



Office of the Conflict
of Interest and Ethics
Commissioner

Commissariat aux
conflits d'intérêts et à
l'éthique

The 2013-2014 ANNUAL REPORT

made under the
*CONFLICT OF INTEREST CODE FOR
MEMBERS OF THE HOUSE OF COMMONS*



June 5, 2014

Mary Dawson
Conflict of Interest and
Ethics Commissioner

The 2013-2014 Annual Report

in respect of the

CONFLICT OF INTEREST CODE FOR MEMBERS OF THE HOUSE OF COMMONS

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June 4, 2014

The Honourable Andrew Scheer, M.P.
Speaker of the House of Commons
Room 224-N, Centre Block
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Ottawa, Ontario K1A 0A6

Dear Mr. Speaker:

I am pleased to submit to you my report on the performance of my duties and functions under the *Conflict of Interest Code for Members of the House of Commons* for the fiscal year ending March 31, 2014.

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

Sincerely,

Mary Dawson
Conflict of Interest and Ethics Commissioner

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I. INTRODUCTION

The Conflict of Interest and Ethics Commissioner administers the *Conflict of Interest Code for Members of the House of Commons* (Code) and the *Conflict of Interest Act* (Act). These two regimes hold Members and public office holders to standards that place the public interest above private interests.

The Code applies to all 308 Members of the House of Commons. It was adopted by the House of Commons in 2004 and was amended in 2007, 2008 and 2009. The Code is appended to the *Standing Orders of the House of Commons*.

The Act applies to current and former public office holders, including ministers, parliamentary secretaries, ministerial staff, ministerial advisers, deputy ministers and most full- and part-time Governor in Council appointees. There are approximately 2,500 public office holders subject to the Act, more than half of whom are part-time. The Act came into force in July 2007 and was amended in 2011 and 2013.

Most rules and procedures set out in the Code and the Act aim to minimize the possibility of conflicts arising between public and private interests. The rules of conduct also address a variety of other situations relating, for example, to preferential treatment and the acceptance of gifts and benefits. The Act also contains a number of post-employment rules.

While the focus of both the Code and the Act is on prevention, the Commissioner is mandated to investigate alleged contraventions of either.

The main responsibilities of my Office are to:

- advise Members and public office holders on their obligations under the Code and the Act;
- receive and review confidential reports of assets, liabilities, income and outside activities of Members and reporting public office holders in order to advise on and establish appropriate compliance measures;
- maintain confidential files of required disclosures;
- maintain public registries of publicly declarable information;
- administer an administrative monetary penalty regime for failures to comply with certain reporting requirements in the Act; and
- conduct inquiries and examinations into alleged contraventions of the Code and the Act.



Under the Act, the Commissioner is also mandated to provide confidential advice to the Prime Minister about conflict of interest and ethics issues.

This is one of two annual reports issued by my Office. This report relates to the Code and the other report relates to the Act.



II. OVERVIEW – Strengthening the Framework for Future Progress

As I approach the end of a seven-year term, this is an appropriate time to take stock of the many achievements of my Office since my appointment. I was appointed to the newly-created position of Conflict of Interest and Ethics Commissioner on July 9, 2007, the same day the *Conflict of Interest Act* (Act) came into force and my Office was established in its current form.

Continuous improvement has been a hallmark of the past seven years, first as I organized the operations and staffing of my Office, and later as I enhanced processes, introduced new outreach initiatives, and continued to interpret and apply the *Conflict of Interest Code for Members of the House of Commons* (Code) and the Act. My Office can now draw on a significant body of work that includes precedents, procedures and interpretations, all of which form a solid framework for future progress.

When I became Commissioner, I articulated my intent to ensure that the Code and the Act were interpreted and applied fairly and consistently, with clarity and common sense. I also undertook to ensure that my Office would support Members and public office holders in achieving and maintaining compliance with the two regimes.

Among my initial priorities as Commissioner were establishing a new administrative monetary penalties regime under the Act, improving the public registries under the Code and the Act, and staffing appropriately. More recently, we have redesigned our case management system in order to adopt a more integrated approach to case management and to improve our reporting capacity. We have also taken steps to renew the public registries in order to make them easier for Members and public office holders to use and for the public to understand.

While the major focus of my Office has been on prevention, enforcement measures have also been taken. I have issued compliance orders and imposed administrative monetary penalties under the Act, and, when necessary, have investigated possible contraventions of the Code or the Act. As noted in previous annual reports, I have encountered some challenges along the way. Some of these have involved process issues, such as difficulty in obtaining timely or adequate access to relevant documents required for investigations. However, in most cases, I have had very good co-operation both from those being investigated and from witnesses or others providing documentation. Since the beginning of my term, I have issued reports on six inquiries under the Code and 17 examinations under the Act.

I have issued a number of advisory opinions under the Code and guidelines and information notices under the Act over the years, and this past fiscal year have continued to do so, specifically on fundraising, letters of support, and gifts offered to administrative tribunal members, among other topics. My staff and I have also made numerous presentations to groups of Members and public office holders about their obligations under the two regimes.



Over the years, the number of requests for information from the media and members of the public has increased significantly. This level of interest provides further opportunities to clarify and promote the role and mandate of my Office, and the scope of the Code and the Act.

Our work with other domestic and international jurisdictions has continued to grow as a result of my coordination role in the Canadian Conflict of Interest Network, the Office's engagement with the Council of Governmental Ethics Laws and other international bodies, and a high level of interest from government officials and ethics practitioners in other countries who wish to learn more about Canada's federal conflict of interest regimes.

I have shared my experiences in administering the Code with the Standing Committee on Procedure and House Affairs, and my experiences in administering the Act with the House of Commons Standing Committee on Access to Information, Privacy and Ethics, primarily through committee appearances and annual reports.

I prepared comprehensive submissions for the five-year reviews of the Code and the Act, in which I noted the strengths of the two regimes and recommended ways to further increase their effectiveness. I also recommended that the provisions of the Code and the Act be harmonized where possible and that consideration be given to developing a separate code dealing with partisan activities, which are not covered by the Code or the Act. The Access to Information, Privacy and Ethics Committee included a few of my recommendations in its report on the review of the Act. I look forward to the government's response to this review. As for the Procedure and House Affairs Committee, it has not yet completed its review of the Code.

