

**Conflict of Interest Policy**  
**Chronology : development, approval, implementation**

- February 11, 1999:** Report to Personnel Sub-Committee from Executive Director HR and CAO recommending a Conflict of Interest Policy for adoption; harmonization of past practices of former municipalities.
- February 15, 1999:** Corporate Services Committee referred the report back to the Executive Director of HR to further consult with Local 79 and report back
- May 8, 2000:** Revised policy to Personnel Committee after changes resulting from consultation with Local 79. Personnel Committee directed that issues raised in the deputation by Local 79 again be re-visited
- July 10, 2000:** Revised policy approved at Personnel Sub-Committee
- July 12, 2000:** Revised policy approved at Corporate Services Committee
- August 4, 2000:** Policy approved at Council
- August 2000:** general communication sent out to employees
- September 14, 2000:** Policy placed on the HR Web
- March –April 2001:** formal roll-out of policy to all employees, included:
- March 2, 2001, letter to Commissioners from CAO
  - April 17, 2001, letter to all Managers and Supervisors
  - Last 2 pay periods of April 2001 : guide sent to all employees as payroll insert

From: HR Communication  
To: \*\*\*  
Date: 5/3/01 9:54am  
Subject: Conflict of Interest Guide - all employees

**This message is for all staff. Please share this message with employees who do not have e-mail.**

May 3, 2001

At the end of April, we sent out a bulletin about the city's new conflict of interest policy and the guide called **Avoiding a Conflict of Interest**. By now you should have received a copy of the guide. Copies were included in employee pay envelopes between April 19th and April 27th.

Please take some time to read the guide and keep it for future reference. The guide contains examples of how to deal with potential conflict situations. The examples may not cover all the situations that may occur in your work area. Talk to your manager or supervisor if you are not sure if a situation you face presents a conflict of interest.

The complete conflict of interest policy is available on HR Web on the city's intranet site. Employees who don't have access to the intranet can use a computer to view the policy in any of the career development centres. The new policy replaces the policies that dealt with conflicts of interest or codes of conduct in the former municipalities and may represent a change in terms of employment for some employees.

Additional copies of **Avoiding a Conflict of Interest** are available at:

- Career Development Centres (all centres are open Monday to Friday from 8:30am to 4:30pm)
  - Etobicoke Civic Centre, main floor
  - Metro Hall, 4th floor
  - North York Civic Centre, 1st floor
  - Scarborough Civic Centre, main floor
  - City Hall, 6th floor, west tower
- Human Resources offices in East York and York Civic Centres
- Access Toronto (City Hall, main floor)

**Keep up with your HR Program**

- Visit HR Web at <http://dom3.city.toronto.on.ca/intra/hr/hrnews.nsf>
- Call the Employee Infoline at 416-392-9591
- Read HR News in the Inside Toronto newsletter



March 2, 2001

**Re: Conflict of Interest Policy – Rollout & Implementation**

To: Commissioners  
All senior management

Council passed a new conflict of interest policy in August 2000 that applies to all employees. It replaces policies that dealt with conflicts of interest or codes of conduct in the former municipalities. In some cases it represents a change in the terms and conditions for employment. A general communication was sent to employees when the policy was approved, and the full policy was added to HR Web. Since the policy was approved, we have been consulting with the Legal division and developing information materials and are now ready to rollout the policy.

At the City of Toronto, we value our good reputation and the trust that exists between the organization and the public. Full implementation of the new conflict of interest policy is important to maintain high standards of integrity and ethics in our business practices.

A conflict of interest guide has been developed and will be sent to employees in April 2001 as an insert in pay envelopes. The guide, which is intended to help employees avoid a conflict of interest, describes the conditions of the policy and provides examples of how to deal with potential conflict situations. The guide is attached. Translated versions of the guide will be available in Chinese, Italian and Portuguese.

Providing the guide as an insert in the pay envelopes is the method of providing notice of the new policy to employees. It is important that you have discussions with your managers and supervisors to ensure that implementation and communication of the policy is completed at all levels of the organization. Human resources staff in the business units are available to provide support to managers and supervisors with implementation issues.

A memo will be sent to managers and supervisors informing them about the implementation and next steps in the rollout of the policy. The memo is attached.

A session is being scheduled for March with EMT and a lawyer from Hicks Morley Hamilton Stewart and Storie to review the policy.

