



UNCLASSIFIED

Internal Audit Services Branch

Audit of the Implementation of the Code of Conduct

November 2013

As of July 2013, the official names of the minister and department are the Minister of Employment and Social Development and Minister for Multiculturalism, and the Department of Employment and Social Development Canada (ESDC).

The name of the previous department, Human Resources and Skills Development Canada (HRSDC), is used in this report in a historical context only.

You can order this publication by contacting:

Publishing Services
Human Resources and Skills Development Canada
140 Promenade du Portage
Portage IV, 10th Floor
Gatineau, Québec
K1A 0J9

Fax: 819-953-7260

Online: <http://www12.hrsdc.gc.ca>

This document is available on demand in multiple formats (large print, Braille, audio cassette, audio CD, e-text diskette, e-text CD, or DAISY), by contacting 1 800 O-Canada (1-800-622-6232). If you use a teletypewriter (TTY), call 1-800-926-9105.

© Her Majesty the Queen in Right of Canada, 2011

Paper

Cat. No: HS28-219/2013E

ISBN: 978-1-100-22953-9

PDF

Cat. No: HS28-219/2013E-PDF

ISBN: 978-1-100-22954-6

Information contained in this publication or product may be reproduced, in part or in whole, and by any means, for personal or public non-commercial purposes, without charge or further permission, unless otherwise specified.

You are asked to:

Exercise due diligence in ensuring the accuracy of the materials reproduced;
Indicate both the complete title of the materials reproduced, as well as the author organization;
and

Indicate that the reproduction is a copy of an official work that is published by the Government of Canada and that the reproduction has not been produced in affiliation with, or with the endorsement of the Government of Canada.

Commercial reproduction and distribution is prohibited except with written permission from the Government of Canada's copyright administrator, Public Works and Government Services of Canada (PWGSC). For more information, please contact PWGSC at: 613-996-6886 or droitdauteur.copyright@tpwgs-pwgsc.gc.ca

Table of Contents

EXECUTIVE SUMMARY	1
1.0 BACKGROUND	3
1.1 Context	3
1.2 Scope and Strategy	3
1.3 Audit Objective.....	3
1.4 Methodology	4
2.0 AUDIT FINDINGS	5
2.1 Roll-out of the Code was effective but monitoring and reporting of its implementation could be strengthened.....	5
2.2 The sustainability of V&E within the Department has been considered but opportunities exist to clarify the overall V&E objectives and vision.....	7
2.3 Operational information on employee behaviour is shared but oversight processes and practices could be further integrated	9
3.0 CONCLUSION	11
4.0 STATEMENT OF ASSURANCE.....	11
APPENDIX A: Glossary	12
APPENDIX B: Audit Criteria Assessment	13
APPENDIX C: Best Practices.....	14

EXECUTIVE SUMMARY

Human Resources and Skills Development Canada (HRSDC) implemented a new Code of Conduct (the Code) specific to the Department on April 2, 2012. The Code incorporates Treasury Board (TB) *Values and Ethics Code for the Public Sector* and the *Policy on Conflict of Interest and Post-Employment*. It also provides examples, illustrations, and department-specific information on certain areas, such as handling personal information and using social media. The Code is a condition of employment for all employees.

The Office of Values and Ethics (OVE), located within the Human Resources Services Branch (HRSB), is responsible for the development of the Code and for orchestrating its implementation. The regional values and ethics (V&E) functions located in the Strategic Services Directorate in each of the four regions supported the roll-out. Outreach, awareness, as well as communication activities and efforts were implemented through training, workshops, and messaging to ensure employees were made aware of the Code and their obligations as an employee of HRSDC.

The Audit of the Implementation of the Code of Conduct was approved and included in the 2013–16 Risk-Based Internal Audit Plan. This engagement will also inform the V&E component of the Audit of Entity Level Controls. The Chief Audit Executive (CAE) is the champion for V&E within the Department. As a result, the Internal Audit Services Branch (IASB) decided that the audit engagement be performed by an independent professional audit firm.

Audit Objective

The overall objective of the audit was to determine if the Department adequately implemented the Code of Conduct.

Summary of Key Findings

- Adequate and effective policies, guidelines, and tools were developed to support the roll-out of the Code. However, monitoring and reporting around their implementation could be strengthened.
- Sustainability of V&E within the Department has been considered and ongoing activities and processes have been implemented to continuously promote V&E. However, opportunities exist to clarify the overall V&E vision and objectives for key stakeholders going forward.
- Operational information is shared between functional areas involved in the management of employee behaviour at HRSDC. However, oversight of breaches of the Code could be further integrated across key branches.

