



Office of the Conflict
of Interest and Ethics
Commissioner

Commissariat aux
conflits d'intérêts et à
l'éthique

The 2015-2016 ANNUAL REPORT

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



June 14, 2016

Mary Dawson
Conflict of Interest and
Ethics Commissioner

The 2015-2016 Annual Report

in respect of the

CONFLICT OF INTEREST CODE FOR MEMBERS OF THE HOUSE OF COMMONS

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

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June 13, 2016

The Honourable Geoff Regan, P.C., M.P.
Speaker of the House of Commons
Centre Block, Room 228-N
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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, 2016, to be tabled in the House of Commons on June 14, 2016.

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* (Members' 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 Members' Code applies to all 338 Members of the House of Commons. It was adopted by the House of Commons in 2004 and was amended in 2007, 2008, 2009 and 2015. The Members' 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 2,200 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 Members' 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 gifts and benefits. The Act also contains a number of post-employment rules.

While the focus of both the Members' Code and the Act is on prevention, I am 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 Members' Code and the Act;
- receive and review confidential reports of assets, liabilities, income and 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 a public registry of publicly declarable information;
- administer an administrative monetary penalty regime under the Act for failures to comply with certain reporting requirements; and
- conduct inquiries and examinations into alleged contraventions of the Members' Code and the Act.



I am also mandated under both the *Conflict of Interest Act* and the *Parliament of Canada Act* 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 Members' Code and the other report relates to the Act.

II. OVERVIEW – A Year of Change

This has been a year of very significant change. In the months following the October 2015 election, the change in government and the addition of 30 new seats to the House of Commons led to a high turnover of public office holders and the arrival of over 200 new Members of Parliament. In administering the *Conflict of Interest Code for Members of the House of Commons* (Members' Code) and the *Conflict of Interest Act* (Act), my focus remains on ensuring that both new and returning Members and public office holders understand their obligations so they can avoid situations that risk placing them in a conflict of interest.

My Office implemented a post-election communications and outreach plan to provide broad guidance and to help Members and new public office holders understand how they can achieve and maintain compliance with the Members' Code and the Act. As amendments to the Members' Code were adopted late in the previous Parliament, my outreach efforts were also aimed at returning Members to ensure that they were aware of these changes. I am confident that the foundation has been laid for a productive relationship. My Office continues its outreach efforts, as outlined in this report, and strives to find innovative ways to reach Members and public office holders.

I continue to place a particular emphasis on prevention. With respect to both the Members' Code and the Act, my Office provides advice based on the individual circumstances of each Member or public office holder. Advisors in the Office guide Members and reporting public office holders through their initial compliance obligations and the annual review process. My Office also assists all Members and public office holders on their ongoing obligations and explains post-employment obligations to outgoing public office holders, whether before or after they leave office. I continue to enforce the Members' Code and the Act by investigating possible contraventions and by imposing administrative monetary penalties on reporting public office holders where appropriate.

My experience in administering the two regimes has shown me where the strengths of the Members' Code and the Act lie and where there are gaps. In each of my previous annual reports, I have made observations in this regard. Over the past fiscal year, the question of the acceptability of gifts and other benefits has attracted particular attention, so I have offered some observations about the rules in the section of this report entitled Matters of Note.

In the last Parliament, I contributed to the review of the Members' Code and the Act and note that a number of my recommendations for the Members' Code were adopted. Should either of the relevant committees pursue these or other reviews, I would be pleased to contribute to them.



As I approach the end of my ninth year as Commissioner, I am confident that the structures, processes and systems that I have put in place provide a solid base from which to administer the Members' Code and the Act. At the same time, my Office has the flexibility and adaptability to evolve in circumstances that may require change. It has a strong internal management and policy framework adapted to its needs which supports the effective, efficient and economical use of public resources, the protection of public assets and the safeguarding of personal information.

I could not fulfill my mandate as Commissioner without the support of my staff. Their longstanding commitment to the work of the Office has resulted in a strong and experienced team. I thank them for their invaluable contributions and for their continued loyalty and dedication.



III. APPLYING THE MEMBERS' CODE

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

The *Electoral Boundaries Readjustment Act* provides for the review of the number of seats in the House of Commons and of the federal electoral district boundaries after each decennial census, the most recent of which took place in 2011. Consequently, the number of Members increased after the 2015 general election from 308 to 338. There were 124 Members reelected from the previous Parliament.

In June 2015, the Standing Committee on Procedure and House Affairs recommended amendments to the Members' Code. They were concurred in by the House of Commons on June 18, 2015 and came into effect on October 20, 2015. I was pleased to see that the amendments responded to some of the recommendations I had made to the Committee in my submission for the five-year review of the Members' Code. I refer in this section to two groups of these amendments: one relating to the initial compliance and annual review processes and the other to lower disclosure thresholds for disclosing gifts and other benefits and for sponsored travel.

Initial Compliance

The Members' Code establishes an initial compliance process that all Members must complete to meet their initial obligations. After the 2015 general election, I wrote to all new and returning Members to inform them of their obligations under the Members' Code. As a first step, they were required to complete and submit a confidential *Disclosure Statement* to my Office within 60 days after the notice of their election was published in the *Canada Gazette*.

The *Disclosure 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 directly or indirectly derive a benefit or income, and benefits that could result from government contracts. Members must also make a reasonable effort to determine the same information for their spouses or common-law partners and their dependent children for disclosure to my Office.

One of the recent amendments to the Members' Code provides Members with the opportunity to request an extension to the 60-day deadline for the filing of the *Disclosure Statement*. The amendment also specifies that no reasonable request shall normally be refused.



This reflects a practice that my Office had already been following. Twenty-five Members requested an extension after the 2015 general election and all requests were granted.

