Indian and Northern Affairs Canada

Audit of Staffing & Classification Manitoba Region

Prepared by:

Audit and Assurance Services Branch

Project #07/16
September 25, 2008

TABLE OF CONTENTS

Background

At the request of Indian and Northern Affairs Canada's Chief Audit and Evaluation Executive (CAEE) an audit of classification and staffing actions completed by the Manitoba Regional Office was conducted to determine if the classification and staffing action decisions were adequately supported and whether the processes were carried out in a fair and transparent manner.

INAC's Human Resources and Workplace Services Branch (HRWSB) is responsible for the provision of classification and staffing services. Services are delivered through a decentralized model in the National Capital Region (NCR) and ten Regional Offices, including Manitoba.

Under the *Public Service Employment Act* (PSEA), the Public Service Commission (PSC) maintains the authority to make appointments to and within the public service. In many cases, the PSC has delegated this authority to deputy heads of departments and agencies including the Deputy Minister of Indian and Northern Affairs Canada.

The Canada Public Service Agency (CPSA) is responsible for ensuring human resource (HR) management excellence across the Public Service and provides policy and guidance to Departments and Agencies with respect to HR Planning, Access and Diversity, HR Management Modernization, Public Service Values and Ethics and Official Languages. Under the Public Service Modernization Act (PSMA) and other tools, the CPSA provides leadership to enable Public Service organizations to deliver quality services to Canadians while upholding the values of integrity, transparency and accountability.

Objective & Scope

The objective of the audit was to assess the adequacy of the controls in place to ensure that staffing and classification actions respect the core values of fairness, transparency, access and representativeness and that the actions are carried out in compliance with Public Service of Canada and Departmental legislation and policies.

The scope of the audit covered a sample of classification and staffing actions that were actioned during the period April 1, 2006 to June 30, 2007. The sample was representative of typical regional staffing and classification work and included for example, HR actions on indeterminate, term and acting positions, reclassification and new position processes, internal and external advertised staffing processes, casual appointments and deployments. The audit team was provided with a listing from the department's HRMIS (PeopleSoft) that identified all the HR actions that had been processed on 80 Manitoba Regional employees during the audit period. Based on additional information provided by the region, it was determined that most of the processes on the 80 employees involved acting situations of under 4 months in duration. For these acting situations, managers are not required to rationalize their decisions and are only required to submit an acting request form to compensation to pay the employee. The region provided the auditors with copies

of the staffing and classification logs for the audit period from which the sample was selected.

Conclusions

Based on the information gathered and the analysis of files and documentation, the audit team concludes that during the period April 1, 2006 to June 30, 2007, the Manitoba Region was not complying with classification and staffing policy guidance and did not have adequate controls in place to ensure that actions were carried out in a fair and transparent manner.

This conclusion is made based on the lack of documentation on files, the lack of monitoring activities within the Region and the lack of HR related training being provided to regional managers and employees.

Based upon discussions with the new Regional HR Director and her staff, the audit team is of the view that measures are now in place and new practices are being introduced to ensure that regional classification and staffing processes comply with and fully respect Public Service of Canada legislation, and departmental policies and values. Please refer to correspondence dated January 16, 2008 with the consultants.

Recommendations

The Manitoba Regional Human Resources Director should ensure that:

Policy Frameworks

Classification

1. Every classification decision is supported by a rationale or at least linked to another identical position or a generic position/decision.

2. All new work descriptions conform to the new INAC work description format.

3a) On-site reviews or desk audits are conducted by the Regional Classification Officer for any position that is being considered for reclassification and for all classification grievance cases.

3b) Inter-regional relativity is researched in all reclassification cases. Classification rationales should discuss the research of and applicability of classification decisions in other regions.

4. All cases for position reclassification are reviewed by a classification committee and the committee includes management representation.
5. Each reclassification case contains a rationale stating how the position has evolved and why the position reclassification is warranted as opposed to the creation of a new position and that the rationale is retained on the position file.

Staffing

6a) Each staffing action is linked to the Regional Human Resources Plan with the exception of non-forecasted staffing actions which should be fully explained and documented.

6b) Each staffing action and type of process is supported by the manager's rationale and linkage to the Human Resources Plan.

7a) The staffing files contain documents listed on the staffing checklist but, at a minimum:

- The Candidate Assessment Form (CAF) which demonstrates how the successful candidate meets the selection criteria and merit criteria;
- The manager's rationale for choice of selection (non-advertised process) and how it meets the merit principle only if different from initial as identified in the HR Plan; and
- Documentation to support those individuals meets the linguistic requirements of the position and conditions of employment.

7b) SOMC development training is developed and delivered for managers.

7c) Files are reviewed on a regular basis to ensure documentation is complete to show that merit has been met.

7d) Managers have access to a SOMC database held in HR. HR Advisors work closely with managers on assessment tools development.

8a) Strategies are developed for processing and initiating acting assignments and linking them to the Regional Human Resources Plan.

8b) Standard operating procedures (SOPs) are developed to provide further direction to regional managers on how acting assignments should be administered. To be developed and implemented in line with Proposed Departmental Policy on Acting Assignments.

8c) Staffing actions, including acting assignments by regional organizational unit, are routinely monitored and reviewed and where anomalies exist discussions are held with regional management.