Audit Conclusion

The audit concluded that the Department has adequately implemented the Code across the regions and branches using a variety of outreach, awareness, and communication activities. The effectiveness of the implementation was highlighted by regional and branch acknowledgement of OVE efforts and established toolkits.

The areas of improvement noted in this audit (monitoring and reporting framework, clarity of V&E objectives and vision, oversight and monitoring of breaches) are intended to build on the implementation progress made to date and further institutionalize V&E as part of employees' overall decision making process.

Summary of Recommendations

HRSB should:

- Develop and implement a formal monitoring framework to ensure communication and training activities related to the Code are appropriately monitored, tracked and course adjusted, as needed.
- Continue to update the OVE Business Plan on an evergreen basis so that the long-term V&E objectives and vision for the Department are clearly defined going forward. The OVE Business Plan along with the V&E Maturity Model should be communicated to key stakeholders and used to guide branch and regional V&E activities in a cohesive and integrated manner.
- Implement a structured process that enables the formal integration and engagement of key functional areas involved in employee behaviour and V&E. The process should include appropriate guidance for the analysis and reporting of V&E trends from across national headquarters and the regions.

1.0 BACKGROUND

1.1 Context

HRSDC implemented a new Code of Conduct (the Code) specific to the Department on April 2, 2012. The Code incorporates TB Values and *Ethics Code for the Public Sector* and the *Policy on Conflict of Interest and Post-Employment*. In addition, it provides department-specific information on certain areas, such as handling personal information and using social media. It also provides examples and illustrations. The Code is a condition of employment for all employees.

The OVE was responsible for the development of the Code and for orchestrating its implementation. Outreach, awareness, as well as communication activities and efforts were implemented through training, workshops, and messaging to ensure employees were made aware of the Code and their obligations as an employee of the Department.

Over the past several years, the V&E functions across the Department have been handled by the OVE within the Integrity Services Branch (ISB). The OVE was transferred to HRSDC in October 2012 and as such, the OVE inherited additional new files, including: harassment prevention and awareness; conflict of interest and post-employment prevention and awareness; and political activities. At the same time, the regional functions of V&E moved from the ISB to the Strategic Services Directorate in each of the four regions.

The Audit of the Implementation of the Code of Conduct was approved and included in the 2013–16 Risk-Based Internal Audit Plan. This engagement will also inform the V&E component of the Audit of Entity Level Controls. The CAE is the champion for V&E within the Department. As a result, IASB decided that the audit engagement be performed by an independent professional audit firm.

1.2 Scope and Strategy

The audit reviewed policies, processes, and practices related to the implementation of the Code between February 2012 and June 2013. More specifically, the audit assessed the alignment of the Code with TB policies and reviewed the prevention, detection, and deterrence strategies the Department has adopted in support of the Code. The audit also reviewed the oversight and reporting mechanisms in place for breaches as well as processes used to ensure employee engagement with the Code and V&E, broadly speaking.

1.3 Audit Objective

The overall objective of the audit was to determine if the Department adequately implemented the Code of Conduct.

1.4 Methodology

This audit used a number of methodologies including: document review, key stakeholder interviews, and a limited number of walkthroughs of processes related to breaches of the Code.

As the functional lead of the Code, the OVE, within HRSB, was the main stakeholder in this engagement. Representatives from the OVE, Office of Informal Conflict Resolution, and ISB as well as representatives from the four regions were interviewed to have a comprehensive view of the implementation of the Code and effectiveness of the suite of policies, tools, and guidelines used to promote awareness and develop knowledge around the Code. Further, the perspectives of these functional areas were pertinent given their complementary role in the oversight and application of prevention, detection, and deterrence strategies and controls pertaining to V&E and the Code. Teleconferences were used to speak with regional representatives throughout the conduct phase.

2.0 AUDIT FINDINGS

The following presents strengths and opportunities for improvement as they relate to the implementation of the Code. The recommendations that have been provided are intended to further enhance implementation and strengthen the controls around the V&E framework.

2.1 *Roll-out of the Code was effective but monitoring and reporting of its implementation could be strengthened*

Adequate and effective policies, guidelines and tools were developed to support the roll-out of the Code. However, monitoring and reporting around their implementation could be strengthened.

