

"20 Questions Directors Should Ask about Codes of Conduct" – 2013 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?	<p>The objectives of the Code of Conduct are to:</p> <ul style="list-style-type: none"> • 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 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?	<p>The City's values (be honest and tell the truth; pursue excellence; be accountable; be responsive, compassionate and fair; treat others with respect) 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.</p>		No action required.

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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 the private sector may have different practices and expectations. New generation of workers with different expectations.	The Code of Conduct is a topic covered in the corporate orientation (COCO) for new employees to The City. It's facilitated through small group discussions using scenarios that are related to each of the policies, to make the Code of Conduct more relatable and thought provoking for the participants.
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.

	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, Customer Service & Communications, and Corporate Security are available to provide assistance to managers and supervisors throughout the organization. Human Resources maintains the Code of Content 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?	<p>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.</p>		<p>Continuous monitoring and updating relevant policies as required.</p> <p><u>Planned for 2014</u> Corporate Security is working on a Workplace Violence Policy to be added to the Code in consultation with the Law Department and Human Resources.</p>

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?	<p>The Code of Conduct is available on The City Intranet for City employees with access to a computer. The Code is also available on-line and as part of the new employee orientation materials.</p> <p>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).</p> <p><u>2013 Highlights</u> Human Resources and Information Technology introduced a variation on the “sign off” for the employees who were not covered under the 2012 sign-off initiative, but became “wired” in 2013.</p> <p>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.</p> <p>Environment & Safety Management (ESM) supported preparation for the 2013 Certificate of Recognition (COR) corporate-wide safety audit.</p> <p>The FOIP Office created an Access Impact</p>	<p>Ensuring employees are aware of the Code of Conduct considering that there are over 14,000 employees in a number of diverse operations.</p> <p>Ensuring employees have a consistent interpretation of the policies within the Code.</p>	<p>Regular development of communication strategies using a wide range of media.</p> <p><u>2014 Actions</u> The City Manager’s Office will continue to champion the annual Code of Conduct employee awareness initiative in 2014.</p> <p>The City Manager’s Office in partnership with Human Resources 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</p>

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		<p>Assessment Tool for Business Units to use in evaluating whether or not information held in the Business Unit could be routinely released or through the FOIP process. They also worked with the City Auditor to create a Privacy Health Check tool that helps Business Units evaluate their compliance in protecting personal information.</p>		<p>Respectful Workplace Policy. The campaign focuses on ensuring supervisors and employees know what to do if a respectful workplace issue arises.</p> <p>Human Resources will review supervisor's resources for the City of Calgary Orientation (COCO). This review will include learning from stakeholders how the Code of Conduct is applied with new employees across various departments from a supervisor's perspective in order to improve the resources.</p>
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.

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Measurement and Monitoring	13. How is compliance with the Code measured and monitored?	<p>While The City expects employees to adhere to all aspects of the eight 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 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.</p>	<p>It is management's responsibility to ensure compliance for all policies including the series of eight policies within the Code. Additional monitoring and measuring of policy compliance would require significant resources.</p>	<p>No action required.</p>
Sign off	14. Do we ask people to sign off?	<p>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 that, in summary, indicate employee sign off for the Code is not recommended. 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.”</p>		<p>Human Resources and Information Technology introduced a variation on the “sign off” for the employees who were not covered under the 2012 sign-off initiative, but became “wired” in 2013.</p>

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		<p>Notwithstanding this legal opinion, Human Resources and Information Technology piloted a form of sign-off in 2012 and evaluated the results. The use of an electronic sign-off 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 union challenge.</p>		
Point of Contact	<p>15. Where do people go for advice, issue resolution, or to seek a waiver of the Code's application?</p>	<p>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.</p>		<p>No action required.</p>
Rewards System	<p>16. How does the Code relate to the rewards system and how are violations handled?</p>	<p>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.</p>		<p>No action required.</p>

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Whistle blowing	17. How does the Code deal with whistle blowing?	<p>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 policy reflects The City’s ongoing effort to support open, ethical, accountable and transparent local government.</p> <p>There are also a number of mechanisms with similar intent that exist within administrative policies including:</p> <ul style="list-style-type: none"> • 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 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 		No action required

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Information to the Board	18. What information should the board receive?	complaint or for providing information. 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 Conduct – status and compliance. This update to that document reflects accomplishments since the last annual report.		No action required.
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, whistleblower 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 expectation that employees of The City will add value for the community by building trusting relationships in an ethical and professional manner is stated in the Corporate Values for the organization. These values and The City's policies including the Code of Conduct ensure that standards of behaviour remain high over time.		No action required.