

Actions in Response to KPMG Report

#	KPMG Report Action (abridged)	Actions Taken	KPMG Report date (Responsible)	Status
5.1.1	Consider application or implication of sign-off	1. Reviewed legal, Labour Relations, behavioral, cost/effort and cultural alignment aspects of sign-off, as well as current, best and recommended practices. 2. Consistent with the intent and desired outcomes from KPMG’s recommendation to consider sign-off, and subject to approval by Administration, The City will implement (possibly mandatory) training for employees and leaders, where attendance and course completion is tracked.	June 30, 2017 (HR)	KPMG Action in progress – on track
5.1.1	Continue and possibly enhance communication strategy for the Code	1. Developed a Communications Strategy for the Code of Conduct that incorporates The City’s cultural values, sets a positive tone, provokes thought and discussion, reinforces key Code highlights and focuses on specific policies or areas needing to be targeted. 2. Incorporated direction in all Letters of Offer for new hires to review the Code of Conduct prior to starting work at The City.	June 30, 2017 (HR)	KPMG Action Complete
5.1.2	Complete a review of training needs and approaches	1. Based on research and feedback from employees and leaders, worked with Human Resources-Learning and Development to develop a Training Strategy and plan for training for employees and leaders (possibly mandatory). Proposed employee training would cover highlights of policies, roles and responsibilities, relevant examples or cases, where to ask questions and how to report concerns. Leaders’ sessions would provide additional understanding of their particular role in guiding employees, dealing with concerns, and seeking help from experts. 2. Updated Corporate Orientation content with updated scripts and examples of policy behaviors to assist facilitators and participants.	December 31, 2017 (HR)	KPMG Action Complete Further work underway to design training programs

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5.1.2	Complete a review of a tracking mechanism for training and ease of access to code and related amendments	1. A plan is in place to acquire and introduce a Learning Management System (LMS) that will enable training registration, enrollment and tracking. 2. Developed a website on Calgary.ca, to better enable <i>all</i> employees to access user-friendly information about the Code and its related policies.	December 31, 2017 (HR)	KPMG Action Complete	
5.1.2	Discuss training needs with Council	1. The City has had a website for a number of years that houses information about the Code. This year a new external website was created that contains information, videos and tools related to the Code of Conduct as well as links to the Code policies within the Administration Library, accessible to members of Audit Committee and Council. 2. HR has developed a refreshed Code of Conduct that will be given to new members of Audit Committee and Council.	March 31, 2016 (City Clerk's)	KPMG Action Complete	
5.1.3	Review of Code of Conduct for staff of Office of the Councillors	1. Inventoried ethics policies in Council and Administration Policy libraries that apply to City employees, and elected officials and their staff. Found that processes for reporting and investigating concerns is unclear. 2. Determined that refreshed Code of Conduct would apply to all <i>City</i> employees 3. Determined that ethics policies that apply to City employees, and those applying to elected officials and their staff should be separate. Ethics policies applying to elected officials and their staff need processes developed that clearly outline how their concerns are reported, investigated and resolved. Administration is pleased to support the Ethics Commissioner and Ethics Advisor in advancing this work.	March 31, 2016 (HR)	KPMG Action Complete	

5.1.3	Assist Council in any review Council chooses to undertake	1. The Integrity Commissioner and Ethics Advisor were not in place when this Action was put forward. In light of the recent selection to these positions, we believe any review with Council would directly involve these ethics personnel. We continue to be available to assist or support Council, and the Integrity Commissioner and Ethics Advisor, in any review Council decides to undertake.	June 30, 2016 (HR)	KPMG Action In progress
				Administration has not yet been engaged by Council or their Ethics personnel
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5.1.3	Review responsibility and process to identify and resolve any conflicts between policies in the Code or with supporting policies and documents; Review the complexity of the Code with objective of providing an understandable and effective code	1. Found few areas of confusion or conflict among Code of Conduct policies; however, to increase clarity, developed clear, easy-to-find, and easy-to-read sections on asking questions and reporting concerns within the refreshed Code, clarifying where to report different types of policy concerns. 2. Defined responsibility for the policy owners and Code of Conduct owner to identify and resolve conflicts or overlaps with other policies and ensure alignment. 3. Based on stakeholder feedback and research re-wrote the entire Code of Conduct to create a more understandable, useful, engaging and accessible reference. 4. Developed Policy and Standards templates and guides to create greater consistency and ease of navigation for end users.	March 31, 2017 (HR)	KPMG Action Complete The refreshed Code of Conduct will be issued in the coming weeks
5.1.3	Review current investigation approach and matrix for applicability to the overall code of conduct and to ensure	1. Developed process maps for the current processes that are in place to report, triage and investigate concerns for policies under the Code.	June 30, 2017 (HR)	KPMG Action Complete