My Office's activities in these and other areas are supported by an internal management framework based on the principles of sound resource management, and a strong policy framework in the area of human resources. I have also ensured that my Office follows good management practices in other areas of its operations. These internal supports have been further strengthened in the past year, through directives that formalize practices already adopted by the Office in the area of expenditure management, and a new directive on performance management that is consistent with the approach being taken in the public service.

Any accomplishments that I have achieved as Commissioner this past year and since my appointment would not have been possible without the expertise and support of my staff, and I thank them for their continued hard work and dedication.



III. APPLYING THE CODE

The *Conflict of Interest Code for Members of the House of Commons* (Code) applies to all 308 Members of the House of Commons. This includes ministers and parliamentary secretaries, who are also subject to the *Conflict of Interest Act* (Act). My Office assists these individuals in achieving and maintaining compliance with the Code.

Initial Compliance

New Members must submit a confidential disclosure statement to my Office within 60 days after the notice of their election is published in the *Canada Gazette*. This statement must list all of the Member's assets, liabilities, sources of income and activities outside of Parliament. The statement must also disclose trusts from which the Member could derive a benefit or income, and benefits that could result from government contracts. In addition, Members must make a reasonable effort to disclose the same information for their spouses or common-law partners and their dependent children.

My Office reviews this information and prepares a summary, which must be signed by the Member and placed on a public registry maintained by my Office. During this initial compliance process, my Office provides Members with advice on maintaining ongoing compliance with the Code and may also recommend specific compliance measures. The initial compliance process is complete when compliance measures acceptable to my Office are put in place and the disclosure summary is placed on the registry for public inspection.

The Code does not set a deadline within which the initial compliance process must be completed. This is in contrast to the Act, which requires that reporting public office holders complete their initial compliance process within 120 days of appointment.

In the past fiscal year, by-elections were held on May 13, 2013 (Labrador), and on November 25, 2013 in four other ridings (Brandon–Souris, Provencher, Toronto Centre and Bourassa). All five newly elected Members met the Code's 60-day deadline to submit a confidential disclosure statement. Two completed the initial compliance process by March 31, 2014 and the remaining three were finalized by mid-May 2014.

Maintaining Compliance

Beyond the initial compliance process, my Office assists Members in meeting their obligations under the Code throughout their terms in office. This is done in part through formal mechanisms set out in the Code. These include the annual review process and the requirements that Members report and publicly disclose material changes, sponsored travel and gifts or other benefits, as discussed below.



Ongoing Advice

The number of communications with Members seeking information and advice or informing my Office of a change in their situation has remained relatively stable over the past two fiscal years. These communications are often prompted by the annual review process. My Office also receives questions on a wide range of matters that are specific to individual Members. The most common requests for advice relate to gifts and other benefits.

Communications with Members

• 2010-2011	486
• 2011-2012	264
• 2012-2013	605
• 2013-2014	534

In addition, my Office occasionally sends emails to all Members as a group, providing information and advice relating to specific provisions of the Code. An advisory opinion is usually then posted on our website.

Annual Review

All Members must review their compliance arrangements on an annual basis and update the information previously disclosed to my Office. Advisors from my Office assess any new information to determine whether new compliance measures are needed and provide confidential advice to Members as required.

As part of our continuing efforts to expedite all compliance processes under the Code, my Office takes particular care in administering the annual review process. We send email reminders to Members and follow up by phone. This practice ensures a more timely return of a greater number of annual reviews.

Annual reviews are initiated on a yearly basis on or around the date of signature of the initial disclosure summary following an election, unless the previous annual review was not completed until close to that date, in which case an annual review is not initiated until the following year.

In 2013-2014, my Office initiated 243 annual reviews and received 201 responses from Members. As is usually the case, some responses to annual reviews initiated in the 2013-2014 fiscal year will not be received until the following fiscal year.

Although the Code does not impose any specific deadlines for annual reviews, I ask Members to complete this process within 30 days. I have recommended, within the context of the five-year review of the Code by the Standing Committee on Procedures and House Affairs, that the Code provide for such a deadline. For purposes of transparency, I have recently begun indicating in the public registry the date on which a Member's most recent annual review was completed.



As reported for 2012-2013, I send a questionnaire to Members as part of the annual review process to assist them in identifying changes to their disclosures over the past year. This questionnaire continues to be very useful. It often prompts Members to contact my Office for further advice on their obligations.

Ongoing Reporting Requirements

The Code requires that Members report the following information on an ongoing basis: gifts or other benefits valued at \$500 or more accepted in relation to their position as Members from any one source; sponsored travel, with some exceptions, if the travel costs exceed \$500; and any material change involving information that is required in the initial disclosure statement. All of these must be reported within 60 days.

Gifts and other Benefits

Issues around the acceptability of gifts and other benefits continue to generate the most requests for advice. Members are prohibited from accepting any gift or other benefit that could reasonably be seen to have been given to influence them, regardless of its value, subject to the exception described below. Any gift accepted by a Member that is related to his or her position and that has a value of \$500 or more must be disclosed to my Office and publicly declared in the public registry.

Advice relating to Gifts and other Benefits	
• 2010-2011	80
• 2011-2012	51
• 2012-2013	99
• 2013-2014	98

The exception to the general prohibition permits gifts or other benefits that are received as a normal expression of courtesy or protocol, or that fall within customary standards of hospitality that normally accompany a Member's position. This exception applies in a variety of circumstances. For example, token gifts offered in appreciation for a speech or presentation made by a Member are usually acceptable.

Gifts or other benefits received in connection with sponsored travel, which is discussed below, are publicly declared as part of a sponsored travel statement rather than as gifts or other benefits. However, gifts received in connection with official travel that is not considered to be sponsored travel are disclosed and publicly declared as gifts.

Table 3-1 sets out a four-year comparison of the number of public declarations of gifts and other benefits made and the number of Members who made these declarations.



