Final Report

2008-610

Evaluation of the PWGSC Ethics Program

Office of Audit and Evaluation

November 19, 2009

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MAIN POINTS

What was examined

i. The Public Works and Government Services Canada (PWGSC) Ethics Program operates under the responsibility of the Chief Risk Officer in the Departmental Oversight Branch of PWGSC.

ii. The mandate of the PWGSC Ethics Program is to provide the framework, direction, focus, learning, tools and processes to guide, assess and continually improve PWGSC employee ethical conduct. Its objective is to support ethical leadership and improve the ethical climate so that employees maintain the highest standards of conduct that will, in turn, strengthen PWGSC's ethical reputation.

iii. The PWGSC Ethics Program is funded through the departmental A-base. Actual expenditures totalled approximately $1.4M in 2008-2009. The program develops policies; provides advice and guidance; educates employees; engages leaders; and conducts research and development related to organisational values and ethics. The PWGSC Ethics Program is a centre of values and ethics expertise at PWGSC. It is composed of a staff of approximately nine employees in 2008-2009, including a Director, administrative staff, ethics advisors and regional ethics advisors. The number of staff has decreased from approximately 20 employees in 2007-2008.

Why it is important

iv. Organisational ethics programs ensure that employees are aware of and understand their responsibilities with regard to their behaviour. Because of the diversity of its functions and large budget, it is particularly important that PWGSC create and maintain a strong ethical climate. PWGSC has a large number of areas where values and ethics risks are high. Canadians need assurance that the department is acting to mitigate these risks. The PWGSC Ethics Program is part of a complement of oversight functions within the department that provide integrated guidance, advice and support on ethical issues within PWGSC.

What was found

v. The program is relevant to federal and PWGSC priorities and needs. The program supports the department's obligations with regard to values and ethics outlined in Government of Canada policies, legislation and frameworks. In addition to delivering on the department's roles and responsibilities concerning ethics, the PWGSC Ethics Program contributes to the department's overall management agenda.

vi. The program offers similar services as other government departments. There are no set standards across the federal government on how ethics functions should be structured or organized. The values-based approach adopted by PWGSC is consistent with other

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government departments and evidence shows this approach to be effective. The grouping of program activities also corresponds well to organisational ethics theory.

vii. In general, the PWGSC Ethics Program is performing activities well. The program has been active in building awareness of public service values within the department. It does this primarily through the training sessions it offers. PWGSC employees attending mandatory ethics training are generally satisfied with the course but are finding it difficult to apply course material to their work environments. Non-mandatory training offered by the program is well received by employees but interest in the course has been moderate.

viii. In addition to training, the program offers advice and guidance to the department on an as requested basis. PWGSC employees are accessing the values and ethics resources offered by the program. However, some regional employees feel that their access to impartial ethics advice and guidance is limited.

ix. Despite indications that the PWGSC Ethics Program is performing well, the evaluation was unable to thoroughly assess the impact of the program due to the lack of effective, results-based, performance measurement within the ethics program. However, existing measures indicate employees have generally positive experiences with regard to values and ethics at PWGSC. Responses to the 2002, 2005 and 2008 Public Service Employee Surveys also indicate that the ethical climate at PWGSC is strong, although this is not necessarily consistent within all branches/regions across the department.

x.   The PWGSC Ethics Program spends the most (per employee) on values and ethics in comparison to other departments and agencies, however the program's expenditures are in line with departments of similar size to PWGSC. The program is among the larger of its kind within the federal government in terms of program expenditures; it was second only to the Department of National Defense. There is evidence that the program is considering cost-saving measures and alternative delivery mechanisms. One such measure considers adapting training to include on online component. This may result in cost-savings to the department.

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Management Response

The Ethics Directorate within the Departmental Oversight Branch accepts the evaluation findings and intends to act on the recommendations of the evaluation by implementing their Management Action Plan detailed as follows.

Recommendations and Management Action Plan

Recommendation 1: The ADM of the Departmental Oversight Branch should develop and implement an ongoing performance measurement strategy to assess the effectiveness of the program and to track overall performance.

> **Management Action Plan 1.1:** Establish a comprehensive performance measurement strategy with expected results, establish measurable baselines and measure progress over time.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: March 2010
>
> **Management Action Plan 1.2:** Proceed with a consultation with academic experts to assist us in the development of the strategic direction of the Ethics program. (Themes: strengths and weaknesses, structure and positioning, learning strategy, best practices, new strategic direction for a second generation.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: December 2009
>
> **Management Action Plan 1.3:** Complete a diagnostic profile that will provide a baseline of PWGSC ethical climate via the pre-survey/focus group approach when developing the Code of Conduct.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: March 2010
>
> **Management Action Plan 1.4:** Integrate existing tracking databases for ethical cases and client activities and analyse trends.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: December 2009

Recommendation 2: The ADM of the Departmental Oversight Branch should ensure equitable access to advice and services offered through the PWGSC Ethics Program to regional employees.

> **Management Action Plan 2.1:** Develop a clear communication strategy to promote our services/ products, helpline and email address via the In the Know newsletter,

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the different regional newsletters and other communications tools to ensure regional staff are aware of the program's services at a departmental level.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Management Action Plan 2.2: Ensure that services provided in NCA are also provided in Regions, i.e.: courses, presentations, facilitation of dialogue sessions, specialized workshops.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: Ongoing

Management Action Plan 2.3: Leverage the use of the Values Champions initiative to discuss ethics in different forum, conferences, events, etc.

OPI/OSI: Chief Risk Officer and DG, Risk Oversight and Integrity and Regional Directors General
Implementation Date: January 2010

Recommendation 3: The ADM of the Departmental Oversight Branch should communicate the neutrality and objectivity of the ethics program throughout the department.

Management Action Plan 3.1: Use different avenues (In the know, courses, events, presentations, etc) to communicate to PWGSC employees that the values and ethics function is neutral.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: Ongoing

Management Action Plan 3.2: Develop a marketing strategy to emphasize values and ethics as a neutral and objective program throughout PWGSC.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Recommendation 4: The ADM of the Departmental Oversight Branch should consider the use of updated technology to enable potentially more effective and efficient means of providing departmental training in ethics.

Management Action Plan 4.1: Explore potential use of the CSPS on line ethics course including a comparative analysis exploring the effectiveness of the Canada School of Public Service course on ethics versus the PWGSC course. If the CSPS course proves viable, use a risk based approach to deliver internal courses in areas of high risk to the department (i.e. procurement, etc.).

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OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: November 2009

Management Action Plan 4.2: Explore other means of providing state of the art learning activities to reach all PWGSC staff.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Management Action Plan 4.3: Explore new technology and potential partnerships to assist with the delivery of training activities.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Management Action Plan 4.4: Complete on line versus in class assessment.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: November 2009

Management Action Plan 4.5: Review the Departmental Ethics Learning strategy and bring it to the next level.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

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INTRODUCTION

1. This report presents the results of the evaluation of the PWGSC Ethics Program. The Audit and Evaluation Committee of Public Works and Government Services Canada (PWGSC) approved this evaluation as part of the 2008-2011 Risk-Based Multi-Year Audit and Evaluation Plan.

PROFILE

Historical Context

2. In line with John C. Tait's report "A Strong Foundation: Report of the Task Force on Public Service Values and Ethics" published in 1996, PWGSC has actively implemented a values and ethics program. In 2000, "Results for Canadians: A Management Framework for the Government of Canada" emphasized the strong role values and ethics have in sound public service management. In the "2003 Report of the Auditor General to the House of Commons", the Auditor General emphasized the importance of values and ethics initiatives in the public service. In this context, the Auditor General referenced the newly developed *Values and Ethics Code for the Public Service*, and recommended that "values and ethics need to [be] better integrated into day-to-day operations". At that time, the Auditor General cited the values and ethics program at PWGSC as being among the most comprehensive program of its kind within the federal government. In its 2008-2009 annual report, the Public Service Integrity Commissioner commended PWGSC's Values and Ethics Program for having invested heavily in values and ethics training for over 12,000 employees.

The PWGSC Ethics Program Description

3. The PWGSC Ethics Directorate manages the PWGSC Ethics Program, which is composed of seven full-time equivalent employees. This is down from approximately 20 employees with staff in all regions in 2007-2008. The program operates with an A-base budget, with actual expenditures of approximately $1.4M in 2008-2009. The mandate of the program is to provide the framework, direction, focus, learning, tools and processes to guide, assess and continually improve PWGSC employee ethical conduct. Its objective is to support ethical leadership and improve the ethical climate so that employees maintain the highest standards of conduct that will, in turn, strengthen PWGSC's ethical reputation.

4. The Ethics Directorate is part of the Office of the Chief Risk Officer under the responsibility of the Assistant Deputy Minister of the Departmental Oversight Branch. The ethics function at PWGSC has been under the purview to the Chief Risk Officer since 2005.

5. The Chief Risk Officer ensures the application of the *Values and Ethics Code for the Public Service* within the department; and functions as an ethics counsellor and advisor to the executive community at PWGSC. As the Senior Departmental Ethics Advisor, the

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Director of Ethics acts as the program authority; promotes departmental ethics policy, guidelines and procedures; and oversees the implementation of the PWGSC Ethics program.

6. The program carries out five main activities:
- Develops policies and practices that clarify or integrate values and ethics-related issues. This includes integrating values and ethics in strategic frameworks and core business lines and processes.
- Provides values and ethics advice and guidance to PWGSC employees. This includes referring employees to other appropriate resources as required.
- Educates PWGSC employees about values and ethics. This includes the delivery of mandatory and optional ethics training sessions, as well as the development of tailored workshops and dialogue sessions.
- Engages values and ethics leaders through the establishment of partnerships with the branches/regions/agencies, identifies "values champions" within PWGSC and educates senior leaders on values and ethics messages.
- Conducts research and development within the ethics field. This includes conducting research on best practices, developing a values and ethics learning strategy and building partnerships with other government departments.

7. Ultimately, the program aims to have strong ethical leadership in the department; an assurance that sound values-based decisions are being made; a culture of integrity, trust and respect for employees; and, a strong departmental ethical reputation.

Program Logic Model

8. In 2008, the program developed a logic model for the PWGSC Ethics Program. The logic model was redesigned by the evaluation team based on a review of documentation and consultations with program managers. It was subsequently validated with program managers. The logic model is provided in Appendix A. In summary the program aims to achieve three main immediate outcomes.