My Office sends a series of reminders and provides assistance to Members as the 60-day deadline approaches. Despite the efforts of my Office, I note that about half of the Members did not submit their *Disclosure Statement* within the 60-day deadline; nor did they seek an extension. The failure to submit on time could be due in part to the timing of the general election in 2015, which resulted in the 60-day period for many new Members falling during the holiday season. No penalty for failing to meet this deadline has been established in the Members' Code.

Once the initial *Disclosure Statement* is submitted, my Office reviews the information and prepares a *Disclosure 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 Members' Code throughout their term in office. My Office might also recommend specific compliance measures to prevent real or apparent conflicts of interest. For example, my Office has in some instances recommended the disclosure of a private interest to the Clerk of the House of Commons which might be recorded in the Journals.

The initial compliance process is complete when any compliance measures recommended by my Office are put in place by the Member and the *Disclosure Summary* is placed on the registry for public inspection.

The amendments to the Members' Code also introduced a new 60-day deadline for Members to review and sign the *Disclosure Summary*. Once again, Members can request an extension to this deadline and no reasonable request may normally be refused. However, at the expiration of the 60-day period or of any extension granted, the *Disclosure Summary* is to be made available for public inspection whether or not it has been signed by the Member.

My Office maintains a *Members' Compliance Status Report* which identifies where each Member is in the initial compliance process on a specific day. This report is available on the Office website and is updated regularly after general elections. On March 31, 2016, only one Member's *Disclosure Statement* was still outstanding, and the initial compliance process had been completed for 116 Members.

As part of my Office's efforts to assist Members in complying with their initial compliance obligations under the Members' Code and to facilitate the process by which they make public declarations, a secure declaration portal was launched in October 2015, giving Members the option of reviewing and approving their public declarations online. Members were introduced to the portal by their advisors in the Office as they were requested to review and sign their



Disclosure Summary. As of March 31, 2016, 81% of those Members who had completed their initial compliance process chose to approve their *Disclosure Summary* through the portal. Another 21 Members either approved or submitted other types of public declarations through the portal.

Maintaining Compliance

Beyond the initial compliance process, my Office assists Members in meeting their obligations under the Members’ Code throughout their term in office. This is done in part through formal mechanisms set out in the Members’ Code. These include the annual review process and the requirements that Members report and publicly disclose gifts or other benefits, sponsored travel and material changes, each of which is discussed separately below. In addition, my Office regularly communicates with Members to provide them with ongoing information and advice on the application of the Members’ Code.

Ongoing Advice

The number of communications with Members seeking information and advice beyond the initial compliance process gradually diminished over the past three fiscal years. The decrease in 2015-2016 can most likely be attributed to the relatively long general election period in 2015. As a result of the dissolution of the 41st Parliament and the fact that Members of the House of Commons cease to hold office once the writs for a general election are issued, the rules and obligations under the Members’ Code no longer applied. The decrease can also be attributed to the fact that during the initial compliance process, my Office is in regular communication with the Members and can answer any questions that may arise as part of that process.

Requests for advice from Members	
2011-2012	264
2012-2013	605
2013-2014	534
2014-2015	499
2015-2016	409

Thirty-two percent of the communications my Office had with Members in 2015-2016 were related to gifts. Another 15% were related to changes in the Members’ personal situations, and 10% were related to letters of support and fundraising activities. The other 43% were related to a wide range of subjects.

Where relevant, Members were reminded of section 5 of the Members’ Code, under which they do not breach the Members’ Code if their activity is one in which they “normally and properly engage on behalf of constituents,” but were also cautioned that pursuant to section 8 of the Members’ Code, they may not act in any way to further their private interests or those of a member of their family, or to improperly further another person’s or entity’s private interests.



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 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 Members' Code, my Office pays particular attention to the annual review process. We send Members email reminders after our annual review letters are sent out, and then follow up by phone. This practice continues to ensure a more timely return of a greater number of annual review documents.

Annual reviews are initiated on or around the date of signature of the initial *Disclosure Summary* following a Member's election unless the previous annual review was not completed in a timely fashion, in which case the initiation of an annual review is delayed. In 2015-2016, my Office initiated fewer annual reviews than in the previous four fiscal years because I did not initiate the annual review process for some Members as the House of Commons' summer recess approached in anticipation of the general election. It is not necessary to initiate first annual review processes in this Parliament until January 2017, because all Members were required to go through the initial compliance process after the election.

As part of the annual review process, I send a questionnaire to Members to inquire about specific changes to their disclosure over the past year. This questionnaire often prompts Members to contact my Office for further advice on their obligations.

As a result of one of the amendments to the Members' Code made in 2015, there is now a 60-day deadline for Members to review the information previously provided to my Office. If there are any changes that must be made, Members will have an additional 60-day period to review and sign the modified *Disclosure Summary* from the time my Office sends it to them. The date on which a Member's most recent annual review is completed always appears on the public registry.

Ongoing Reporting Requirements

The Members' Code requires that Members file a statement disclosing gifts or other benefits, sponsored travel or material changes relating to information that is required to be disclosed 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 many requests for advice. Section 14 of the Members' Code establishes an acceptability test for gifts and other benefits offered to Members or members of their families. Where a gift or other benefit could reasonably be seen to have been given to influence the Member in the exercise of a duty or function of his or her office, it may not be accepted, regardless of its value.

There is an exception for gifts or other benefits that are received as a normal expression of courtesy or protocol, or within the customary standards of hospitality that normally accompany the 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, or meals offered to Members at a public event at which the Member's attendance is considered to fulfil an official duty or function, are usually acceptable. Such gifts are, however, still subject to the disclosure and public statement requirements of the Members' Code.

