

Office of the Conflict of Interest and Ethics Commissioner

Commissariat aux conflits d'intérêts et à l'éthique

ANNUAL REPORT

Conflict of Interest Code for Members of the House of Commons

> Honourable Konrad W. von Finckenstein, C.M., K.C.

Interim Conflict of Interest and Ethics Commissioner

 20^{22}_{23}

Conflict of Interest and Ethics Commissioner – Annual Report 2022-2023, in respect of the CONFLICT OF INTEREST CODE FOR MEMBERS OF THE HOUSE OF COMMONS

For additional copies of this document, please contact:

Office of the Conflict of Interest and Ethics Commissioner Parliament of Canada 66 Slater Street, 22nd Floor Ottawa, Ontario K1A 0A6

<u>Email</u> Telephone: 613-995-0721

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Office of the Conflict of Interest and Ethics Commissioner Commissariat aux conflits d'intérêts et à l'éthique

September 2023

The Honourable Anthony Rota, P.C., M.P. Speaker of the House of Commons House of Commons West Block, Room 233-C Ottawa, Ontario K1A 0A6

Dear Mr. Speaker:

I am pleased to submit to you the report on the performance of the Commissioner's duties and functions under the *Conflict of Interest Code for Members of the House of Commons* for the fiscal year ending March 31, 2023, for tabling in the House of Commons. The report is deemed permanently referred to the House of Commons Standing Committee on Procedure and House Affairs, under Standing Order 108(3)(a)(vii).

This fulfills my obligations under paragraph 90(1)(a) of the *Parliament of Canada Act*.

Sincerely,

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Honourable Konrad W. von Finckenstein, C.M., K.C. Interim Conflict of Interest and Ethics Commissioner

PARLIAMENT OF CANADA

66 Slater Street, 22nd floor Ottawa, Ontario, K1A 0A6 PARLEMENT DU CANADA

66, rue Slater, 22^e étage Ottawa (Ontario) K1A 0A6 tiec-ccie.parl.gc.ca
@EthicsCanada | @EthiqueCanada
info@cie.parl.gc.ca
613.995.0721

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COMMISSIONER'S MESSAGE



I am pleased to report on the administration of the *Conflict of Interest Code for Members of the House of Commons* in 2022-2023.

Notably, the Office expanded its focus on education and training during the year. It started implementing a strategic communications and engagement plan that includes ways to better understand Members' needs so it can make its communications and outreach activities more effective. Actions in the plan help the Office give Members the information they need, when they need it and in the way they want to receive it so they can effectively manage conflict of interest issues. The Office also continued to give Members confidential advice and direction.

The Office carried out its mandate in 2022-2023 through these and other actions.

I only came to this role in September 2023, so everything reported here was accomplished under previous leadership. And of course, it rests on the efforts of the Office's employees.

I am honoured to serve Parliament and Canadians and look forward to helping the Office continue its work. The Code and the *Conflict of Interest Act* are important accountability tools that help prevent public office from being used for private gain and support transparency. I will bring my experience and judgment to bear in administering them.

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Hon. Konrad W. von Finckenstein, C.M., K.C. Interim Conflict of Interest and Ethics Commissioner

OUR VISION

Offer exemplary services in support of a culture of integrity in order to achieve a high degree of public confidence in the integrity of federal institutions and Parliament.

OUR MISSION

Our Office provides independent, rigorous and consistent direction and advice to Members of Parliament and federal public office holders, conducts investigations and, where necessary, makes use of appropriate sanctions in order to ensure full compliance with the *Conflict of Interest Code for Members of the House of Commons* and the *Conflict of Interest Act*.

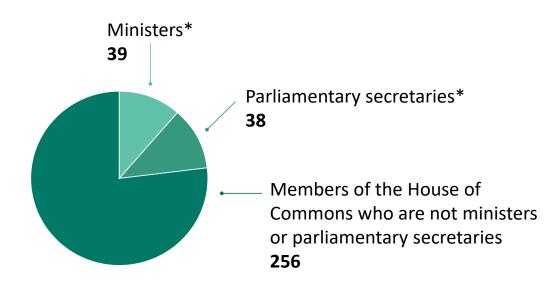
OUR STAKEHOLDERS

Regulatees are key stakeholders of the Office. They are the people who are subject to the conflict of interest regimes it administers. Stakeholders also include Parliament, academics, ethics practitioners and others with an interest in the field, the media and the general public.

This report touches on all stakeholder groups but focuses on the elected officials who are covered by the <u>Conflict of Interest Code for Members of the House of Commons</u>.