- *Increased awareness*: PWGSC employees are more aware of values and ethics in the workplace and of applicable acts, policies and guidelines (e.g. *Values and Ethics Code for the Public Service*, Gifts and Hospitality Guidelines).
- *Increased access*: PWGSC employees have more access to the proper tools to guide them in making ethical decisions, as well as to advice and guidance on ethical issues.
- *Increased continuity in messaging*: Values and ethics messaging within PWGSC and among government departments is more consistent.

Program Authorities

9.   The PWGSC Ethics Program operates under the following authorities:

10. The *Values and Ethics Code for the Public Service* (2003) says:
"Deputy Heads have the following obligations: […]
   ▪   To encourage and maintain an ongoing dialogue on public service values and ethics within their organisations, in a manner that is relevant to the specific issues and challenges encountered by their organisations.
   ▪   To ensure that mechanisms and assistance are in place to help public servants raise, discuss and resolve issues of concern related to this Code. This includes designating a senior official to assist public servants to resolve issues arising from the application of the Code…."
"Deputy Heads may add compliance measures beyond those specified in this Code to reflect their department's particular responsibilities or the statues governing its operations…."
"Deputy Heads may delegate responsibilities and authorities for the implementation of the Code, but they may not delegate their accountability for ensuring that the Code is fully upheld and advanced within their organisation or for the specific matters outlined in this section [of the Code]."

11. PWGSC has developed a Terms of Reference for the Ethics Program that assigns responsibilities for values and ethics to the Chief Risk Officer. It says,
   "The DM [Deputy Minister] has the right to allocate the duties in the *Values and Ethics Code* for the Public Service, as he/she sees fit and the responsibilities have been distributed to the Chief Risk Officer …"

12. The Terms of Reference also establishes that others, throughout the department, have responsibilities with respect to values and ethics. These include:
   •   Ethics and Risk Management Committee that approves policies on ethics, resolves program issues, approves work plans and budget for the program, and ensures that performance is being measured.[1]
   •   Branch/Agency Heads and RDGs [Regional Directors General] who implement the key elements of the ethics program within their organizational cultures.
   •   Management and supervisors at all levels who support and promote an ethical culture within their area of responsibility and encourage dialogue with their employees about values and ethics.
   •   Employees, at all levels, who must familiarize themselves with the *Values and Ethics Code for the Public Service*, support and adhere to ethical standards and values.
   •   Assistant Deputy Minister, Human Resources Branch, who implements and monitors specific ethics related programs such as the harassment prevention

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[1] This committee has recently been dismantled. A new committee of senior managers will be established by PWGSC to replace this function.

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> and resolution and Conflict of Interest and supports the ethics program by
> helping deliver program learning activities.
>
> - Ethics advisors who assist PWGSC in resolving ethical issues and support the
>   delivery of the program.

13. As specified in the Treasury Board *Directive on Departmental Audit Committees*, PWGSC's Audit and Evaluation Committee also has responsibilities related to values and ethics. This committee, which provides advice to the Deputy Head, is required to review the arrangements established by management to "exemplify and promote public service values and to ensure compliance with laws, regulations, policies and standards of ethical conduct".

Focus of the evaluation

14. The objective of this evaluation was to determine the program's relevance and performance in achieving its planned outcomes. The evaluation also explored alternative ways of achieving the expected results.

15. The evaluation examined the following components of the PWGSC Ethics Program: mandatory and optional ethics training; ethics advice and guidance; ethics support of leadership; policy development; and other activities undertaken by the Ethics Directorate in support of improving the ethical climate of PWGSC.

16. An evaluation matrix, including evaluation issues, questions, indicators and data sources, was developed during the planning phase (see Appendix B). More information on the approach and methodologies used to conduct this evaluation can be found in the "About the Evaluation" section at the end of this report.

FINDINGS AND CONCLUSIONS

17. The findings and conclusions below are based on multiple lines of evidence used during the evaluation. They are presented by evaluation issue (relevance and performance).

RELEVANCE

18. Relevance is measured by the extent to which the program is aligned with federal government priorities and departmental strategic outcomes; is an appropriate role and responsibility for the federal government; and the degree to which it addresses a demonstrable and continuing need.

The program aligns closely with federal government priorities and to the PWGSC strategic outcome

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19. The April 2006 Speech from the Throne announced the *Federal Accountability Act* as a tool to restore public trust in government. The Act emphasizes values, such as integrity and fairness, in the public service and provides legislation and tools to support them. The role of values and ethics has also been highlighted in sound management practices. The "Sixteenth Annual Report to the Prime Minister on the Public Service of Canada" from March 2009, cites values and ethics as being a key leadership competency for all senior leaders. In addition, the Treasury Board Secretariat is in the process of developing the *Federal Public Sector Code of Conduct*, which will replace the current *Values and Ethics Code for the Public Service*.

20. Recognizing the importance of public service values and ethics, the federal government has implemented several key policies, legislation and frameworks in support of public service values and ethics. The evaluation assessed the PWGSC Ethics Program alignment with values and ethics obligations and duties outlined in these documents. It found that the PWGSC Ethics Program supports the department's obligations with regard to the following key documents:

> *Values and Ethics Code for the Public Service* (2003)
> *Public Servants Disclosure Protection Act* (2005)
> Treasury Board *Policy on Legal Assistance and Indemnification* (2008)
> Management Accountability Framework (2008)

21. The *Values and Ethics Code for the Public Service* requires Deputy Heads to support public service values and ethics by encouraging and maintaining dialogue within their organisations. Deputy Heads are also required to ensure that mechanisms are in place for public servants seeking to discuss or resolve issues related to the code.

22. *The Public Servants Disclosure Protection Act* (2005) says, "(1) Each chief executive must establish internal procedures to manage disclosures made under this Act by public servants employed in the portion of the public sector for which the chief executive is responsible." The act also legislated the Treasury Board to develop a federal code of conduct and that each department develop their own code of conduct.

23. The Treasury Board *Policy on Legal Assistance and Indemnification* says, "Approval authorities[2] are responsible for ensuring Crown servants are aware that they are to inform the appropriate official at the earliest opportunity whenever an incident takes place that may result in a claim against the Crown or Crown servant that may give rise to the need for legal assistance."

24. In addition to aligning with federal government priorities, the PWGSC Ethics Program corresponds to the department's strategic outcome. PWGSC's strategic outcome is, "high-quality, central programs and services that ensure sound stewardship on behalf

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[2] Approval authorities are those designed to decide whether to approve or deny provision of legal assistance or indemnification to a Crown servant, i.e., the prime minister or his or her designated alternate, the minister, the Treasury Board, the Clerk of the Privy Council or the deputy head.

of Canadians and meet the program needs of federal institutions". The element of stewardship reflects PWGSC's and the Government of Canada's commitment to responsible management of the services under its charge.

25. Good stewardship is linked to values and ethics programming because values and ethics are considered integral to sound management within the public service. The Management Accountability Framework (MAF) defines ten key areas of management that collectively define "management" and establish the expectations for good management of a department or agency. The first of ten MAF Areas of Management is "Values-based Leadership and Organisational Values". The MAF (2008) defines public service values as "Public Service leaders embody public service values and ethics and foster a culture of integrity and respect in their organisations".

26. The relationship of values and ethics to sound management is also emphasized in the 2000 Report of the Auditor General of Canada. "Maintaining sound values and ethics is a part of good governance…[The] results of ethical leadership include employees who are more satisfied and committed, organisations that can attract and retain better employees, and organisations that are trusted and more effective". Similarly, in his influential discussion paper "A Strong Foundation: Report of the Task Force on Public Service Values and Ethics", John C. Tait argued that the risks of not implementing strong values and ethics programming would "reduce the legitimacy and credibility of the public service as an instrument of public good".

The program is consistent with federal roles and responsibilities

27. The policies and legislation outlining federal obligations regarding values and ethics provide flexibility for department heads to determine how these obligations will be met. At the government-wide level, the Office of the Chief Human Resources Officer, within the Treasury Board Secretariat, offers policy support. This office is currently developing the *Federal Public Sector Code of Conduct*, which will replace the *Values and Ethics Code for the Public Service*. The office views itself as primarily developing and supporting Treasury Board policies in the area of values and ethics and plays a minimal role in guiding the structure and management of departmental values and ethics initiatives.

28. Values and ethics policies support a wide variety of initiatives. The primary authority for values and ethics programming in the federal government is the *Values and Ethics Code for the Public Service*. This code requires Deputy Heads to: ensure that new employees are made aware of the code and are informed of the requirements of the code annually; encourage and maintain ongoing dialogue within their organisations, with specific reference to the particular challenges faced within that organisation; ensure that mechanisms and assistance are in place to assist public servants in upholding the code; ensure that methods are in place to avoid conflict of interest; and, ensure that personal information in confidential reports is secured. The code allows flexibility in organisations as to how they are structured to meet these requirements.

29. At PWGSC, responsibilities outlined in the code are shared among Branches and Directorates. The PWGSC Ethics Program is mainly responsible for building awareness of the code, while encouraging and maintaining dialogue about values and ethics within the department. The program is also responsible for providing clarification on the obligations of public servants regarding gifts and hospitality. Other specific obligations identified in the code are under the responsibility of other areas of PWGSC. For example, obligations in the code regarding conflicts of interests are under the responsibility of the Human Resources Branch.

30. The *Public Servants Disclosure Protection Act* requires federal organisations to develop their own codes of conduct with respect to the disclosure of wrongdoing. The Act requires that departments provide appropriate channels for public servants to disclose wrongdoing without fear of reprisal. The Act also requires that the federal government develop a code of conduct, and that departments, subsequently develop their own codes of conduct as indicated above.

31. The Departmental Oversight Branch shares responsibility with Human Resources Branch (HRB) for the eventual implementation of an organizational code of conduct and building awareness about the *Public Servant Disclosure Protection Act* among PWGSC public servants. HRB is responsible for the implementation of the section of the Act dealing with conflict of interest. The PWGSC Ethics Program supports this function by providing a source of referral and information about the *Values and Ethics Code for the Public Service* and obligations of public servants regarding the code of conduct and the disclosure of wrongdoing.