In the meantime, if you have questions about the information in this letter, please contact Alison Anderson, Director of Employment Services, Human Resources, Corporate Services.

Michael Garrett  
Chief Administration Officer

Joan Anderton  
Commissioner, Corporate Services

Attach.



**Corporate Services**  
M. Joan Anderton, Commissioner

**Human Resources**  
Employment Services  
Metro Hall, 5<sup>th</sup> Floor  
55 John Street  
Toronto, ON M5V 3C6

**Tel:** 416 392-5028  
**Fax:** 416 392-3920

**Date:** April 5, 2001

**To:** HR Directors, HR Managers

**From:** Alison Anderson, Director, Employment Services, Human Resources

**Subject:** Conflict of Interest Policy - Rollout, Implementation & Responsibilities

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Council passed a new conflict of interest policy in August 2000 that applies to all employees. It replaces the policies that dealt with conflicts of interest or codes of conduct in the former municipalities. A general communication was sent to employees when the policy was approved and the full policy was added to HR Web. Since the policy was approved, we have been consulting with the Legal division and developing information materials and are now ready to rollout the policy. It is important that all staff are informed of this policy.

#### **Information for all employees**

A conflict of interest guide has been developed and will be sent to employees in the last two weeks of April 2001 as an insert in pay envelopes. The guide, which is intended to help employees avoid a conflict of interest, describes the conditions of the policy and provides examples of how to deal with potential conflict situations. The guide is attached.

Copies of the guide will also be available in the career development centres and in the Human Resources offices in East York and York as these locations do not have career centres.

Translated versions of the guide will be available in Chinese, Italian and Portuguese. As part of our approach to distributing the translated guides, managers and supervisors will be advised that they can contact their business unit to request translated copies of the guide. Before the English version of the guide is distributed to all employees, we will provide you with 20 copies of the guide in each translated version. Contact Ava Lucero at 416-392-3966 for additional translated copies.

Information about the conflict of interest policy will also be included in Inside Toronto, HR news bulletins, the Employee Infoline and on the city's intranet site. These messages will be coordinated with the distribution of the English version of the guide.

#### **Information for managers and supervisors**

The policy states that managers and supervisors must discuss the conflict of interest policy with their staff and highlight any of the rules or conditions that have particular relevance in their work area. A memo will be sent to managers and supervisors advising them of their responsibilities under the policy, and suggesting ways to inform their employees of the contents of this policy. A copy of this memo is attached. You will notice in the memo that Human Resources staff in the

business units are referenced as a resource to assist managers and supervisors with the implementation of the conflict of interest policy.

**Next steps**

We recommend that you meet with your clients to discuss the policy, implementation issues and potential conflict of interest situations that may arise in their work areas.

Consultants in your business units may be requested by clients to facilitate meetings between managers and employees in relation to this policy.

Please share this memo with your staff.

Check HR Backstage for more information about the rollout and how to identify a conflict of interest situation.

Attached is a copy of the letter that was sent to commissioners and senior management about the rollout and implementation of this policy.

Alison Anderson  
Director, Employment Services  
Human Resources, Corporate Services

Attach.



Corporate Services  
M. Joan Anderton, Commissioner

Human Resources  
Employment Services  
Metro Hall, 5<sup>th</sup> Floor  
55 John Street  
Toronto, ON M5V 3C6

Tel: 416 392-5026  
Fax: 416 392-3920

**Date:** April 17, 2001

**To:** All Managers and Supervisors

**From:** Alison Anderson, Director, Employment Services, Human Resources

**Subject:** Conflict of Interest Policy - Rollout, Implementation & Responsibilities

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Council passed a new conflict of interest policy in August 2000 that applies to all employees. It replaces the policies that dealt with conflicts of interest or codes of conduct in the former municipalities and may represent a change in terms of employment for some employees. A general communication was sent to employees when the policy was approved, and the full policy was added to HR Web. Since the policy was approved, we have been consulting with the Legal division and developing information materials and are now ready to rollout the policy. It is important that all staff are informed of this policy.

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The guide will also be available in Chinese, Italian and Portuguese from your business unit. These guides will be printed within the next two weeks, and we will send you an e-mail message when they are ready.

Information about the conflict of interest policy will be included in Inside Toronto, HR news bulletins, the Employee Infoline and on the city's intranet site. These messages will be coordinated with the distribution of the English version of the guide.