In October 2022, the Office surveyed Members. The aim was to help it better communicate and engage with them so they understand how to comply with the Code. The survey was confidential and anonymous. The results were analyzed and the main findings were shared with all Members.

The Office's <u>quarterly statistical reports</u> show how the number of Members varied during the year. The following graph is a snapshot of Members on March 31, 2023.



Members of the House of Commons (333)

*Also subject to the Conflict of Interest Act

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OUR ACHIEVEMENTS

Key activities

| Reporting to Parliament | Reporting to Parliament and testifying before its committees |
|----------------------------------|--|
| Compliance | Helping regulatees achieve and maintain compliance with the conflict of interest regimes |
| Direction and advice | Giving regulatees confidential guidance tailored to their individual situations |
| Education and outreach | Helping regulatees understand their obligations under the regimes |
| Enforcement | Applying investigation and other enforcement provisions of the regimes as appropriate |
| Public communications | Educating and informing regulatees, the media and the general public |
| Collaboration and best practices | Exchanging information with domestic and international counterparts |

REPORTING TO PARLIAMENT

The Conflict of Interest and Ethics Commissioner has a duty to report to Parliament, testify before parliamentary committees and answer questions from Parliament. The Commissioner reports on behalf of Canadians to Parliament directly, not through a minister. This reflects the Commissioner's <u>independence</u> as an Officer of the House of Commons.

The Commissioner sends reports under the *Conflict of Interest Code for Members of the House of Commons* to the Speaker of the House of Commons. The Speaker tables them in the House.

The Commissioner reports on inquiries under the Code to the House of Commons.

The Commissioner sends a <u>list of sponsored travel</u> under the Code to the Speaker of the House by March 31 each year. Under subsection 15(1) of the Code, sponsored travel is any travel worth more than \$200 that is not fully paid by the government, a political party, a recognized parliamentary association, or by Members themselves. The <u>List of Sponsored Travel 2022</u> was tabled in the House of Commons on March 30, 2023. It showed that sponsored travel accepted by Members started to return to pre-pandemic levels. After accepting just seven sponsored trips for themselves and their guests in each of the previous two years, Members accepted 55 in 2022.

By June 30 each year, the Commissioner must send an annual report on the administration of the Code to the House. The Office cannot submit the report in the absence of a Commissioner.

The Office sends communiqués to parliamentarians when it issues reports under the Code and under the *Conflict of Interest Act*, as well as <u>advisory opinions</u>. It sent 10 communiqués in 2022-2023.

The House of Commons Standing Committee on Procedure and House Affairs has responsibility for the Code. It did not invite former Commissioner Mario Dion to testify in 2022-2023.

Changes to the Code

Under section 33 of the Code, the House of Commons Standing Committee on Procedure and House Affairs must review the Code's provisions and operation every five years and report on each review to the House.

On June 21, 2022, the Committee reported to the House on its review of the Code that began in February of that year. On March 30, 2023, the House approved the <u>Committee's report</u> and its 13 recommendations came into effect, amending the Code.

The Office immediately started planning a series of projects to implement those amendments. It will include an update in its 2023-2024 annual report under the Code.

COMPLIANCE

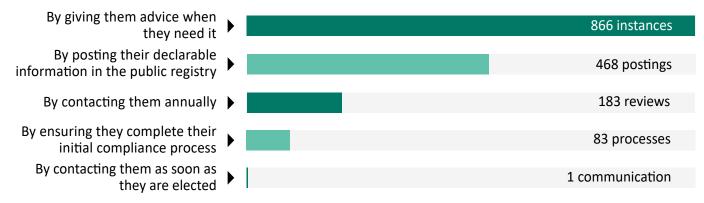
To support its mission to ensure full compliance with the conflict of interest regimes it administers, the Office uses most of its resources to help regulatees follow the rules.

Employees in the Advisory and Compliance division help Members comply with the *Conflict of Interest Code for Members of the House of Commons*. They give Members the information they need to understand the rules and what they must do to meet them, as well as confidential direction and advice. That guidance is sometimes based on legal opinions prepared by the Investigations and Legal Services division. To meet the Code's transparency requirements, the Office posts in the <u>public registry</u> some of the information submitted by Members.

The Office guides Members proactively, giving them direction on issues that involve real or potential conflicts of interest. It also encourages them to consult the Office if they have questions or concerns. Advisors will give them advice based on the facts at hand, with input from the Commissioner as needed. That advice may reflect precedents confirmed by the Commissioner.

The Office offers Members educational sessions about how to comply with the Code. It also offers annual training for Members who are ministers or parliamentary secretaries to help them identify potential conflicts of interest. As a result of the March 2023 changes to the Code, Members will have to attend mandatory training after they are elected.