There is a continuing need for the PWGSC Ethics Program

32. The need for values and ethics programming is highest where values and ethics risks are high. The nature of PWGSC's main business lines, including procurement, real property and receiver general, means that employees interact with other government departments as well as private sector business, often on files that see the exchange of large sums of money. As such, the ethical risks in the department are high.[3]

33. The need for values and ethics programming in areas such as procurement is echoed by the Organisation for Economic Co-operation and Development, which has recently developed recommendations for enhancing integrity in public procurement. The Organisation for Economic Co-operation and Development recognizes that,

> "public procurement is a key economic activity of governments that is particularly vulnerable to mismanagement, fraud and corruption [and] efforts to enhance good governance and integrity in public procurement contribute to an efficient and effective management of public resources and therefore of tax payer's money."

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[3] In order to mitigate these risks, and in addition to program efforts in values and ethics, PWGSC has also issued a "Code of Conduct for Procurement" in support of conducting procurement in an accountable, ethical and transparent manner.

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34. Values and ethics risks are also high at PWGSC as the department is large, has operations that span across the country, and welcomes a high number of new employees annually. In 2008-2009, there were approximately 12,000 indeterminate (permanent) employees at PWGSC. Additionally, in 2008-2009, 1,700 new indeterminate employees joined the department. This means that about 8% of the total population of indeterminate employees will require an introductory exposure to the values and ethics of the department.

Conclusions: RELEVANCE

35. The PWGSC Ethics Program corresponds to federal government's commitment to improving and strengthening the ethical behaviour of the public service. This is a commitment that has been strengthened by the *Federal Accountability Act* and is reinforced by the *Values and Ethics Code for the Public Service*.

36. Each federal government department has an obligation to provide values and ethics support for its public servants. The *Values and Ethics Code for the Public Service* requires deputy heads to ensure that departmental employee behaviour aligns with the code. The code, however, allows for flexibility in the type of support that the department offers.

37. PWGSC's commitment to good stewardship supports values and ethics programming. As risks of ethical wrongdoing are identified as being particularly high in government procurement, ethics support is also identified as being essential in government procurement. These elements provide strong evidence supporting the need for a values and ethics function.

PERFORMANCE

38. Performance is measured by the extent to which the program is effective in achieving results and to what degree it is able to do so in a cost-effective manner.

Program activities are appropriate to deliver on results

39. The achievement of results depends, in part, on the appropriateness of the program's design. In 2005, the Canada Public Service Agency published the "Report on Governance Structures for Values and Ethics". The study showed that, even among a small group of departments, there was wide variation. The governance structures of departmental values and ethics initiatives of a number of government departments, including PWGSC, were described. Most of these organisations offered ethics policy development; advice and guidance (some with training elements); and promotion of values and ethics across the department. However, the study found a considerable range in how values and ethics initiatives were structured within each of these organisations. Specifically, the location of ethics-related policy area responsibilities ranged from within the Human Resources or Risk/Audit/Assurance functions to stand-alone offices.

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40. Our analysis also found that there is no consistent placement of the ethics function across other government departments. It can be located in a variety of places including a separate unit reporting to the Deputy Head's Office, or as a unit within audit and evaluation, risk oversight, integrity, legal services, human resources, corporate services or ombudsman branches. Employees participating in focus groups were also particularly sensitive to the placement of the Ethics Directorate in the Departmental Oversight Branch. Employees perceived the Departmental Oversight Branch as a "watchdog" for the Department. This did not correspond well with employee belief that the ethics function should be a source of neutral advice and guidance. When interviewing some Ethics Directorate staff, similar concerns were raised regarding the positioning of the Ethics Directorate within the Department.

41. The study also revealed a broad range of staffing levels within departments, ranging from two to 19 employees. Budgets also varied, from 'as needed' to almost $9M. More recent studies have confirmed that the federal government continues to see broad variation in values and ethics initiatives across organisations.

42. The literature review identified six elements generally accepted as necessary to be a part of a comprehensive ethics program. Overall, the PWGSC program is delivering in each of these. Exhibit 1 below shows how the elements link to the PWGSC Ethics Program.

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Exhibit 1. Crosswalk between elements of a comprehensive ethics program and PWGSC Ethics Program elements.

Elements of a Comprehensive Ethics Program	PWGSC Ethics Program
Code of Conduct	✓ *Values and Ethics Code for the Public Service* ✓ PWGSC's *Statement of Values*[4]
Way to report observed violation anonymously[5]	✓ Ethics helpline ✓ Provision of advice and guidance in support of Internal Disclosure
Mechanism for employees to seek advice on ethical matters	✓ Ethics helpline ✓ Ethics advisors ✓ Values and Ethics intranet site
Training for all employees on code of conduct and ethics policies[6]	✓ Mandatory course for all PWGSC employees – "Introduction to Ethics" ✓ Non-mandatory course – "Ethical Decision-Making" ✓ Tailored workshops and dialogue sessions
Mechanism to discipline employees that violate the code or ethics policies	✓ (*indirect*) Reports of wrongdoing to ethics helpline or ethics advisors are referred to appropriate Directorate/Branch
Evaluation of ethical behaviour as a part of regular performance appraisals	✓ Ethics performance indicators developed[7]

43. The PWGSC Ethics Program has an additional element that is linked to values and ethics leadership. There is strong evidence to support the importance of ethics leadership in promoting values and ethics in the workplace. Public servants are motivated by the behaviour of their supervisors and senior managers. The literature shows that organisations with strong ethical cultures are those where values and ethics have backing

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[4] In 2006, the program, in consultation with 340 employees across Canada, established a *Statement of Values* that outlines core values that are specific to PWGSC while also aligning to the *Values and Ethics Code for the Public Service*.

[5] The Ethics Resource Center identifies the willingness for employees to seek impartial advice without fearing judgement or reprisal as a critical indicator of ethical organisations.

[6] The importance of training in values and ethics is also emphasized by prominent organizations such as the Organisation for Economic Co-operation and Development and Transparency International.

[7] While these indicators could be included in senior management performance accords, the program reports that none of these performance indicators have been used to date in performance plans. However, the Treasury Board "Guidelines on the Performance Management Program for Executives" outlines key leadership competencies against which executive performance is assessed. The first of these competencies is 'values and ethics'.

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from leaders; values and ethics are prominent within the organisation; and, where leaders behave ethically. In 2008, the Management Accountability Framework criteria for a "strong" rating in 'Value-based Leadership and Organisational Culture' required:

- Leadership demonstration of strong Public Service values and ethics.
- Public Service values and ethics infrastructure in place, understood and effective.
- Organisation culture reflective of Public Service values and ethics.

44. Federal departments and agencies are assessed annually on their ability to meet the MAF values and ethics element. In 2007-2008, PWGSC was one of the eight departments that received the highest rating of 'strong' in 'Values-based Leadership and Organisational Culture'. In 2008-2009, PWGSC again scored 'strong' in the same area.

45. The literature review conducted in the context of this evaluation included international best practices for values and ethics in other government jurisdictions. It found that the PWGSC Ethics Program design corresponds to international best practice. Common best practices include the presence of a code of conduct; training and education; and a focus on leadership for values and ethics.

46. There is evidence to show that the collection of activities of the PWGSC Ethics Program should yield several positive outcomes. The Ethics Resource Center is a private, nonprofit, American-based organization devoted to independent research and the advancement of high ethical standards and practices in public and private institutions. The Center conducts biennial surveys of ethics programs, issues and culture using a national (within the United States of America) sample of employees in government. The survey is the only longitudinal study of it kind and provides a good understanding of what works with government ethics programs. The most recent survey report shows that comprehensive ethics programs reduce rates of misconduct, increase rates of reporting of misconduct and improve public trust. These positive outcomes correspond well with the intended outcomes of the PWGSC Ethics Program.

Lack of effective results-based measures makes it difficult to assess the overall impact of the program

47. With respect to assessing the impact of the program on the ethical action of employees and the ethical climate of the department, a lack of effective performance measurement means that the evaluation was unable to thoroughly assess the results of the program. The Ethics Directorate has developed a survey instrument, but has not yet been able to go forward and implement it due to internal restrictions on public opinion research.

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The program is contributing to the ethical action of employees

48. The intended outcomes of the PWGSC Ethics Program can be divided into two distinct but related categories: outcomes related to the ethical action of individuals, and outcomes related to the ethical environment of PWGSC. An employee's confidence in his/her ethical abilities is largely due to personal attributes and behaviours, and to the overall ethical environment in which they work. The evaluation considered the performance of the program relative to these two types of outcomes.

49. Outcomes related to the ethical action of employees refer to an employee's ability to make the right decision at the right time. This depends on the awareness, access, and continuity of messaging of values and ethics within the department.

50. As regards awareness, all federal public servants are made aware of the existence of the *Values and Ethics Code for the Public Service* as part of their conditions of employment. Mere awareness that the code exists, however, does not ensure that PWGSC employees have an awareness or understanding of the contents of the code. Building this awareness and understanding requires further support and reinforcement.

Values and Ethics Training

51. Federal employees attend ethics training at various points in their career. In 1999, PWGSC began offering non-mandatory values and ethics training in the form of one-day courses. In 2004, these courses were made mandatory to all staff. The Canada School of Public Service is now providing the "Orientation to the Public Service" course where they present a values and ethics component. PWGSC has continued to provide the one-day course to its employees and is examining use of the Canada School of Public Service.

52. The PWGSC Ethics Program is the most complete source of ethics training available to PWGSC employees. Since the inception of the one-day "Introduction to Ethics" course in 1999, over 12,000 PWGSC employees have attended the course. The course continues to be offered to new employees, as well as current employees who have not yet received the training. The program plans to train at least 1,000 employees in 2009-2010 throughout the National Capital Area and the regions. However, recent statistics on indeterminate employee inflow rates show that the number of new employees joining the department may be closer to 1,700.

53. In 2006, the program funded an independent study of the course. The study found that the course was successful in increasing PWGSC employee's awareness of the *Values and Ethics Code for the Public Service*. Specifically, from the perspective of course participants, the study cited improved understanding of the:
- Department's ethics initiatives
- *Values and Ethics Code for the Public Service*
- Forces driving the ethics movement in the public service

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- Departmental resources available to support employees in addressing ethical questions

The study also recommended continued monitoring of the results of the course.

54. The program monitors its progress towards achieving results through the participant feedback form. At the end of the training session, participants complete a feedback form rating the effectiveness of the course. An analysis of the feedback forms from the courses conducted for this evaluation shows that employees are generally happy with the course and find the material informative. The analysis also showed that 80% of course participants (from courses offered in 2009) felt satisfied with the course. Fewer than 50% of employees, however, felt that they were excited to apply what they learned in the course in their work environment.

