



Office of the Conflict  
of Interest and Ethics  
Commissioner

Commissariat aux  
conflits d'intérêts et à  
l'éthique

## The 2016-2017 ANNUAL REPORT

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



June 9, 2017

Mary Dawson  
Conflict of Interest and  
Ethics Commissioner

## The 2016-2017 Annual Report

in respect of the

*CONFLICT OF INTEREST CODE FOR MEMBERS OF THE HOUSE OF COMMONS*

For additional copies of this publication, please contact:

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

Telephone: (613) 995-0721

Fax: (613) 995-7308

Email: [ciec-ccie@parl.gc.ca](mailto:ciec-ccie@parl.gc.ca)

*Ce document est également publié en français.*

This publication is also available online at the following address:

<http://ciec-ccie.parl.gc.ca/>

© Office of the Conflict of Interest and Ethics Commissioner, Parliament of Canada, 2017  
062017-65E





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

---

66, rue Slater Street  
22<sup>e</sup> étage / 22<sup>nd</sup> Floor  
OTTAWA, ONTARIO  
CANADA  
K1A 0A6

June 8, 2017

The Honourable Geoff Regan, P.C., M.P.  
Speaker of the House of Commons  
Centre Block, Room 228-N  
Parliament of Canada  
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, 2017, to be tabled in the House of Commons on June 9, 2017.

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

Sincerely,

Mary Dawson  
Conflict of Interest and Ethics Commissioner



## TABLE OF CONTENTS

<b>I.</b>	<b>INTRODUCTION</b> .....	<b>1</b>
<b>II.</b>	<b>OVERVIEW – TEN YEARS AS COMMISSIONER</b> .....	<b>3</b>
<b>III.</b>	<b>APPLYING THE MEMBERS’ CODE</b> .....	<b>5</b>
	Initial Compliance.....	5
	Maintaining Compliance.....	6
	Ongoing Advice .....	7
	Ongoing Reporting Requirements.....	7
	Annual Review.....	8
<b>IV.</b>	<b>INVESTIGATIONS</b> .....	<b>13</b>
	Overview of Investigation Case Files under the Members’ Code and the Act.....	13
	Case Files in Progress under the Members’ Code in 2016-2017 .....	16
	Case Files Closed under the Members’ Code in 2016-2017.....	16
	Overview of Case Files Closed Without Proceeding to an Inquiry .....	17
	Case Files Carried Over under the Members’ Code into 2017-2018.....	18
	Reports Issued under the Members’ Code .....	18
	Case Files under the Act .....	18
<b>V.</b>	<b>OUTREACH AND COMMUNICATIONS</b> .....	<b>21</b>
	Reaching Out to Members and Public Office Holders.....	21
	Parliamentary Activities.....	22
	Working with Others.....	24
	Inquiries from Media and Members of the Public .....	26
	Public Communications .....	27
	Framework for Future Action .....	28
<b>VI.</b>	<b>ADMINISTRATION</b> .....	<b>29</b>
	Accountability.....	29
	Human Resources Management.....	29
	Financial Management .....	31
	Information Management and Information Technology.....	31
	Security .....	32
<b>VII.</b>	<b>LOOKING AHEAD</b> .....	<b>35</b>
	<b>APPENDIX – FINANCIAL RESOURCES SUMMARY</b> .....	<b>37</b>



## 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 2,250 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 to accommodate specific issues in 2011, 2013 and 2014.

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 or advantages. 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 – Ten Years as Commissioner

The *Conflict of Interest Act* (Act) came into force on July 9, 2007 and that same day I assumed the responsibility of administering the Act and the *Conflict of Interest Code for Members of the House of Commons* (Members' Code). As I approach the end of my tenth year as Conflict of Interest and Ethics Commissioner, I look back with satisfaction on my contribution as the first incumbent of this Office.

In the early years after my appointment, I took care to ensure that the Office was organized in a way that would effectively support my mandate. I also said I would aim to administer the Members' Code and the Act with clarity, consistency and common sense, and I have always sought to be as transparent as possible.

In my annual reports I have explained key advisory interpretations, summarized my decisions in inquiries under the Members' Code and in examinations under the Act, and explained why some investigation files did not result in an inquiry or an examination. I am also as open with the media as I am permitted to be under the two regimes, as I believe that the media can help communicate existing ethics rules.

Over the years, my Office has instituted system improvements to help Members and public office holders achieve and remain in compliance. The automation of processes, including a system of reminders, and the launch of a declaration portal have all contributed to more efficient service delivery.

The Canadian ethics model emphasizes prevention. Throughout my mandate, I have put a major emphasis on the provision of advice, outreach and education. My Office has given presentations to organizations and offices whose members are subject to the Act and sends an annual letter to public office holders, including those who are not reporting public office holders. Each year, I have offered presentations to party caucuses and independent Members. In the past year, I initiated a series of email newsletters to Members explaining various aspects of their obligations under the Members' Code.

While my focus has been on prevention, I have enforced the Members' Code and the Act as required. In the past 10 years, I have issued six inquiry reports and 29 examination reports. In those reports, I have always sought to clarify and reinforce the requirements of the Members' Code and the Act. I have also used the reports to make recommendations on how the two regimes could be improved or strengthened.



