequence of accepting such hospitality.</li> </ol>

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		<p>b. The expenses involved are not greater than the employee's Commissioner would allow to be claimed on an expense account if it were charged to the City (as defined in the City's Business Expenses and Hospitality Policy); and</p> <p>c. It serves a legitimate business purpose related to the responsibilities of the individual.</p> <p>Employees may attend cultural, social, charitable, political, recreational, golf or sporting events if, in the opinion of their Commissioner, it would be beneficial to the City and if it directly relates to the functions of the position of the staff member attending the event. Specific rules regarding the disclosure, permission and documentation required to participate in golf events are included in Schedule B.</p> <p>Consideration may be given to reimbursing an employee for the expense of such an event if it is determined by the appropriate Commissioner that attendance would be of benefit to the City.</p> <p>If an employee is invited to such an event in the company of the person extending the invitation, the employee should consult with his/her Commissioner, to determine if attendance would be of benefit to the City.</p> <p>If an employee is invited to such an event where the person extending the invitation is not attending, the invitation is to be refused citing this policy.</p> <p>Employee shall not accept travel costs or accommodation, or payment related to travel or accommodation, from any person or business organization unless their Commissioner decides acceptance is in the best interest of the City.</p> <p>In recognition of the value of interaction with business associates, the City occasionally participate in invitational, charity or special events. Participation in such events shall be approved by the appropriate Commission prior to the event taking place.</p>
<b>Thunder Bay</b>	No. Modest, nominal, infrequent	<p><b>Code of Conduct Policy</b> Employees will not solicit nor accept any gift or favour which compromises his or her real or perceived ability to make decisions or carry out his or her official duties in an impartial "unbiased" manner. Moderate tokens of appreciation and modest hospitality may be accepted as a normal courtesy of a business relationship. The frequency and scale of hospitality should not exceed what would be permitted to be claimed as an expense in the normal course of one's duties.</p> <p><b>Conflict of Interest Procedure</b></p>

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		An employee shall not accept any gift, money, discount, favour or other assistance from any business that has a contract with the City, unless the gratuity is one which is of nominal value (such as a coffee mug or meal) or available to the general public at no cost.
Toronto	No. Nominal value.	<p><b>Toronto Municipal Code – Chapter 192 Public Service</b>  <b>192-13. Gifts.</b>  A. City or Agency employee will not accept, arrange to accept, give or request to be given a reward, gift, advantage or benefit of any kind from any person or entity that influences or could be perceived to influence the performance of the employee's duties.  B. City or Agency employee, who receives a gift in the performance of his or her duties, will immediately notify his or her manager/supervisor or Ethics Executive.  C. City or Agency employee may accept a gift of nominal value given as an expression of courtesy or hospitality if doing so does not influence, or would not be perceived to influence, the performance of the employee's duties.  D. The head of a City or Agency department or division may pre-determine that no gift may be accepted under any circumstance.</p>
Vaughan (comparator)	No. Nominal value.	<p><b>Code of Conduct</b>  <b>8. Gifts</b>  8.1 Employees shall not accept gifts (including items, articles, services, offers or vouchers) except of nominal value.  8.2 Employees recognize that even items of nominal value, if frequently accepted, may be perceived to be an attempt to create an obligation.  8.3. Employees will donate gifts to charity or raffle gifts and send proceeds to charity where money is raised.  8.4. Employees can share gifts of nominal value amongst the department, if perishable.  8.5. Employees will not accept loans offered in the course of their employment at the City.</p>
Windsor	No. Limited exceptions.	<p><b>Employee and Volunteer Code of Ethics and Conflict of Interest Policy</b>  No Employee or Volunteer shall accept any gift, favour or services or other financial benefit in the course of the performance of their employment duties other than:</p>

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		<ul style="list-style-type: none"> <li>• Normal hospitality among persons doing business where normal hospitality is restricted to food and beverages;</li> <li>• Seasonal gift baskets or flowers which cannot be reasonably returned and which are shared equitably within the receiving department or donated to charity;</li> <li>• Token exchanges as part of a protocol;</li> <li>• Normal presentations made to persons participating in public functions;</li> <li>• Acceptance of an invitation to any social or recreational event flowing from a business relationship related to the Employee's or Volunteer's employment with the City of Windsor where the Employee or Volunteer pays for all entry fees and participates on their own time.</li> </ul> <p>All monetary conflicts of interest including the above noted exceptions shall be disclosed on a Conflict of Interest Disclosure Form and in the case of invitations to events, they shall be disclosed in advance of attendance.</p>