55. Focus groups confirmed these results. Focus group participants felt that the mandatory "Introduction to Ethics" course was useful in building awareness about federal and departmental values and ethics codes and guidelines. However, they expressed a frustration with the vagueness and flexibility of values-based codes in dealing with ethical dilemmas. They felt that the course could be improved by making it more concrete and relevant to work experiences. Some participants suggested a shorter, awareness-building ethics course but with periodic workshops held for specific work groups. These workshops would deal with concrete ethical situations that are likely to be faced by employees in their work environment. Program resources are available to managers who want to request such workshops or dialogue in their own work units. The program reported conducting 20 dialogue sessions with management teams from April 2008 to December 2008. None of the focus group participants had attended any of these workshops.

56. In addition to mandatory training, the PWGSC Ethics Program offers an optional course. There has been only moderate interest in this, "Ethical Decision Making" course. Designed for managers, executives and people influencing decision-making, this course helps employees better understand the complexity of ethical issues and helping them improve their readiness to deal with these issues as they arise. Since 2004, 599 employees have attended the course. Feedback forms are also administered following the course. Results have been positive, with an average rating of 4.7/5 on "course efficiency and usefulness". Employees who attended this course were invited to participate in the evaluation-led focus groups, but only a very small sample attended.

Values and Ethics Advice

57. The provision of impartial advice is another important element in values and ethics programs. Senior managers of the PWGSC Ethics Program identify their role of impartial ethics experts as being essential to the success of the program.

58. One way in which the program provides advice is through an ethics helpline. Calls to the helpline steadily decreased from 2005-2006 (a total of 514 calls) to 2007-2008 (a total of 162 calls) but increased in 2008-2009 (a total of 208 calls). Callers consistently inquire

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about a broad range of topics but, most often, seek advice about gifts and hospitality and conflict of interest. Approximately one half of the calls received by the helpline are referred to another unit. These include internal disclosure reports. The Ethics Directorate reports that the Office of the Chief Risk Officer investigated several internal disclosures in 2008. Of those, evidence of wrongdoing was found in one of the cases.

59. In addition to the ethics helpline, regional ethics advisors report that employees often approach them "in the halls" to discuss ethics-related issues. Currently, there is only one region with a dedicated ethics advisor. Focus group participants in the regions expressed concern regarding the availability of a trusted ethics advisor in their region. In both regions participating in the evaluation-led focus group exercise, participants felt that there needed to be a relationship of trust with the ethics advisor. Since many ethics-related situations are considered 'delicate', some focus group participants felt that these situations were better discussed in person rather than over the phone. As these regional employees only have access to ethics advisors located at headquarters, employees did not feel comfortable in consulting on matters related to ethics. This contributed to their impression that the function was not entirely neutral or "safe".

Communication and Consistent Messaging

60. The PWGSC Ethics Program is geared to communicating a consistent values and ethics message to PWGSC employees. The program has followed through on a communications plan that included values and ethics advisor presence at departmental events, ethics messaging in departmental communications and maintenance of an intranet site. This site includes information about the program and provides tools and resources on values and ethics.

61. Under the Public Service's *Values and Ethics Code for the Public Service*, the Ethics Directorate is responsible for the implementation and strategic guidance regarding gifts and hospitality. In 2004, the program developed the draft *PWGSC Guidelines on Gifts and Hospitality and dealings with lobbyists*. The department is planning to implement the guidelines in 2009-2010 to support ethical decision-making within the department.

62. In addition to communicating a consistent message about values and ethics within the department, the program is contributing to ensuring that the program is consistent with values and ethics messaging across the federal government. The PWGSC Ethics Directorate is currently leading an interdepartmental network on values and ethics. The network brings together directorate/section heads who communicate regularly on an informal basis to share best practices. PWGSC has also participated in inter-departmental committees or working groups to help resolve ethics-related issues and has cooperated with other government departments to help them establish their Ethics program. More recently, employees across the federal government, including those in PWGSC, have been asked to participate in a survey on the renewal of the *Values and Ethics Code for the Public Service*.

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The program is supporting an ethical environment within PWGSC

63. The second category of outcomes for the PWGSC Ethics Program is related to the ethical environment. Rather than focusing only on the behaviours of individuals, outcomes related to the environment characterize the department as a whole. The evaluation considered four elements, discussed below, in the assessing the program's impact on the ethical environment. These are: the appropriateness of the general approach; the success of leadership initiatives; the assessment of the ethical climate; and public perceptions of the department.

Values-Based Approach

64. The overall approach of the PWGSC Ethics Program is values-based. Generally, organisational ethics programs are either mostly compliance-based or values-based. Compliance-based ethics programs emphasize a set of rules that are uniformly applied. The responsibility of the program is to ensure that rules are being applied and that corrective and/or punitive measures are taken when they are not. Values-based programs emphasize a set of values that underline the culture that the organisation wishes to promote and assume that employees are already committed to ethical behaviour. Though rules are necessary, and integrated into values-based systems, ethical behaviour is expected to go beyond the blind application of rules. Values-based systems steer ethical behaviour, encourage dialogue when rules do not seem to apply and promote critical awareness of novel ethical situations as they arise.

65. The values-based approach to ethics is the most utilized approach in the Government of Canada and abroad. The Auditor General Reports in 1995, 2000 and 2003 all emphasize the need for values-based ethics initiatives in addition to sound management controls. Transparency International, a well-respected global civil society organization that tracks corruption and corruption-related issues in governments across the globe, found that such an approach is more profitable and effective than mere compliance.

66. The evaluation found that one drawback of the values-based approach was that values tended to be vague and did not give employees a clear decision path. Many focus group participants understood ethics in terms of values but also expressed a desire for more concrete rules that outline behaviour and details about the consequences of misconduct. Focus group participants felt that values were too vague to provide guidance in how to behave.

Ethical Leadership: The Values Champion Initiative

67. Another important element of the ethical environment has to do with leadership. Strong ethical leadership is key to promoting a sound ethical environment within an organisation. The Values Champion Initiative was launched in 2008 by the Deputy Minister with the support of the program. The Values Champion Initiative has the following goals:

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- strengthen senior management's leadership and commitment to PWGSC's four values through individual champions focusing on a specific value while retaining links to the other three organisational values;
- promote an ethical climate and workplace; and
- advance these values across the department and ingrain them in the organisational culture.

68. Values Champions have participated in various activities since the inception of the Initiative. Values Champions have provided introductory remarks at 49 sessions of "Introduction to Ethics" and "Ethical Decision Making" courses as well as orientation sessions for new employees/students. Champions have also been present to talk about values and ethics at other speaking engagements such as:

- Branch and regional all staff meetings
- A regional tour to different sites in Western Canada
- Dialogue sessions with the Youth Network on Leadership and Excellence
- Armchair values-based discussions at PWGSC

69. A program-led analysis of the success of the Values Champion Initiative emphasizes that it has received positive feedback and comments. The analysis shows that the program's support is critical to the success of the initiative. The program also found that the initiative could benefit from more meetings between Champions and the program, that there was little value added in the co-Champion structure (Assistant Deputy Minister and Regional Director General sharing a value) and that a more global approach of representing all the values could be better suited to the regions.

70. Focus group participants confirmed the importance of leadership in creating strong ethical environments. Focus group participants generally had positive perceptions of senior managers of the department. Participants felt supported in their values and ethics when leaders were perceived as behaving ethically. Ethical issues arose in the work environment primarily when managers and supervisors were seen as behaving unethically. Employees felt that peers also played an important role in defining the ethical work environment.

Public Service Employee Survey Results

71. The Treasury Board Secretariat conducted the Public Service Employee Survey in 2008. Previous surveys were conducted in 1999, 2002 and 2005. The survey provides a snapshot of the views of federal public servants about the organisations and units in which they work. In the context of this evaluation, the evaluation team analysed results from the 2002, 2005 and 2008 surveys. The 1999 survey results were omitted, as there were significant differences in the wording of questions.

72. The analysis examined questions specifically referring to ethics as well as related questions. PWGSC results were positive when compared to the average results across the federal government (see Exhibit 2).

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Exhibit 2. PWGSC Results for Ethics-Related Questions[8], Public Service Employee Surveys (2002, 2005, 2008)[9]
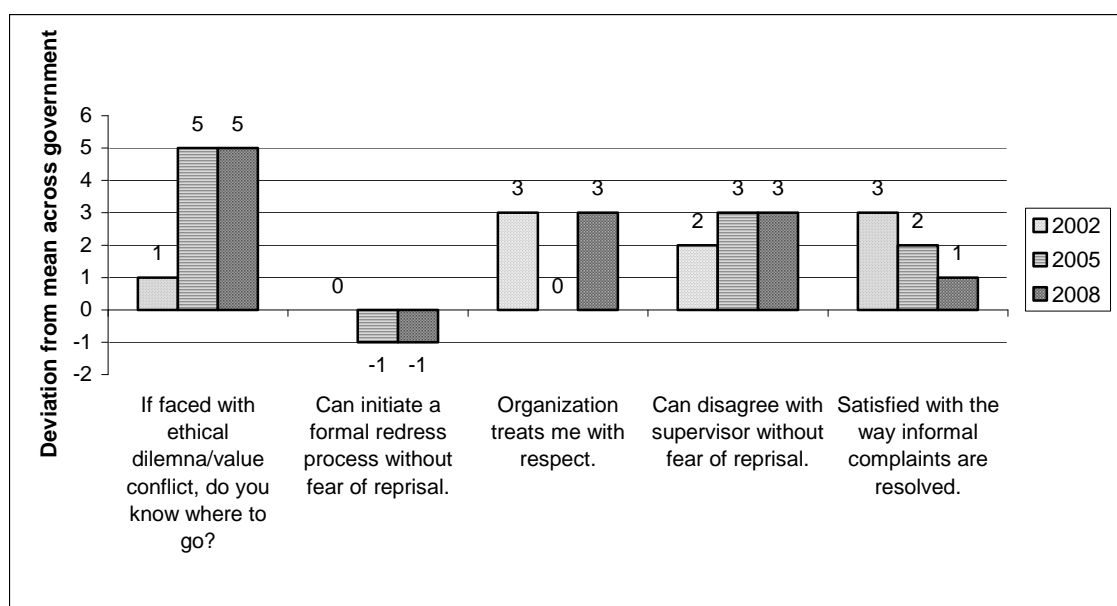
Source: Public Service Employee Survey 2002, 2005, 2008.