I am pleased that key interpretations that I have made of such concepts as private interest, outside activity, friend, direct and significant official dealings, and post-employment provisions have stood the test of time. Future commissioners will be able to draw on a body of work with solid precedents, procedures and interpretations when making their own determinations.

I have shared my experiences in administering the Members' Code and the Act with Members of the House of Commons through my annual reports and committee appearances. I also prepared comprehensive submissions for the five-year reviews of the Members' Code and the Act, noting the strengths of the two regimes and ways to further increase their effectiveness. I made 23 suggestions for improvements to the Members' Code and 75 suggestions for improvements to the Act, including some technical and translation improvements. The Members' Code was amended to reflect 10 of the suggestions that I had made. I was particularly pleased to see the threshold for the disclosure of gifts or other benefits in the Members' Code lowered in 2015 from \$500 to \$200. No amendments to the Act resulted from the statutory review.

Key recommendations made in the context of the five-year review of the Members' Code that were not acted upon include:

- Including a prohibition against Members furthering the private interest of relatives or friends;
- Broadening the disclosure and recusal obligations to include the private interest of relatives or friends;
- Applying an acceptability test to sponsored travel;
- Prohibiting the personal solicitation of funds by Members;
- Harmonizing some of the provisions of the Members' Code and the Act; and
- Implementing separate codes of conduct to address the partisan and personal conduct of Members and their staff.

Although the Members' Code and the Act, at their core, have functioned relatively well, there is room for improvement. I hope that future Parliaments will consider these and the many recommendations that I have made in my annual reports, and in my inquiry and examination reports.

It has been an honour to serve as Conflict of Interest and Ethics Commissioner. I take pride in the contribution that I have made in administering the Members' Code and the Act.

As always, I gratefully acknowledge the expertise, hard work and dedication of my staff. I have been fortunate to lead a strong team that contributes to the achievement of my mandate as Commissioner.



### III. APPLYING THE MEMBERS' CODE

The *Conflict of Interest Code for Members of the House of Commons* (Members' Code) applies to all 338 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.

#### Initial Compliance

The Members' Code establishes an initial compliance process that all Members must complete to meet their initial obligations. After every election or by-election, I write to new and returning Members to inform them of their obligations under the Members' Code. In 2016-2017, there was only one by-election, namely on October 24, 2016 in Medicine Hat–Cardston–Warner.

As a first step in the initial compliance process, Members are required to complete and submit a confidential *Disclosure Statement* to my Office within 60 days after notice of their election is published in the *Canada Gazette*. My Office sends a series of reminders and provides assistance to Members as the 60-day deadline approaches. Members may also request an extension to the 60-day deadline for the filing of the *Disclosure Statement* and the Members' Code specifies that no reasonable request shall normally be refused.

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.

My Office reviews the information in the *Disclosure Statement* and provides Members with advice on maintaining ongoing compliance with the Members' Code throughout their term in office. My Office might also request further information, such as financial statements, to clarify or confirm the information provided in the *Disclosure Statement*, and may also recommend specific compliance measures to prevent real or apparent conflicts of interest. There are no time limits set out in the Members' Code for this stage and delays can occur when information that is required has not been received.

Once the initial *Disclosure Statement* is submitted and any additional information that has been requested is provided, my Office prepares a *Disclosure Summary*, which must be signed by the Member and placed in a public registry maintained by my Office. Members have a 60-day



deadline to review and sign the *Disclosure Summary*. 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 made available for public inspection whether or not it has been signed by the Member.

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

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, 2017, the initial compliance process had been completed for 309 Members. Five ridings were awaiting the results of the April 3, 2017 by-elections.

While my Office has communicated with all Members since their election, the fact that 24 files remained outstanding can still be partly explained by the high-volume workload in my Office resulting from the 2015 election. However, in some instances, Members have not submitted all supporting documents with their *Disclosure Statement* and my Office is still waiting for that information to complete the initial compliance process of those Members. Another factor was the staffing processes in ministers' offices, which were given some priority because deadlines are established by the *Conflict of Interest Act* but not by the Members' Code.

In order to facilitate the process by which Members meet their reporting requirements, a secure declaration portal was launched in October 2015, giving Members the option of reviewing and approving their *Disclosure Summary* and other public statements online. Eighty-three percent of the Members who were directed to the portal in 2016-2017 have chosen to use it.

## **Maintaining Compliance**

My Office assists Members in meeting their obligations under the Members' Code throughout their term in office. This is done during the annual review process and when 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.



Members are invited to access the declaration portal referred to above to submit or approve their subsequent disclosures. Members used the portal 128 times to approve or submit these disclosures.

### Ongoing Advice

The number of communications with Members seeking information and advice beyond the initial compliance process increased in 2016-2017, their first full year after the 2015 fall election.

Requests for advice from Members	
2012-2013	605
2013-2014	534
2014-2015	499
2015-2016	409
2016-2017	628

Thirty percent of the communications my Office had with Members in 2016-2017 were related to gifts or other benefits. Another 14% were related to letters of support and fundraising activities, and 12% were related to changes to Members' personal situations. The other 44% were related to a wide range of subjects.

This year, with the arrival of many new Members, my Office received a number of requests for advice about sponsoring the reservation of a meeting room on Parliament Hill or in another House of Commons facility for the use of an outside stakeholder, where a lunch might be provided.