The Office's contact with Members starts within three days after their name is published in the *Canada Gazette* or earlier if they contact the Office. It continues the whole time they are in office.



How does the Office help Members comply with the Code?

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INITIAL COMPLIANCE PROCESS

All Members must complete an <u>initial compliance process</u> under the *Conflict of Interest Code for Members of the House of Commons*. This means they have to give the Office certain information. When they disclose their information, advisors can help them address potential issues. Advisors also help them learn the rules. Once they complete the process, it is easier for them to comply with the Code going forward. Members can also ask the Office for advice at any time.

Initial compliance is a two-stage process. The first stage starts soon after a Member is elected or re-elected in a general election or by-election, when their name is published in the <u>Canada Gazette</u>. They have 60 days to give the Commissioner a confidential <u>disclosure statement</u> with their information and that of their spouse and dependent children.

An advisor in the Office reviews the disclosure statement and advises the Member on how to comply with the Code. The advisor may recommend specific measures to prevent conflicts of interest. They then prepare a summary of the information in the disclosure statement for the Member to review and sign.

The second stage starts when the Member receives their disclosure summary. They have 60 days to review and sign it. The Office then posts the Member's disclosure summary in the <u>public registry</u>.

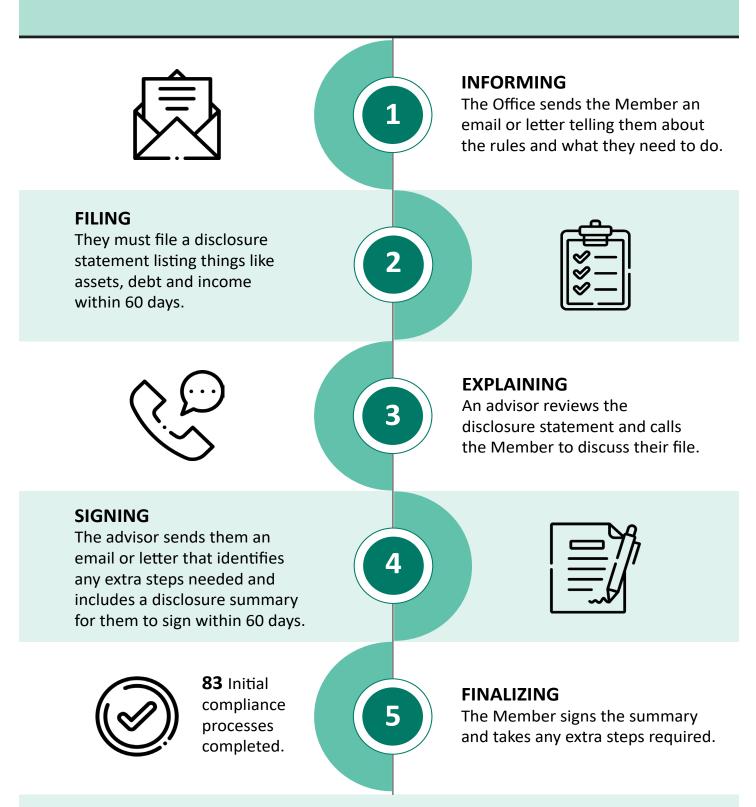
Once the information is posted, the initial compliance process is over.

The Office maintains a <u>Members' Compliance Status Report</u> that shows where each Member is in the initial compliance process.

Once they have completed the initial compliance process, Members are on track to avoid any <u>conflicts of</u> <u>interest</u> while they are in office. They are welcome to contact the Office for confidential advice at any time.

Some processes may have been started in one fiscal year and completed in the next.

Helping new Members comply with the Code



The process is completed when the information is added to the public registry.

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ONGOING REPORTING REQUIREMENTS

Completing the initial compliance process under the *Conflict of Interest Code for Members of the House of Commons* is just the first step. Members also have to meet other reporting requirements while they are in office.

For example, they must let the Office know about any change to the information in their disclosure statement, within 60 days. These "material changes" could include buying or selling a house or car, getting or paying off a loan, or any new ties between relatives or friends and government entities.

When Members disclose these kinds of information to the Office, advisors can help them prevent conflicts of interest. They may also have to amend their disclosure summary.

| Annual review | • | 183 annual reviews initiated and 103 received |
|--------------------------|---|--|
| Material changes | | • |
| Gifts and other benefits | | |
| Sponsored travel | • | Sponsored travel totalled \$422,015.79 in calendar year 2022 |
| Private interests | | |

Ongoing reporting requirements

PUBLIC REGISTRY

The Office maintains a <u>public registry</u> of all the information about individual regulatees that the Commissioner is authorized to make public. It is a searchable database that is often accessed by regulatees, the media, members of the public, governments, and ethics practitioners around the world.