Advice relating to gifts and other benefits	
2011-2012	51
2012-2013	99
2013-2014	98
2014-2015	111
2015-2016	129

One of the amendments to the Members' Code made in 2015 was to lower the threshold for public declarations of gifts and benefits from \$500 to \$200. Any gift or benefit accepted by a Member that is related to his or her position and that has a value of \$200 or more must be disclosed to my Office within 60 days and publicly declared.

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

My Office launched an improved public registry in April 2015, simplifying its search functions. One of these changes affected the disclosure of gifts and other benefits. It allows members of the public to find a reference to a specific gift or other benefit more easily. In the previous registry, gifts and other benefits were displayed as a group based on the date they were disclosed. Currently, they are displayed on an individual basis, which increases the number of declarations in a year. The increase in public declarations of gifts and other benefits reported in 2015-2016, as indicated in table 3-1, can also be attributed to the lowering of the reporting threshold for gifts in October 2015 from \$500 to \$200.



Table 3-1 sets out a five-year comparison of the number of publicly declared gifts and benefits and the number of Members who made these declarations.

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

	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016
Number of publicly declared gifts or other benefits	36	49	78	37	57
Number of Members who publicly declared gifts or other benefits	14	24	19	17	27

Gifts that were found to be unacceptable or that were valued at under \$200 (or previously \$500) were not publicly declared. In cases where my Office determined that gifts were unacceptable, those gifts were refused, returned or paid for by the Member.

Sponsored Travel

As mentioned earlier, the threshold for disclosure of sponsored travel was lowered from \$500 to \$200 as a result of the amendments made in October 2015.

Subsection 15(0.1) of the Members' Code expressly permits Members to accept sponsored travel that arises from or relates to their positions, effectively exempting it from the 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 \$200 and is not wholly paid from the Consolidated Revenue Fund or by the Member personally, his or her political party or any parliamentary association recognized by the House, it must be disclosed to the Commissioner and publicly declared within 60 days after the end of the trip.

Public declarations of sponsored travel are posted on the Office website once they have been reviewed by an advisor in the Office. The Members' Code also requires that the Commissioner submit, by March 31 of each year, a list of sponsored travel by Members during the previous calendar year. In 2015-2016, the volume of sponsored travel reported was approximately one-third of that of previous years, probably because of the general election. Because Members have 60 days to file a *Statement of Sponsored Travel* with my Office, some Members may not have had the opportunity to file their statement before the election period and could not do so after the election was called because of the change in their status during the election period.



I have noted in previous reports that, unlike for gifts and other benefits, there is no acceptability test for sponsored travel. I have recommended, in the context of the five-year review of the Members' 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 the Member in the exercise of his or her official duties. Although the sponsored travel section of the Members' Code was modified, no change has been made to include an acceptability test.

Table 3-2 sets out a five-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

	2011	2012	2013	2014	2015
Declarations of sponsored travel	73	85	110	87	27
Members who declared sponsored travel	59	65	71	57	26

Material Change

Members are required to file a statement with my Office reporting any material change to the information that is included in their initial *Disclosure Statement* within 60 days after the change. I have determined that, at a minimum, a change is material if it affects the information that is or should be made available for public inspection on the public registry. I note that, despite the deadline, material changes are often not reported until the annual review process.

In 2015-2016, my Office received 13 requests for advice relating to possible material changes. All of these communications resulted in public declarations. Members who have questions regarding whether a change to their personal situation constitutes a material change under the Members' Code are encouraged to contact my Office because new compliance measures may be necessary to meet their obligations.

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

Table 3-3: Public Declarations of Material Changes

	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016
Declarations of material changes	27	33	25	20	14
Number of Members who declared a material change	18	30	22	20	14





IV. MATTERS OF NOTE

Gifts and Other Benefits

The Members' Code prohibits Members and public office holders and their family members from accepting gifts or other benefits that might reasonably be seen to have been given to influence them in the exercise of a duty or function of their office. The *Conflict of Interest Act* has a similar provision.

I have discussed the rules around gifts and other benefits earlier in the section entitled Applying the Members' Code at pages 9 to 11.

Gifts and other benefits have always been the subject of many requests for advice. The election of many new Members and the release of the new *Lobbyists' Code of Conduct* drew the attention of a wider audience to issues relating to gifts and other benefits. Questions about their acceptability under the Members' Code were raised during my presentations to the Liberal and Conservative caucuses this past winter, where Members were seeking greater clarity about the application of the gift rules. Gifts and other benefits were also the subject of many questions during my February 2016 appearance before the House of Commons Standing Committee on Procedure and House Affairs, both in relation to the Members' Code and the *Conflict of Interest Act*.

I have already issued a number of advisory opinions under the Members' Code relating to gifts and other benefits, both generally and to address specific circumstances, including, in March of this year, one on invitations and receptions.

Having received a commitment from the Committee on Procedure and House Affairs that it would consider any guidelines sent to it, I also drafted a comprehensive guideline on gifts and other benefits under the Members' Code, similar to my guideline under the *Conflict of Interest Act* and, in early April 2016, I submitted the draft guideline to the Committee for approval. The draft guideline provides comprehensive guidance on how I am interpreting the existing Members' Code provisions relating to gifts and other benefits as they are written.

It appears to me that the real concern that some Members have about these provisions lies with what rules under the Members' Code might be adjusted, rather than with receiving further guidance on what they mean as currently written.