Training

9. Staffing and classification overview courses are developed and delivered by regional HR and include:

- Work description writing
- Participation of line managers on classification rating committees
- The development of SOMCs and assessment material for managers
- Refresher training for managers and employees in the new PSEA processes and individual roles and responsibilities. Planned for this fiscal year.
- Staffing file documentation

Monitoring

10. A monitoring regime is developed and implemented in a timely manner for classification and staffing actions to ensure compliance with policies and guidelines and required documentation is being retained on classification and staffing files.

Section 1 – Background & Context

Background

At the request of INAC's Chief Audit and Evaluation Executive (CAEE) an audit of classification and staffing actions completed by the Manitoba Regional Office was conducted to determine if the classification and staffing action decisions were adequately supported and whether the processes were carried out in a fair and transparent manner.

INAC's Human Resources and Workplace Services Branch (HRWSB) is responsible for the provision of classification and staffing services. Services are delivered through a decentralized model in the National Capital Region (NCR) and ten Regional Offices, including Manitoba.

Under the *Public Service Employment Act* (PSEA), the Public Service Commission (PSC) maintains the authority to make appointments to and within the public service. In many cases, the PSC has delegated this authority to deputy heads of departments and agencies including the Deputy Minister of Indian and Northern Affairs Canada.

The Canada Public Service Agency (CPSA) is responsible for ensuring human resource (HR) management excellence across the Public Service and provides policy and guidance to Departments and Agencies with respect to HR Planning, Access and Diversity, HR Management Modernization, Public Service Values and Ethics and Official Languages. Under the Public Service Modernization Act (PSMA) and other tools, the CPSA provides leadership to enable Public Service organizations to deliver quality services to Canadians while upholding the values of integrity, transparency and accountability.

Audit Objectives and Scope

The objective of the audit was to assess the adequacy of the controls in place to ensure that staffing and classification actions respect the core values of fairness, transparency, access and representativeness and that the actions are carried out in compliance with Public Service of Canada and Departmental legislation and policies.

The scope of the audit covered a sample of classification and staffing actions that were actioned during the period April 1, 2006 to June 30, 2007. The sample was representative of typical regional staffing and classification work and included for example, HR actions on indeterminate, term and acting positions, reclassification and new position processes, internal and external advertised staffing processes, casual appointments and deployments. The audit team was provided with a listing from the department's HRMIS (PeopleSoft) that identified all the HR actions that had been processed on 80 Manitoba Regional employees during the audit period. Based on additional information provided by the Region, it was determined that most of the processes on the 80 employees involved acting situations of under 4 months in duration. For these acting situations, managers are not required to rationalize their decisions and are only required to submit an acting request form to compensation to pay the employee. The Region provided the auditors

with copies of the staffing and classification logs for the audit period from which the sample was selected.

Audit Criteria

The criteria applied in the performance of the audit are listed in Appendix A. The audit criteria were derived from public service and departmental staffing and classification policies and procedures.

Audit Approach and Methodology

The audit was conducted between October 2007 and March 2008 and was based primarily on files obtained from the Manitoba Regional Office. Onsite, telephone and email discussions were conducted with the Regional Human Resources Director and a Human Resources Advisor at various times during the course of the audit to obtain information on departmental and regional staffing and classification policies and practices. A management survey was developed and forwarded via email to a selected number of Manitoba Region INAC managers who had participated in staffing processes during the period covered by the audit. The audit team did not perform actual on-site reviews or position desk audits with employees to confirm whether their work descriptions accurately reflected the work being performed. Therefore, job coincidence was not assessed during the audit.

Interviews were not conducted with Corporate Classification or Staffing, however, the audit team did review a classification audit report of the Manitoba Region written by INAC Corporate Classification and the team discussed a number of corporate classification initiatives with the Regional HR Director.

A random sample of classification and staffing actions was selected from manual logs provided by the Regional HR Director.

The audit was conducted in accordance with the standards and requirements set out in the Treasury Board Secretariat's *Policy on Internal Audit*.

The following provides a summary of the classification and staffing files and processes reviewed:

A total of 36 (47%) classification position files from a population of 77 files were reviewed as follows:
- 12 new positions, 7 reclassifications, 4 no change decisions
- 19 indeterminate positions, 4 term positions
- 21 decisions supported by rationales, 2 without rationales
- 6 job evaluation committees (2 included managers), 17 without committees

A total of 13 (39%) staffing files from a population of 33 staffing actions were reviewed as follows:

- 3 external advertised processes
- 2 internal advertised processes
- 1 internal non-advertised process
- 2 casual processes
- 4 deployment processes
- 1 without competition process

Section 2 – Findings and Recommendations

1.0 Policy Frameworks

Criteria #1…Policy frameworks for Staffing and Classification have been established and are communicated.

The Canada Public Service Agency (CPSA) provides departments and agencies with classification direction in three areas: work description (WD) writing, the job evaluation process, and the reclassification of positions.

INAC has developed its own set of classification policies which adhere to CPSA direction and demonstrate that the department is fully supportive of the government's Classification Modernization Initiative.

INAC *Classification Policies and Guidelines* state:

- Management needs to be involved in job evaluation and classification decisions
- Managers need to write accurate WDs and should be moving towards the use of a shorter WD

- HR Advisors need to work with managers to increase their participation on classification committees and should be providing advice to managers on WD writing including the use of a shorter WD

- HR Advisors should be consulting staffing authorities to determine when a new position is required or whether an evolution of the work has resulted in the reclassification of an existing position.