Advice was given to the effect that, unless there were a specific contravention under the Members' Code, such as the furthering of a private interest of the Member or his or her family, sponsoring the reservation was acceptable under the Members' Code. I concluded that the issue of reserving a room in the House of Commons for an event hosted by a third party constitutes parliamentary business and falls within the jurisdiction of the Board of Internal Economy (BOIE). Section 6 of the Members' Code provides that nothing in the Code affects the jurisdiction of the BOIE. As long as the rules of the BOIE were followed, I would not consider sponsoring the reservation of a room to be improper.

### Ongoing Reporting Requirements

The Members' Code requires that Members review on an annual basis the information that they previously disclosed to the Office and requires that they update their disclosures accordingly. The Members' Code also requires disclosures, throughout the year, of gifts or other benefits, sponsored travel and material changes to information that is required to be disclosed in the initial disclosure statement.



## 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.

Annual reviews are initiated on or around the date of signature of the initial *Disclosure Summary* following a Member's election. Following the 2015 general election, some Members signed their *Disclosure Summaries* as early as January 2016. Therefore, my Office began initiating the annual review processes for those Members in January 2017. Between January and March 31, 2017, my Office initiated 40 annual reviews, and received 22 responses.

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

My Office sends Members email reminders after the annual review letters are sent out, and then follows up by phone. This practice continues to encourage a more timely return of annual review documents.

The Members' Code requires Members to review the information previously provided to my Office within 60 days. If any change to the *Disclosure Summary* is required as a result of new information provided, my Office modifies the *Disclosure Summary* and Members have 60 days to review and sign the modified *Disclosure Summary* from the time my Office sends it to them. As in the case of the initial *Disclosure Summary*, 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.

The date on which a Member's most recent annual review is completed always appears in the public registry.



## *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.

<b>Advice relating to gifts and other benefits</b>	
2012-2013	99
2013-2014	98
2014-2015	111
2015-2016	129
2016-2017	187

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, a token gift offered in appreciation for a speech or presentation made by a Member at a reception or meeting would generally not reasonably be seen to have been given to influence the Member. It would, however, still be subject to the disclosure and public statement requirements of the Members' Code if it has a value of \$200 or more. Another example of gifts that would generally be acceptable would be light refreshments such as coffee, tea or non-alcoholic beverages and sweet rolls or pieces of fruit offered at a meeting or reception.

Any gift or other 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. Similarly, if the total value of all gifts or other benefits received from one source in a 12-month period has a value of \$200 or more, they must also be publicly disclosed within 60 days after that total value is exceeded.

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 or other benefits received in connection with official travel that is not considered to be sponsored travel are disclosed and publicly declared as gifts or other benefits.



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. It must be noted that the threshold for public disclosure of gifts or other benefits prior to October 2015 was \$500.

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

	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Number of gifts or other benefits publicly declared	49	78	37	57	89
Number of Members who publicly declared gifts or other benefits	24	19	17	27	53

Gifts or other benefits that were found to be unacceptable or that were valued at under \$200 were not publicly declared. The gifts that were unacceptable were refused, returned or paid for by the Members.

### ***Sponsored Travel***

Subsection 15(0.1) of the Members' Code expressly permits Members to accept sponsored travel that arises from or relates to their position, effectively exempting it from the rules on gifts or other benefits. Sponsored travel includes all gifts and other benefits received in connection with the travel, including accommodation. Sponsored travel offered to Members who are also reporting public office holders is subject to the acceptability test under section 11 of the *Conflict of Interest Act*.

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 my Office. The Members' Code requires that the Commissioner submit, by March 31 of each year, a list of sponsored travel by Members during the previous calendar year. The *List of Sponsored Travel 2016* was tabled in the House of Commons on March 24, 2017 and can be found on the Office website. As I have suggested in previous reports, I am of the view that an acceptability test should be added to the Members' Code, 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.





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

	2012	2013	2014	2015	2016
Declarations of sponsored travel	85	110	87	27	84
Members who declared sponsored travel	65	71	57	26	67

### ***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 of that 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 in the public registry. I note that, despite the deadline, material changes are often not reported until the annual review process.

In 2016-2017, my Office received 75 requests for advice relating to possible material changes. Thirty-three 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. In some cases, new compliance measures may be necessary for Members 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

	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Number of declarations of material changes	33	25	20	14	33
Number of Members who declared a material change	30	22	20	14	27





## IV. 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). I can initiate an inquiry under the Members' Code 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 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.

In the case of inquiries or examinations initiated on my own initiative, information concerning possible contraventions of the Members' Code or the Act may come 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 that 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, 37 new case files were opened and eight case files were carried over from previous fiscal years. One of the case files carried over, the Carson examination, opened in April 2011 and suspended in November that same year, remained suspended at the end of the 2016-2017 fiscal period.



Table 4-1 compares all the investigative activity over the past five fiscal years.

Table 4-1: Case Files under the Members' Code and the Act

	<b>2012-2013</b>	<b>2013-2014</b>	<b>2014-2015</b>	<b>2015-2016</b>	<b>2016-2017</b>
Case files opened	32	28	39	28	37
Case files carried over from previous fiscal year	16	13	6	8	8
<b>Total</b>	<b>48</b>	<b>41</b>	<b>45</b>	<b>36</b>	<b>45</b>

Table 4-2 compares the investigative activity under the Members' Code over the past five fiscal years.