73. In general, the results show that PWGSC employees are rating the department higher on ethics-related questions than employees from other government departments and agencies. With the exception of the question "Can initiate a formal redress process without fear of reprisal", PWGSC shows better results than the mean across the federal government. Of particular interest are results to the question "If faced with ethical dilemma/value conflict, do you know where to go?". PWGSC employees are more aware of values and ethics departmental resources available to them than are employees in most other federal government departments and agencies.

74. When looking at the breakdown of results of the Public Service Employee Survey (2008) within PWGSC, we can see that results to ethics-related questions are not uniform across the department. Exhibit 3 shows these results.

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[8] Questions were chosen that most closely aligned with indicators of ethical climate.
[9] Scores refer to the total percentage of responses to "strongly agree" + "somewhat/mostly agree" for each department compared to the average for these responses across the survey.

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Exhibit 3. PWGSC Branches/Regions deviating from departmental aggregate results of the PSES 2008 questions on ethics issues.[10],[11]
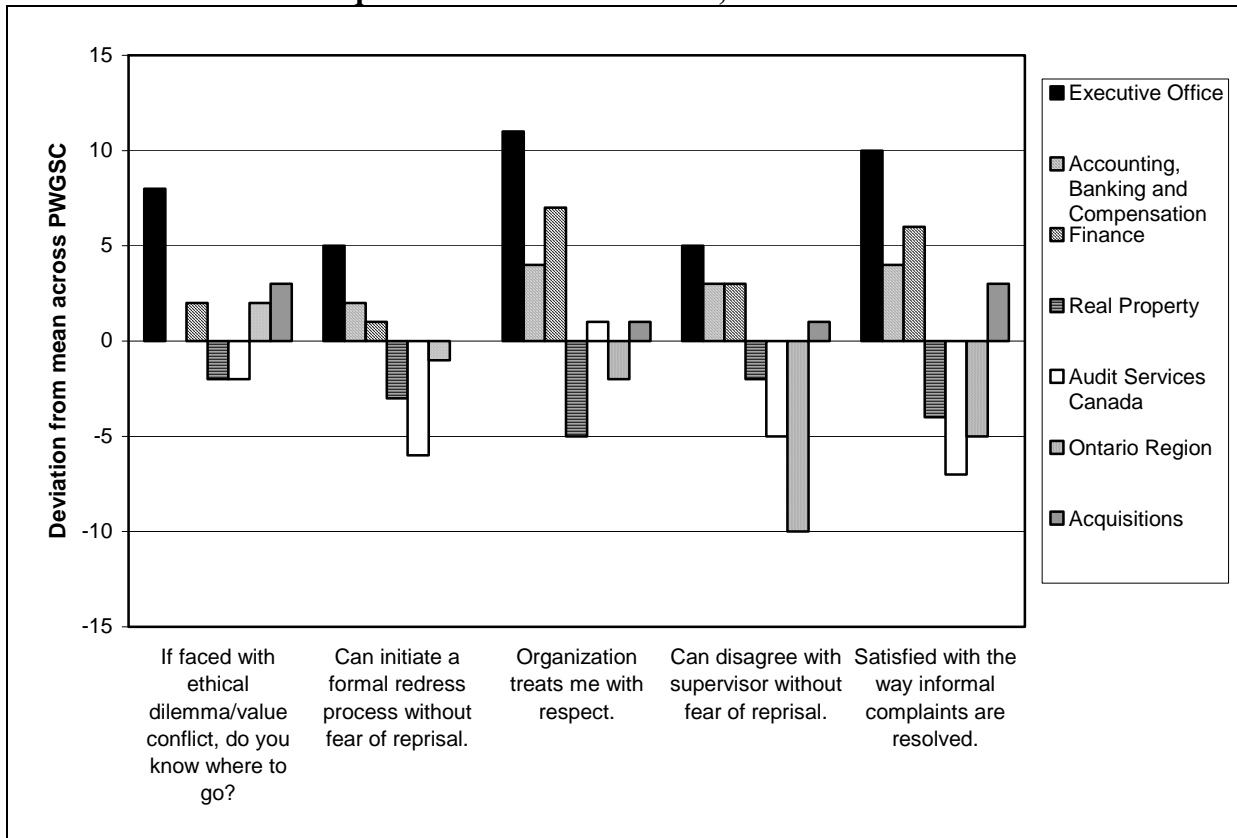
Source: Public Service Employee Survey, 2008.

75. Employees working in the Executive Office; Accounting, Banking and Compensation Branch; and in Finance Branch responded relatively favourably to ethics-related questions. Similarly, the high-risk area covered by Acquisitions Branch, is performing well. Conversely, employees in the Real Property Branch, Audit Services Canada and in the Ontario region responded relatively negatively to the same questions. These differences may indicate that the values and ethics program is having a different impact in different pockets of the department. Another factor could be the culture and specific issues that is different from one sector to another.

76. The evaluation-led focus groups provided a more personal perspective on the ethical climate of the department. Focus group participants were engaged and showed a good appreciation and knowledge of ethics and values in the department. In general, most participants felt that they were well equipped to deal with the ethical challenges they were facing in the workplace. However, at times, participants found that the need to produce work quickly encouraged an environment that bypassed ethical considerations. Good ethical environments are based on principals of sound management (such as time

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[10] Scores refer to the total percentage of responses to "strongly agree" + "somewhat/mostly agree" for each Branch/Region compared to the average for these responses across PWGSC.

[11] Questions were chosen that most closely aligned with indicators of ethical climate.

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management, communication, knowledge of work). When ethical environments were poor, employees felt like the other processes available to them (such as the "Whistleblower Policy"[12]) were not strong enough to ensure that they would be protected. Employees in one of the regions who participated in the focus group felt that the general climate, including the ethical climate of their work environments was weakening, though the causes of this were not clear.

77. One of the ultimate outcomes of the PWGSC Ethics Program is linked to public perceptions of the department. PWGSC Communications Branch publishes a quarterly report that analyses media coverage of the department in past quarter. An analysis of Communications Branch Quarterly Report Summaries shows that public perceptions of the department's ethics were low in 2005. This coincided with the beginning of the Gomery Commission. However, since 2005, negative coverage related to the ethical climate of the department has declined considerably. Based on the Communications Branch Quarterly Media Reports, media coverage of PWGSC regarding ethics is minimal (under 8% of total PWGSC coverage) and is generally neutral or positive in tone.

The findings with regard to the cost-effectiveness of the program are mixed

78. In order to assess the effectiveness of the program, the evaluation compared program costs, structure and outcomes for PWGSC with other government departments identified in the Office of Public Service Values and Ethics, "Report on Governance Structures for Values and Ethics". Compared to these departments, the PWGSC Ethics Program is among the largest program of its kind within the federal government. In 2007, PWGSC had 19 full-time employees dedicated to the program and spent a considerable amount per employee on values and ethics. It was second in size only to the Department of National Defence.

79. As of April 2009, the PWGSC Ethics Program employs nine staff. In comparison to other government departments, the PWGSC Ethics Program spends a considerable amount on values and ethics per employee (approximately $90 per PWGSC employee in program expenditures in 2008-2009). Though not necessarily the same structure, other values and ethics initiatives of similar size and scope are located in government departments where values and ethics risks are high. Most notably, National Defence, a strong force in federal government procurement with close ties to PWGSC, has a comparably sized values and ethics program.

80. The evaluation reviewed the Public Service Employee Survey responses to ethics-related questions of a sample of other government departments. In 2002, 2005 and 2008, there was a strong correlation between the level of investment in values and ethics and successful scores. Departments investing in values and ethics programs, regardless of the structures, are generally "above average" on ethics-related questions. Similarly, departments and agencies that do not invest in values and ethics score "below average" on ethics-related questions. Exhibit 4 shows this relationship.

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[12] *Public Service Disclosure Protection Act*

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Exhibit 4. Public Service Employee Survey: Question "If faced with ethical dilemma/value conflict, do you know where to go?"[13]
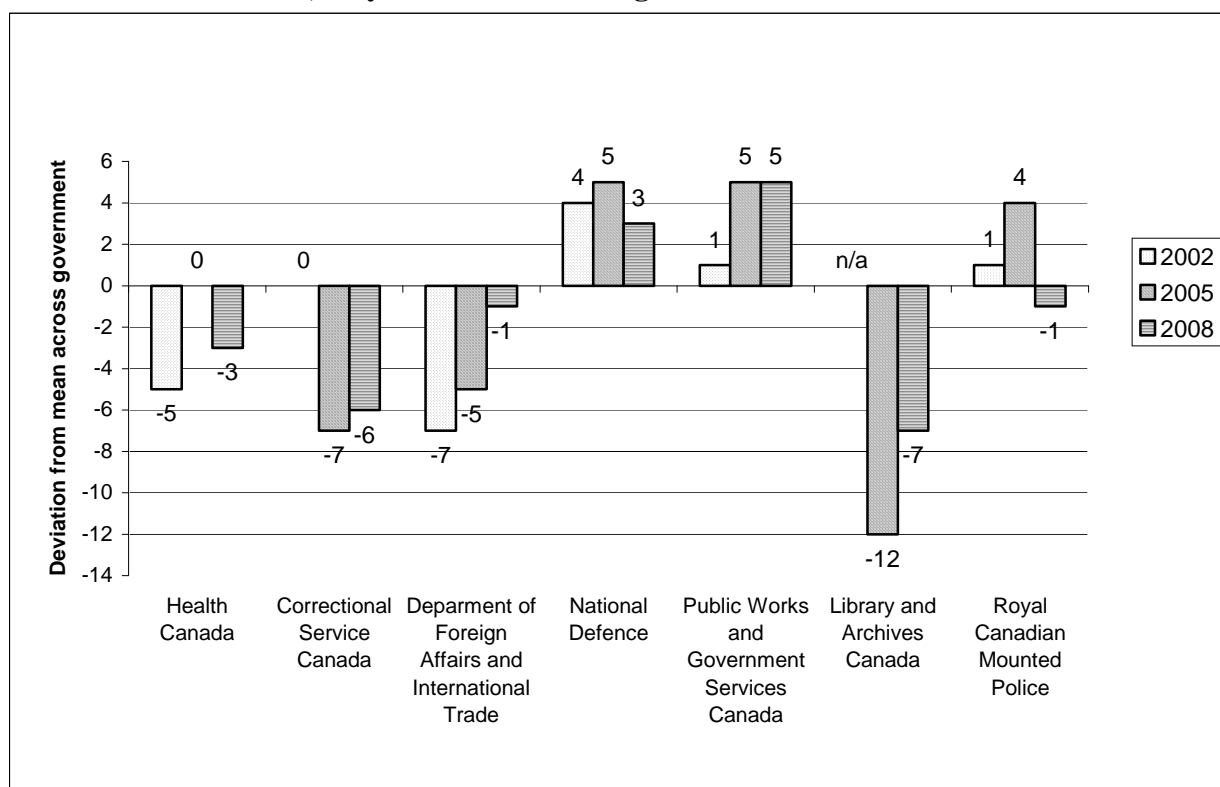
Source: Public Service Employee Survey 2002, 2005, 2008.

