"20 Questions Directors Should Ask about Codes of Conduct" – 2014 Summary for The City of Calgary

Section A – Code context, development & revision

Topic	Question	Current Status	Main Challenges	Actions
Objectives	1. What are the objectives of the Code of Conduct?	The objectives of the Code of Conduct are to: • Support a strong culture of respectful, ethical and safe behaviour in the workplace. • Address a broad range of employee conduct issues that may create risk for The City as a corporation. • Provide a summary of key City policies that address risk areas regarding conduct and behaviours employees may encounter in their work. • Ensure employees know where they can find the policies summarized in the Code as well as additional information. • Ensure employees understand their responsibilities under the Code of Conduct.		No action required.
Mission, Vision and Values	2. What is the Code's relationship to the organization's mission, vision and values?	The City's values of individual responsibility and collective accountability are espoused within the various policies covered within the Code of Conduct (e.g. The Respectful Workplace Policy outlines acceptable behaviour in alignment with the value of treating others respectfully; the Acceptable Use of Technology Policy and the Conflict of Interest Policy outline how employees are held accountable for their actions). The underlying message within the Code of Conduct fits with the key messages of The City's mission, vision and values.		2015 Actions: Review in conjunction with the review of The City's mission and behaviours scheduled to start Q1 2015.Ensure alignment to the values of individual responsibility and collective accountability.

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Organizational Context	3. Is the Code at the right level for the organization?	Yes, the Code of Conduct addresses a broad range of employee conduct issues that may create risk for The City. It is an Administrative policy sponsored by Corporate Administration/City Manager's Office, and has been approved by the Administrative Leadership Team. The Code of Conduct has equal importance to all other Administrative policies. The expectations outlined in the various policies are realistic and appropriate for this organization.		No action required
Culture	4. How does the Code relate to the organization's culture?	The Code in its current form mirrors The City's culture of setting high behavioural expectations for City employees. It also relies heavily on trust with respect to ethical behaviour of employees, rather than a heavy handed approach to ensuring compliance.	New employees entering the workforce from other organizations may have different practices and expectations. New generations and diverse workers with different expectations and backgrounds. New set of values identified; new behaviours and mission to be confirmed.	Ongoing work through COCO.
Ethical Risks	5. Has the organization determined its actual ethical	Council's Integrated Risk Management Policy came into effect on 2004 July 6 and applies to all employees. Its purpose is to embed a proactive, corporate-wide and systematic approach to		No action required.

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	risks?	managing risks (including compliance with City of Calgary values) that impact The City of Calgary's ability to achieve its objectives.		
Foreign Operations	6. How does the Code apply to foreign operations?	This question is not applicable to The City of Calgary.		Not applicable.

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Role of Board of Directors	7. Who are the champions of the Code?	The City Manager is the overall champion of all City administrative policies including the Code of Conduct.		Ongoing messaging to employees.
Administration of the Code	8. Who develops, administers and maintains the Code?	Administering the Code of Conduct is the responsibility of management. Resources from several business units including Human Resources, Environment and Safety Management, Information Technology, City Clerks, Customer Service & Communications and Corporate Security are available to provide assistance to managers and supervisors throughout the organization. Human Resources maintains the Code of Conduct based on input received from the owners of the individual policies		Ongoing monitoring and updates as required.
Process	9. What is the process for developing the Code?	The Code of Conduct was developed by a steering committee and a working committee of City employees including representatives from Law, Human Resources and City Auditors. Subject matter experts representing the various policies outlined in the Code provided input into the wording of the summary portions.		No action required.

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Review	10. What is the process for the periodic review and revision of the Code?	The Code of Conduct continues to evolve as policies governing conduct are revised to reflect changes in our operating environment and in best practices. Business units review and update their policies under the Code of Conduct as required. The Administrative Policy Template requires the review date to be identified. The Audit Committee, as part of its terms of reference, has requested an annual report regarding The City's Code of Conduct status and compliance.		Continuous monitoring and updating relevant policies as required. 2015 Actions: Human Resources will be working with Law and Corporate Security on the Code of Conduct and associated training and promotional materials to revise it to include the new Workplace Violence Policy. The Code of Conduct and educational and training materials will also be reviewed in conjunction with a review of the City's mission and behaviours and to ensure alignment to the values of individual responsibility and collective accountability. Additionally the Conflict of Interest Policy is scheduled for review and expected to be completed by Q1 2015.