Policies, Guidelines, and Tools

The OVE developed and maintained specific and appropriate policies, guidelines and tools which effectively supported the roll-out of the Code across the Department. The Code itself was developed using a hybrid-plus model, whereby the policies and values described within it align with the TB *Values and Ethics Code for the Public Sector* and *Policy on Conflict of Interest and Post-Employment*. Department-relevant examples are used to define the Code in concrete terms for HRSDC employees and their daily activities. In addition to the Code, specific training and awareness tools were developed by the OVE to promote independent V&E learning and to assist and guide managers in discussions with employees on the Code. Some of the tools include, but are not limited to: a comprehensive toolkit for managers, presentation decks on the Code and engaging in dialogue, case studies and solutions, lunch & learn events, Frequently Asked Questions fact sheets, and V&E and Code-related games. The OVE also supported a Regional Advisor from within the Strategic Services Directorate in each of the four regions to reinforce the roll-out of the Code and ensure V&E are consistently promoted across the Department.¹

The training and awareness tools were well-received and widely leveraged by the regions and branches to roll-out the Code. Further, managers and employees noted that the tools were easily accessible and simple to navigate on the national V&E website. However, the audit noted that access to and navigation of V&E information, tools, and the Code on the four regional intranet sites were difficult and did not provide clear links to the national intranet and V&E module.

Monitoring and Reporting

The OVE developed a formal 2012–13 Implementation Plan (Plan) to articulate the approach to disseminate the Code across the Department. The Plan defined the communication, training, and performance measurement activities used to inform employees of the Code, raise awareness of the Code, availability of training, and

¹ Refer to Appendix C for a listing of best practices related to the application of V&E processes, tools, and activities across regions and branches.

encourage managers to engage in discussions on the meaning of the Code. Due dates for all communication and training activities were identified in the Plan. However, monitoring against these dates appeared to be done informally and on an ad hoc basis by the OVE via monthly conference calls with Regional Advisors, internal team meetings, and bi-laterals with management.

The audit noted that the performance measurement activities section in the Plan was not robust and focused exclusively on performance reporting through the annual Management Accountability Framework (MAF) exercise. There was no evidence the OVE identified performance measures or key indicators for the communication and training activities outlined in the Plan. Consequently, the OVE could not conduct appropriate monitoring of operational-level activities to proactively course adjust, as needed for delayed communication and training activities. At the end of our fieldwork, we were informed that the OVE is currently developing an Evaluation Framework to formalize performance and monitoring of the overall V&E function.

The audit noted that neither formal nor informal reporting requirements on the status of the implementation of the Code were clearly defined with branches and regions from the outset of the launch. The OVE reported informally to the Director General (DG), Center of Expertise and Assistant Deputy Minister (ADM) HRSB (i.e. quarterly) or only as requested by the Corporate Management Committee (i.e. once in fiscal year 2012–13). Reporting requirements from the regions and branches to the OVE on activities undertaken to roll-out the Code were also not made clear. Despite the lack of clarity, in February 2013, senior management requested that regions and branches conduct a mandatory and formal monitoring activity to assess the depth and breadth of the roll-out across the Department. This activity included the requirement for branches and regions to report on the percentage of employees reached through management sessions on V&E. This activity was not problematic for those branches and regions who voluntarily implemented processes to monitor and track V&E activities within their functional area (e.g. use of learning reports and the Corporate Management System). However, branches and regions which informally or did not monitor the number of employees engaged in dialogue sessions had to rely on estimated percentages.

Without formal monitoring processes in place, there is a risk that delays or potential delays of key implementation activities are not identified and course adjusted, as needed to ensure effective implementation.

Recommendation

- 1) HRSB should develop and implement a formal monitoring framework to ensure communication and training activities related to the Code are appropriately monitored, tracked and course adjusted, as needed.

Management Response

HRSB will develop a monitoring framework for implementation in fiscal year 2014–15 to systematically track progress/reach and the impact of corporate and Branch/Region communication and training activities on raising employee understanding of the Code. This framework will be incorporated in the V&E Maturity Model. Findings from monitoring activities will inform future communication and training plans.

2.2 The sustainability of V&E within the Department has been considered but opportunities exist to clarify the overall V&E objectives and vision

Sustainability of V&E within the Department has been considered and key ongoing activities and processes have been implemented to continuously promote V&E. Opportunities exist however to clarify the overall V&E vision and objectives for key stakeholders going forward.