In 2022-2023, the Office posted almost 1,400 items for all regulatees in the public registry, up 10% from the year before.

There were over 80,500 public registry page views in 2022-2023, almost a third more than the year before. In the past few years, there has been an overall increase in the number of public registry visits, with a significant spike in the first and last quarters of 2022-2023. To promote transparency, the Office has drawn attention to the public registry in its public communications. This continued increase in the number of visits reflects greater interest in and knowledge of the Office's mandate and the regimes it administers.

What did Members of the House of Commons declare in 2022-2023?

| | 2022-2023 |
|---------------------------------------|-----------|
| Disclosure summaries | 250 |
| Material changes | 108 |
| Sponsored travel (calendar year 2022) | 55 |
| Gifts and other benefits | 51 |
| Private interests | 1 |

DIRECTION AND ADVICE

Prevention is a major focus of the *Conflict of Interest Code for Members of the House of Commons*. Members must learn the rules so they can recognize possible conflicts of interest and take steps to avoid them.

The Office guides Members proactively, giving them direction on issues that involve real or potential conflicts of interest.

It also encourages them to consult the Office if they have questions or concerns. Advisors will give them advice based on the facts at hand. That advice may reflect precedents confirmed by the Commissioner or result from consultation with the Commissioner. The Commissioner reviews in advance all advice for Members who are ministers or parliamentary secretaries.

The Office responded to over 850 requests for advice from Members in 2022-2023, up 43% from the year before. Many of those requests were about gifts.

The Office makes sure the confidential advice it gives Members is clear and consistent. Advice reflects their personal circumstances, so different advice may be given in cases that appear similar. The Office ensures consistency by recording the Commissioner's interpretations of the Code in an internal practice manual that advisors can consult and by adding Members' requests for advice to their files.

The Office tracks the types of advice requested so it can spot trends that may impact its workload and identify training needs.

What did Members of the House of Commons ask about?

| | 2022-2023 | 2021-2022 |
|------------------------------------|-----------|-----------|
| Material changes | 272 | 255 |
| General obligations | 199 | 220 |
| Gifts and other benefits | 337 | 82 |
| Letters of support and fundraising | 58 | 48 |

EDUCATION AND OUTREACH

Members of the House of Commons are key stakeholders of the Office. One of its strategic objectives is to increase the trust key stakeholders have in the Office and the Office's credibility in their eyes. The idea is for them to become stronger allies in the delivery of its mandate and to be able to effectively manage conflict of interest issues. The Commissioner also has a specific mandate under section 32 of the *Conflict of Interest Code for Members of the House of Commons* to educate Members and the general public about the Code and the Commissioner's role.

In 2022-2023, the Office started implementing a strategic communications and engagement plan to help achieve that objective. The plan includes ways to better understand the needs of the Office's audiences so it can make its communications and outreach activities more effective. Members are part of its primary target audience, so the Office reaches them in different ways than the media, academics, domestic and international stakeholders and others. Actions in the plan will help the Office give Members the information they need, when they need it and in the way they want to receive it.

The Office sometimes issues advisory opinions under subsection 26(4) of the Code to help Members comply with it in specific situations. In November 2022, it issued one to explain how to meet the Code's rules when making recommendations about how grants under the <u>Canada Summer Jobs program</u> and similar programs are allocated in their ridings. In January 2023, it issued an advisory opinion about the <u>gift of a radon detector</u> offered to all Members.

ENFORCEMENT

The Commissioner can investigate possible contraventions of the *Conflict of Interest Code for Members of the House of Commons*. Investigations under the Code are called "inquiries." All <u>inquiry reports</u> are made public.

Inquiries can start in three ways:

- Any Member who has reasonable grounds to believe another Member has contravened the Code may ask the Commissioner to investigate by submitting a <u>written request</u> that meets the requirements set out in the Code. When the Office receives a valid request from a Member, it follows a <u>process</u> set out in the Code to decide if an inquiry is warranted.
- The House of Commons may also direct the Commissioner to conduct an inquiry. This has not happened since the Code was adopted in 2004.
- The Commissioner may self-initiate an inquiry if the Commissioner has reason to believe a Member has contravened the Code. The Commissioner's decision may be based on information from various sources, including media reports and complaints from members of the public.

No inquiries were underway as of March 31, 2023. One inquiry remains suspended.

The Office did not issue any inquiry reports in 2022-2023.

Sanctions

The Commissioner cannot impose sanctions under the Code. However, under section 28 of the Code, the Commissioner may recommend in inquiry reports that the House of Commons impose appropriate sanctions. This is because only the House has the right to discipline its own Members. It is responsible for imposing and administering sanctions, including any that may be recommended by the Commissioner.