	clarity and effectiveness	2. The processes for Respectful Workplace, Acceptable Use of Technology, Conflict of Interest, Workplace Violence, Substance Use, and Public Statements and Media Relations will be aligned by reporting incidents through the intake system used by Corporate Security. This will align processes, allow for incident monitoring, and provide sound data capture for performance measurement and trend analysis. 3. The reporting and investigation processes in place for safety, environment and FOIP will remain separate. The processes for reporting, triaging and investigating safety, environment and FOIP situations are well established. As well, there are legislative or regulatory requirements to report certain events to outside parties.		Work will be underway over the next year to bring incident reporting and investigations into the Corporate Security system
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5.1.3	Review the effectiveness of the process for policy review and procedure to record evidence of the review	1. We will continue to update policies every three years and bring the Code and its related policies to a common, three-year review cycle to realize efficiencies in updating documents, websites and programs (e.g. training), to facilitate policy alignment and to better coordinate communication of changes. The three-year cycle will still allow for more frequent policy updates, as needed.	September 30, 2016 (HR)	KPMG Action Complete
5.1.4	Review the reporting processes and determine whether a generic reporting process should be created	1. Examined and mapped existing processes for reporting, triaging and investigating concerns. 2. Clarified in the refreshed Code of Conduct where employees can report their concerns generally as well as for specific types of concerns. 3. Provided employees with multiple avenues to report concerns. For example, if	March 31, 2017 (HR)	KPMG Action Complete

		it not appropriate to inform their supervisor, they have other options for reporting. 4. Agreement reached with policy owners that data capture can be consolidated into a single system for most (6) Code policies (excluding safety, environment and FOIP) 5. Utilized existing phone line as an option employees and leaders can use to ask questions.		Work will be underway over the next year to bring incident reporting into the Corporate Security system
5.1.4	Consider expanding Bid Submissions forms to clearly include identification of current and former employees. At that time also consider enhancements to reference spouses/partners of staff.	1. Supply, in collaboration with Law, has considered and implemented new wording in the Bid Submission (RFP) templates that have been recently issued, to include identification of current and former employees and spouses of employees.	June 30, 2016 (Supply)	KPMG Action Complete
#	KPMG Report Action (abridged)	Actions Taken	KPMG Report date (Responsible)	Status
5.1.5	Explore the development of a mechanism to monitor and report on Code violations/investigations and report regularly to City Manager/Senior Management	1. Worked with policy owners and Corporate Initiatives to identify performance measures, using Results-Based Accountability (RBA) methodology. 2. Gained agreement from 6 policy owners to use the Corporate Security data base for reporting incidents and investigations, including outcomes, so we will have a method to report on investigations and policy violations. The Code of Conduct owners will assemble additional data from existing systems that track safety, environmental and FOIP violations. 3. Identified existing Corporate Employee Survey measures and added Code-specific questions.	June 30, 2017 (HR)	KPMG Action In progress – on track Measures are in process of being finalized

5.1.6	Document clear roles and responsibilities for the code processes	1. Developed detailed roles and responsibilities for governance stakeholders: Executive Sponsor, Code governance (CFO), Policy approval (ALT), Audit Committee, City Auditor, Code Administration (CHRO), Code of Conduct Owner, Policy Owners, leaders and employees.	March 31, 2016 (HR)	KPMG Action Complete	
5.1.6	Revisit the individual performance evaluation process to ensure it reflects corporate values and, by extension, the values inherent in the Code.	1. A separate HR-Leadership Strategic Plan project is revisiting the Individual Performance Development (IPD) system for the corporation. Its work will extend in to 2017. Corporate values, and by extension, the values inherent in the Code of Conduct are being integrated into the work of this project. 2. The Corporate values and specifically ethical behavior has been integrated into the core competencies of employees and leaders. 3. The newly defined corporate values and behaviors have been both highlighted in and integrated throughout the refreshed Code of Conduct.	December 31, 2016- As Amended (HR)	KPMG Action In progress-on track	A project team is underway to review and revise the individual performance system to align with corporate values and behaviors