Sustainable Activities and Processes

The Department and the OVE have considered the ongoing sustainability of V&E within the Department and have implemented some key V&E processes and activities for all employees at all levels going forward. The OVE developed a Draft Internal Communications Strategy which identifies key outreach and awareness objectives and activities for 2013–14. This strategy includes a detailed work plan which identifies key products, vehicles to be used, and target dates. The OVE also maintains an inquiry log of V&E related questions received from branches or regions. Trend analysis by type, region, and client group/employee level will continue to be conducted on these inquiries and going forward, will feed into the refinement of existing V&E tools and the development of new, more tailored tools.

An optional V&E training module, offered by the Service Canada College, was recently launched and will complement the upcoming implementation of the mandatory training module. Although the mandatory training module was expected to be implemented last fiscal year, the delay allowed the module to be developed in a more integrated manner and inclusive of several of the Department's key training subjects: information technology security, information management, V&E, and access to information and privacy. The successful completion of this training module by all existing and new employees will be tracked and the requirement for a regular (i.e. annual or bi-annual) sign-off or re-certification of this training is currently under discussion.

V&E continues to be a mandatory corporate commitment in the 2013–14 performance agreements for all executive positions. This formalizes the accountability of Directors, DGs, and ADMs in the ongoing support of V&E within the organization. Some senior managers informed us they leveraged the option to integrate this commitment into the agreements for all employees within their area.

V&E Vision and Objectives

The OVE vision for 2013–14 and beyond could be further clarified. Whereas last fiscal year the OVE formally planned and conducted an abundance of training sessions or workshops across the regions, branches, and communities, the OVE has not developed a 2013–14 training plan and has not formalized V&E awareness sessions and case studies going forward. The OVE has also not developed a detailed outreach calendar which ensures department-wide coverage when targeting specific values embedded in the Code. The OVE suggested that moving forward they will only be holding training sessions with regions, branches, and communities on an as requested basis to deepen employees' V&E understanding.

The audit noted that guidance from the OVE to the regions and branches is minimal for fiscal year 2013–14 and going forward. The audit also noted that V&E remains a priority for regions and branches and in the absence of explicit guidance from the OVE (e.g. strategic objectives, logic model, training activities), branches and regions continue to develop and implement V&E activities and tools with limited cross-communication and vertical integration or alignment with the OVE. Whereas some regions have included V&E in 2013–14 regional plans as an ongoing business priority, others are taking a more informal approach and will continue to weave V&E into management forums and team meetings. Regions will also be focusing on marketing the Regional Advisor role, while the Western-Territories region has plans to undertake a regional employee survey which touches upon V&E.

The OVE is currently updating its 2013–15 Draft Consolidated Business and Human Resource Plan (Business Plan). The Business Plan identifies the OVE's objectives and is supported by the OVE Logic Model and Strategic Long-Term Business Plan 2014–17. The OVE is also currently finalizing a Draft V&E Maturity Model which highlights the progression and formalization needed to optimize V&E commitment across the Department. Taken together, the Business Plan and Maturity Model aim to provide an overall long-term vision for regions and branches.

There are plans to have the Business Plan and Maturity Model reviewed by the regions but to date these documents have yet to be shared by the OVE with key stakeholders. This has prevented an integrated and cohesive planning process from occurring and has limited the ability of the OVE to provide direction to branches and regions.

If the overall V&E vision for the Department is not clearly defined, there is a risk that the application of V&E processes, tools, and activities is inconsistent across regions and branches resulting in varying levels of awareness of key V&E themes across the Department. Although a certain level of discretion for tailoring V&E mechanisms to regional and branch contextual environments should be maintained, it is pertinent that OVE provide guidance on how these V&E mechanisms can assist in the achievement of national strategies.

Recommendation

- 2) HRSB should continue to update the OVE Business Plan on an evergreen basis so that the long-term V&E objectives and vision for the Department are clearly defined going forward. The OVE Business Plan along with the V&E Maturity Model should be communicated to key stakeholders and used to guide branch and regional V&E activities in a cohesive and integrated manner.