Case Files under the Code

When the Office receives information about a possible contravention of the Code, whether from a Member of the House of Commons, media reports, or complaints from members of the public, it may open a case file.

When a case file is opened, the Office conducts an initial review of the matter. Some of these reviews may lead to <u>inquiries</u>. When an inquiry is not found to be warranted, the case file is closed.

Case files under the Code in 2022-2023

| How many case files were opened and closed? | |
|--|----|
| Total case files (a case file is a concern that is reviewed by the Office) | 11 |
| Ongoing or suspended | 4 |
| Closed without an inquiry | 7 |
| Closed with publication of report | 0 |
| Who was the subject of each case file?* | |
| Current or former Member of the House of Commons | 13 |
| Person not subject to the Code | 0 |
| What was the source of these case files? | |
| Member of the House of Commons | 4 |
| Within the Office | 2 |
| Member of the general public | 4 |
| Media | 1 |
| What was the nature of the concern?* | |
| Furthering a private interest | 4 |
| Influencing a decision or attempting to influence a decision | 8 |
| Disclosure of information | 3 |
| Attempt to engage in prohibited activities | 6 |
| Sponsored travel | 0 |
| Gifts and other benefits | 2 |

*Some case files deal with more than one concern

As of March 31, 2023, the Office was not working on any active inquiries under the Code. One inquiry remains suspended.

PUBLIC COMMUNICATIONS

The Office shares information on its website, is active on social media, responds to inquiries from the media and members of the public, and delivers presentations to the interested public. The goal is to educate Canadians about the regimes it administers.

The Office monitors the volume of relevant Twitter, news, Question Period mentions, and website activity. Tracking these trends can help it prepare for an influx of public and media inquiries, for example, as high volumes tend to lead to workload increases for the Office. Tracking can also make it aware of issues that might relate to its work. The Office publishes this data in its <u>quarterly statistical reports</u> as context for the work done in any quarter.

Website

The Office continued to maintain its website as an important source of information to help educate and inform regulatees, the media and the public. The number of website visitors remained steady with just a 2% increase, for a total of almost 54,000.

Social Media

The Office's social media presence helps it stay aware of relevant discussions and participate in them as appropriate. It also uses social media to share information about the conflict of interest regimes it administers, its activities and the public registry.

The Office stayed active on social media in 2022-2023. It maintained its Twitter presence and, in December 2022, created a LinkedIn account. This gives it another way to educate regulatees and the public and advertise job opportunities. Regulatees are always welcome to contact their advisors if they have any questions.

The October 2022 survey of Members of the House of Commons revealed that only 30% rely on Twitter as a source of information about conflict of interest rules, so the Office shifted its Twitter strategy. It now focuses its tweets on educating its secondary audiences: the media, academics, international and domestic stakeholders, and members of the Canadian public who are interested in the Office's activities. It sends fewer tweets but aims to send more readers to information on its website. Twitter remains a preferred tool for the media, who are also key stakeholders of the Office. The Office's tweets can help them report accurately on the Office and its work.

The total number of Twitter followers for <u>@EthicsCanada</u> and <u>@EthiqueCanada</u> grew by 10% to 3,969, further increasing the Office's social media reach. It tweeted 7% less than in the previous year, sending one to two tweets a day. Nearly 5% of visits to the Office's website were from links on Twitter and the Office's own tweets drove nearly 2% of website traffic.

About 45% of the Office website's traffic resulted from Internet searches. Social media conversations about investigations and ethics matters lead to visits to the Office website to verify facts or get more information. For example, website activity spiked in the week after the Office released the *Ng Report*. This resulted from the Office's communications around the report, conversations on social media and organic searches prompted by media articles.

Media and Public Inquiries

The Office received nearly 1,800 information requests from the media and members of the public by phone, email, post, fax and direct messages on Twitter.

At the end of May 2022, it received some emails calling on it to investigate parliamentarians' involvement in the World Economic Forum. Those emails spilled over from a coordinated email campaign that ran in the early spring and were prompted by media coverage of the campaign after it was mentioned in one of the Office's 2021-2022 annual reports.

The Communications, Outreach and Planning division responds to media and public inquiries with accurate, timely and useful information. Although it cannot provide information about individual cases, the Office includes as much information as possible about the rules and their general application.

The Office responds only to emails that are directly addressed to it and not to ones it is simply copied on. Copies of emails that were not related to its mandate accounted for 80% of total correspondence received in 2022-2023.