Table 3-1: Public Declarations of Gifts or other Benefits

	2010-2011	2011-2012	2012-2013	2013-2014
Declarations of gifts or other benefits	37	20	39	40
Number of Members who declared gifts or other benefits	15	14	24	19

Sponsored Travel

Subsection 15(0.1) of the Code expressly permits Members to accept sponsored travel that arises from or relates to their positions, effectively exempting it from the general rules on gifts or other benefits. Sponsored travel includes all benefits received in connection with the travel, including accommodation and, as noted above, gifts and other benefits.

Where the cost of any sponsored travel accepted by a Member exceeds \$500 and is not wholly or substantially paid from the Consolidated Revenue Fund or by the Member personally, his or her political party or any interparliamentary association or friendship group recognized by the House, the Member must disclose to the Commissioner and publicly declare the sponsored travel within 60 days after the end of the trip.

Public declarations of sponsored travel are posted on the Office's website as soon as they are received. The Code also requires that the Commissioner submit, by March 31 of each year, a list of sponsored travel taken by Members during the previous calendar year.

I have noted in previous reports that there is no acceptability test for sponsored travel, as there is for other gifts. I have recommended, in the context of the five-year review of the Code, that such an acceptability test be added, which would prohibit the acceptance of sponsored travel if it could reasonably be seen to have been given to influence a Member in the exercise of his or her official duties.

Table 3-2 sets out a four-year comparison of the number of public declarations of sponsored travel and the number of Members who made these declarations.

Table 3-2: Public Declarations of Sponsored Travel

	2010	2011	2012	2013
Declarations of sponsored travel	99	73	85	110
Number of Members who declared sponsored travel	68	59	65	71



Material Change

Members are required, on an ongoing basis, to file a statement with my Office reporting any material change to the information required in their initial disclosure statement within 60 days after the change. Generally speaking, a material change is one that might affect a Member's obligations under the Code. A change that would require a public declaration or a modification to an existing public declaration is always a material change.

This year, my Office received 36 requests for advice relating to possible material changes. Of these communications, 25 resulted in public declarations of material change. Members who question whether a change to their personal situation constitutes a material change under the Code are encouraged to contact my Office.

Table 3-3 sets out a four-year comparison of the number of public declarations of material change made and the number of Members who made these declarations.

Table 3-3: Public Declarations of Material Change

	2010-2011	2011-2012	2012-2013	2013-2014
Declarations of material change	10	27	33	25
Number of Members who declared a material change	10	18	30	22

Matters of Note

Letters of Support

In 2013-2014, my Office received approximately 35 requests for advice from Members who wished to support their constituents in relation to various interactions with government. About two thirds of these requests were made by Members who are also ministers or parliamentary secretaries, subject as well to the Act. When providing advice on such matters, I take into consideration the fact that serving constituents is an important part of the role of elected officials. As stated in chapter 4 of the *House of Commons Procedure and Practice* (O'Brien and Bosc, second edition, 2009), Members "act as ombudsmen by providing information to constituents and resolving problems." While the legitimacy of constituency work is explicitly recognized in both the Code and the Act, these regimes also place limitations on it.

In December 2013, I issued an advisory opinion on letters of support in order to provide Members with guidance on the practice of issuing such letters. This and most other advisory opinions are available on my Office website. Members are encouraged to seek advice from my Office if they have any questions about the appropriateness of providing a letter of support.



Public Registry

One of the main responsibilities of the Office relating to the Code and the Act is to maintain a public registry of publicly declarable information. A paper version of the registry is kept up-to-date and is available for public inspection in my Office. In January 2009, the Office launched an electronic version of the Members' public registry, which contains Members' disclosure summaries and public declarations and is available on our website. While the information available in the electronic version of the registry is updated as needed, no changes have been made to its infrastructure since that time.

Although the current registry is functional, much can be done to update its infrastructure in order to simplify the process by which Members' and reporting public office holders' declarations are made public and to make it more user-friendly. In 2013-2014, my Office began the planning necessary to renew the public registry infrastructure for both the Code and the Act.

It is intended that the new registry will allow Members and reporting public office holders to submit their public disclosures online, directly through a secure account. It is also envisioned that the renewed public registry will display the required information in a way that is easier to understand for the general public, especially in relation to ministers and parliamentary secretaries who make public disclosures under both the Code and the Act.

Five-Year Review of the Code

In May 2012, the House of Commons Standing Committee on Procedure and House Affairs launched its review of the Code. I appeared before the Committee at that time, and provided its members with a written submission outlining my recommendations for possible changes to the Code.

Later that spring, the Committee suspended its study in order to pursue other priorities. As of the date of publication of this annual report, the Committee has not yet resumed its study of the Code.

IV. INVESTIGATIONS

My Office administers two investigative regimes, one under the *Conflict of Interest Code for Members of the House of Commons* (Code) and the other under the *Conflict of Interest Act* (Act). An inquiry under the Code can be initiated after receiving a request from a Member, upon resolution of the House of Commons or on my own initiative. An examination under the Act can be initiated after receiving a request from a Senator or a Member of the House of Commons, or on my own initiative.

When a Member makes a request under the Code, or a Member or Senator makes a request under the Act, he or she must, among other requirements, set out reasonable grounds for believing that a contravention has occurred. If the requirements are met, the Commissioner must, in the case of the Code, conduct a preliminary review to determine whether an inquiry is warranted or, in the case of the Act, conduct an examination.

Information concerning possible contraventions of the Code or the Act also comes to my attention in a variety of other ways, such as media reports and communications from the general public. In those instances, the information is reviewed to determine whether the concerns fall within the mandate of this Office and whether I have reason to believe a contravention of the Code or the Act has occurred. In most cases, this requires preliminary fact-finding, after which I determine whether an inquiry or examination is warranted or whether any other action should be taken.

Overview of Case Files

Over the past fiscal year, my Office worked on 41 investigation cases. Fourteen of these cases resulted from requests from Members, including seven under the Code and seven under the Act. I initiated the remaining 27 cases myself in light of information received from other sources. No requests for examinations were made by Senators. Most of the 41 cases were related to the obligations of public office holders under the Act, nine of which concerned ministers or parliamentary secretaries.