In INAC, the direction is that all staffing must be based on a strategy that addresses the current and future organizational and operational needs. The INAC policy *Area of Selection* conforms to PSC direction in that the policy addresses the national area of selection, includes well-defined terms, is clear and discusses values and merit. The INAC policy *Criteria for the Use of Non-Advertised Processes* outlines the importance of respecting the values of fairness, transparency and access and also allows for flexibility, efficiency and cost effectiveness. The policy provides direction as to what documentation must accompany each staffing process and provides direction to ensure departmental consistency in applying non-advertised processes. The PSC recommends that departments follow the Central Agency guideline *Informal Discussion*. An informal discussion policy does not exist in the department.

The Manitoba Region has not created its own classification and staffing policies but abides by the policies created by the INAC, Human Resources, and headquarters.

The audit team examined the INAC and regional staffing and classification policy frameworks and compared these against related PSC and CPSA legislation and regulations. The team examined whether regional staffing and classification processes were in compliance with regional classification and staffing policies and procedures and examined the operational practices of the region with respect to classification and staffing.

The review of the INAC and regional staffing and classification policy framework revealed that the policies are consistent with the direction of the CPSA and the PSC. The policies are well outlined on the INAC HR website and the website is readily accessible to departmental managers and employees.

2.0   Classification

2.1   Rationales and Supporting Documentation

Criteria #2…Classification decisions are made in accordance with legislative and policy requirements and adequately supported by rationales and work descriptions.

2.1.1   The classification process involves the evaluation of work, as identified in work descriptions, against the federal system of classification standards, to arrive at a group and level or position classification (e.g. CR-04, AS-02) This corresponds to a pay rate for the position. Management are accountable for writing and updating work descriptions for positions they manage and HR (delegated Classification Officer) is responsible for rationalizing the job evaluation or classification decisions.

CPSA has provided Departments and Agencies guidance on the writing of work descriptions, on the job evaluation process and on the reclassification of positions. In short, the CPSA guidelines state that:
- work descriptions should be kept current and be brief (4 to 5 pages)
- classification decisions should be well rationalized with proper application of the classification standards, and where decisions are precedent setting, rationales should take into consideration departmental and inter-departmental relativity
- reclassification decisions should be made by job evaluation or classification rating committees and management should participate in the classification decision making process
- information on the reclassification of public servant positions should be transparent and available to the public
- departmental guidelines must be established/followed with respect to the reclassification of positions versus the creation of new positions (i.e. when changes to a position are so significant it is determined that a new position has actually been created)

2.1.2 Results of the review of 23 (21%) classification decisions/position files out of a total of 111 revealed that:

- Job descriptions were found to be current (updated within the last 5 years)
- Job descriptions were signed by supervisors and position incumbents
- Employees and managers were being notified of the results of classification decisions and were advised of their right to challenge or grieve this decision
- Retroactivity of classification decisions respected CPSA/INAC policy/guidance
- Reclassification decisions were supported by full rationales and
- Classification standards were being properly applied (no cases of under or over-classification were found).

2.1.3 Overall, the audit team found that the quality of the available rationales supporting classification decisions was good. Results of the review of 20 position files that had undergone some sort of classification review during the audit period are as follows:

- 10 of the 20 files contained what the audit team considered to be excellent rationales. One of these contained a discussion of how the role/responsibility of the position had significantly changed to result in a new position, included a thorough rating of the job against the classification standard including benchmark comparisons, and included discussion of relativity with other positions.
- 5 of the 20 position files contained satisfactory rationales and
- 5 of the 20 position files contained poor rationales. 2 of these 5 files contained neither a rationale nor made reference to a similar position to substantiate the classification arrived at.

2.1.4 Regional work descriptions were all found to be in the long UCS format. INAC policy is to move toward the use of a shorter work description.

2.1.5 On-site reviews or position desk audits were not routinely being performed as part of the classification review process. Of the 23 position files reviewed, not one of the position files contained an on-site review or desk audit report. CPSA direction is that desk audits should be performed to confirm/clarify duties and responsibilities where any precedent setting decisions may be involved and to resolve classification related disputes.

2.1.6 Classification relativity was very seldom mentioned in classification rationales. It is assumed that other regions must have positions with similar roles and responsibilities. Corporate Classification has recently created a database where classification staff can do internal relativity work and then contact counterparts in other regions for more information.

2.1.7   **Recommendation #1**

The Regional Human Resources Director should ensure that:

1)   Every classification decision is supported by a rationale or at least linked to another identical position or a generic position/decision.

Management Response

Effective April 1, 2007 all classification activities, including classification administrative actions, require a file review for completeness. The region has introduced and implemented a classification checklist which ensures that appropriate documentation including classification rationale for unique decisions and/or linking the decision to an identical, similar or a generic position/decision are identified. INAC Headquarters provided the regional classification specialist with a Current Classification Report, which contains a detailed list of all existing positions at INAC for relativity purposes. Furthermore, as a result of HQ Classification Monitoring exercise 2007 departmental guidelines have been established for all classification files. Implemented

2.1.8   **Recommendation #2**

The Regional Human Resources Director should ensure that:

2)   All new work descriptions conform to the new INAC work description format (see also recommendation #9).

Management Response

Departmental training on the new format for work description writing for the region has been targeted for October, 2008. Once trained, managers will be required to submit work descriptions in the new format alongside the Human Resources Request Form for classification action.

2.1.9   **Recommendation #3**

The Regional Human Resources Director should ensure that:

3a) On-site reviews or desk audits are conducted by the Regional Classification Officer for any position that is being considered for reclassification and for all classification grievance cases.