Table 4-2: Case Files under the Members' Code

	<b>2012-2013</b>	<b>2013-2014</b>	<b>2014-2015</b>	<b>2015-2016</b>	<b>2016-2017</b>
Open case files relating to the Members' Code	13	17	9	3	7

Although the number of case files opened under the Members' Code has increased this year in comparison to last year, the trend reflects fewer case files opened over the last five years.



Table 4-3 sets out the sources and subjects of the case files in progress over the past fiscal year under the Members' Code and the Act. Thirty-one of the 45 case files in progress were self-initiated. Twelve of the 14 remaining case files resulted from requests from Members, including one under the Members' Code and 11 under the Act. The two other case files resulted from referrals from the Public Sector Integrity Commissioner.

Table 4-3: Sources of Information and Subjects of Case Files under the Members' Code and the Act

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	10	6	12	28
Office of the Conflict of Interest and Ethics Commissioner	0	0	0	1	1
Media reports	0	1	0	1	2
MP requests	1	10	0	1	12
Referrals from the Public Sector Integrity Commissioner	n/a	0	n/a	2	2
<b>Total</b>	<b>1</b>	<b>21</b>	<b>6</b>	<b>17</b>	<b>45</b>

Seven of the 45 case files in progress in 2016-2017 were opened under the Members' Code and 38 were opened under the Act.

I only received directions from the House of Commons under the Members' Code once, in 2008, to give further consideration to an inquiry report tabled in 2008.



## Case Files in Progress under the Members' Code in 2016-2017

Table 4-4 sets out the nature and the number of concerns raised in 2016-2017 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 the concern most often raised relates to an allegation of furthering a private interest.

Table 4-4: Concerns Addressed

Nature of concern (Sections of the Members' Code)	Number of concerns				
	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Actions that could be perceived as making, or seeking to influence decisions that would further a private interest (section 8 or 9)	11	11	5	2	4
Gifts or other benefits (section 14)	1	1	2	4	3
Duty to recuse (section 13)	0	0	2	0	0

## Case Files Closed under the Members' Code in 2016-2017

My Office closed six of the seven case files under the Members' Code in 2016-2017, none of which resulted in an inquiry report.

Table 4-5 summarizes the circumstances in which case files were closed under the Members' Code over the past five fiscal years.

Table 4-5: Why Case Files Were Closed

	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
Reports released following an inquiry	0	0	0	0	0
Joint reports released following an inquiry and an examination	0	1	0	0	0
Case files relating to the Members' Code closed without proceeding to an inquiry or public report	6	16	8	3	6
<b>Total</b>	<b>6</b>	<b>17</b>	<b>8</b>	<b>3</b>	<b>6</b>



For those case files that are closed after consideration without proceeding to an inquiry, 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 requester 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, if that is the case. 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 some cases, whether or not I proceed to an inquiry, my Office also provides compliance advice to the subject of the case file, which could result in changes to his or her compliance arrangements.

### **Overview of Case Files Closed Without Proceeding to an Inquiry**

In 2016-2017, my Office closed six case files under the Members' Code without proceeding to an inquiry. All six case files were opened as a result of concerns raised with my Office by members of the public. Four of the six cases involved the furthering of private interests and two cases involved the acceptance of a gift or other benefit.

#### ***Furthering Private Interests***

In one of four cases relating to the furthering of private interests, I received a request setting out a number of allegations against a Member, all of which suggested that the Member had been acting in a manner contrary to the public interest. Only one of the allegations related to the Member's obligations under the Members' Code. It was alleged that the Member improperly used their position as a member of a parliamentary committee to improperly further the private interest of another person. After looking into the matter, I found there was no information to suggest that the Member was furthering private interests.

In another case, it was alleged that a Member was improperly furthering the private interests of an entity representing the interests of a foreign nation by meeting with the entity as well as with other representatives of the foreign nation. On reviewing the information 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.

In a third case, it was suggested that a Member was inappropriately receiving salary and benefits as a Member while engaging in outside activities. However, upon reviewing the



information provided, it became clear that the matter related to the jurisdiction of the Board of Internal Economy and not to the Member's obligations under the Members' Code.

In a fourth case, it was alleged that several members of a parliamentary committee were furthering their private interests contrary to their obligations under the Members' Code because they were participating in the committee's work. However, 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.

### ***Acceptance of Gifts or Other Benefits***

In one of the two cases relating to the acceptance of a gift, it was alleged that a Member had accepted a gift from an individual whose organization allegedly lobbies the government. After reviewing the matter, I found no information to suggest that the donor or the donor's organization had or anticipated having any dealings with either the Member in question or the House of Commons. Therefore there was nothing to suggest that the gift might reasonably be seen to have been given to influence the Member in the exercise of the Member's responsibilities.

Finally, in the other case relating to gifts, a member of the public wrote to my Office raising concerns about the conduct of a Member in relation to gifts received as a result of certain fundraising activities. On reviewing the documents provided by the Member, I determined that there was no information to suggest that the Member had engaged in any such fundraising activities.