81. The evaluation analysed financial reports for the Ethics Directorate from 2003-2004 to 2008-2009. The Ethics Directorate operates with an annual A-base budget with actual expenditures of approximately $1.4M in 2008-2009. The program has undergone restructuring whereby the number of full time employees declined from approximately 20 in 2007-2008 to seven in 2008-2009. The majority of expenditures are spent on full time employees. However, the proportion of the annual budget that full time employees represent has varied from 72% to 90% since 2003-2004.

82. In 2009, the PWGSC Ethics Directorate functions were realigned in favour of a more centrally managed model. A staff of dedicated Branch and regional advisors was replaced with a smaller team of advisors who, together, manage and deliver the program including the development, coordination and facilitation of ethics courses.

83. In addition to an A-base budget, the program does not absorb the costs of training. Human Resources Branch administers the courses taught by the Ethics Directorate under a cost-recovery model. In the National Capital Area, participants' training costs are paid

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[13] Scores refer to the total percentage of responses to "strongly agree" + "somewhat/mostly agree" for each department compared to the average for these responses across the survey.

by the responsibility centre manager of the respective branch/sector. In December 2008, the cost, per employee, increased from $100 to $230.[14]

84. In addition to using Ethics Directorate resources to achieve its outcomes, the program is accessing resources already available within the department. The program is leveraging resources through its Values Champion Initiative. The Ethics Directorate acts as a secretariat to the initiative. However, the program has noted that drawing on the time of Champions has been a challenge. The demands facing Assistant Deputy Ministers and Regional Directors General means that these people have "limited bandwidth" to engage in the Initiative.

Alternative training delivery may result in cost savings

85. There is some evidence to suggest that the Ethics Directorate is considering costs in the delivery of the PWGSC Ethics Program. One example is a recent analysis conducted by the Directorate of the costs of travel associated with training needs. In 2009-2010, the program plans to conduct training across the country and in some satellite offices. This will require travel to various sites. When considering delivering a course in Germany, the program considered videoconferencing as a potentially cost-saving alternative. They found that the costs of travelling to international PWGSC sites were comparable to videoconferencing. The program will be pursuing travel as they see that the benefits of face-to-face meetings with employees outweigh the minimal extra cost (approximately $500 extra for traveling versus video-conferencing).

86. The PWGSC Ethics Program has also been considering adapting their training to an online model, which may reduce the costs associated with the delivery of in-class courses. A preliminary needs analysis conducted by the program identified the following benefits from an online course entitled "Paving the Way: Values and Ethics Foundation for Employees" offered free of charge by *Campusdirect* (The Canada School of Public Service online school):

- Provides access to new, engaging technology
- Incurs minimal costs (there is no cost for the course)
- Conducts pre and post tests
- Covers several topics including values and ethics, conflict of interest, post-employment, harassment and internal disclosure
- Can be completed anywhere, anytime with the proper tool (computer, CD-ROM reader)

87. While the program is considering the use of on-line courses, it is aware that there are drawbacks to this form of teaching. The program's needs analysis warns that best practices emphasize a two-way exchange and dialogue as a part of learning. This is not possible with the on-line course. Furthermore, the online course does not allow customization to PWGSC's specific environment. The course is designed to be widely

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[14] This increase in cost is likely due to a change in costing models and not an actual increase in overall cost to the Department.

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applicable to all departments and therefore does not address the specific needs and circumstances of individual departments like PWGSC.

88. The literature shows that there are similar concerns with the exclusive use of online training for ethics. In 2000, the U.S. Office of Government Ethics conducted an Executive Branch Employee Survey, which measured the effectiveness of training methods in ethics. It found that in-person training was the most effective (rated at 3.9/5) followed by direct communications (rated at 3.67/5). The average rating for computer-based training was (3.62/5).

Conclusions: PERFORMANCE

89. The most significant program activities have been geared to awareness building. Training sessions have been primarily successful in building employee awareness around ethical policies, obligations and resources. However, the training may need to be adapted to be more relevant to work experiences. The program has also provided more dialogue sessions with managers but has not implemented a department-wide program to address customizing ethical messaging to specific work environments within the department.

90. Some employees are concerned about the placement of the program within the Departmental Oversight Branch. The 'watchdog' perception of the Branch may cause some employees to hesitate before contacting the program for advice and guidance. Additionally, some regional employees worry about contacting the ethics helpline because they feel that advisors in headquarters may not understand their experiences. As a result of this perception, some regional employees may be reluctant to use the helpline.

91. The program has followed a communications plan and has participated in several communications-related activities. In an effort to provide a consistent values and ethics message across the department, the program maintains an intranet site with values and ethics resources and has developed the draft *PWGSC Guidelines on Gifts and Hospitality and dealings with lobbyists*. The program has also been active in the federal government values and ethics community to ensure consistency of messaging with other government departments. The program has also implemented the Values Champion Initiative to reinforce departmental leadership's commitment to values and ethics. This initiative appears to be relatively successful.

92. There is evidence to suggest that the PWGSC ethics program activities are appropriate and adequate to maintain a strong ethical environment within the department. These PWGSC Ethics Program activities correspond very well to concepts of what constitutes a robust organisational ethics program design. Training, leadership, advice and guidance elements work together to ensure that PWGSC employees are well supported as regards values and ethics. However, existing performance data on the program was unable to provide an in-depth assessment the impact of the program.

93. The evaluation reviewed the results of the Public Service Employee Surveys conducted in 2002, 2005 and 2008 in an effort to assess the general ethical climate of the

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department. Results from the survey show that PWGSC is scoring consistently higher on ethics-related questions when compared to the average across the federal government. Results from the 2008 Public Service Employee Survey also show that the strength of the ethical climate of the department is not uniform. Focus group participants confirm that the ethical climate of their work environments is generally positive but that there is variation across the department.

94. PWGSC is among the federal departments that invest the most in its ethics programming. This can be justified by the potential ethical risks inherent in PWGSC business lines. There are potential cost savings as a result of recent changes. These changes include the realignment of the program's functions and the consideration of an on-line training model. The evaluation is unable to determine the potential impact these changes may have on the values and ethics climate of the department.

GENERAL CONCLUSIONS

95. There is strong support for having a robust organisational ethics program at PWGSC. PWGSC's position as a central procurement body for the federal government, coupled with its commitment to stewardship, mean that a focus on a strong ethical climate is particularly important. Investments in ethics programming demonstrate PWGSC's commitment to values and ethics and provide the public and the federal government with assurance that values and ethics are being upheld.

96. PWGSC's Ethics Program is appropriate to accommodate PWGSC's needs regarding ethics. The program undertakes a wide range of activities – all of which are components of a well-rounded and successful program. In general, PWGSC employees are reporting that they are aware of ethics-related policies and obligations. Employees are using ethics resources available to them. The development and conduct of additional research about the ethical climate of the Department would provide more in-depth data about the success of the PWGSC Ethics Program.

97. The evaluation focus groups raised some concerns about ethics resources in the regions, suggesting that some regional employees do not feel that a centrally managed ethics function corresponds to their needs. The evaluation also determined the program's current location in the Departmental Oversight Branch is consistent relevant policies and other departmental best practices which do not identify a specific location for an ethics program within a department. Departments have the discretion to determine the appropriate organizational structure for programs.

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MANAGEMENT RESPONSE

98. The Ethics Directorate within the Departmental Oversight Branch accepts the evaluation findings and intends to act on the recommendations of the evaluation by implementing their Management Action Plan detailed as follows.

RECOMMENDATIONS AND MANAGEMENT ACTION PLAN

Recommendation 1: The ADM of the Departmental Oversight Branch should develop and implement an ongoing performance measurement strategy to assess the effectiveness of the program and to track overall performance.

> **Management Action Plan 1.1:** Establish a comprehensive performance measurement strategy with expected results, establish measurable baselines and measure progress over time.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: March 2010
>
> **Management Action Plan 1.2:** Proceed with a consultation with academic experts to assist us in the development of the strategic direction of the Ethics program. (Themes: strengths and weaknesses, structure and positioning, learning strategy, best practices, new strategic direction for a second generation.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: December 2009
>
> **Management Action Plan 1.3:** Complete a diagnostic profile that will provide a baseline of PWGSC ethical climate via the pre-survey/focus group approach when developing the Code of Conduct.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: March 2010
>
> **Management Action Plan 1.4:** Integrate existing tracking databases for ethical cases and client activities and analyse trends.
>
> OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
> Implementation Date: December 2009

Recommendation 2: The ADM of the Departmental Oversight Branch should ensure equitable access to advice and services offered through the PWGSC Ethics Program to regional employees.

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Management Action Plan 2.1: Develop a clear communication strategy to promote our services/ products, helpline and email address via the In the Know newsletter, the different regional newsletters and other communications tools to ensure regional staff are aware of the program's services at a departmental level.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Management Action Plan 2.2: Ensure that services provided in NCA are also provided in Regions, i.e.: courses, presentations, facilitation of dialogue sessions, specialized workshops.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: Ongoing

Management Action Plan 2.3: Leverage the use of the Values Champions initiative to discuss ethics in different forum, conferences, events, etc.

OPI/OSI: Chief Risk Officer and DG, Risk Oversight and Integrity and Regional Directors General
Implementation Date: January 2010

Recommendation 3: The ADM of the Departmental Oversight Branch should communicate the neutrality and objectivity of the ethics program throughout the department.

Management Action Plan 3.1: Use different avenues (In the know, courses, events, presentations, etc) to communicate to PWGSC employees that the values and ethics function is neutral.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: Ongoing

Management Action Plan 3.2: Develop a marketing strategy to emphasize values and ethics as a neutral and objective program throughout PWGSC.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Recommendation 4: The ADM of the Departmental Oversight Branch should consider the use of updated technology to enable potentially more effective and efficient means of providing departmental training in ethics.