Section B – Code implementation and execution

Topic	Question	Current Status	Main Challenges	Actions
Communication	11. How is the Code communicated and how are people educated in it?	The Code of Conduct is available on The City Intranet for City employees who have access to a computer. The Code is also available on-line and as part of the new employee orientation materials. Management may communicate policies within the Code of Conduct to employees using different mechanisms (e.g. presentations, workshops, pamphlets, employee notices). As with all City policies, management is responsible for ensuring employees are aware of and comply with policy (including the policies outlined in the Code). 2014 Highlights To improve supervisor resources, Human Resources conducted a review of the supervisor portion of The City of Calgary Orientation (COCO). This included engaging with supervisors from across The Corporation to learn how they apply the Code of Conduct with their new employees and what improvements can be made. Environment & Safety Management (ESM) supported corporate-wide environmental programs to educate employees and help mitigate the impact of The City's business on air, land and water and continually improve environmental performance. ESM also developed a corporate environmental, health and safety (EH&S) risk registry process which integrates the elements of the Environmental Policy and Occupational Health and Safety	Ensuring employees are aware of the Code of Conduct given the number of diverse operations. Ensuring all employees have a consistent interpretation of the policies within the Code.	Regular development of communication strategies using a wide range of media. 2015 Actions The City Manager will continue to champion the annual Code of Conduct employee awareness initiative in 2015. Administration will launch an education and awareness initiative to all employees and supervisors designed to foster safe and respectful workplace and strengthen their knowledge of their roles and responsibilities related to the Code of Conduct, emphasizing the Respectful Workplace Policy. The campaign focuses on ensuring supervisors and employees know what to do if a respectful workplace issue arises. ESM will utilize the recently developed risk registry process to prioritize corporate

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		(OHS) Policy to identify and quantify environmental and safety risks. The Corporate Safety Strategy was introduced to align actions across the corporation in the support of improved safety performance and adherence to the OHS Policy. A new Workplace Violence Policy was developed by Corporate Security in partnership with Human Resources and Environmental & Safety Management to establish a proactive approach to violence in the workplace and outline the expectations of employees and The City of Calgary in reporting and responding to violent incidents if they occur. The first phase of a comprehensive communications campaign around the new Workplace Violence Policy launched in November 2014. Key messages encouraged employees and supervisors to read the new policy and its corresponding procedures, and directed employees to a myCity site with Frequently Asked Questions and workplace violence statistics.		environmental and safety risks and highlight potential gaps in corporate commitment to the policies. ESM will also build the necessary support mechanisms to support the integration of the new or increased aspects of the update for ISO 14001 registration to ensure City compliance with the standard. Corporate Security is currently developing a City Specific e-learning program for the Workplace Violence Policy, with an anticipated completion date of August 2015. Additionally, there is another phase to the communications campaign being developed, which will direct employees to the new e-learning program and additional information on the subject. In Q1 2015, Human Resources will launch an e-learning module on Respect in the Workplace accessible to all employees, Council and

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				Staff. This has been highlighted in communications to all employees, the Corporate Management Team, Learning and Employee Development networks and Human Resources. To support the e-learning module, Human Resources is developing a plan to deliver education and training on the Respectful Workplace Policy aimed at all employees. Human Resources will be working with Law and Corporate Security on the Code of Conduct and associated training and promotional materials to revise it to include the new Workplace Violence Policy and updating the Conflict of Interest Policy.
Criticism	12. How does the organization handle criticism of the Code?	Concerns can be raised with management or with the policy owner (e.g., Environmental Management for the Environmental Policy).		No action required.
Measurement and Monitoring	13. How is compliance with the Code measured and monitored?	While The City expects employees to adhere to all aspects of the nine policies referenced in the Code of Conduct, compliance is not formally monitored. Processes are in place to manage non-compliance of the individual policies under the Code of Conduct. Management is	It is management's responsibility to ensure compliance for all policies including	No action required.