Until 2009, the Members' Code contained a blanket prohibition against the acceptance of any gifts and other benefits related to a Member's position, with exceptions for courtesy, protocol and hospitality gifts. I had the impression that this rule was not always being respected



because of its absolute nature. As I said in my 2008-2009 annual report, “I had a growing sense that there were significant variations in how Members were adhering to the Code based on their personal understanding and interpretation of its provisions.” For this reason, in 2009, I suggested to a subcommittee of the Standing Committee on Procedure and House Affairs that this broad prohibition might be replaced by an acceptability test similar to the one that exists under the *Conflict of Interest Act*. The Members’ Code was amended accordingly in June 2009.

Over the years, Members have commented on how onerous it is to apply the acceptability test to gifts and other benefits of trivial value, such as books or trinkets offered to attendees at an event or received by their office. I have in the past made some suggestions, particularly at the time of five-year reviews and in my annual reports. I observed that perhaps it would help to establish a threshold of a reasonably low value under which gifts and other benefits would not need to be subject to an acceptability test. At that time I suggested a threshold of \$30 and subsequently commented that perhaps \$35 or \$50 could be considered.

From another perspective, I note that if the acceptability threshold were the same as the reporting threshold, this would eliminate the constant confusion between the two thresholds.

The power to decide what changes to make rests with the House of Commons. In its *Thirty-Ninth Report* to the House of Commons, following its review of the Members’ Code, the Standing Committee on Procedure and House Affairs recommended that a comprehensive review of the Members’ Code be resumed in the 42nd Parliament. Should the Committee decide to proceed to a review, it might wish to consider the advisability of recommending to the House of Commons an amendment to the gift rules, possibly along the lines described.

V. INVESTIGATIONS

My Office administers two investigative regimes, one under the *Conflict of Interest Code for Members of the House of Commons* (Members' Code) and the other under the *Conflict of Interest Act* (Act). An inquiry under the Members' Code can be initiated after receiving a request from a Member of the House of Commons, 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. Inquiries and examinations are not initiated unless thresholds of probability set out under the Members' Code or the Act are met.

When a Member makes a request under the Members' 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 Members' 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 Members' 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 Members' Code or 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 Investigation Case Files under the Members' Code and the Act

Over the past fiscal year, 28 new case files were opened and eight case files were carried over from previous fiscal years. Only two of the 28 newly opened case files related to the Members' Code, and only one of the eight case files carried over from 2014-2015 related to the Members' Code.

Table 5-1 compares all the investigative activity over the past five fiscal years.

Table 5-1: Case Files under the Members' Code and the Act

	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016
Case files opened	30	32	28	39	28
Case files carried over from previous fiscal year	11	16	13	6	8
Total	41	48	41	45	36



Table 5-2 compares the investigative activity under the Members' Code over the past five fiscal years.

Table 5-2: Case Files under the Members' Code

	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016
Open case files relating to the Members' Code	6	13	17	9	3

While the total number of case files in progress under both the Members' Code and the Act is relatively consistent from year to year, the number of case files in progress under the Members' Code has fluctuated significantly from a low of three in 2015-2016 to a high of 17 in 2013-2014. General elections were held in 2011-2012 and 2015-2016 and, while they do not appear to have significantly affected the overall numbers, they appear to have significantly reduced the number of case files in progress under the Members' Code.

Table 5-3 sets out the sources and subjects of the case files in progress over the past fiscal year. I self-initiated all but five of the case files. Two of the five resulted from referrals from the Public Sector Integrity Commissioner. Three of the five resulted from requests from Members, including one under the Members' Code and two under the Act. However, there were three others that were brought to my attention by a Member of the previous Parliament during the election period in the summer of 2015 when he was no longer a Member.

Table 5-3: Source of Information and Subjects of Case Files

Source of information	Subject is a current or former minister or parliamentary secretary		Subject is a Member	Subject is another public office holder	Total
	Members' Code	Act	Members' Code	Act	
Members of the general public	0	8	9	1	18
Office of the Conflict of Interest and Ethics Commissioner	0	4	1	4	9
Media reports	0	1	0	3	4
MP requests	1	1	0	1	3
Referrals from the Public Sector Integrity Commissioner	n/a	0	n/a	2	2
Total	1	14	2	19	36



Case Files in Progress under the Members' Code in 2015-2016

Table 5-4 sets out the nature and number of the concerns raised in 2015-2016 and shows the number of those concerns raised in the four previous fiscal years. Individual case files sometimes address concerns relating to more than one provision of the Members' Code. The numbers show that the nature of concern most often raised relates to an allegation of furthering a private interest.

Table 5-4: Concerns Addressed

Nature of concern (Sections of the Members' Code)	Number of concerns				
	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016
Actions that could be perceived as making, or seeking to influence, decisions that would further a private interest (section 8 or 9)	5	11	11	5	2
Gifts (section 14)	1	1	2	4	1
Duty to recuse (section 13)	2	0	0	2	0

Case Files Closed under the Members' Code in 2015-2016

My Office closed three case files under the Members' Code in 2015-2016. None of them resulted in an inquiry or even a preliminary review. No case files under the Members' Code were carried over into 2016-2017 and no new case files under the Members' Code have been opened in 2016-2017 up to the time of printing this report.

Table 5-5 summarizes the circumstances in which case files were closed under the Members' Code over the past five fiscal years.

Table 5-5: Why Case Files Were Closed

	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016
Reports released following an inquiry	1	0	0	0	0
Joint reports released following an inquiry and an examination	0	0	1	0	0
Case files closed relating to the Members' Code without proceeding to an inquiry or public report	4	6	16	8	3
Total	5	6	17	8	3



Reports Issued

No inquiry reports were released under the Members' Code in 2015-2016, nor were there any released in 2014-2015.