These 41 cases raised concerns relating to a range of matters, often involving more than one provision of the Code or the Act. More particularly, 30 of the cases pertained to actions that could be perceived as making, or seeking to influence, decisions that would improperly further a private interest (section 8 or 9 of the Code or section 6, 7, or 9 of the Act). Five cases raised concerns related to gifts (section 14 of the Code or section 11 of the Act), another five related to post-employment rules (section 33 or 34 of the Act), and four related to fundraising (section 16 of the Act). Finally, 20 of the cases raised concerns about a variety of other provisions of the Code or the Act not already mentioned in this paragraph.



Table 4-1: Comparison of Investigative Activity over the Past Four Fiscal Years

	2010-2011	2011-2012	2012-2013	2013-2014
Cases opened	33	30	32	28
Cases carried over from previous fiscal year	6	11	16	13
Total	39	41	48	41

The Office closed 35 investigation files in the past fiscal year, and six were carried over into 2014-2015. Two of these six files, the suspended Carson examination and an ongoing examination not in the public domain, had been carried over earlier from 2012-2013 into 2013-2014.

I issued three public reports during the past fiscal year: *Referral from the Public Sector Integrity Commissioner: The Fonberg Report*, which was summarized in last year's annual report under Act; *The Paradis Report* (August 2013), which is summarized in this year's annual report under the Act; and *The Paradis Report* (December 2013), which is summarized below.

I did not launch any inquiries under the Code in the past fiscal year.

Four examinations are ongoing under the Act, including the Lynn examination and the Glover examination. There has been no media reporting on the other two examinations, and no media inquiries. My practice is to keep such cases confidential unless and until I issue an examination report. There is always the possibility that I might discontinue an examination that I have initiated myself, in which case no purpose would be served by making the matter public. No examinations have been discontinued during the past fiscal year, although a number of files were closed without proceeding to an examination.

Two other examinations under the Act remain suspended while criminal investigations or proceedings are pending, in accordance with section 49 of the Act. One, suspended in November 2011, relates to the post-employment obligations of Mr. Bruce Carson under the Act. The other, suspended in June 2013, relates to a payment made by Mr. Nigel Wright, while still in office, to Senator Mike Duffy.

Reports Issued

The Paradis Report (December 2013)

In December 2013, I released a joint report following an inquiry under the Code and an examination under the Act into the conduct of the Honourable Christian Paradis, Member of Parliament for Mégantic-L'Érable, when he was Minister of Natural Resources and regional



minister for the province of Quebec. I received a request that I examine Mr. Paradis' conduct under the Act based on a media report in February 2012 that stated that Mr. Paradis had made representations to the Honourable Diane Finley, then Minister of Human Resources and Skills Development, supporting the relocation of an employment insurance centre from Rimouski to Thetford Mines, and into a building owned by a company whose principal shareholder, Mr. Ghislain Dionne, was an associate of Mr. Paradis' father. I decided that it was also necessary to examine the matter under the Code.

In 2008, the then Department of Human Resources and Skills Development had established a plan to consolidate the employment insurance claims processing function into significantly fewer Service Canada centres. Mr. Paradis was approached in 2010 by constituents who were concerned that this reorganization might lead to the closure of Thetford Mines' Service Canada centre, and result in the loss of jobs to the region.

In late winter or early spring 2011, Mr. Paradis approached Ms. Finley informally in the House of Commons in order to represent his constituents' concerns. He sought to make her aware that Thetford Mines was already operating a Service Canada centre and had the capacity to host a consolidated processing centre.

There was no evidence that Mr. Paradis discussed the consolidation process with Mr. Dionne or mentioned the company's building to Ms. Finley. The decision as to what premises the consolidated claims processing centres would occupy did not rest with Ms. Finley's department but with Public Works and Government Services Canada (PWGSC). Mr. Paradis did not contact anyone at PWGSC about the matter and there was no evidence that he had any other involvement in the consolidation process.

I sought to determine whether Mr. Paradis had contravened sections 8 or 9 of the Code or subsection 6(1) or section 9 of the Act. Section 8 of the Code prohibits a Member from improperly furthering another person's private interests when performing parliamentary duties and functions and section 9 of the Code prohibits a Member from using his or her position to influence the decision of another person to improperly further another person's private interest. Subsection 6(1) of the Act prohibits a public office holder from making or participating in a decision where doing so would place him or her in a conflict of interest and section 9 of the Act prohibits a public office holder from using his or her position to seek to influence a decision of another person so as to improperly further a private interest.

In making these determinations I took into account section 5 of the Code and subsection 64(1) of the Act, each of which limits the extent to which the Code or the Act applies in relation to legitimate activities that a Member normally carries out as a Member. I determined



that, in the particular circumstances of this case, both the requirements of the Code and the more stringent requirements of the Act were met.

I determined that the concerns of Mr. Paradis' constituents represented a legitimate issue of significant public interest. Even though there was a possibility that Mr. Paradis' intervention with Ms. Finley could have resulted in furthering the private interests of Mr. Dionne, I found, having considered the factors described above, that this intervention was not improper. For these reasons, I found that Mr. Paradis did not contravene these sections of the Code or the Act.

Files Closed during the Past Fiscal Year

Table 4-2: Files Closed in the Past Fiscal Years

	2010-2011	2011-2012	2012-2013	2013-2014
Reports issued following an examination	1	1	3	1
Reports issued following an inquiry	2	1	0	0
Joint reports issued following an examination and an inquiry	0	1	0	1
Discontinued examinations	1	2	3	0
Reports resulting from a referral by the Public Sector Integrity Commissioner	0	0	3	1
Files closed without proceeding to an inquiry, examination, or public report	24	20	24	32
Total	28	25	33	35

The Office has closed 35 files in the past fiscal year. One of these files resulted in *The Paradis Report* (December 2013), which was issued as a joint report resulting from an inquiry under the Code and an examination under the Act. Two resulted in public reports of an examination under the Act, *Referral from the Public Sector Integrity Commissioner: The Fonberg Report* and *The Paradis Report* (August 2013).

The remaining 32 files were closed without initiating an inquiry or an examination and without issuing a report. Each file was reviewed to determine whether the matter fell within the mandate of the Office, whether I had reason to believe a contravention of the Code or the Act had occurred and whether an inquiry or an examination was warranted or any other action should be taken.

In almost all cases, my Office informs the subject of the file that concerns have been raised about him or her. In some cases, whether or not I proceed to an inquiry or an examination, my



Office provides compliance advice to that individual and changes may be made to his or her compliance arrangements as a result of that advice.