The media can help give the public accurate information about the conflict of interest regimes. In 2022-2023, the Office received and responded to 113 media requests, including 9 interviews, up 20% from the year before. Inquiries about the status of a current case file or regulatee made up 60% of media requests. Only 25% were general inquiries about the role and mandate of the Office. The remaining 15% were related to investigation reports the Office published. Perhaps because of previous interactions with the Office, journalists appear to better understand the regimes, resulting in fewer requests for information about general topics and more accurate explanations of the regimes administered by the Office.

HOW THE OFFICE PERFORMED

The Office has a set of standards for service to regulatees and others. Its quarterly statistical reports track how it is meeting its service standards, whose achievement rate is set at 80%. In 2022-2023, the Office again surpassed that target.

| | 2022-2023 |
|--|-----------|
| Contact all Members of the House of Commons within three days of learning of their election or re-election | 96% |
| Respond to Members' requests for advice within three business days | 92% |
| Respond to media inquiries within four hours | 100% |
| Respond to public inquiries within 10 business days | 92% |

Service standards

Note: In the 2021-2022 Annual Report under the Conflict of Interest Code for Members of the House of Commons, *achievement of the service standard for responding to requests for advice within three days was listed as 95%; however, the correct figure is 91%.*

COLLABORATION AND BEST PRACTICES

The Office maintained and strengthened connections with officials and organizations in Canada and other countries in 2022-2023.

Domestic Outreach

CCOIN

The Office continued to coordinate information sharing within the Canadian Conflict of Interest Network (<u>CCOIN</u>), made up of federal, provincial and territorial conflict of interest commissioners.

In 2022-2023, it added to its electronic library of information and materials from these jurisdictions. It shared summaries of reports on investigations done by CCOIN members. When asked, it also did research for them.

The Director of Communications, Outreach and Planning represented former Commissioner Dion at CCOIN's September 2022 annual meeting, hosted in Yellowknife by David Phillip Jones, K.C., Conflict of Interest Commissioner for the Northwest Territories. The Director also participated in its March 2023 semi-annual meeting, held virtually.

Collaboration

Former Commissioner Dion met privately with other agents of Parliament to discuss common issues and concerns, and Office employees liaised with their counterparts in those agents' offices.

The Office was asked by the Treasury Board Secretariat to comment on a consultation paper on Public Safety Canada's Canadian Foreign Influence Transparency (CFIT) initiative.

International Outreach

The Office is an active member of two international non-profit ethics organizations: the Réseau francophone d'éthique et de déontologie parlementaires (<u>RFEDP</u>) [link in French only] and the Council on Governmental Ethics Laws (<u>COGEL</u>).

RFEDP

Formed in 2018, the RFEDP is a group of public institutions in the <u>Organisation internationale de la</u> <u>Francophonie</u> that are involved in ethics and codes of conduct. It helps francophone parliamentarians stay connected, shares knowledge, encourages information-sharing, offers training, compares practices, and develops research.

In 2022-2023, the Director of Advisory and Compliance continued to serve on the RFEDP's Bureau.

The Office was part of two RFEDP working groups on training and best practices. The training working group finished its mandate in May 2022. It created a template for training that members can get from its website. The best practices working group was still active at the end of the year. The Office was also working with the RFEDP on a project to partner with universities on research about various topics. In November, former Commissioner Dion participated in the RFEDP's two-day annual general meeting. The Director of Communications, Outreach and Planning and the Acting Director of Advisory and Compliance also attended.

Through the RFEDP, the Office was consulted on several initiatives. In September 2022, it commented on the <u>Interparliamentary Union</u>'s preliminary <u>indicators</u> aimed at helping parliaments measure their performance in overseeing parliamentary ethics and other areas. In October, it commented on the French version of the Cambodian Senate's ethics code.

COGEL

Formed in 1978, COGEL is a U.S.-based organization of government ethics practitioners.

The Office's Director of Communications, Outreach and Planning was a member of the program committee for <u>COGEL's 2022 conference</u>, held in Montreal in December. Senior Office representatives gave two presentations at the event, which was also attended by several other Office employees. The Director of Communications, Outreach and Planning was on a panel about transparency and one of the Office's legal counsels was on a panel about blind trusts. The Director is also on the program committee for COGEL's 2023 conference, to be held in Kansas City, Missouri.

Collaboration

The Office is always pleased to meet with officials from other countries who wish to discuss Canada's ethics regimes and share best practices. In February 2023, it gave presentations to delegations from Ethiopia and South Africa.

The Office also responded to several information requests from or on behalf of international organizations.

In January 2023, it reviewed and commented on the G20 Anti-Corruption Working Group's High-Level *Principles on Promoting Integrity among Public Bodies and Authorities Involved in Preventing and Combating Corruption*. It also gave input for Canada's annual progress report on how it has implemented the <u>Inter-American Convention against Corruption and its Follow-Up Mechanism</u> (MESICIC).