Overview of Case Files Closed Without Proceeding to an Inquiry

For those case files that are closed without proceeding to a preliminary review, my Office normally informs the subject of the case that concerns have been raised. However, I may decide not to do so where there is no evidence provided to support the allegation or where the matter is outside the scope of my mandate. On the other hand, where the requestor has made public the allegation against the subject as well as the fact that he or she contacted me about it, I would normally inform the subject that I am not looking into the matter. My Office also contacts the individual who raised the matter, once the file has been closed, to inform him or her of how the matter was resolved unless, of course, the source was anonymous.

In 2015-2016, my Office closed three case files under the Members' Code without proceeding to an inquiry. Two cases involved the furthering of private interests and the other case involved the acceptance of a gift.

One case was raised by a Member of the House of Commons. The Member referred me to a news report that raised concerns about another Member, who was also a minister, using partisan symbols during a government announcement, alleging that the minister was furthering private interests. I determined that, because it was a political interest that was involved and not a private interest, this situation was not covered by the Members' Code.

In another case, I received information from a member of the public that a Member had written an email to a lawyer in the context of a lawsuit. On reviewing the documents provided by the member of the public, I determined that there was no information to suggest that the Member was furthering private interests within the meaning of the Members' Code.

Finally, I opened a third case file as a result of concerns raised within my Office that a Member of the House of Commons may have attended a social event as the guest of an organization that was registered to lobby the House of Commons. My Office contacted the Member and it was determined that the Member had accepted the invitation and attended the event, but had no official duties or functions that could be exercised in relation to the organization. I therefore was not concerned that the invitation might reasonably be seen to have been given to influence the Member in the exercise of his responsibilities.



Case Files under the Act

In 2015-2016, 33 of the 36 case files in progress related to obligations of public office holders under the Act.

My Office closed 25 of the 33 case files under the Act. Two resulted in public reports. Two were self-initiated examinations under the Act that were subsequently discontinued without releasing a report. I closed the remaining 21 case files under the Act without proceeding to an examination. My 2015-2016 annual report under the Act provides a description of the case files that were closed under the Act in 2015-2016.

Eight of the 33 case files under the Act that were in progress in 2015-2016 were carried over into 2016-2017. Three of the eight resulted in ongoing examinations. Two of the eight were examinations that remained suspended pursuant to section 49 of the Act at the end of 2015-2016.

The remaining three of the eight were still under consideration at the end of 2015-2016, pending a determination as to whether an examination was warranted. They have subsequently been closed.





VI. OUTREACH AND COMMUNICATIONS

My Office continues its efforts to strengthen awareness of Canada's federal conflict of interest regimes, and my role and mandate in applying them.

Reaching Out to Members and Public Office Holders

As in previous years, my Office undertook a variety of outreach and communications initiatives in 2015-2016 aimed at helping Members and public office holders understand their obligations under the *Conflict of Interest Code for Members of the House of Commons* (Members' Code) and the *Conflict of Interest Act* (Act), educating and informing other stakeholders and the Canadian public and exchanging information with other jurisdictions. The number of communications between my Office and Members and public office holders has increased in 2015-2016, and I attribute this increase in part to our outreach activities, some of which are described below.

Members of the House of Commons

My Office updated a number of information products on our website to reflect the amendments to the Members' Code that were adopted by the House of Commons in June 2015 and came into force in October 2015, including the *Overview of the Conflict of Interest Code for Members of the House of Commons* and a number advisory opinions that I had issued on the Members' Code (*Acceptability of Gifts Offered in Conjunction with Lobby Days, Publicly Disclosing Gifts Received in Connection with Travel, Acceptability of Event Invitations and Tickets, and Acceptability of Gifts Offered at Events*). In meeting with Members in various fora, I found that many questions continue to be raised about gifts, particularly with respect to invitations and receptions. Accordingly, I issued a new advisory opinion on March 7, 2016 entitled *Invitations and Receptions*.

I was invited for the first time to participate in the Members' Orientation Program for new Members of the House of Commons following the general election. Information on Members' obligations under the Members' Code was included in Source, the House of Commons' mobile-enabled portal accessible on the iPads that were provided to Members, along with a welcoming note from me explaining my role. I was pleased to meet with Members early in their mandate at the Administrative Orientation Session on November 5, 2015 and to provide them with a pamphlet summarizing the main elements of the Members' Code. As a result of the June 2015 amendments to the Members' Code, my focus was not only on ensuring that new Members were aware of their obligations, but also on ensuring that returning Members were aware of the changes.



For the first time, representatives of my Office were present at the Service Fair in January 2016. They staffed an information kiosk and met with a large number of Members and their staff. Although Members' staff are not subject to the Members' Code, it is important that they understand their Members' obligations in order to assist them in complying with the Members' Code. There were many questions about gifts, including event invitations, as Members' staff frequently deal with these matters.

I have continued my practice of offering presentations to the caucuses of all recognized parties in the House of Commons, as well as individual meetings to the other party caucuses and to independent Members. In January 2016, I made presentations to both the Liberal and Conservative caucuses.

In February 2016, I participated in an information seminar organized by the Library of Parliament for Members of Parliament, their staff, and administrative staff of the Senate and the House of Commons, as part of a panel of officers of Parliament.

Public Office Holders

In the past fiscal year, my staff and I have given 26 presentations to organizations and offices whose members are subject to the Act or the Members' Code. These included ministerial staff, citizenship judges, honorary consuls and members of boards and tribunals.

In July 2015, I issued a backgrounder entitled *Measures Relating to Confidential Report and Divestment of Controlled Assets* intended as a quick reference for reporting public office holders. At the same time, I revised the existing backgrounder entitled *Blind Trusts*. I also updated a guideline and renamed it *Reimbursement of Costs Associated with Divestment of Assets and Withdrawal from Activities* in April 2015. That guideline sets out the process that public office holders must follow to request reimbursement.