Where it is appropriate to do so, my Office will also follow up with the individual who raised the matter once the file has been closed, to inform him or her of how the matter was resolved.

Table 4-3 breaks down the files that were closed according to how the matters were raised with my Office, and whether they related to a minister or parliamentary secretary, another public office holder or a Member of the House of Commons.

Table 4-3: Files Closed during the Past Fiscal Year without Proceeding to an Inquiry, an Examination or a Report

	Related to a Member under the Code	Related to a minister or parliamentary secretary	Related to another public office holder	Total
Raised by Members	7	2	2	11
Raised in the media	3	1	0	4
Raised by the public	4	4	9	17
Total	14	7	11	32

Cases Relating to Members of the House of Commons

My Office closed 14 files under the Code involving Members of the House of Commons during the past fiscal year. This is a significant increase over 2012-2013, when only five such files were closed. The 14 files, none of which resulted in inquiries, are summarized below along with a case for which a file was not opened.

- A Member of the House of Commons requested an inquiry in relation to fundraising activities carried out by another Member in support of a personal ongoing legal matter. I conducted a preliminary review to determine whether the donations raised, which I considered to be gifts, were acceptable under section 14 of the Code. I found that some of the donations accepted by the Member passed the acceptability test since they could not reasonably be seen to have been given to influence him in the exercise of a duty or function of his office. Of these gifts, those having a value of \$500 or more were publicly reported. Other donations did not pass the acceptability test and had to be returned to the donors.



- A member of the public alleged that a Member of the House of Commons should have recused himself from participating in debate or vote on a matter related to an employment contract the Member had with an outside organization. Another Member of the House of Commons subsequently submitted a request for an inquiry in relation to the same matter. I considered the matter but did not find that the request set out reasonable grounds to proceed to a preliminary review. In any event, it appeared that the matter affected the Member as one of a broad class of the public, an exception to the requirement to recuse.
- A Member of the House of Commons requested separate inquiries in relation to two other Members, alleging that they had failed to declare sponsored travel. A preliminary review was conducted for each. In one case, I determined that the Member had paid for the travel himself; therefore, no sponsored travel was involved. In the other case, relating to three separate instances in 2012, I determined that, although the Member paid for one of the trips, the two other trips did involve sponsored travel. The Member was advised accordingly and signed public declarations of sponsored travel, which were posted on the public registry forthwith. Because the matter was dealt with in this way and was made public, no inquiry was warranted. There are no penalties under the Code for failures to meet deadlines.
- A Member of the House of Commons submitted a request for an inquiry into allegations that another Member had failed to disclose financial liabilities, contrary to the requirements of the Code. I conducted a preliminary review and determined that the Member had contravened his reporting requirements under sections 20 and 24 of the Code. The Member was required to sign a public declaration of these liabilities, which was placed on the public registry.
- Two Members of the House of Commons submitted requests for inquiries into allegations that another Member was being paid for speaking at events while acting in his role as a Member. A preliminary review was conducted in relation to each instance, but it was determined that the Member did not further his private interests while performing parliamentary duties. The Code does not preclude Members from engaging in outside activities, paid or unpaid, as long as they are able to fulfill their obligations under the Code.
- A member of the public raised concerns that a Member of the House of Commons had used his position as a Member to influence matters related to the termination of employment of an individual who had been critical of him and his political party. Upon examination of the information provided during the preliminary review, including a media article and supporting documents submitted by the Member, I determined that there was no reason to believe that the Member had used his position to influence the



decision of the individual's employer to terminate the employment of the individual concerned.

- A member of the public alleged that a Member of the House of Commons had used his office and position to assist the Member's daughter with a news article she had written for publication. During a preliminary review, I determined that it was a staff member who had, on his own initiative, undertaken to help the daughter while the Member was travelling abroad. Members' staff are not subject to the Code.
- Media reports suggested that a former Member of the House of Commons might have been in a conflict of interest because he accepted a position with a private sector entity that substantially benefited from his work while the Member was in office. Because there are no post-employment obligations for Members under the Code, there was no contravention of the Code.
- My Office received a question from the media concerning a Member of the House of Commons whose fundraising event was sponsored by a private organization at a time when the Member was advocating for a bill to legalize activities the sponsoring organization wished to pursue. I determined, after reviewing the list of sponsors submitted by the Member, that he had not advocated on behalf of any of the sponsors of the fundraising event.
- Allegations were made in media reports and by a member of the public that a Member of the House of Commons had used his position as a Member to obtain information that he used in order to further his own private interests. I determined that the Member did not use his position in order to obtain the information because the information was available to the general public.
- My Office received an anonymous letter from a member of the public related to the employment of the spouse of a Member of the House of Commons within the Member's riding that could have involved a contravention of the Code. I determined, after my Office contacted the Member, that there was no reason to believe that a contravention of the Code had occurred. However, I determined that the Member's disclosure summary should be modified so that the public declaration disclosed the employment of the spouse.
- I received a copy of a letter addressed to another agent of Parliament from a member of the public alleging that there had been an inappropriate use of House of Commons resources by a Member. As the use of funds, goods, services or premises made available to Members falls within the jurisdiction of the Board of Internal Economy, I did not open a file, but forwarded the information to the Speaker of the House of Commons for the attention of the Board.



Cases under the Act

My Office closed 18 files under the *Conflict of Interest Act* without proceeding to an examination, seven of which involved ministers and parliamentary secretaries and 11 of which involved other public office holders. My 2013-2014 annual report under the Act provides a brief description of these cases.

V. OUTREACH AND COMMUNICATIONS

Proactive outreach and communications are very important practices to ensure that public office holders and Members are aware of, and adhere to, their obligations under the *Conflict of Interest Code for Members of the House of Commons* (Code) and the *Conflict of Interest Act* (Act). My Office has continued its efforts in this critical area, with a variety of products and initiatives designed to increase awareness and understanding of the Code and the Act among stakeholders.

I have also sought to increase public awareness of Canada's federal conflict of interest regimes and the role and mandate of my Office in administering them, and have continued to work with officials in other jurisdictions.