In February, the Office commented on a review by South Africa and the United States of how Canada has implemented articles 5-14 and 51-59 of the <u>United Nations Convention against Corruption</u> (UNCAC).



OUR TOOLS

OUR PEOPLE

The Office employs about 50 people. They have expertise in compliance, investigations, legal services, communications, parliamentary relations and corporate management.

Equity, Diversity and Inclusion

The Office recognizes the importance of fostering an engaged, qualified, and productive workforce that embraces equity, diversity and inclusion, values differences and supports the full participation of all employees.

The Office continued to work on complying with the <u>Employment Equity Act</u>. The Act, in part, requires employers to take actions to ensure members of four designated groups are represented within their organizations: women, Indigenous people, persons with disabilities and members of visible minorities.

The Office's Equity, Diversity and Inclusion Working Group is part of this effort. It includes employees from all divisions. The group led the development of a Policy on Equity, Diversity and Inclusion adopted in October 2022. Under it, a new Equity, Diversity and Inclusion Committee will tackle these objectives:

- Eliminate systemic barriers to employment and any other conditions that create disadvantages for both employees and prospective candidates.
- Foster inclusive discussions between employees and inclusive communications with external stakeholders.

The Committee made some recommendations that the Office implemented right away. For example, it now writes all job posters in plain language and posts them on boards that will be seen by diverse candidates. It also started working to put other recommendations into practice.

Accessibility

The Office is committed to meeting all its obligations under the <u>Accessible Canada Act</u>. The Act aims to identify, remove and prevent barriers to accessibility and to make Canada barrier-free by January 1, 2040.

In 2022-2023, the Office ran consultations on accessibility that included surveys. It reflected the feedback in its accessibility plan. That plan shows how the Office identifies and will remove and prevent barriers in its environment, policies, programs, practices and services. The Office posted its <u>Accessibility Plan 2023-2025</u> on its website in December 2022.

As an example of how the Office is implementing the plan, it is using accessible formats for its digital communications. It has also started using plain language to help people access, understand and use the information it shares. Some employees have joined the Government of Canada's Accessible Communications Community of Practice and its Plain Language Community of Practice. These networks of communications professionals offer excellent learning resources and activities.

The Office created a Working Group on Accessibility. It will continue to consult persons with disabilities to identify, remove, and prevent barriers at the workplace and in all aspects of its communications and activities.

Internal Communications

In 2022-2023, the Office finished implementing a wide-ranging plan to strengthen internal communications. These are especially important in a hybrid work environment. The strategy also responded to an area that a previous employee satisfaction survey had identified as needing improvement.

The Office's Internal Communications Working Group, with employees from all divisions, continued to further improve internal communications.

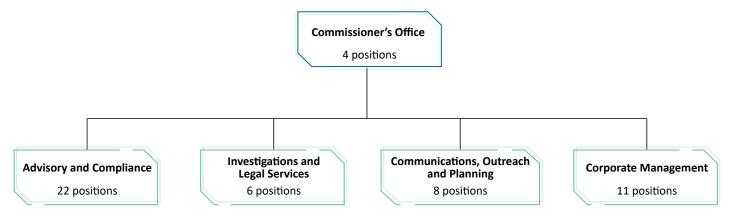
Employee Satisfaction Survey

In June 2022, the Office conducted an employee satisfaction survey, something it does every three years. The results showed a high level of satisfaction in most areas. Most measures had improved or stayed at the same high level since the last survey in 2019. And almost all of those that had relatively low scores in 2019 went up in 2022. The survey did, however, highlight a few areas that could use some attention. The Office is taking action.

Staffing

To make sure it has the right positions and the right people in them to carry out its mandate, the Office ran 14 staffing processes in 2022-2023.

Employee turnover rose in 2022-2023: four employees left.



OUR INFRASTRUCTURE

The Office continued to update its internal policies and guidelines in line with those of other parliamentary entities and the wider public service. A suite of updated financial policies took effect in 2022-2023.

The Office's financial statements are audited each year by an independent external auditor. Its financial information for 2022-2023 is outlined in the <u>Appendix</u>.

The Office continued to work with House of Commons IT services on a new, integrated system for compliance. The new system will replace the <u>declaration portal</u> that regulatees use to submit information, the <u>public</u> <u>registry</u> and the Office's internal case management system.

It will be a one-stop shop for regulatees, a single point where they can:

- submit information;
- keep their contact information up to date;
- communicate with their advisors;
- keep track of what they need to do;
- seek reimbursement of costs associated with blind trust fees and withdrawal from activities.