Management Response

Effective April 1, 2007 submissions for reclassifications, noting substantial change in work performed, and for all classification grievance cases will require an on-site. On a

case by case bases and based on the findings of the on-site report, recommendations will include that the work description be submitted to a classification committee for evaluation. New Departmental guidelines and a template implemented September 2008.

3b) Inter-regional relativity is researched in all reclassification cases. Classification rationales should discuss the research of and applicability of classification decisions in other regions.

Management Response

INAC Headquarters has provided regional classification specialist with a Current Classification Report, which contains a detailed list of all existing positions at INAC for relativity purposes. Effective April 1, 2007 all classification actions requiring an update and review as well as the creation of a new position will be cross referenced to both internal regional relativity as well as nationally. Contacts with other regions regarding classification relativity and rationales will be utilized and incorporated into the classification decision full written rationale. In line with Departmental and Treasury Board monitoring requirements, departmental standardized classification tools and practices will be implemented as developed.

2.2   Position Reclassification

Criteria #3...Position reclassifications are decided by job evaluation committees, management are represented on these committees and these decisions are fully rationalized.

2.2.1   Of the 7 reclassification cases reviewed, each decision was arrived at by a job evaluation committee. INAC *Classification Policies and Guidelines* states that there be manager participation in the classification decision making process. However, only 1 of the 7 reclassification cases reviewed included the participation of a line manager on the job evaluation committee. In the other 6 reclassification cases that were reviewed, the rating committees consisted of a Classification Officer and another HR professional (i.e. no line manager).

2.2.2   Where an encumbered position is reclassified, CPSA direction is that this information be posted on a publicly accessible internet site. All of the encumbered reclassified positions reviewed by the audit team were properly posted on an INAC website and this site is accessible to the public.

2.2.3   In reclassification cases, there is a requirement to show how the position has evolved and warrants a reclassification as opposed to the creation of a new position. The results of the review of 7 reclassification cases are as follows:

- 1 case included a rationale by the Classification Officer to support the evolution of the position as warranting the reclassification
- In 4 reclassification cases, there was no discussion/rationale on the position file supporting the reclassification decision as opposed to the creation of a new position
- In the 2 remaining cases the changes in the key activities should have, in the opinion of the audit team, resulted in the creation of new positions, not reclassification actions. In 1 of these, the duties of a vacant AS-03 position were added to an encumbered AS-02 position and the AS-02 was reclassified to AS-03. In the second situation, significant new responsibilities, including management of human and financial resources, were added to an encumbered SI-05 position and the position was reclassified to an SI-06.

2.2.4 **Recommendation #4**

The Regional Human Resources Director should ensure that:

4) All cases for position reclassification are reviewed by a classification committee and the committee includes management representation.

Management Response

To ensure classification decisions adhere to both CPSA direction and INAC internal classification policies appropriate training is scheduled for regional managers in the Fall of 2008. Classification Committee capacity building in the region will ensure that management representation is present in committees.

2.2.5 **Recommendation #5**

The Regional Human Resources Director should ensure that:

5) Each reclassification case contains a rationale stating how the position has evolved and why the position reclassification is warranted as opposed to the creation of a new position and that the rationale is retained on the position file.

Management Response

As addressed in Response 1 - Effective April 1, 2007 all classification activities including classification administrative actions require a file review for completeness. The region has introduced and implemented a classification checklist which ensures that appropriate documentation including classification rationale linking the decision to an identical, similar or a generic position/decision are identified. INAC Headquarters provided regional classification specialists with a Current Classification Report, which contains a detailed list of all existing positions at INAC for relativity purposes. Full classification rationales, signed work descriptions, signed organizational charts depicting levels above and below, as well as any other related documentation (ie on-site reviews) utilized in the classification decision are held on the position file. For reclassification cases the rationale will include how the position has evolved and why the position reclassification is warranted as opposed to the creation of a new position.

3.0 Staffing

3.1 Linkage to the Human Resources Plan

Criteria # 4...Staffing actions are linked to the Regional Human Resources Plan.

3.1.1 CPSA encourages departments and agencies to fully integrate their HR planning with their business plans and to use these integrated plans as a basis for staffing decisions. INAC has developed an HR Management Strategy and HR Plans for future staffing but it is unclear on how these plans have been communicated to management. The development of the HR Plans and the need to link the plan with all staffing processes respects the requirement outlined by CPSA. Documentation should be provided on each process on how the respective process links with the HR plan.

3.1.2 The Manitoba Human Resources Plan was available to managers and HR advisors and all the staffing actions selected for audit were reviewed against the HR plan. It was not clear if the managers provided any input or assisted in the development of the plan. However, the plan was readily available. Results of the review revealed that:
- Merit appears to have been applied in all audited processes
- The type of staffing process was identified on the regional Human Resources Action Form (HRAF) prior to the staffing being initiated
- PSC clearance had been received in all cases
- Deployments were actioned in accordance with policy direction
- All staffing processes contained a SOMC; the criteria were assessed and the assessment material appeared to be fair and did assess the criteria for the particular process.

3.1.3 All staffing processes must be linked to the HR plan (HQ or Region) to ensure that the process is in line with business plans. If not in the plan, the process must be explained, rationalized and approved by senior management.

3.1.4 In many cases, the linkage of the staffing process to the HR plan was not explained.

3.1.5 **Recommendation #6**

The Regional Human Resources Director should ensure that:

6a) Each staffing action is linked to the Regional Human Resources Plan, with the exception of non-forecasted staffing actions which should be fully explained and documented;
6b) Each staffing action and type of process is supported by the manager's rationale and linkage to the Human Resources Plan.