### **Case Files Carried Over under the Members' Code into 2017-2018**

The one case file under the Members' Code that was carried over into 2017-2018 involved an inquiry into the conduct of the Right Honourable Justin Trudeau, P.C., M.P., Prime Minister of Canada, in relation to his stay at His Highness the Aga Khan's privately owned island.

### **Reports Issued under the Members' Code**

No inquiry reports were released under the Members' Code in 2016-2017.

### **Case Files under the Act**

In 2016-2017, 38 of the 45 case files in progress related to obligations of public office holders under the Act.





My Office closed 35 of the 38 case files under the Act. Three resulted in public reports, namely *The Vennard Report*, *The Bennett Report* and *The Philpott Report*. The remaining 31 case files were given careful consideration but were closed when they were found not to warrant an examination. My *2016-2017 Annual Report* under the Act provides a description of the case files that were closed under the Act in 2016-2017.

Four of the 38 case files under the Act that were in progress in 2016-2017 have been carried over into the 2017-2018 fiscal year. All four case files resulted in ongoing examinations.

Two of these examinations were completed shortly after the end of the fiscal year. They resulted in *The Toews Report* and *The Wright Report*, both of which are summarized in my *2016-2017 Annual Report* under the Act.

As has been reported by the media, a third ongoing examination relates to the conduct of the Right Honourable Justin Trudeau, P.C., M.P., Prime Minister of Canada, in relation to his stay at and travel to His Highness the Aga Khan's privately owned island.

The fourth case file remained suspended pursuant to section 49 of the Act at the end of 2016-2017. The Carson examination, suspended in November 2011, relates to the post-employment obligations of Mr. Bruce Carson under the Act.





## V. OUTREACH AND COMMUNICATIONS

The work of my Office in administering the *Conflict of Interest Code for Members of the House of Commons* (Members' Code) and the *Conflict of Interest Act* (Act) is supported and strengthened by outreach to public office holders and Members, and communications targeted at wider audiences.

My Office has undertaken a range of initiatives aimed at helping public office holders and Members understand their obligations under the Members' Code and the Act, educating and informing other stakeholders and the Canadian public about the two regimes and my role and mandate in applying them, facilitating my reporting to Parliament and exchanging information with other jurisdictions.

### **Reaching Out to Members and Public Office Holders**

The number of communications between my Office and Members and public office holders increased again in 2016-2017, as we continued to build on and expand the outreach initiatives undertaken earlier in my mandate.

#### ***Members of the House of Commons***

In the fall of 2016, I instituted a series of regular email communications with Members of the House of Commons in order to remind them of their obligations under the Members' Code. In early December, I sent Members an email about the gift rules, along with links to information on my Office website. In early March, I sent them an email on sponsored travel, also with links to material available on the website.

I continued my practice in the past fiscal year of offering presentations to the caucuses of all recognized parties in the House of Commons, as well as to other party caucuses and independent Members. None accepted my offer in 2016-2017.

Under the Members' Code, Members are required to disclose certain information about the private interests of their spouses or common-law partners and dependent children. My Office gave a presentation to the Parliamentary Spouses Association in October 2016 to familiarize the spouses and common-law partners with Members' obligations in this area.



## ***Public Office Holders***

In the past fiscal year, my staff and I gave 16 presentations to organizations and offices whose members are subject to the Act. These included ministerial staff, honorary consuls and members of boards and tribunals.

My Office reviewed and revised as appropriate a number of public documents: the *Summary of Rules for Public Office Holders*; the *Summary of Rules for Reporting Public Office Holders*; the *Summary of Rules for Ministers and Parliamentary Secretaries*; and the *Summary of Rules for Ministerial Staff*. These fact sheets, which were created early in my mandate, set out the requirements of the Act that apply to the different types of public office holders.

I have continued my long-standing practice of sending an annual letter to public office holders who are not reporting public office holders, most of whom are appointed on a part-time basis. This was my seventh such letter. The letter, which went out in November, was accompanied this year by the *Summary of Rules for Public Office Holders* and an information sheet about the rules relating to gifts, an area that always generates a lot of questions. My Office tends to have little contact with public office holders who are not reporting public office holders, as they are not subject to the Act's reporting requirements or its specific prohibitions against holding controlled assets and engaging in outside activities.

## **Parliamentary Activities**

As an independent officer of the House of Commons, I report directly to Parliament through the Speaker of the House of Commons. My Office conducts a variety of parliamentary activities.

## ***Reports to Parliament***

In 2016-2017, I issued six reports. They included my 2015-2016 annual reports under the Members' Code and under the Act, which I released in June 2016, and the *List of Sponsored Travel 2016*, which I submitted to the Speaker of the House of Commons for tabling on March 24, 2017.

I also released three examination reports under the Act in 2016-2017, which are discussed on pages 18 and 19 of this report, along with two examination reports released shortly after this reporting period. No inquiry reports were issued under the Members' Code in 2016-17.



## *Committee Appearances*

The House of Commons Standing Committee on Access to Information, Privacy and Ethics has oversight responsibility for my Office and reviews our annual spending estimates, as well as matters related to my reports under the *Conflict of Interest Act*.