Reaching out to Members of the House of Commons and Public Office Holders

Members of the House of Commons

I have continued my practice of offering annual presentations to the caucuses of all recognized parties in the House of Commons. This February, we contacted all parties with official status in the House of Commons to offer presentations, and offered individual meetings to other party caucuses and to independent Members of the House of Commons. In March we made one such presentation.

Under the authority provided in subsection 26(4) of the Code, I have published advisory opinions on fundraising and letters of support.

Public Office Holders

Over the past fiscal year, my staff and I have responded to 26 requests for presentations to organizations and offices whose members are subject to the Act, as well as to other groups of public office holders. They include new ministers, ministerial staff in the Prime Minister's Office and other ministerial offices, deputy ministers, departmental officials, the Association of Canadian Port Authorities, the Citizenship Commission, the National Farmers Council of Canada, the National Seniors Council, the Parole Board of Canada, the Social Security Tribunal and honorary consuls.

In support of our commitment to public office holder education and outreach, my Office has developed a number of documents that explain various aspects of the Act and its application. I have issued two guidelines, one on fundraising and the other on serving constituents for ministers and parliamentary secretaries, and issued two information notices: *Gifts offered to public office holders serving on administrative tribunals* and *Working with government after leaving office*. I have also issued a backgrounder on blind trusts.



Parliamentary Activities

As Conflict of Interest and Ethics Commissioner, I report directly to Parliament. In support of this reporting relationship, my Office conducts a variety of parliamentary activities.

Reports to Parliament

In the past fiscal year, I have issued six reports. These include my annual reports under the Code and the Act, which were tabled in the House of Commons in June 2013, and the *List of Sponsored Travel 2013*, which I submitted to the Speaker of the House of Commons in March 2014. The other three reports were examination and inquiry reports: *Referral from the Public Sector Integrity Commissioner: The Fonberg Report* issued under the Act in April 2013, *The Paradis Report* issued under the Act in August 2013 and *The Paradis Report* issued jointly under the Code and the Act in December 2013. The latter report is discussed in the Investigations section of this report.

Committee Appearances

I am occasionally summoned to appear before parliamentary committees to testify about matters related to my Office and its work.

The House of Commons Standing Committee on Access to Information, Privacy and Ethics has oversight responsibility for my Office and reviews its annual spending estimates, as well as matters related to my reports tabled in the House of Commons under the Act. The House of Commons Standing Committee on Procedure and House Affairs has responsibility for the Code. During my term of office, I have appeared most frequently before these two committees.

I have not been summoned to appear before the Standing Committee on Procedure and House Affairs since May 2012, when the Committee initiated a five-year review of the Code. I discussed with the Committee my recommendations in respect of the Code at that time. Subsequently, the Committee suspended its study of the Code because of other priorities, and as of the time of the completion of this report, has not yet resumed its study.

In May 2013, I appeared before the Standing Committee on Access to Information, Privacy and Ethics to discuss my budgetary estimates for 2013-2014, and also met *in camera* with the Committee to discuss the five-year statutory review of the Act. In February 2014, I was summoned to appear before the same Committee during its deliberations on *Bill C-520, An Act supporting non-partisan agents of Parliament*.

I note that the last time I was invited to discuss my annual reports before either the Standing Committee on Procedure and House Affairs or the Standing Committee on Access to Information, Privacy and Ethics was in 2010.



On November 21, 2013, I was summoned to appear before the Senate Standing Committee on Banking, Trade and Commerce during its study of *Bill C-4, Economic Action Plan 2013 Act, No. 2*, to discuss Division 2 dealing with financial institutions and conflict of interest.

On February 4, 2014, I was summoned to appear before the Senate Standing Committee on National Finance, as part of its examination of the expenditures set out in the Main Estimates for the fiscal year ending March 31, 2014.

Other Parliamentary Activities

My Office continues to participate twice a year in the Parliamentary Officers' Study Program, this past fiscal year in November 2013 and February 2014. These sessions, held once in English and once in French, provide an opportunity for senior staff from foreign legislatures and other jurisdictions within Canada to learn about the functioning of the Parliament of Canada and, in turn, to reflect on their own practices. We provide information about the Office's mandate, the Canadian parliamentary ethics framework and the Code and the Act, and respond to questions.

Working with Others

My Office has continued to exchange information about conflict of interest and ethics rules and to discuss related rules with organizations and individuals from Canada and around the world, through a range of activities.

I continue to serve as coordinator of the Canadian Conflict of Interest Network (CCOIN), which is comprised of federal, provincial and territorial conflict of interest commissioners. In fulfilment of this role, my Office gathers and disseminates within the network information and materials from the different Canadian jurisdictions. Last September, I hosted CCOIN's annual meeting in Ottawa. This two-day conference provides commissioners and senior officials with the opportunity to discuss developments in the field, share helpful insights and exchange best practices.

My staff and I made presentations to several external audiences. I spoke at the 30th annual Canadian Administrative Law Seminar in May 2013, the annual general meeting of the Government Relations Institute of Canada in June 2013 and a workshop in Ottawa on "Ethics Essentials" in March 2014. Members of my staff gave guest lectures on ethics and public affairs at the University of Ottawa in October 2013 and again in February 2014 and spoke to the Rotaract Club of Ottawa in November 2013. I spoke to a graduate political management class at Carleton University in February 2014.

In December 2013, I attended the annual conference of the Council on Governmental Ethics Laws (COGEL) in Québec City, where I participated in a panel discussion on taking preventive



approaches to ensuring compliance. COGEL is a U.S.-based international not-for-profit organization of government ethics practitioners.

As in previous years, my Office welcomed several international delegations. We hosted visits by delegations of parliamentarians from Tunisia in May 2013 and from Lesotho in June 2013. In October 2013, I met with officials from the Kenyan Commission on Parliamentary Service and with students visiting Canada as part of the Canada-Ukraine Parliamentary Program. In February 2014, I met with a group of interns from the African Leadership Intern Program. These visits all involved presentations about my role and mandate and included time for subsequent discussion and questions. In September 2013, I had an informal discussion of Canada's conflict of interest regimes with a visiting academic from the Czech Republic, and held another such meeting with two visiting academics from Australia in April 2014.