I continued my practice of sending an annual letter to public office holders who are not reporting public office holders, accompanied by a summary of the Act's rules for public office holders. This year, I highlighted the rules relating to gifts and to recusals.

Parliamentary Activities

As an independent Officer of Parliament, I report directly to Parliament through the Speaker of the House of Commons. In support of this reporting relationship, my Office conducts a variety of parliamentary activities, which are described below.

Reports to Parliament

In 2015-2016, I issued five reports. Among them were my 2014-2015 annual reports under the Members' Code and under the Act, both of which I released on June 9, 2015, and the *List of Sponsored Travel 2015*, which I submitted to the Speaker of the House of Commons for tabling on March 24, 2016.

There were no inquiries reported under the Members' Code.

Two examination reports under the Act were made public: *The Kosick Report*, which I released on September 15, 2015, in relation to post-employment activities, and *The Gill Report*, which I released on February 24, 2016, relating to the question of letters of support sent to administrative tribunals.

Committee Appearances

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

The House of Commons Standing Committee on Procedure and House Affairs has responsibility for the Members' Code. My Office operates under the general direction of the House of Commons Standing Committee on Access to Information, Privacy and Ethics, which reviews our annual spending estimates and may review any matter related to the Act.

In June 2015, the House of Commons concurred in the *Thirty-Ninth Report* of the Standing Committee on Procedure and House Affairs, agreeing to the Committee's recommended changes to the Members' Code. I was pleased to note that 10 of the recommendations that I made in my submission to the Committee in February 2015 were included in the report and were agreed to by the House. The resulting amendments came into effect on October 20, 2015, the day after the general election. I note that, in its report, the Committee acknowledged that it did not have sufficient time to conduct a comprehensive review of the Members' Code and recommended that such a review be undertaken in the 42nd Parliament.

I was invited to appear before the Standing Committee on Procedure and House Affairs in February 2016. The Committee was considering whether it wished to recommence the review of the Members' Code and I had the opportunity to provide explanations of the other recommendations that I had made in the previous Parliament and to answer the Committee's questions.



During my appearance I stated that, in the past, I had had difficulty obtaining the Committee's approval for forms and guidelines, as required by section 30 of the Members' Code and had recommended that this provision be removed from the Members' Code.

In fact, this obligation proved to be problematic when amendments were made to the Members' Code in June 2015. The House adjourned for the summer on June 19, the day after the Committee's *Thirty-Ninth Report* containing amendments to the Members' Code was concurred in and before I was able to obtain the required approval of the House to make the necessary editorial and consequential alterations to the forms. On August 2, the Governor General dissolved Parliament and issued the writs for the general election. It was therefore impossible for me to obtain the House's approval for the amended forms.

I was left with little choice but to proceed with the consequential amendments so that the forms would reflect the amended provisions of the Members' Code and could be used by new and returning Members in fulfilment of their obligations. I explained these circumstances and my actions in a letter to the newly elected Chair of the Committee in the 42nd Parliament. The Committee met to retroactively approve the changes on February 23, 2016. In its *Fourth Report*, the Committee recommended that the House adopt the revised forms, which it did by concurring in the Committee's report on March 7, 2016.

I have noted that it is unusual for a Commissioner to have to submit guidelines and forms for approval since these are based on existing rules. During my appearance, however, I was heartened by the Chair's assurance of the Committee's goodwill and commitment to deal fairly quickly with guidelines submitted to it. As a result, I finalized a *Guideline on Gifts and other Benefits* and submitted it to the Committee early in April 2016 for its consideration.

In May 2015, I appeared before the Standing Committee on Access to Information, Privacy and Ethics to discuss my budgetary estimates for 2015-2016.

In February 2016, after the election of the new government, I appeared before the new Standing Committee on Access to Information, Privacy and Ethics as it considered its future business. The Committee had invited the four commissioners within its mandate to share with it recommendations for the Committee to consider for its work plan. I suggested that the Committee might wish to revisit the five-year review of the Act, which was concluded in February 2014, or undertake a new review. No amendments to the Act have resulted from the five-year review; I note that no further reviews are required under the Act.

I am encouraged by the fact that the House of Commons Standing Committee on Procedure and House Affairs and the House of Commons Standing Committee on Access to Information, Privacy and Ethics wished to meet with me so early in the new Parliament, and I look forward to



a productive working relationship with them. Although I have not been invited to appear before either committee to discuss my annual reports since 2010, I would welcome such an opportunity.

Other Parliamentary Activities

My Office participated in the Parliamentary Officers' Study Program again in 2015-2016. The program involves three partners of the Parliament of Canada: the Senate, the House of Commons and the Library of Parliament. It is designed as an opportunity for senior parliamentary staff from foreign legislatures and other Canadian jurisdictions to learn about the functioning of the Parliament of Canada and, in turn, to reflect on their own practices. My Office made presentations to the Parliamentary Officers' Study Program in April 2015 and in February 2016.

Conflict of interest codes and ethics regimes are of continuing interest to visiting officers and, as the Canadian system is fairly mature, it is a pleasure to share our experience with those who are considering implementing or improving such a regime. We also enjoy the opportunity to share experiences with those whose parliaments do have conflict of interest and ethics regimes in place.

Working with Others

My staff and I continue to work with my counterparts and other individuals in Canada and from around the world, exchanging information and discussing issues in the conflict of interest and ethics field.

I continue to take an active part in the Canadian Conflict of Interest Network (CCOIN), whose members are federal, provincial and territorial conflict of interest and ethics commissioners. My Office carries out a coordinating role for the network by gathering and disseminating within it information and materials from various Canadian jurisdictions. Last September, I participated in CCOIN's annual general meeting, which was held in the city of Québec.