On May 3, 2016, I appeared before that Committee to discuss my budgetary estimates for 2016-2017. I was also invited to appear before it on October 27, 2016, to share some comments and observations based on my experience in administering the Members' Code and the Act since 2007.

The House of Commons Standing Committee on Procedure and House Affairs has responsibility for the Conflict of Interest Code for Members of the House of Commons and recommends changes to the Members' Code. I was not invited to appear before that Committee in the past fiscal year.

I note that I have not been invited to appear before either committee to discuss my annual reports since 2010.

## *Other Parliamentary Activities*

I submitted a draft guideline on gifts under the Members' Code in April 2016 to the House of Commons Standing Committee on Procedure and House Affairs for approval. I am required to do so under section 30 of the Members' Code before any guidelines can come into effect. This matter remains in abeyance.

In November 2016, I sent that Committee a letter informing it of how my Office has interpreted the scope of the obligation under section 31 of the Members' Code to "destroy all documents relating to a Member." Section 31 reads as follows:

*31. The Commissioner shall retain all documents relating to a Member for a period of 12 months after he or she ceases to be a Member, after which the documents shall be destroyed unless there is an inquiry in progress under this Code concerning them or a charge has been laid against the Member under an Act of Parliament and the documents may relate to that matter.*

Section 31 is worded very broadly ("all documents relating to a Member") and could be interpreted to mean that all documents in which a Member is mentioned should be destroyed, including those of precedential value or those that are already in the public domain. This would



create an arduous task and is not in keeping with generally accepted record management practices. I have concluded that section 31 should be interpreted to mean only the destruction of confidential disclosures that a Member of Parliament makes to my Office in the fulfilment of his or her obligations under the Members' Code. This interpretation protects the privacy of Members of Parliament while preserving documents of precedential value. I have not had any reaction from the Committee and continue to implement this obligation in accordance with my interpretation.

My Office participated in the Parliamentary Officers' Study Program again in 2016-2017. The program involves the Senate, the House of Commons, the Library of Parliament and the Office of the Conflict of Interest and Ethics Commissioner. It offers an opportunity for senior parliamentary staff from foreign legislatures and from 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 a presentation to the Parliamentary Officers' Study Program in April 2016.

In March, I spoke at a seminar organized by the Canadian Study of Parliament Group, a group dedicated to enhancing the understanding of parliamentary government and institutions, as part of a panel on "The Relationship Between Parliament and the Agents of Parliament."

### **Working with Others**

Throughout my mandate, my staff and I have worked 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, held in Edmonton.

My Office continues to be an active member of the Council on Governmental Ethics Laws (COGEL). In December 2016, I attended its annual conference in New Orleans, Louisiana. I was on three panels organized as part of the conference, two providing ethics updates and one focussing on the provision of advice. COGEL conferences provide an opportunity to learn about international developments in the ethics field and to share our experience.



In September 2016, at the Public Sector Ethics Conference in Toronto, I took part in a panel called “The State of Public Sector Ethics: Exploring Emerging Issues and Challenges in the Field.”

This past January, I made a presentation to a public sector ethics class in the Master of Public Administration program at Queen’s University.

I received an invitation from the Association Parlementaire de la Francophonie to speak at an ethics training seminar in Madagascar in November. I could not accept the invitation, but sent a written submission. I also received an invitation to speak at an event in Brussels organized by Transparency International EU in December, which I also had to decline, but I provided some clarifications on my administration of the Members’ Code and the Act.

Last November, I was invited to appear before the Committee on Institutions of the Quebec National Assembly, in the context of its review of the Report on the Implementation of the Code of Ethics and Conduct of the Members of the National Assembly. Time constraints did not allow me to attend in person but I provided a written submission.

I also met with and made presentations to three international delegations visiting Ottawa. One delegation, in April 2016, was from the South Africa Department of Public Service and Administration. In August, a delegation from the U.S. House of Representatives’ Committee on Ethics and its Committee on House Administration visited. In December, I briefed a delegation led by the government of Mali’s Minister of Labour and Public Service. In March 2017, my Office met with members of the Public Accounts Committee of the National Assembly of the Republic of Kenya.

As in previous years, my Office also responded to several information requests from international organizations. These included requests for information from the Korea Legislation Research Institute about controlled assets, blind trusts, the disclosure process and recusals, and the Liberia Revenue Authority about creating a link between our offices. My Office also responded to a Member of the National Assembly of France about the hiring practices relating to parliamentary assistants and a request from an Australian parliamentary employee who inquired first about the Commissioner’s parliamentary privilege and then about the Commissioner’s use of sanctions. Finally, my Office responded to a questionnaire from the Organisation for Economic Co-operation and Development on the process for handling complaints from the public.



## Inquiries from Media and Members of the Public

The number of requests for information my Office receives from journalists and members of the public increased again this year. 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.

My Office strives to respond in a timely manner to requests from the media and the public. We have established service standards to help us achieve and measure our response times: three hours, or within an agreed-upon deadline, for media requests; and two business days, or within an agreed-upon deadline, for requests from members of the public. We established a target to meet these standards in 75% of the cases. In 2016-2017, the first year for which we collected relevant data, my Office exceeded its target and met its service standards in 83% of cases for media requests and in 81% of cases for public inquiries. We continue to strengthen our internal processes for responding to inquiries.