Management Action Plan 4.1: Explore potential use of the CSPS on line ethics course including a comparative analysis exploring the effectiveness of the Canada School of Public Service course on ethics versus the PWGSC course. If the CSPS

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course proves viable, use a risk based approach to deliver internal courses in areas of high risk to the department (i.e. procurement, etc.).

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: November 2009

Management Action Plan 4.2: Explore other means of providing state of the art learning activities to reach all PWGSC staff.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Management Action Plan 4.3: Explore new technology and potential partnerships to assist with the delivery of training activities.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

Management Action Plan 4.4: Complete on line versus in class assessment.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: November 2009

Management Action Plan 4.5: Review the Departmental Ethics Learning strategy and bring it to the next level.

OPI: Chief Risk Officer and DG, Risk Oversight and Integrity
Implementation Date: March 2010

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ABOUT THE EVALUATION

Authority

This evaluation was approved by the Audit and Evaluation Committee of Public Works and Government Services Canada as part of the 2008-2011 Risk-Based Multi-Year Audit and Evaluation Plan.

Evaluation Objectives

The evaluation examined PWGSC's Ethics Program, delivered by the Ethics Directorate within the Departmental Oversight Branch. This evaluation had two objectives:

- To determine the relevance of PWGSC's Ethics Program: the continued need for the program, its alignment with governmental priorities and its consistency with federal roles and responsibilities.

- To determine the performance of PWGSC's Ethics Program: the achievement of its expected outcomes and a demonstration of the efficiency and economy of the program.

Approach

The evaluation was conducted in accordance with the Evaluation Standards of the Government of Canada and the Office of Audit and Evaluation of PWGSC. The evaluation took place between October 2008 and May 2009 and was conducted in three phases: planning, examination and reporting. To assess the evaluation issues and questions, the following lines of evidence were used.

Document Review: The initial document review was conducted to gain an understanding of the program and its context to assist in the planning phase. This included the review of documents produced by the program (primary documents), documents produced about the program (secondary documents), performance measures, and contextual documents. A second phase of the document review was conducted to collect and assess program data (such as financial, performance measurement and other types of data already collected by the program). The analysis of program data contributed to assessing the relevance and performance of the program.

Literature Review: A literature review was conducted to contextualize the program both nationally and internationally, provide theoretical background for the program model, provide baseline data against which the program can be assessed and identify alternative delivery models through an analysis of other jurisdictions. Additionally, the review identified key policies and supporting documentation regarding ethics related issues.

Interviews: The evaluation team conducted interviews with program managers and staff (n=5). The qualitative analysis of the interviews provided information about the

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program's activities, outputs, expected outcomes, stakeholders, relevance and performance from the perspective of program managers. An interview guide was used.

Focus groups: Focus groups were conducted with PWGSC employees working in headquarters and in two regions (n=34). A total of five focus groups were held, each lasting approximately 1.5 hours. The purpose of each focus group was to:

- generate a comprehensive list of topics surrounding ethics and values in PWGSC;
- identify key issues related to ethics and values in PWGSC; and
- make connections between key ethics and values issues and the resources available to employees to help them understand or clarify ethics and values within their workplace.

Limitations of the Methodology

Document Review: Efforts were made to ensure that all data provided by the program were reviewed and documented. Due to the large volume of data provided by the program, the large volume of data available for literature review and the complex nature of the ethics environment, the evaluation team prioritized documents based on the relevance, usefulness and comprehensiveness of the document. As a result, some documents were relied on more heavily than others. However, every effort was made to systematically identify and categorize data from all documents. Data from documents was also verified with supporting evidence from other documents or research methodologies. Performance data provided by the program was not adequate to thoroughly assess the ethical climate of the department.

Literature Review: An extensive and wide range of literature is available on values and ethics in the context of public administration, business administration and in general. Efforts were made to include relevant material from reliable sources to enable an unbiased and neutral assessment.

Interviews: Only current PWGSC Ethics Program management and regional ethics advisors were interviewed in the context of this evaluation. Questions pertained primarily to the administration and delivery of the program.

Focus groups: Several limitations are typically associated with focus groups. First, the researcher has less control over a group than an individual interviewee. The focus group allows the participants to influence and interact with each other and, as a result, group members are able to influence the course of the discussion. Second, data are more difficult to analyze and interpret. Data was collaboratively analysed and interpreted by several team members to ensure consistency. Third, group composition can vary considerably. Each focus group tends to have unique characteristics. Fourth, groups may be difficult to assemble. Focus groups were composed of employees who had all attended the mandatory Ethics training session over six months ago. Three focus groups were conducted in headquarters, with a total participation of 14 employees (500 invitations

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were sent out) and two focus groups were held in regions, totalling 20 participants (250 invitations were sent out). The results of the focus groups are not statistically representative of all PWGSC employees. In addition, these individuals represent their own opinions and experiences. Program management provided a list of eligible employees who had taken mandatory training.

The use of multiple lines of enquiry served to mitigate these limitations.

Reporting

We documented our findings in a Director's Draft Report, which will be internally cleared through the Office of Audit and Evaluation's Quality Assessment function. We are providing the Program's Director General with the Director's Draft Report and a request to validate facts and comment on the report. A Chief Audit Executive's Draft Report will be prepared and provided to the Assistant Deputy Minister, Departmental Oversight Branch, for acceptance as the Office of Primary Interest. The Office of Primary Interest will also be requested to respond with a Management Action Plan. The Draft Final Report, including the Management Action Plan, will be presented to PWGSC's Audit and Evaluation Committee for the Deputy Minister's approval in September 2009. The Final Report will be submitted to the Treasury Board Secretariat and posted on the PWGSC website.

Project Team

The evaluation was conducted by employees of the Office of Audit and Evaluation, overseen by the Director of Evaluation and under the overall direction of the Chief Audit and Evaluation Executive.

Appendix A: LOGIC MODEL OF THE PWGSC ETHICS PROGRAM

MANDATE

To provide the framework, direction, focus, learning, tools and processes to guide, assess and continually improve PWGSC employee ethical conduct, support ethical leadership and improve the ethical climate so that employees maintain the highest standards of conduct that will strengthen PWGSC's ethical reputation

ACTIVITIES

Develop policies and practices that clarify or integrate values and ethics-related issues for PWGSC
- Develop appropriate governance, policies, guidelines and practices
- Integrate values and ethics within strategic frameworks, core business lines, processes and practices

Provide advice and guidance to employees at all levels in regards to values and ethics
- Maintain a responsive ethics infrastructure for advice and guidance
- Refer clients to appropriate resources as required

Educate PWGSC about values and ethics
- Develop and conduct mandatory and optional ethics training sessions
- Develop tailored workshops and dialogue sessions
- Communicate Public Service and PWGSC values and ethics issues, codes, policies and tools to promote and reinforce awareness of values and ethics as well as related resources available to PWGSC employees

Engage values and ethics leaders to increase the profile and reinforce values within PWGSC
- Build partnerships with Branches to identify ethics leaders in PWGSC (Values Champions)
- Educate and reinforce values and ethics messages with senior leaders

Conduct research and development of the ethics field to continually contribute to improving the quality of resources developed and managed by the Program
- Research best practices in the values and ethics field
- Develop a values and ethics learning strategy
- Build partnerships with other government departments

Environmental Factors that can influence the degree to which the Program achieves outcomes

- Obtaining or Lack of buy-in from Senior Management and PWGSC employees
- New legislatures or policies
- Changing governmental demands, priorities and pressures
- Changing workforce demographics
- Ability to collect performance data on the ethical climate of PWGSC
- PWGSC staff turnover

OUTPUTS

- List of performance pay indicators
- PWGSC Statement of Values
- Values and ethics-related governance structures, policies, guidelines and practices
- Values and ethics components in strategic frameworks, core business lines, processes and practices

- Record of requests for advice and guidance
- Documentation of values and ethics advice provided
- Tools and templates posted on website

- Effective:
  - ➢ Training manuals and guides
  - ➢ Learning materials
  - ➢ Website and newsletters
  - ➢ Presentation decks
- Special events booths, brochures
- Report on statistics of attendees
- Departmental Values and Ethics Training Calendar

- Meeting minutes and other communication with Branch representatives
- Ethics leaders
- Ethics leader events
- Key messages
- Funding for values and ethics

- Documentation of communications with other government departments

IMMEDIATE OUTCOMES

- PWGSC employees are more aware of:
  - ➢ Values and ethics in the workplace
  - ➢ Applicable acts, policies and guidelines (e.g. Values and Ethics Code for the Public Service, Gifts and Hospitality Guidelines, Integrated Risk Management Policy, *Public Servants Disclosure Protection Act*)

- PWGSC employees have increased access to the proper tools to make sound ethical decisions (e.g. Ethical Decision-Making learning events, Integrated Risk Management Policy)
- PWGSC has increased access to advice and guidance related to values and ethics issues for all its employees

- Increased continuity of messaging of values and ethics within PWGSC
- Increased continuity of values and ethics messaging with other government departments

INTERMEDIATE OUTCOMES

- PWGSC employees have increased ability to recognize and resolve values-based and ethical situations
- PWGSC employees have increase ability to incorporate ethical considerations in their daily work
- More ethical considerations are integrated in departmental policies, guidelines and processes
- The PWGSC work environment is characterised by an ethical atmosphere that is based on organizational values

ULTIMATE OUTCOMES

- Strong ethical leadership demonstrated and perceived at all levels of PWGSC
- Sound values-based and ethical decisions are being made
- A culture of integrity, trust and respect for employees is established
- PWGSC is viewed as an ethical organization; the reputation of PWGSC is strengthened

Activities

The logic model identifies the activities carried out by the program that contribute to the achievement of outputs and outcomes.

- Develops policies and practices that clarify or integrate values and ethics-related issues. This includes integrating values and ethics in strategic frameworks and core business lines and processes.
- Provides values and ethics advice and guidance to PWGSC employees. This includes referring employees to other appropriate resources as required.
- Educates PWGSC employees about values and ethics. This includes the delivery of mandatory and optional ethics training sessions, as well as the development of tailored workshops and dialogue sessions.
- Engages values and ethics leaders through the establishment of partnerships with the branches/regions/agencies, identifies "values champions" within PWGSC and educates senior leaders on values and ethics messages.
- Conducts research and development within the ethics field. This includes conducting research on best practices, developing a values and ethics learning strategy and building partnerships with other government departments.