Management Response

HRSB will implement a planning process/cycle for developing a three-year V&E vision, objectives and departmental plan seeking input from key stakeholders, approval from senior management, sharing of the plan with key stakeholders and monitoring activities to track progress and make necessary course corrections. The V&E Program Maturity Model as well as the objectives/indicators identified in the Management Accountability Framework for V&E will serve for the development of the vision and plan. HRSB will seek senior management approval on the 2014–17 vision and plan in March 2014.

2.3 Operational information on employee behaviour is shared but oversight processes and practices could be further integrated

Operational information sharing is occurring between functional areas involved in the management of employee behaviour at HRSDC. However it was noted that processes and practices to provide oversight and monitor breaches of the Code could be further integrated across key branches.

Operational Information Sharing

There are several functional areas involved in the management of employee behaviour at HRSDC, including Labour Relations, the OVE, the Office of Informal Conflict Management, and ISB. The Department has also named the ADM, ISB as the Senior Disclosure Officer (SDO) and the CAE and Senior DG, Service Policy, Partnerships and Performance as departmental V&E Co-Champions. Although each functional area has distinct and defined roles and responsibilities pertaining to the oversight, reporting, management, and monitoring of breaches to the Code, there are elements and activities which overlap horizontally and require integration across branches. The audit noted that operational information sharing between these areas is occurring informally and on an as needed basis for functional direction, collaboration on investigations and fact finding, or implementation of disciplinary actions. The Department has not however, implemented a formal mechanism or process (e.g. committees, forums) to promote horizontal engagement among these functional areas.

V&E Trend Analysis

There is currently no mechanism in place to analyze operational information and identify trends related to cross-cutting V&E issues, disclosures, and breaches of the Code from across national headquarters and the regions. Reporting to branch and senior management continues to be done in a siloed manner by functional area and primarily to meet specific reporting requirements (e.g. results of an investigation, terminations). As a best practice, the Security and Investigation Committee conducts this type of analysis for the Ontario region and this process has enabled effective decision making by management in terms of prioritizing and focusing regional V&E efforts.

Consequences and Disciplinary Actions

Consequences, enforcement, and the consistent application of disciplinary procedures to an employee who has committed a breach of the Code is a key element of every employee management framework. The Department currently does not widely publicize breaches or discuss disciplinary actions stemming from an investigation with employees. Interviews informed the audit team that as a result, awareness of consequences is limited in the Department and the inconsistency of disciplinary actions is a potential risk area. It was also noted that “zero tolerance” attitude from senior management is more prominent in messaging and that the application of disciplinary actions is embraced more so now than in the past.

Although the OVE has developed case studies based on real-life scenarios in order to make V&E relevant to employees' daily activities, senior management may want to consider the wide communication of consequences and disciplinary actions because it could act as an effective deterrence tool. It could also act as a mechanism through which senior management can exemplify that unethical behaviour and the effective application of the Code are taken seriously. Moreover, the wide communication of consequences and disciplinary actions could ensure disciplinary measures are applied nationally by increasing the awareness of outcomes associated with specific breaches of the Code.

If cohesive and comprehensive information on key V&E trends is not developed and reported to an appropriate level, there is a risk that branch and senior management will not have a fulsome understanding of the health of V&E within the Department. This may impact branch and senior management's ability to make effective V&E related decisions going forward. Further, without an in-depth understanding of cross cutting V&E trends, the OVE will not be able to effectively refine or tailor V&E tools, activities, and case studies to lessons learned.

Recommendation

- 3) HRSB should implement a structured process that enables the formal integration and engagement of key functional areas involved in employee behaviour and V&E. The process should include appropriate guidance for the analysis and reporting of V&E trends from across national headquarters and the regions.

Management Response

The OVE already leads a national network of V&E advisors/champions from across the regions that meet on a monthly basis. The network will be expanded to include representatives from each Branch located at the National Headquarters (NHQ) and effective November 2013, will establish a quarterly meeting cycle. This network will support best practice exchanges and early identification of emergent trends. This network will also play a key role in supporting the development and monitoring of the departmental V&E vision and plan.

In addition, effective October 2013, a quarterly forum involving senior representatives from NHQ and the regions will be established and chaired by the DG, Centre of Expertise, HRSB. Further to the development of a reporting template for tracking breaches of the Code, the group will assess ongoing statistics, identify trends and opportunities for better integration of the Code in the workplace.

3.0 CONCLUSION

The audit concluded that the Department has adequately implemented the Code across the regions and branches using a variety of outreach, awareness, and communication activities. The effectiveness of the implementation was highlighted by regional and branch acknowledgement of OVE efforts and established toolkits.