The following table tracks the number of general inquiries received by my Office over the past nine fiscal years. We do not have complete data for 2007-2008 as my initial term as Commissioner began in July 2007.

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

	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17
Media	28	17	44	102	185	213	140	143	315
Public	429	581	544	593	839	1,097	597	1,373	2,066

In 2016-2017, my Office received and responded to 315 media inquiries, more than double the number in the previous year, I participated in four media interviews, and there were 426 media mentions of the Office. Of note, in November, I participated in an interview with Ukrainian Television about Canada's ethics regimes.

While these figures can also fluctuate, I believe that the overall increase in media inquiries since my Office was created reflects heightened and sustained awareness among journalists about Canada's federal conflict of interest regimes. My approach is for the Office to be as forthcoming with information for the media as is permitted under the Members' Code and the Act. My Office regularly issues news releases, media statements and backgrounders.

In the past fiscal year, we have been taking a more proactive approach when inaccurate information about my Office's administration of the Members' Code and the Act appears in the media. In November 2016, for example, I wrote an op-ed article that was published by the





*National Post* in response to a column on the subject of political fundraising that misinterpreted sections 7 and 16 of the Act. I explained the sections and outlined recommendations that I had made to strengthen the Act in relation to fundraising.

The number of inquiries from members of the public by email, telephone, fax and letter mail increased this year to 2,066. 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.

Many of the inquiries from members of the public relate to complaints that I have received. Others relate to allegations about Members raised in the House of Commons. In the past fiscal year, my Office and the regimes that I administer were mentioned in 48 out of 122 Question Periods. Other inquiries are prompted by media reports about alleged conflicts of interest involving public office holders.

In responding to these inquiries, my Office provides as much information as is permitted under the Members' Code and the Act. When appropriate, we also direct those requesting information to the Office website for additional information about the Members' Code or the Act.

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 best placed to assist them.

## **Public Communications**

My Office has strengthened and expanded its use of Twitter. I created a bilingual Twitter account in June 2013 as the initial component of a broader social media strategy. Now that my Office has an established presence on Twitter, we have started taking steps to further develop our Twitter activity in order to provide general information on the regimes that I administer. In February of this year, we sent our first “storytelling” tweets, a series of six tweets, with text images, about sponsored travel. We are also using more infographics and tweeting more frequently.



## **Framework for Future Action**

I continue to explore new 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.

Communications and outreach priorities for 2017-2018 include evaluating the Office website and developing new criteria for its design and accessibility, renewing our social media strategy, operationalizing the crisis communications plan, surveying Members of the House of Commons to gauge their satisfaction with our services and renewing our parliamentary engagement strategy.



## **VI. ADMINISTRATION**

### **Accountability**

As an entity of Parliament, my Office operates under the *Parliament of Canada Act*, and is not generally subject to legislation governing the administration of the public service or to Treasury Board policies and guidelines.

My Office has a sound internal management framework in place 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 take steps to ensure that our resource management practices are, to the greatest extent possible, consistent with those found in the public service and in Parliament. To this end, employees of the Office are part of 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 of the work of my Office. We publicly disclose our annual financial statements and reports on annual expenditures for travel, hospitality and conferences, and they are easily accessible through the Office website.

Since 2010-2011, my Office's financial statements have been audited on an annual basis by an independent external auditor. No concerns have been raised and the financial statements have always been positively received by the auditing firms. The auditor also assesses the policies and procedures that the Office has in place for financial reporting and safeguarding assets, and no deficiencies have been noted.

### **Human Resources Management**

As an Officer of the House of Commons, my independence from the government of the day is assured in several ways, including by my status as a separate employer. My Office is not subject to the *Public Service Employment Act* or the *Public Service Employment Regulations*, but has its own *Terms and Conditions of Employment*.

The staff turnover in the Office remained low in 2016-2017, with five employees leaving the Office. Two of them accepted indeterminate employment in the federal public service, one took a position outside the public service, one retired and one was affected by workforce adjustment as the position was no longer necessary.



To fill the four vacant positions, I appointed two employees from newly launched staffing processes and two from previously established pools of qualified candidates. Two positions currently remain vacant. We plan to launch new staffing processes for the positions of Compliance Advisor and Investigations Officer to replenish the pool of qualified candidates.

My Office discontinued its service agreement with the Library of Parliament, which provided us with financial management services. As the Library would only have been able to maintain those services for another year and could no longer provide a deputy chief financial officer with an accounting designation, I decided to bring our financial management services in-house by creating and filling a financial services manager position in the Office.

My Office also discontinued its service agreement with Public Services and Procurement Canada for compensation services and created a compensation advisor position to offer the services internally. The conditions of employment for my Office are different from those in the public service and there was a high level of turnover among the compensation advisors assigned to us, resulting in the need for frequent training. By having access to an in-house compensation advisor, employees have access to better-quality and faster service.

Other services continue to be outsourced to reduce costs where appropriate, including classification, commissionaire services, the Employee and Family Assistance Program, information technology, information management, security and auditing.

My Office has entered into a new agreement with the Canada School of Public Service that gives employees access to a wide range of learning opportunities.