Management Response

Manitoba Regional Staffing Strategies have been developed with each Directorate to ensure completeness and that collective processes have been identified to optimize efficiencies. Directors, managers and human resources staff are responsible for quarterly updating and reporting on achievements as well as identifying any unforeseen needs that may arise.

Staffing file documentation will include justification for staffing tied not only to the Regional Human Resources Plan but also area of selection and process considerations and approach. Non-forecasted staffing actions will require documentation as well. As identified in the audit report the staffing files will be reviewed (peer) to ensure appropriate documentation meet the minimum criteria.

3.2   Documentation

Criteria #5...Staffing files contain adequate documentation to support decisions regarding area of selection, selection process and candidate selection.

3.2.1   The PSC Appointment Policy (Accountability Guide - Module III: Staffing Documentation) specifies that, as a minimum, the following written documentation must be maintained by organizations, as evidence of their respect for the staffing values and foundations, and the integrity of the staffing system:

- A rationale for each non-advertised process, demonstrating how it meets the organizational criteria and the appointment values
- Reasons for appointment decisions and offers of appointment
- Notifications of persons being considered or proposed for appointment, or appointed
- The reasons for revocation, its effective date and other relevant information

3.2.2   Organizations can refer to the *Audit of Staffing File Documentation* to determine whether any of the findings may apply to their own organizations. INAC includes a checklist on each staffing file and this staffing checklist meets the PSC

requirement. The audit team found, however, that the list is checked off on staffing files but not all supporting documentation is on the file.

3.2.3 As a good practice, Departments in general agree that staffing files should contain:

- Statement of merit criteria (SOMC)
- Candidate Assessment Form (CAF)
- HRAF (showing link to the HR Plan)
- PSC priority clearance
- Current work description/proof of position classification
- Documentation to show key decision points in staffing process (such as area of selection, type of process, choice of candidate)
- Notice of consideration

3.2.4 The staffing file needs to explain how appointment related decisions were reached and how these meet statutory and PSC requirements and this information also needs to meet the requirements of managers, employees, applicants, PSC auditors/investigators, the Public Service Staffing Tribunal and INAC HR HQ, all of whom may request access to this information.

3.2.5 A total of 13 (39%) staffing files were selected for review from 33 staffing actions recorded in the Regional log provided by the Regional HR Director. The processes included in this review are as follows:

External Advertised	3 out of 5 processes
Internal Advertised	2 out of 4 processes
Internal Non-advertised	1 out of 4 processes
Casual	2 out of 5 processes
Deployment	4 out of 11 processes
Without Competition	1 out of 4 processes (old act)

3.2.6 The results of the audit team review of these files are as follows:

- None of the files contained documentation rationalizing the area of selection chosen
- None of the files contained the rationale for the type of process selected
- INAC policy *Criteria for the use of Non-Advertised processes* outlines specific documentation required for internal non-advertised processes. The 1 Non-Advertised process file did not contain the required documentation. In many of the files reviewed, there was no discussion on how a particular appointment met the values of staffing or how a successful candidate was chosen.
- The 4 files reviewed on deployments contained adequate documentation supporting the managers' deployment decisions.
- Of the 2 files reviewed on casual appointments, 1 contained an assessment of the candidate and the other contained no documentation. However, all casual appointments were limited to 90 working days, as per PSEA policy.

- Due to the lack of documentation on many files, the audit team could not confirm whether the processes demonstrated fairness and access.
- All staffing files reviewed either did not contain the required documentation, or documentation was poor or inconsistent. While checklists were attached to staffing files and the documents on this checklist were checked off, not all the documents were contained in the staffing files.
- All 13 staffing files contained the required security documentation.

3.3   Statements of Merit

Criteria #6...Staffing actions contain adequate evidence to demonstrate that the core values of fairness, transparency, access and representativeness have been respected and that decisions respect the merit principle.

3.3.1   The new *Public Service Employment Act* allows a broader definition of merit to be applied in order to ensure the selection of a person who is the *right fit* for the job. Under the Public Service Employment Act (section 30), merit is achieved when:
- The delegated manager appoints persons who **meet** the essential qualifications for the work to be performed and
- The delegated manager **has regard** to any additional criteria that is an asset for the work performed or for the organization currently or in the future, to any current or future operational requirement, and to any current or future need of the organization and of the public service.

3.3.2   Four things need to be taken into account in establishing merit:
1. Essential qualifications (including official languages)
2. Current and future asset qualifications
3. Current and future operational requirements and
4. Current and future organizational needs.

3.3.3   In some of the staffing processes reviewed by the audit team, the Statement of Merit Criteria (SOMC) did not accurately match the duties and responsibilities of the job and some SOMCs were considered too specific in nature making it difficult for many candidates to apply.

3.3.4   In some of the processes reviewed, it was not clear that the questions in the assessment linked to the qualification being assessed. Most processes reviewed used the old way of assessment by referring to total points. It is difficult to rationalize a 19 versus a 20 point rating…what criteria distinguishes the one point difference?

3.4   Acting Appointments

Criteria #7...Acting appointments are completed in accordance with departmental policy

3.4.1   INAC policy on *Acting Appointments at the Executive Level* and the guideline *Staffing Processes in Acting Situations* demonstrate that the department promotes acting on a rotational basis and opening up opportunities for employees from within their organization. If acting is to be longer than 4 months, the INAC guideline is that an advertised process should be launched. This is in line with CPSA direction.