The areas of improvement noted in this audit (monitoring and reporting framework, clarity of V&E objectives and vision, oversight and monitoring of breaches) are intended to build on the implementation progress made to date and further institutionalize V&E as part of employees' overall decision making process.

4.0 STATEMENT OF ASSURANCE

In our professional judgement, sufficient and appropriate audit procedures were performed and evidence gathered to support the accuracy of the conclusions reached and contained in this report. The conclusions were based on observations and analyses at the time of the audit. The conclusions are applicable only for the Audit of the Implementation of the Code of Conduct. The evidence was gathered in accordance with the *Internal Auditing Standards for the Government of Canada* and the *International Standards for the Professional Practice of Internal Auditing*.

APPENDIX A: Glossary

ADM	Assistant Deputy Minister
CAE	Chief Audit Executive
Code	HRSDC Code of Conduct
DGs	Directors General
HRSB	Human Resources Services Branch
HRSDC	Human Resources and Skills Development Canada
IASB	Internal Audit Services Branch
ISB	Integrity Services Branch
MAF	Management Accountability Framework
NHQ	National Headquarters
OVE	Office of Values and Ethics
PPSB	Processing and Payment Services Branch
SDO	Senior Disclosure Officer
SEB	Skills and Employment Branch
TB	Treasury Board of Canada
V&E	Values and Ethics

APPENDIX B: Audit Criteria Assessment

Audit Criteria	Conclusion on Audit Criteria
It is expected that the Department:	
A.1 Developed and maintains specific, and appropriate policies, guidelines, and tools which align to TB guidance.	●
A.2 Established an implementation plan to roll-out the Code and that progress against this plan is monitored and course adjusted, as needed.	⦿ (Section 2.1)
B.1 Clearly defined and communicated the Code and other applicable V&E documentation across the organization.	●
B.2 Offers sustainable and ongoing training and awareness processes and activities for all employees at all levels.	⦿ (Section 2.2)
B.3 Clearly defined and communicated roles, responsibilities and accountabilities related to the implementation of the Code and to the ongoing support of V&E within the organization.	●
B.4 Developed and communicated processes and practices to provide oversight, report, manage, and monitor breaches of the Code.	⦿ (Section 2.3)

★ = Best practice

● = Sufficiently controlled, low risk exposure

⦿ = Controlled but should be strengthened, medium risk exposure

○ = Missing key controls, high risk exposure

APPENDIX C: Best Practices

The following presents a list of the best practices related to the application of V&E processes, tools, and activities across regions and branches. These best practices are above and beyond those tools created and activities implemented by the OVE for the implementation of the Code. These best practices were identified during the conduct of this audit. Management should give wide consideration across all best practices and identify where and how a few could be deployed within the Department.

- 1 Trend analysis of key V&E issues, disclosures and breaches of the Code (Security and Investigation Committee, Ontario)
- 2 Regional employee survey, including questions pertaining to V&E (Western Canada and Territories)
- 3 SharePoint site used to network and collaborate on V&E issues, share pertinent V&E information, provide advice and guidance, etc. (all Regions and NHQ)
- 4 V&E Committees established at the branch and regional-levels. For example:
 - Security and Investigation Committee, Ontario Region
 - Regional Ethics Committee, Quebec Region
 - V&E Working Group, Skills and Employment Branch (SEB)
 - V&E Steering Group, Processing and Payment Services Branch (PPSB)
- 5 Designated Branch V&E Champion (PPSB)
- 6 Branch-specific tracking tool to monitor management conversations with staff (PPSB)
- 7 Use of the Corporate Management System to track management discussions with staff (Western Canada and Territories, Ontario, and Quebec)
- 8 Certificate of Attendance signed for each employee who attended a training session (Western Canada and Territories)
- 9 Including articles on key V&E themes in branch and regional newsletters (SEB and Ontario)
- 10 Developing and implementing branch and region-specific messaging and V&E marketing tools. For example:
 - Internal communications on Browsing and Unauthorized Access and “In Briefs” on V&E (Quebec)
 - V&E place mats and formal dissemination of V&E messages from Branch Champion (PPSB)
- 11 Incorporating V&E as a priority in branch and regional operational plans (Ontario)
- 12 Incorporating V&E into the performance agreements for all employees in a functional area (IASB)