While in the city of Québec, I had the pleasure of taking part in a separate meeting with the *Déontologue* (Compliance Officer) of the French National Assembly and his staff and representatives of France's *Haute Autorité pour la transparence dans la vie publique* to learn about recent developments in conflict of interest and ethics regimes in France and to share best practices between Canada and France.

My Office is a member of the Council on Governmental Ethics Laws (COGEL). I attended its annual conference in Boston, Massachusetts, in December 2015. These conferences provide an opportunity to learn about international developments in the ethics field.



My Office also responded to information requests from international organizations. We revised Canada's *Asset Disclosure Country Profile* for the G-20 Anti-Corruption Working Group at the request of the Treasury Board Secretariat, responded to a request from a researcher in Israel for information about the treatment of political interests in Canada's federal conflict of interest regimes, and responded to a request for information from the Gauteng Provincial Legislature in South Africa about the use of blind trust agreements.

Finally, universities continue to be interested in the work of my Office. In June 2015, I participated in a panel discussion entitled Ethics in Government at the University of Ottawa, which was organized as part of the Canadian Political Science Association's annual conference. In May 2015 and February 2016, I led day-long workshops at Concordia University in Montréal as part of the Workshops on Social Science Research series. I also participated, at the end of the day, in a panel discussion with the Auditor General entitled Ethics, Integrity and Democratic Reform.

Inquiries from Media and Members of the Public

My Office continues to receive and respond to requests for information from journalists and members of the public. I believe that the actions taken by my Office have contributed to a growing level of public awareness over the years about the Members' Code and the Act and the role of my Office in applying them.

Table 6-1 tracks the number of general inquiries received by my Office over the past five fiscal years.

Table 6-1: Inquiries from the Media and Members of the Public

	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016
Media	102	185	213	140	143
Public	293	839	1097	597	1373

My Office strives to respond in a timely way to requests from the public and the media. In 2015-2016, my Office received and responded to 143 media inquiries, I participated in three media interviews, and there were 207 media mentions of the Office.

We received 1373 inquiries from members of the public by email, telephone, fax and letter mail. They included inquiries related to my mandate, such as requests for information about the scope of the application of the Members' Code and the Act and requests for documents issued by my Office. When appropriate, I direct those requesting information to the Office website for additional information about the Members' Code or the Act.



Many of the public and media inquiries relate to complaints that I have received, allegations raised in the House of Commons, or media reports alleging conflicts of interest. In such cases, my Office explains that advice given to individual Members or public office holders is confidential. We can only confirm, when asked, whether or not a specific complaint has been received, and whether an inquiry or examination has been commenced or completed. We can, however, describe the reasons for not proceeding with an inquiry where the matter to which the inquiry relates has already been made public.

In 2015-2016, we received a significant number of requests from lobbyists and other stakeholders who wished to offer event invitations and other gifts to Members and public office holders and were seeking information about whether public office holders and Members could accept them under the Members' Code and the Act. In each instance, I explained that I could not provide blanket approval for gifts offered by lobbyists, as each case had to be considered in light of the circumstances of each individual Member or public office holder. I also encouraged lobbyists to consult the Office of the Lobbying Commissioner for advice on how to comply with their obligations under the *Lobbyists' Code of Conduct*.

As in past years, many of the inquiries from members of the public were related to matters that are beyond my mandate. More than half of the inquiries were from individuals who had a complaint or concern but did not know which office to turn to. In these situations, after explaining my role, my Office tries to direct the member of the public to the person or organization that is best placed to assist them.

My Office is always as forthcoming with information as we are permitted to be under the two regimes. We regularly issue news releases, media statements and backgrounders, and respond to queries from journalists on a range of matters. We also continue to tweet regularly about various aspects of my mandate, with links to information on the Office website, and our activities. In 2015-2016, we made 68 tweets in both official languages.

Framework for Future Action

I continue to explore various ways to reach out to Members of the House of Commons, public office holders and the Canadian public to increase awareness of the Office and the conflict of interest regimes that I administer.

My Office has developed service standards for communications and outreach. In 2016-2017, we will measure and report on our success in meeting them.

Over the years, I have placed a large amount of information on the Office website to help Members and public office holders to understand their obligations under the Members' Code and the Act. I continue to work on ways to improve the organization of information on our website and I look forward to reporting on the progress of my efforts to make this information more accessible.





VII. ADMINISTRATION

Accountability

As an entity of Parliament, my Office operates under the *Parliament of Canada Act*. Legislation governing the administration of the public service does not usually apply to my Office. Nor do Treasury Board policies and guidelines.

My Office continues to add to its internal management framework to ensure sound resource management. Recently, a *Policy on Internal Control*, along with a *Directive on Account Verification*, was implemented to ensure the prudent stewardship of public funds, the safeguarding of public assets and the effective, efficient and economical use of public resources.

I also make sure that our resource management practices are consistent with those found in the public service and in Parliament. To this end, employees of the Office have joined networks and working groups that focus on the management of resources both in the public sector and in Parliament.

Transparency continues to be a guiding principle for the work of my Office. Annual financial statements, quarterly financial reports and status reports on travel, as well as conference and hospitality expenses, are publicly disclosed and easily accessible through the Office website.

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 always been positively received by the auditing firms.

In addition, an annual assessment of the Office's internal control system is conducted in partnership with the Library of Parliament. No material deficiencies have been noted; however, opportunities to further strengthen internal controls have been identified, such as the need for additional policies and adjustments to internal practices.

External partners provide expertise in the area of information technology and security (House of Commons), accounts payable and external reporting (Library of Parliament) and compensation (Public Works and Government Services Canada). This results in greater efficiency and an additional level of scrutiny in the management of resources.