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		responsible for identifying any breaches of policy and dealing with these breaches as appropriate through the discipline process outlined in the various collective agreements and exempt policy statement.	the series of the policies within the Code. Additional monitoring and measuring of policy compliance would require significant resources.	
Sign off	14. Do we ask people to sign off?	At the 2010 February 08 Council Meeting, Council directed that Report AC2010-02 be referred to Law for a legal opinion concerning the appropriateness and relevance of employee sign-off on the Employee Code of Conduct, considering current Provincial and Federal Legislation, and to report back to the Audit Committee no later than 2010 April. The report from Law (AC2010-28) provided 6 conclusions. An excerpt from this report states…"a change of this nature would likely be challenging for The City to implement and manage. In implementing the sign-off requirement, The City may face legal and logistical costs that outweigh the limited potential benefits."

Notwithstanding this legal opinion, Human Resources and Information Technology piloted a form of sign-off in 2012 and evaluated the results. The sign-off acknowledged that the employee had read the Code of Conduct. The use of an electronic acknowledgement would mitigate the logistical costs and an assessment will be made of the legal costs before actions are taken in response to an employee and/or | | 2015 Actions: The use of eHR and all employee access will be explored. |

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		union challenge.		
Point of Contact	15. Where do people go for advice, issue resolution, or to seek a waiver of the Code's application?	Employees would go to their immediate supervisor, senior management in their business unit, Human Resources or Corporate Security. They may also contact the office responsible for a specific policy (e.g. FOIP Office for FOIP issues). Citizens would normally call 3-1-1 or contact their Councillor.		No action required.
Rewards System	16. How does the Code relate to the rewards system and how are violations handled?	The City's Corporate Management Team (CMT) Performance Management System is a process for defining expectations and goals, and making pay for performance decisions. A key component of the program is the use of competencies to denote how things get done. One of the eight CMT Leadership Competencies is Values and Ethics which is defined as "demonstrates professionalism, integrity, ethical behavior, and commitment to the values of The City of Calgary." How well a member of CMT performs with respect to the eight CMT Leadership Competencies relates to their base pay adjustments. Through this process and the discussions that occur throughout the year on progress, members of the Corporate Management Team are held accountable for not only what they do, but how they do it.		2015 Actions: To be reviewed as part of the review of all Corporate Recognition and Rewards Programs (alignment to new values and behaviours) and as part of the review of the Individual Performance Plan.
Whistle blowing	17. How does the Code deal with whistle blowing?	The City Auditor's office is the policy owner for the Council approved Whistle-Blower Policy (CC026) This policy establishes specific program responsibilities regarding the reporting and investigation of allegations of waste and/or wrongdoing with The City of Calgary. The		No action required

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		policy reflects The City's ongoing effort to support open, ethical, accountable and transparent local government. There are also a number of mechanisms with similar intent that exist within administrative policies including: • Corporate Security GN-027 – Criminal Investigations and Reporting: ensures adherence to corporate policies and reporting procedures relative to the investigative function in the Corporation. • Labour Relations HR-LR-002 – Malfeasance: establishes an expectation that employees will report known or suspected malfeasance through business unit channels or to the Manager of Corporate Security. The anonymity of an employee reporting malfeasance shall be protected as far as it is within The City's control. • Labour Relations HR-LR-002 – Inappropriate Workplace Behaviour: establishes the responsibility that all employees have to bring concerns of disrespectful behaviour forward to the employee's supervisor or to the attention of Corporate Security; and that no person shall suffer reprisal as a result of making a complaint or for providing information.		
Information to the Board	18. What information should the board receive?	At its 2006 January 19 meeting, the Audit Committee requested that the Canadian Institute of Chartered Accountants' methodology "20 Questions Directors Should Ask about Codes of Conduct" be used as the basis of the annual update on the Code of		No action required.

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		Conduct – status and compliance. This update to that document reflects accomplishments since the last annual report.		
Is the Code working?	19. But, as a director, how do I really know the Code is actually working?	A number of mechanisms are in place – both formal and informal to ensure compliance with City policies including the Code of Conduct. Currently, instances of non compliance with the policies summarized in the Code of Conduct, as experienced through grievances, whistle-blower complaints, etc. is considered minimal for an organization of this size.		No action required.
Timeliness	20. How does an organization's Code stand the test of time?	The Code of Conduct's overview includes the statement, "This document will continue to evolve as policies governing conduct are revised to reflect changes in our operating environment and in best practices." Standards of behaviour or principles should not vary significantly over time. The values of individual responsibility and collective accountability and The City's policies including the Code of Conduct ensure that standards of behaviour remain high.		Ensuring the alignment of the Code, training and resources to the new values and behaviours is planned as part of the work to be done under the Leadership Strategic Plan in 2015.