Copies of the English version of the guide will be available in the career development centres and in the Human Resources offices in East York and York as these locations do not have career centres.

#### **Managers/Supervisors role**

The policy places responsibility on managers and supervisors to inform employees of this policy. **The policy states that managers and supervisors must discuss the conflict of interest policy with their staff and highlight any of the rules or conditions that have particular relevance in their work area.** If you need assistance interpreting how the conditions of the policy apply to specific situations in your department or division, consult with the person you report to.



Employees who are currently on leave must be notified of the new policy as soon as possible because it may change the terms and conditions of their employment. Make sure that you send a copy of the conflict of interest guide to any of your employees who are on paid or unpaid leave.

The information in the guide should be made available in the appropriate format to any of your employees who are visually impaired, blind or have other access issues.

You may want to communicate the policy to your employees in the following ways:

- Have a meeting with your employees to discuss the policy and potential conflict situations that may arise in the course of their work. We recommend that you have a record of who attended the meeting.
  
- Send an e-mail message or memo to your staff advising them that they must read the guide inserted in their pay envelope and the policy available on HR Web, and encourage them to come to you with any questions.

We recommend that you advise suppliers and clients of the city's policy so that they do not place employees in a potential conflict situation.

#### **Enforcing the policy**

All the former municipalities had policies that addressed values, standards or codes of conduct and ethics. The new conflict of interest policy may represent a change in the terms of employment for some employees. The initial emphasis should be on informing employees about this policy, reinforcing its importance and answering any questions that employees may have. Human Resources and the Legal division recommend that the policy not be enforced until employees are given reasonable notice. However, do not ignore situations which are clearly a conflict of interest and /or may result in any damage or risk to the organization.

Your human resources business unit is available to assist in interpreting or implementing this policy.

Alison Anderson  
Director, Employment Services  
Human Resources, Corporate Services

Attach.

# EXECUTIVE MANAGEMENT TEAM (EMT)

## AGENDA

Friday, April 20, 2001

9:00 am - 1:00 pm

City Hall, 11<sup>th</sup> Floor East, CAO's Boardroom

Time	Item	Name	Action
9:00 - 9:30	<p>1. <b>Conflict of Interest Policy for City Staff</b></p> <ul style="list-style-type: none"> <li>- Rollout and Implementation</li> <li>- Overview (attached).</li> </ul> <p><i>To review and update EMT on Conflict of Interest Policy for staff.</i></p>	<p>Joan Anderton Alison Anderson Ross Dunsmore (Hicks, Morley, Hamilton, Stewart and Storrie)</p>	<ul style="list-style-type: none"> <li>- discussion item</li> <li>- support and reinforce rollout with Departmental staff</li> </ul>
9:30 - 10:15	<p>2. <b>Corporate Redeployment Policy for Union Employees</b></p> <ul style="list-style-type: none"> <li>- briefing note attached</li> <li>- EMT requested an update on this matter. Carol Ellis attending with Harold due to WES experience.</li> </ul>	<p>Harold Ball Carol Ellis</p>	<ul style="list-style-type: none"> <li>- briefing and discussion item</li> </ul>
10:15 - 10:45	<p>3. <b>Alternative Revenue Sources</b></p> <p><i>To review and provide input to a proposal the CFO has developed at CAO's request (Wanda to distribute copies at the EMT meeting).</i></p>	<p>Michael R. Garrett Wanda Liczyk</p>	<ul style="list-style-type: none"> <li>- discussion and input to proposal</li> </ul>
10:45 - 11:15	<p>4. <b>IT Strategic Plan, Directions and Cross-Corporate Steering/ Reference Staff group</b></p> <p><i>To review future direction for corporate IT and seek EMT input into directions and proposed "administrative governance" model.</i></p>	<p>James Ridge</p>	<ul style="list-style-type: none"> <li>- discussion and input to directions</li> </ul>
11:15 - noon	<p>5. <b>Review of significant reports for next Council/Committee cycle.</b></p> <p><i>For each Commissioner and CAO to identify reports for next cycle and discuss timing.</i></p>	<p>Roundtable - All</p>	<ul style="list-style-type: none"> <li>- discussion</li> </ul>
noon - 1:00	<p>6. <b>Other Business</b></p>		