The public registry will be easier to use thanks to a new search interface. There will be no changes to the types of information it contains.

This project is complex and challenging. It has used a lot of time and resources and will launch later than originally planned. While delays are unfortunate, it is important to make sure the new system is built right.

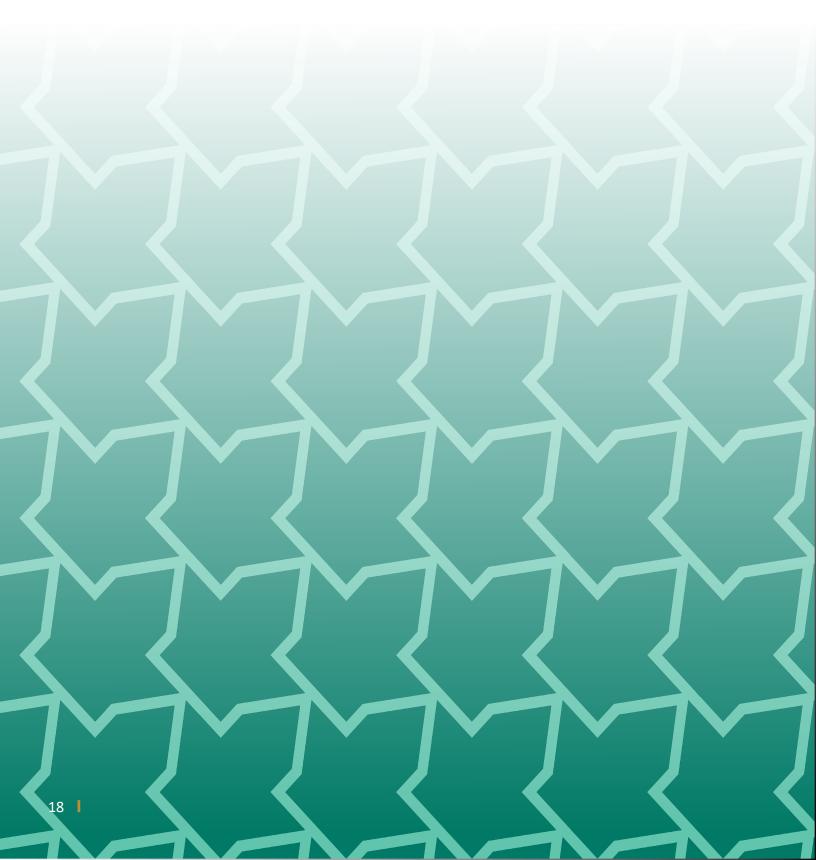
Because many employees are working in a hybrid format, the Office started reducing its physical space requirements. As of September 2023, it will occupy just one floor instead of two at 66 Slater Street in Ottawa.

OUR PLAN

The Office continued to implement a three-year strategic plan covering the 2021-2024 period.

The plan is an evergreen tool that helps the Office match its activities to strategic priorities. All projects listed in it are reviewed every quarter. Senior management may adjust some timelines to meet changing operational needs.

By March 31, 2023, the Office had completed over two thirds of the projects identified in the plan.



FINANCIAL RESOURCES SUMMARY

| (thousands of dollars) | | | | | |
|---|--------------------|-------------------|----------------------|--------------------|----------------------------|
| Program Activities | 2021-2022 | 2022-2023 | | | Alignment to Government |
| | Actual Spending | Main Estimates | Total Authorities | Actual Spending | of Canada Outcomes |
| Administration of the Conflict of Interest Code for Members of the House of Commons and the Conflict of Interest Act | 6,568 | 7,277 | 7,277 | 6,769 | Government Affairs |
| Contributions to employee benefit plans | 771 | 866 | 866 | 812 | Government Affairs |
| Total spending | 7,339 | 8,143 | 8,143 | 7,581 | |
| Plus: cost of services received without charge | 1,141 | 0 | 0 | 1,133 | |
| Net cost of department | 8,480 | 8,143 | 8,143 | 8,714 | |

The budget process for the Office of the Conflict of Interest and Ethics Commissioner is established in the *Parliament of Canada Act*. Before each fiscal year, the Commissioner has the Office prepare an estimate of its budgetary requirements. The estimate is considered by the Speaker of the House of Commons and then transmitted to the President of the Treasury Board, who lays it before the House with the estimates of the Government of Canada for the fiscal year. The mandate of the Standing Committee on Access to Information, Privacy and Ethics includes reviewing and reporting on the Office's effectiveness, management and operations, together with its operational and expenditure plans.

Complete audited financial statements are available on the Office's website.