My Office also responded to a survey from the G20 on asset disclosure rules within member states, and a survey on lobbying from the Organisation for Economic Co-operation and Development, as well as to inquiries on a range of subjects from officials in various countries.

Inquiries from the Media and Members of the Public

Over the course of my mandate, including this past fiscal year, there has been a significant increase in the number of requests for information that my Office receives from journalists and members of the public.

I believe that this increase resulted largely from two factors. One is a growing public awareness about the Code and the Act and the role of my Office in administering them, as evidenced by the 690 media mentions of my Office in the past fiscal year. The other is our approach to media relations: I seek to be as forthcoming with information as my Office is permitted to be under the two regimes. We regularly issue news releases, media statements and backgrounders, and respond to queries from journalists in a timely manner.

The creation, in June 2013, of a bilingual Twitter account (@CIEC_CCIE) for my Office will also, I believe, help increase its profile in the future. We have been tweeting report releases and other Office activities, and are considering ways in which we can expand our use of Twitter. This is part of a broader social media strategy that will also be supported by the new platform that we recently began using for the Office website.

In the last fiscal year, we received and responded to 213 media inquiries, up from 185 in 2012-2013, and I participated in five media interviews. This is a considerable increase over the 28 media requests received and responded to by my Office in 2008-2009, its first full year of operation.



The number of inquiries that we receive from members of the public has also continued to grow. In 2013-2014 we received, by email, telephone, fax and letter mail, some 1,100 such communications, up from approximately 800 the previous fiscal year.

Among those inquiries were ones related to my mandate, including requests for information about the application of the Code and the Act, requests for documents issued by my Office and requests for information about ongoing investigations or compliance matters. My Office also receives information from members of the public about possible contraventions of the Code and the Act.

Many of the inquiries from members of the public consisted of requests for information, action or assistance that were not related to my mandate. In keeping with my objective of increasing public awareness about the administration of the Code and the Act, my staff responded to those inquiries by providing information clarifying my mandate and, where possible, referred the correspondents to other bodies better suited to respond to the issues raised.

The following table shows the increase in the number of inquiries received by my Office over the past six fiscal years.

Table 5-1: Inquiries from the Media and Members of the Public

	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014
Media	28	17	44	102	185	213
Public	429	581	544	593	839	1,097





VI. ADMINISTRATION

Accountability

As an entity of Parliament, my Office operates under the *Parliament of Canada Act*. It is not subject to most Treasury Board policies and guidelines. In addition, most legislation governing the administration of the public service, such as the *Public Service Employment Act*, the *Access to Information Act* and the *Privacy Act*, does not apply to my Office.

Over the years, my Office has directed considerable efforts towards establishing and maintaining an internal management framework based on the principles of sound resource management followed in the public service. In this regard, my Office's focus over the past fiscal year has been on developing and implementing internal directives related to expenditure management, including travel, conference and hospitality expenses and the use of acquisition cards. These new directives document and formalize practices already adopted by the Office.

I have adopted a number of practices followed in the public service to publicly disclose accountability information. Annual financial statements, quarterly financial reports and status reports on travel, conference and hospitality expenses are easily accessible through the Office's website.

In my 2012-2013 annual report, I referred to internal controls being documented at the Office. Over the past fiscal year, these internal controls have been assessed by employees of the Library of Parliament as part of a shared services agreement for financial services. Spot checks of transactions processed throughout the year, similar to an internal audit, assessed the adequacy of and respect for internal controls put in place by the Office for sound expenditure management. I am pleased to report that results of this exercise were very positive.

Since 2010-2011, the annual financial statements for my Office have been audited by an independent auditor. No concerns have been raised and the financial statements have consistently been positively evaluated by the auditing firms.

My Office continues to rely on the expertise of other entities of Parliament as well as Public Works and Government Services Canada (PWGSC) for the delivery of shared services for information technology and security (House of Commons), accounts payable and external reporting (Library of Parliament) and compensation (PWGSC). These arrangements provide greater efficiency and one more level of scrutiny in the management of resources.



Human Resources Management

Employee turnover remains low in my Office, although there have been some departures over the past fiscal year. Three employees left to join the public service, including two who were at the management level, and one employee accepted a position outside the federal public service. As we continue to look for opportunities to increase efficiency at the Office, only one of these four positions has been staffed. Three remain vacant for the time being.

As part of its succession planning strategy, my Office is aiming to have competency profiles in place for all positions at the Office by the summer of 2014. These profiles, which will include defined performance indicators for each competency, will be used for all human resources management functions, including staffing, performance evaluation, training and succession planning.

A new directive on performance management came into effect at the Office on April 1, 2014. In addition to documenting already-existing practices at the Office related to performance management, such as annual performance reviews and the establishment of objectives and learning plans, this directive covers the requirements for mid-year performance reviews, talent management strategies and action plans for unsatisfactory performance. Our approach is consistent with that being taken in the federal public service.

As mentioned in my 2012-2013 annual report, job shadowing was introduced in my Office in an effort to support and encourage the career development of our employees. This initiative has been well received. Over the past fiscal year, eight employees have participated in the program by spending a few hours with a colleague who performs a different task or function.

Other policies and guidelines implemented in 2013-2014 address occupational health and safety, disability management and duty to accommodate, and management of leave.

In May 2013, my Office tendered a contract to an external company to carry out an employee satisfaction survey seeking feedback from employees on their level of satisfaction with the Office in general and their job specifically. I was very pleased with the response rate of 98%. Overall, survey results suggest that employees are generally satisfied. Employees responded very favourably, especially when it pertained to their own division, as to how they perceive their job, the level of resources provided to them to complete their work, the ability to work in both official languages, employee benefits, and collaboration and respect for diversity. Opportunities for advancement within the Office and employee empowerment were areas that were raised as needing improvement. A desire was also expressed that conflict resolution mechanisms be established. In response to these suggestions, the Office now makes more frequent use of working groups, consisting of employees only, to work on specific projects, and has negotiated an arrangement for third-party conflict resolution services.



Financial Management

For the first five years after the Office was created in July 2007, I maintained a constant operating budget of \$7.1 million. Over the last fiscal period, in recognition of the current climate of fiscal restraint, my Office conducted a spending review to identify opportunities for efficiencies. As a result, I decided to reduce the non-salary portion of my 2013-2014 budget by an amount equivalent to 3% of the 2012-2013 operating budget, with an additional one percent in 2014-2015. Although that reduction was partially offset by an increase in my salary envelope to cover the economic increases that came into effect on April 1, 2013, I was able to proactively offer an overall budget reduction of 1.4 % for 2013-2014.