Outputs

Outputs are concrete and direct results of the activities. Outputs for the program are as follows:

- Developing policies and practices that clarify or integrate values and ethics-related issues results in outputs such as the PWGSC Statement of Values; values and ethics-related governance structures, policies, guidelines and practices; as well as strategic frameworks, processes and practices that incorporate values and ethics components.
- Providing values and ethics advice and guidance produces outputs such as the documented ethical advice provided by the program in response to requests from employees, as well as the tools and templates posted on the program's Web site.
- Educating PWGSC employees about values and ethics produce a series of outputs, which include training sessions (and associated training calendar and statistics on attendees), as well as resources such as training manuals and guides, learning materials, program Web site, newsletters, presentation decks, special events booths and brochures.
- Engaging values and ethics leaders results in partnerships with branches/regions/agencies, branch representatives and "Values Champions" being engaged, events led by "Values Champions" and key messages for senior leaders.
- Conducting research and development activities in the ethics field helps to identify best practices, builds partnerships and produces communications with other government departments (resulting from established partnerships).

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Outcomes

The logic model has three levels of outcomes: immediate (or short term), intermediate (or medium term) and ultimate (or long term). The Program has more direct influence over the immediate outcomes. These are followed by the intermediate and ultimate outcomes, which should occur subsequent to the achievement of the immediate outcomes. However, these are generally subject to influences beyond the program's control.

The Ethics Program should lead to three main immediate outcomes.
- *Increased awareness*: PWGSC employees are more aware of values and ethics in the workplace and of applicable acts, policies and guidelines (e.g. *Values and Ethics Code for the Public Service*, Gifts and Hospitality Guidelines).
- *Increased access*: PWGSC employees have more access to the proper tools to guide them in making ethical decisions, as well as to advice and guidance on ethical issues.
- *Increased continuity in messaging*: Values and ethics messaging within PWGSC and among other government departments is more consistent.

These immediate outcomes should result in several intermediate outcomes. These are an increased ability by PWGSC employees to recognize and resolve values-based and ethical situations and to incorporate ethical considerations into their daily work. Also, the departmental policies, guidelines and processes produced should include more ethical considerations. Finally, an ethical atmosphere based on organisational values should characterize PWGSC's work environment.

Ultimately, these immediate and intermediate outcomes are expected to result in strong ethical leadership being demonstrated and perceived at all levels of PWGSC; sound values-based and ethical decisions being made; a culture of integrity, trust and respect for employees; and PWGSC being viewed as an ethical organisation, therefore strengthening its reputation and the reputation of the Government of Canada.

Program Risks

The logic model includes environmental factors that can have an impact on the program's ability to achieve outcomes. These contextual elements are labelled as risks. These include the lack of buy-in from senior management/employees; new legislation or policies coming into force; changing governmental demands, priorities and pressures; changing workforce demographics; staff turnover within PWGSC; and the ability of the Ethics Program to measure the departmental ethical climate.

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Appendix B: EVALUATION MATRIX

Evaluation Questions	Indicators	Data Sources
Relevance		

Is there a continuing need for the Ethics Program?	• Comprehensiveness of the Program structure given the Program's mandate
	• Evidence that the Program is addressing ethical gaps at PWGSC
	• Evidence linking organisational ethics programs with the Program's stated results
		1. Interviews
		   • Senior Program Management
		2. Document Review
		   • Strategic Plans
		   • Business Plans
		   • Logic Models
		3. Literature Review
		   • "Report on Governance Structures for Values and Ethics (2005)"
		   • "Ethics Resource Center's National Government Ethics Survey" (2007)
		   • "OECD Ethics in the Public Service: Current Issues and Practice" (1996)
		   • Federal government department and agency ethics and values websites
		   • "The Gomery Commission Report Phase II, an Overview"
		   • Management Accountability Framework
		   • Speech from the Throne
		   • Clerk's Annual Reports to the Prime Minister on the Public Service of Canada
		   • Transparency International – Corruption Index

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Evaluation Questions	Indicators	Data Sources

Does the Program align with Government priorities?	• Degree to which the Program aligns with federal government policies and priorities
	• Evidence that the Program is responsive to shifts in federal government policies and priorities
		1. Interviews
		   • Senior Program Management
		   • Ethics Champions
		2. Document Review
		   • Strategic Plans
		   • Business Plans
		   • Logic Models
		   • Financial Plans/Reports
		3. Literature Review
		   • "A Special Calling: Values, Ethics and Professional Public Service"
		   • "The Gomery Commission Report Phase II, an Overview"
		   • Federal government department and agency ethics and values websites
		   • Speech from the Throne
		   • Clerk's Annual Reports to the Prime Minister on the Public Service of Canada

Evaluation Questions	Indicators	Data Sources

Is the Program consistent with federal roles and responsibilities?	• Degree to which the Program is consistent with federal roles and responsibilities	1. Interviews
		    • Senior Program Management
		2. Document Review
		    • Strategic Plans
		    • Business Plans
		    • Logic Models
		    • Financial Plans/Reports
		3. Literature Review
		    • "A Strong Foundation: Report of the Task Force on Public Service Values and Ethics"
		    • "Implementation Strategy for Ethics Programs in the Public Service of Canada" (2002)
		    • "The Gomery Commission Report Phase II, an Overview"
		    • *The Federal Accountability Act*
		    • *Values and Ethics Code for the Public Service*
		    • *Public Servants Disclosure Protection Act*
		    • *Policy on the Internal Disclosure of Information Concerning Wrongdoing in the Workplace*
		    • *Policy on Legal Assistance and Indemnification*
		    • Management Accountability Framework
		    • Speech from the Throne
		    • Clerk's Annual Reports to the Prime Minister on the Public Service of Canada
		    • Statements by Government of Canada

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Evaluation Questions	Indicators	Data Sources
Performance: Effectiveness		

Is the Program achieving its intended outcomes with regards to:
A) Contributing to the ethical action of PWGSC employees?
	• % of PWGSC employees eligible for mandatory ethics training who are trained
	• % of PWGSC employees targeted for optional ethics training who are trained
	• Documented reactions to ethics training
	• Degree to which employees:
	  ▪ are willing to seek ethics advice
	  ▪ receive positive feedback for ethical conduct
	  ▪ feel confident that they can recognize ethical misconduct
	  ▪ know the channels available for reporting ethical misconduct
	  ▪ feel prepared to handle situations that invite misconduct
	  ▪ feel that they can question the decision of management without fear of reprisal
	  ▪ are rewarded for following ethics standards
	  ▪ who achieve success through questionable means are not rewarded
	  ▪ feel positive about the organisation's efforts to encourage ethical conduct
	  ▪ feel that their organisation is an ethical workplace
	• Employee knowledge of federal and
		1. Document Review
		  • Report on statistics of attendees
		  • "Arriving at a New Statement of Values" (2006) [Results of Program-led focus groups]
		  • Program files pertaining to advice and guidance requests
		  • Program files pertaining to misconduct reports
		  • Training and education materials
		  • Training feedback forms
		2. Literature Review
		  • "Report on Governance Structures for Values and Ethics (2005)"
		  • Public Service Employee Survey
		  • *Values and Ethics Code for the Public Service*
		  • *Conflict of Interest Act*
		  • *Public Servants Disclosure Protection Act*
		  • *Policy on the Internal Disclosure of Information Concerning Wrongdoing in the Workplace*
		  • Websites of similar programs in federal departments and agencies
		3. Focus Groups
		  • PWGSC Employees (having received training)

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Evaluation Questions	Indicators	Data Sources
	departmental ethical values • Comparison of Program model to other ethics and values initiatives across government departments and agencies • Profile of misconduct cases reported to the Ethics directorate (including trends in volume of cases, type of ethical wrongdoing reported, corrective action undertaken)	

B) Supporting an ethical environment within PWGSC?	• Strength of ethical leadership at PWGSC as evidenced by:
	  ▪ Appropriateness of selection process for ethics champions
	  ▪ Leader-participation in events
	  ▪ Level of integration of ethics elements in individual performance accords (EX level accords)
	  ▪ Values and ethics content in leadership training/meeting materials
	• Degree to which federal and departmental ethical values are integrated in PWGSC policies, processes and reporting
	• % of favourable versus non-favourable media coverage of PWGSC
	• % of employees leaving PWGSC who cite values and ethics as being the reason for leaving
	• Discrepancies between
		1. Interviews
		  • Senior Program Management
		  • Ethics Champions
		2. Document Review
		  • Gifts and Hospitality Guidelines
		  • Integrated Risk Management Policy
		  • Values and ethics performance indicators
		  • Presentations to senior management
		  • Requests for specialized learning events
		  • Training materials
		  • Meeting minutes with other government departments and agencies
		  • Guidance on common performance indicators for EXs
		3. Literature Review
		  • PWGSC Communications Sector reports on media coverage
		  • PWGSC Human Resource reports on former employees
		  • Websites of similar programs in federal departments and agencies

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Evaluation Questions	Indicators	Data Sources
	PWGSC-developed values and ethics guidelines and those of other government departments and agencies	4. Focus groups • PWGSC Employees (having received training)
Performance: Efficiency and Economy		
To what degree are Program activities efficient given the resources, time and intended results of the Program?	• Comparison of Program model to similar programs within federal government, provincial government, other comparable jurisdictions • Comparison of Program resources (total budget and human resources) to other federal department and agency resources in values and ethics	1. Document Review • Financial Reports • Organisational Chart • Human Resource plans (Business Plans) 2. Literature Review • Websites of similar programs in federal departments and agencies, provincial government, other comparable jurisdictions • OECD Ethics: Case Studies • "Report on Governance Structures for Values and Ethics (2005)"
To what extent is the Program delivered economically?	• Evidence that the Program is taking strategic and business decisions with cost-savings in mind	1. Interviews • Senior Program management 2. Document Review • Strategic Plans • Business Plans • PWGSC Dashboard • Financial Plans/Reports • Program-led analysis of Canada School of Public Service Online Training course
Can the Program achieve the same results at a lower cost?	• % of annual PWGSC budget allocated to Ethics Program as compared to % of annual departmental budgets of similar ethics programs in other federal government departments and agencies • Assessment of likelihood of Program	1. Interviews • Senior Program Management 2. Document Review • Program-led analysis of Canada School of Public Service Online Training course • Canada School of Public Service website

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Evaluation Questions	Indicators	Data Sources
	achieving outcomes with less resources • Availability of alternative resources in values and ethics	3. Literature Review • "Report on Governance Structures for Values and Ethics (2005)" • Public Service Employee Survey • "Ethics Resource Center's National Government Ethics Survey" (2007) • Management Accountability Framework