3.4.2   A full assessment of the acting assignments that occurred during the audit period was not conducted as not all of the required information was made available for analysis (such as the substantive classification of the employee).

3.4.3   The audit team did note, however, that the region appeared to be offering acting assignments on a rotational basis to regional employees and assignments appeared to be in compliance with the respective collective agreements. However, it was not clear on how these individuals were selected for the acting assignments.

3.4.4   The audit team does, however, ask the question "why were there so many acting assignments during the audit period for a small organization and are these really required?"

3.5   Recommendations

3.5.1   **Recommendation #7**

The Manitoba Regional Human Resources Director should ensure:

7a) Staffing files contain documents listed on the staffing checklist, but at a minimum:

- The Candidate Assessment Form (CAF) which demonstrates how the successful candidate meets the selection criteria and merit criteria;
- The manager's rationale for choice of selection (non-advertised process) and how it meets the merit principle only if different from initial as identified in the HR Plan; and
- Documentation to support that individual meets the linguistic requirements of the position and conditions of employment.

7b) SOMC development training is developed and delivered for managers.
7c) Files are reviewed on a regular basis to ensure documentation is complete to show that merit has been met and supported.
7d) Managers have access to a SOMC database held in HR. HR Advisors work closely with managers on assessment tools development.

Management Response

Staffing file documentation will include justification for staffing tied not only to the Regional Human Resources Plan but also area of selection and process considerations and approach. Non-forecasted staffing actions will require documentation as well. As identified in the audit report, the staffing files will be reviewed (peer) to ensure appropriate documentation meet the minimum criteria.

The following training sessions for regional managers are scheduled for the third and fourth quarter of fiscal year 2008-09:

- New Work Description Format
- Classification Evaluation
- Staffing sub-delegation and tools development

3.5.2 **Recommendation #8**

The Regional Human Resources Director should ensure:

8a) Strategies are developed for processing and initiating acting assignments and linking them to the Regional Human Resources Plan.
8b) Standard operating procedures (SOPs) are developed to provide further direction to regional managers on how acting assignments should be administered.
8c) Staffing actions, including acting assignments by regional organizational unit, are routinely monitored and reviewed and where anomalies exist discussions are held with regional management.

Management Response

All submissions for acting assignments (under and over four months) must be supported by a rationale and where necessary linked to the Regional Human Resources Plan.

A proposed departmental policy on acting assignments along with SOP's will be regionally implemented and adhered to once finalized.

All staffing actions, including acting assignments both under and over 4 months are reviewed by the responsible Human Resources Advisor and where anomalies or concerns are identified, discussions are held with the responsible Director. Any irregularities/ concerns are addressed with the Regional Director Human Resources.

4.0 Training

4.1 **Training on Staffing and Classification**

Criteria #8...Regional managers are being provided with adequate training on their roles and responsibilities in the classification and staffing processes

4.1.1 Results of the interviews with the Regional HR Director and her staff revealed that little or no classification or staffing training has been provided to regional managers and staff in the last several years. The audit team was informed that a course in relation to implementation of the new PSEA was provided to regional managers but no classification or staffing training has been provided since.

4.1.2 **Recommendation #9**

The Regional Human Resources Director should ensure:

9) Staffing and classification overview courses are developed and delivered by regional HR and include:
- Work description writing
- Participation of line managers on classification rating committees
- The development of SOMCs and assessment material for managers
- Refresher training for managers and employees in the new PSEA processes and individual roles and responsibilities.
- Staffing file documentation

Management Response

The following training sessions for regional managers are scheduled for the third and forth quarter of fiscal year 2008-09:
- New Work Description Format
- Classification Evaluation
- Staffing sub-delegation and tools development

Since April, 2007, Regional HR Advisors have worked diligently with regional management on all aspects of staffing. Consultation is required and conducted at each step throughout the process. The Advisors focus on coaching and working with managers and Board Members to ensure the tools developed are appropriate, sufficient and meaningful.

5.0 Monitoring

5.1   Monitoring framework

Criteria #9...A monitoring framework is in place for classification and staffing actions

5.1.1   Results of the review of documentation and interviews with the Regional Human Resources staff revealed that there is no monitoring regime in place for classification and staffing actions in the region.

5.1.2   **Recommendation #10**

The Regional Human Resources Director should ensure:

10) A monitoring regime is developed and implemented in a timely manner for classification and staffing actions to ensure compliance with policies and guidelines and required documentation is being retained on classification and staffing files.

Management Response

All classification files are reviewed by the Director of HR who is accredited in classification.

HR Advisors ensure compliance with regional procedures, Department and Central Agency policies and guidelines on an ongoing basis while managing staffing files. Both the HR Advisor and HR Assistant review and ensure that each file maintains complete and appropriate documentation.

Criteria 1

Policy frameworks for Classification and Staffing have been established and are communicated.

Criteria 2

Classification decisions are in made accordance with legislative and policy requirements and are adequately supported by rationales and work descriptions.

Criteria 3

Position reclassifications are decided by job evaluation committees, management are represented on these committees and these decisions are fully rationalized.

Criteria 4

Staffing actions are linked to the Regional Human Resources Plan.

Criteria 5

Staffing files contain adequate documentation to support decisions regarding area of selection, selection process and candidate selection.