Measures implemented internally to reduce spending are producing expected results. These measures include the increased use of email, rather than traditional mail, to communicate with our stakeholders; the use of webcasts to participate in conferences, hence reducing travel costs; and the centralization of certain purchases and functions. In addition, one position in the Corporate Management division was abolished.

A table broadly outlining the financial information for the Office for the 2013-2014 fiscal year is provided in the Appendix under the heading Financial Resources Summary. Detailed financial information can be found on our website.

My Office continues to spend less than its allocated budget, in part due to the measures just mentioned, but also due to the decision not to immediately fill positions that have become vacant. I maintain a reserve within my Office to cover unexpected operational pressures, such as an increase in investigation activities. I also use this reserve to internally fund projects and initiatives that lead to greater efficiency. One such project is the renewal of the public registries maintained by my Office.

As mentioned earlier in this report, I am required under both the *Conflict of Interest Code for Members of the House of Commons* and the *Conflict of Interest Act* to maintain public registries of public declarations submitted by Members of Parliament and reporting public office holders. Although the current registries enable me to meet my obligations, they present challenges when it comes to integration with the new case management system, making structural changes and presenting information in both official languages. Business requirements have been defined and it is expected that the new registry will be launched in April 2015.





VII. LOOKING AHEAD

The next year could bring important developments for the *Conflict of Interest Code for Members of the House of Commons* (Code) and the *Conflict of Interest Act* (Act), and for my Office's administration of them.

While I continue to believe that the two regimes, at their core, are working well, my experiences in administering the Code and the Act have demonstrated that there is room for improvement. I believe that Canadians desire and deserve a system of governance that ensures that elected and appointed officials are held to the highest standards of integrity. They also deserve a system that is rooted in clear rules that are sensible, and that can be implemented effectively and efficiently.

The Standing Committee on Procedure and House Affairs has yet to complete its five-year review of the Code. The government is expected to respond in the near future to the report of the House of Commons Standing Committee on Access to Information, Privacy and Ethics on the five-year review of the Act. Until such time as the results of these reviews are made public and the impact of changes, if any, are known, I will continue to apply the two regimes as they currently are.

In support of an ongoing focus on prevention, my Office will continue to provide Members and public office holders with the advice and guidance they need to comply with the Code and the Act.

We will also continue to investigate possible contraventions of the Code and the Act to ensure that elected and appointed officials are held to the highest standards of integrity. During the next fiscal year, we expect to be able to complete and report on all the cases that are now currently under investigation. Two cases remain suspended at this time.

Beyond the day-to-day administration of the Code and the Act, I have identified a number of priorities for my Office in 2014-2015.

One priority is to implement any changes arising from the reviews of the Code and the Act, referred to above, which could involve new processes, procedures or initiatives. It could also involve an assessment of the resource implications of any changes.

Another priority is the renewal of the public registries that are currently accessible on the Office's website. They will be updated using new technology and redesigned so that they are more user-friendly and allow for greater search functionality. The new registries are expected to be launched in April 2015.



We will also work toward completing an electronic internal practice manual reflecting the precedents that I have created over the years through my interpretations. This will facilitate ongoing consistency and clarity in the advice that my Office provides to Members and public office holders.

My Office has now developed the performance measurement framework that I discussed in the annual report for the previous fiscal year. This will allow us to measure and report on results more effectively and is in line with the approach used in the federal public service, but tailored to our own context. We will begin to implement it, in pilot stages, during the upcoming fiscal year.

We will endeavour to identify further opportunities for cost savings. Building on the measures that my Office has already taken to reduce spending, we will continue to assess regularly our practices and procedures with a view to enhancing our effectiveness.

Finally, we will focus on documenting internal processes, improving the way we manage electronic records and developing a succession plan for critical positions and functions. This will ensure that the corporate knowledge of the organization is secured.

Achieving these and other priorities will help my Office continue to carry out its mission to administer the conflict of interest rules for Members of the House of Commons and for public office holders with a view to maintaining and enhancing the trust and confidence of the Canadian public in the conduct of these elected and appointed officials.



APPENDIX – FINANCIAL RESOURCES SUMMARY (from page 27)

Program Activity	(thousands of dollars)				Alignment to Government of Canada Outcomes
	2012-2013 Actual Spending	2013-2014			
		Main Estimates	Total Authorities	Actual Spending	
Administration of the <i>Conflict of Interest Act</i> and the <i>Conflict of Interest Code for Members of the House of Commons</i>	5,698	6,235	6,235	5,336	Government Affairs
Contributions to Employee Benefit Plans	755	800	800	699	
Total Spending	6,453	7,035	7,035	6,035	
Plus: Cost of services received without charge	1,035	n/a	n/a	1,060	
Net Cost of Department	7,488	7,035	7,035	7,095	

The budget process for the Office of the Conflict of Interest and Ethics Commissioner is established in the *Parliament of Canada Act*. The Speaker of the House considers the estimates for the Office and transmits them to the President of the Treasury Board for inclusion in the estimates of the Government of Canada. The Standing Committee on Access to Information, Privacy and Ethics has within its mandate the role to review and report on the effectiveness, management and operations together with the operational and expenditure plans relating to the Office.

For the first five years after the Office was created in July 2007, it maintained a constant operating budget of \$7.1 million. As a result of a spending review conducted in 2012, the non-salary portion of the 2013-2014 budget was reduced by an amount equivalent to 3% of the 2012-2013 operating budget. This reduction was partially offset by an increase in the salary envelope to cover the economic increases that came into effect on April 1, 2013. Seventy-seven per cent (or \$5.4 million) of the total budget is dedicated to salaries and employee benefits. Of the remaining \$1.6 million, approximately \$650,000 is used to cover the cost of shared services provided by the House of Commons, the Library of Parliament and Public Works and Government Services Canada in the area of information technology, security, finance and compensation.

Complete financial statements can be found on our website at <http://ciec-ccie.gc.ca>.