Human Resources Management

As expected, the Office saw more employee turnover than usual in 2015-2016: two employees retired, three employees accepted indeterminate employment in the federal public service, another employee accepted a term position elsewhere in Parliament, and two employees



took a one-year leave without pay to pursue other employment opportunities. Furthermore, three term assignments within the Office ended as planned. Appointment processes were conducted to fill vacancies. As of March 31, 2016, there were three vacant positions. One was filled in April 2016.

In February 2016, my Office launched a staffing process to replenish its pool of qualified candidates for the generic position of Compliance Advisor. This pool has proven to be quite effective in responding quickly to staff turnover in this particular group and is part of the succession planning strategy of the Office.

Financial Management

An operating budget of \$6.952 million was allocated to my Office for 2015-2016. Given the nature of my mandate, salaries represent by far the largest expenditure. Non-salary expenditures are mostly related to the cost of shared services agreements and the standard costs of running an office.

A table broadly outlining the financial information for the Office for the 2015-2016 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, especially its non-salary budget. I maintain a reserve within the 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 within the Office, such as the new online portal for public disclosures and video-conference equipment for investigations.

Information Management and Information Technology

My Office implemented an internal *Policy on Information Management* in 2015-2016. It also released a *Guide on Managing Information* to support the implementation of the policy, to help employees gain a better understanding of their responsibilities for managing information and to establish common practices for the creation, naming, filing, storage and disposition of records in all formats. Shortly after the release of the policy, an introductory session on information management was given to all employees. A *Guide on E-mail Management* was also developed for employees. Naming conventions for electronic records are being implemented in each division and the shared network drive has been restructured to mirror the records classification structure used for paper documents.

The ongoing partnership with the House of Commons for information technology services continues to produce positive results for my Office. We have access to a reliable and secure

network infrastructure. Solid measures have been put in place to segregate the information of the Office from that of the House, and vice versa.

As mentioned earlier in this report, in October 2015 my Office launched an online portal for the submission of public declarations by Members of the House of Commons and reporting public office holders. This project involved close collaboration with the information technology team of the House of Commons.

My Office also worked with the information technology services of the House of Commons to implement a new content management tool for the Office's intranet.

After investing considerable resources over the last few years in the development of new mission-critical systems, my Office is not planning any major new projects in the near future. Instead, resources will be spent, as necessary, on migrating current systems to newer versions of the software supporting these systems.

Security

My Office relies on a number of partners to ensure the security and safety of its employees and other assets. A security plan was developed in the summer of 2014 that included the identification and assessment of risks faced by the Office, and the establishment of priorities to address some of these risks.

My Office is in the process of implementing a more comprehensive security program, including a *Policy on Security Management*, standards on security screening and on information technology security, a business resumption plan and a number of supporting procedures.





VIII. LOOKING AHEAD

My Office will continue to be active on a number of fronts in 2016-2017 as it helps Members of the House of Commons and public office holders comply with the *Conflict of Interest Code for Members of the House of Commons* (Members' Code) and the *Conflict of Interest Act* (Act), conducts inquiries and examinations as appropriate, works with Parliament, further strengthens its internal management and seeks greater efficiencies in its operations.

The advice and guidance my Office provides to Members and individual public office holders will be complemented by broader outreach and communications initiatives to ensure that they are aware of their obligations and to contribute to Canadians' understanding of the two regimes. My Office will continue to produce information products to help Members and public office holders understand various provisions of the Members' Code and the Act and how they can comply with them.

My Office looks forward to working with the House of Commons Standing Committee on Procedure and House Affairs on matters related to the Members' Code and with the House of Commons Standing Committee on Access to Information, Privacy and Ethics on matters related to the Act.

I would be pleased to contribute to a potential review of the Members' Code or the Act should either committee decide to undertake one. Although some amendments were made to the Members' Code in 2015, the Committee on Procedure and House Affairs at that time noted that it did not have sufficient time to conduct a comprehensive review and recommended that such a review be undertaken in the new Parliament. There is also pending the *Guideline on Gifts and other Benefits* under the Members' Code that I submitted to it in April 2016.

No amendments resulted from the five-year review of the Act that was completed in 2014.

The activities of my Office will continue to be supported by a solid internal management framework that will be enhanced and refined as appropriate. As always, my Office will manage resources prudently. Initiatives in this area will include implementing videoconferencing technology as an efficient and cost-effective tool.

My Office will also progress to the next step in its performance measurement plan. While my 2015-2016 annual report discusses output, my next annual report will include information on my Office's service standards.

I look forward to receiving the results of the Office's second employee satisfaction survey, which will be used to ensure that the Office continues to be able to attract and retain qualified, motivated staff.



Achieving these and other priorities in 2016-2017 will enable my Office to continue to administer the Members' Code and the Act effectively, helping to prevent conflicts between the public duties of Members and public office holders and private interests, and contributing to Canadians' trust and confidence in the conduct of appointed and elected officials.



IX. APPENDIX – FINANCIAL RESOURCES SUMMARY (from page 30)

Program Activity	(thousands of dollars)				Alignment to Government of Canada Outcomes
	2014-2015 Actual Spending	2015-2016			
		Main Estimates	Total Authorities	Actual Spending	
Administration of the <i>Conflict of Interest Code for Members of the House of Commons</i> and the <i>Conflict of Interest Act</i>	5,608	6,178	6,178	5,157	Government Affairs
Contributions to Employee Benefit Plans	669	774	774	600	
Total Spending	6,277	6,952	6,952	5,757	
Plus: Cost of services received without charge	1,044	n/a	n/a	1,084	
Net Cost of Department	7,321	6,952	6,952	6,841	

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.

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