Criteria 6

Staffing actions should contain adequate evidence to demonstrate that the core values of fairness, transparency, access and representativeness have been respected and that decisions respect the merit principle.
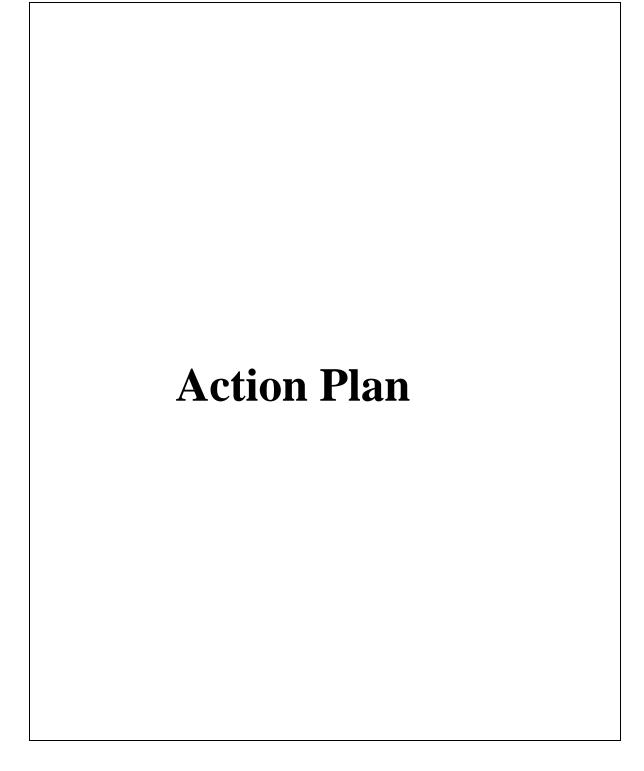
Criteria 7

Acting appointments are completed in accordance with departmental policy.

Criteria 8

Regional managers are being provided with adequate training on their roles and responsibilities in the classification and staffing processes.

Criteria 9

A monitoring framework is in place for classification and staffing actions.

Action Plan

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
Classification The Manitoba Regional Human Resources Director should ensure that: 1) Every classification decision is supported by a rationale or at least linked to another identical position or a generic position/decision.	*Management's Response* <u>*Actions*</u> 1) Effective April 1, 2007 all classification activities, including classification administrative actions, require a file review for completeness. The region has introduced and implemented a classification checklist which ensures that appropriate documentation including classification rationale for unique decisions and/or linking the decision to an identical, similar or a generic position/decision are identified. INAC Headquarters provided the regional classification specialist with a Current Classification Report, which contains a detailed list of all existing positions at INAC for relativity purposes. Furthermore, as a result of HQ Classification Monitoring exercise in 2007 departmental guidelines have been established for all classification files.	Director, Human Resources Manitoba Region	April 1, 2007

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
continued … **Classification** The Manitoba Regional Human Resources Director should ensure that: 2) All new work descriptions conform to the new INAC work description format.	*Management's Response* <u>*Actions*</u> 2) Departmental training on the new format for work description writing for the region has been targeted for October, 2008. Once trained, managers will be required to submit work descriptions in the new format alongside the Human Resources Request Form for classification action.	Director, Human Resources Manitoba Region	October 31, 2008

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
continued … **Classification** The Manitoba Regional Human Resources Director should ensure that: 3a) On-site reviews or desk audits are conducted by the Regional Classification Officer for any position that is being considered for reclassification and for all classification grievance cases. 3b) Inter-regional relativity is researched in all reclassification cases. Classification rationales should discuss the research of and applicability of classification decisions in other regions.	*Actions* 3a) Effective April 1, 2007 submissions for reclassifications, noting substantial change in work performed, and for all classification grievance cases will require an on-site. On a case by case basis and based on the findings of the on-site report, recommendations will include that the work description be submitted to a classification committee for evaluation. New Departmental guidelines and a template were implemented in September, 2008. 3b) INAC Headquarters has provided the regional classification specialist with a Current Classification Report, which contains a detailed list of all existing positions at INAC for relativity purposes. Effective April 1, 2007 all classification actions requiring an update and review as well as the creation of a new position will be cross referenced to both internal regional relativity as well as nationally. Contacts with other regions regarding classification relativity and rationales will be utilized and incorporated into the classification decision full written rationale. In line with Departmental and Treasury Board monitoring requirements, departmental standardized classification tools and practices will be implemented as developed.	Director, Human Resources Manitoba Region	April l, 2007

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
continued … **Classification** The Manitoba Regional Human Resources Director should ensure that: 4) All cases for position reclassification are reviewed by a classification committee and the committee includes management representation.	*Management's Response* *Actions* 4) To ensure classification decisions adhere to both CPSA direction and INAC internal classification policies, appropriate training is scheduled for regional managers in the Fall of 2008. Classification Committee capacity building in the region will ensure that management representation is present in committees.	Director, Human Resources Manitoba Region	December 31, 2008

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
continued … **Classification** The Manitoba Regional Human Resources Director should ensure that: 5) Each reclassification case contains a rationale stating how the position has evolved and why the position reclassification is warranted as opposed to the creation of a new position and that the rationale is retained on the position file.	*Management's Response* <u>*Actions*</u> 5) Reference Response 1 - Effective April 1, 2007 all classification activities including classification administrative actions require a file review for completeness. The region has introduced and implemented a classification checklist which ensures that appropriate documentation including classification rationale linking the decision to an identical, similar or a generic position/decision are identified. INAC Headquarters provided regional classification specialists with a Current Classification Report, which contains a detailed list of all existing positions at INAC for relativity purposes. Full classification rationales, signed work descriptions, signed organizational charts depicting levels above and below, as well as any other related documentation (ie on-site reviews) utilized in the classification decision are held on the position file. For reclassification cases the rationale will include how the position has evolved and why the position reclassification is warranted as opposed to the creation of a new position.	Director, Human Resources Manitoba Region	April 1, 2007

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
Staffing The Manitoba Regional Human Resources Director should ensure that: 6a) Each staffing action is linked to the Regional Human Resources Plan, with the exception of non-forecasted staffing actions, which should be fully explained and documented. 6b) Each staffing action and type of process is supported by the manager's rationale and linkage to the Human Resources Plan.	*Management's Response* *Actions* 6a & b) Manitoba Regional Staffing Strategies have been developed with each Directorate to ensure completeness and that collective processes have been identified to optimize efficiencies. Directors, managers and human resources staff are responsible for quarterly updating and reporting on achievements as well as identify any unforeseen needs that may arise. Staffing file documentation will include justification for staffing tied not only to the Regional Human Resources Plan but also area of selection and process considerations and approach. Non-forecasted staffing actions will require documentation as well. As identified in the audit report the staffing files will be reviewed (peer) to ensure appropriate documentation meet the minimum criteria.	Director, Human Resources Manitoba Region	June 30, 2007

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
continued … **Staffing** The Manitoba Regional Human Resources Director should ensure that: 7a) The staffing files contain documents listed on the staffing checklist, but at a minimum: ● The Candidate Assessment Form (CAF) which demonstrates how the successful candidate meets the selection criteria and merit criteria; ● The manager's rationale for choice of selection (non-advertised process) and how it meets the merit principle only if different from initial as identified in the HR Plan; and ● Documentation to support that individuals meet the linguistic requirements of the position and conditions of employment.	*Management's Response* *Actions* 7a, b, c, d) Staffing file documentation will include justification for staffing tied not only to the Regional Human Resources Plan but also area of selection and process considerations and approach. Non-forecasted staffing actions will require documentation as well. As identified in the audit report the staffing files will be reviewed (peer) to ensure appropriate documentation meet the minimum criteria. The following training sessions for regional managers are scheduled for the third and fourth quarter of fiscal year 2008-09: - New Work Description Format - Classification Evaluation - Staffing sub-delegation and tools development	Director, Human Resources Manitoba Region	June 30, 2007

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
7b) SOMC development training is developed and delivered for managers.			
7c) Files are reviewed on a regular basis to ensure documentation is complete to show that merit has been met.			
7d) Managers have access to a SOMC database held in HR. HR Advisors work closely with managers on assessment tools development.			

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
continued … **Staffing** The Manitoba Regional Human Resources Director should ensure that: 8a) Strategies are developed for processing and initiating acting assignments and linking them to the Regional Human Resources Plan. 8b) Standard operating procedures (SOPs) are developed to provide further direction to regional managers on how acting assignments should be administered. 8c) Staffing actions, including acting assignments by regional organizational unit, are routinely monitored and reviewed and where anomalies exist discussions are held with regional management.	*Management's Response* <u>*Actions*</u> 8a) All submissions for acting assignments (under and over four months) must be supported by a rationale and where necessary linking them to the Regional Human Resources Plan. 8b) Proposed Departmental Policy on Acting Assignments along with (SOP's) will be regionally implemented and adhered to once finalized**.** 8c) All staffing actions, including acting assignments both under and over 4 months are reviewed by the responsible Human Resources Advisor and where anomalies or concerns are identified, discussions are held with the responsible Director. Any irregularities/concerns are addressed with the Regional Director Human Resources.	Director, Human Resources Manitoba Region	June 30, 2007

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date

Training
The Manitoba Regional Human Resources Director should ensure that:
 	
9) Staffing and classification overview courses are developed and delivered by regional HR and include:
• Work description writing
• Participation of line managers on classification rating committees
• The development of SOMCs and assessment material for managers
• Refresher training for HR managers and employees in the new PSEA processes and individual roles and responsibilities.
• Staffing file documentation
	Management's Response
	
	<u>Actions</u>
	9)The following training sessions for regional managers are scheduled for the third and fourth quarter of fiscal year 2008-09:
	  - New Work Description Format
	  - Classification Evaluation
	  - Staffing sub-delegation and tools development
	
	Since April, 2007, Regional HR Advisors have worked diligently with regional management on all aspects of staffing. Consultation is required and conducted at each step throughout the process. The Advisors focus on coaching and working with managers and Board Members to ensure the tools developed are appropriate, sufficient and meaningful.
		Director, Human Resources Manitoba Region	April 1, 2007

Recommendations	Actions	Responsible Manager (Title)	Planned Implementation Date
Monitoring The Manitoba Regional Human Resources Director should ensure that: 10) A monitoring regime is developed and implemented in a timely manner for classification and staffing actions to ensure compliance with policies and guidelines and required documentation is being retained on classification and staffing files.	*Management's Response* **_Actions_** 10) All classification files are reviewed by the Director of HR who is accredited in classification. HR Advisors ensure compliance with regional procedures, Department and Central Agency policies and guidelines on an ongoing basis while managing staffing files. Both the HR Advisor and HR Assistant review and ensure that each file maintains complete and appropriate documentation.	Director, Human Resources Manitoba Region	June 30, 2007