In May 2016, my Office conducted its second employee satisfaction survey, which revealed a high degree of employee satisfaction. The last such survey, which itself showed high satisfaction levels, was conducted in 2013. A comparison of the results demonstrated improvements in some areas and continued satisfaction in many others. A need for improvement was identified in only one area: the implementation of strategies for the acceptance of individual differences among team members. In response, a mandatory information session on informal conflict resolution and harassment prevention was provided to all managers and employees.

In order to continue to be able to attract and retain employees and to provide the best conditions for employees, we will be reviewing the new collective agreements negotiated for represented employees of Parliament and for represented public servants and will be amending our current *Terms and Conditions of Employment* as appropriate.



## **Financial Management**

An operating budget of \$6.971 million was allocated to my Office for 2016-2017. Given the nature of my mandate, salaries represent by far its largest expenditure. Non-salary expenditures are mostly related to the cost of service agreements and the standard costs of running an office.

A table broadly outlining the financial information for my Office for the 2016-2017 fiscal year is provided in the [Appendix](#) under the heading Financial Resources Summary. Detailed financial information can be found on the Office website.

My Office continues to operate within its allocated budget. I maintain a reserve to allow my Office to respond to exceptional circumstances that could significantly impact its workload, including information technology projects.

## **Information Management and Information Technology**

My Office continues to contract with the House of Commons for information management and information technology services.

The transfer of financial management services from the Library of Parliament to my Office meant that the various financial software applications used by the Library of Parliament had to be installed in-house. The most critical applications were installed in March in order to ensure they would be operational by April 1, 2017.

I am investing resources in the development of a new system to manage financial and human resources services. The current applications employ older technology and are therefore increasingly difficult to operate. The new system, which includes financial and human resources modules, is already in use by the House of Commons and the Parliamentary Protective Service, thus providing a cost-effective solution. The system's finance module is expected to be implemented in 2017-2018 while the human resources module is planned for release in 2018-2019.

My Office continues to improve the way we organize and manage electronic records, including emails. For example, we have initiated a pilot to replace the Office's shared electronic drive by a document management system that will make it easier to store and retrieve information, while offering strong access controls through user rights. This is in line with innovations made in the public service and will improve efficiency while ensuring the security of information. We will also be introducing an email management standard to ensure the proper filing, retention and disposal of email records.



The Office's electronic case management system, which maintains relevant information on Members and public office holders, will undergo a significant upgrade this year, leading to improvements in how we electronically manage stakeholder information and operational cases. We will also take the opportunity to review and reassess the processes and procedures used by my Office in administering the *Conflict of Interest Code for Members of the House of Commons* and the *Conflict of Interest Act*, improving them where appropriate.

My Office has purchased a videoconference system. This new equipment has helped reduce the costs of examinations and inquiries by giving the Office the ability to conduct high-quality interviews remotely.

Our intranet site is an important communications tool for employees. When the House of Commons' Information Services advised my Office that they were moving to new software to manage the information on the site, we took the opportunity to reorganize and expand our intranet as well.

## **Security**

Over the past 10 years, I have worked to establish, maintain and strengthen my Office's internal management framework. To ensure the safety of employees, the protection of assets, the delivery of services and to align our efforts with the approach taken with other parliamentary entities, my Office implemented a more comprehensive security program in the past fiscal year. It includes:

- a policy on security management;
- a standard on security screening;
- a standard on information technology security;
- a business resumption plan;
- a procedure for the recovery of property and relinquishment of privileges for employees leaving the Office; and
- a procedure for emergency response.

Because of our ongoing partnership with the House of Commons for information technology services, we continue to have access to reliable and secure network infrastructure. Effective measures have been put in place to keep separate the Office's information and that of the House of Commons.



As a precautionary measure, my Office asked the House of Commons to update the 2008 Threat and Risk Assessment for its network infrastructure. There have not been any issues of concern to date. The Threat and Risk Assessment was initiated by the House of Commons in December 2016 and is currently underway.

My Office is in the process of putting in place an agreement with the Parliamentary Protective Service for security services, including patrol and first response services.







## VII. LOOKING AHEAD

As I submit my last annual reports to Parliament as Commissioner, I recall the theme of my very first report, *A Year of Transition*. The year to come will involve another transition.

The *Conflict of Interest Act* (Act) came into force on July 9, 2007 and that same day I assumed the responsibility of administering the *Conflict of Interest Code for Members of the House of Commons* (Members' Code) and the Act. I was honoured by the trust and confidence that Members of the House of Commons placed in me when they adopted the resolution supporting my appointment at that time and again in 2014.

It is important that Canadians be assured that the most senior appointed and elected officials are held to a high standard of conduct. As Commissioner, I have done what I can to ensure that this objective is being met.

I believe that I will have left in place a mature office equipped with the processes and procedures required to administer and enforce the Members' Code and the Act and to ensure the highest standards of public sector governance.

My experience suggests that the two regimes, at their core, are working well, but there is room for improvement. I hope that Parliament will in the future consider the recommendations that I have made in the context of the five-year reviews of the Members' Code and the Act and elsewhere.

I conclude this report by reiterating what an honour and privilege it has been to serve as Conflict of Interest and Ethics Commissioner. I have enjoyed my interactions with Members of Parliament and with public office holders. I am grateful for the support that I have received throughout the years from my staff.

I wish the new Commissioner every success as he or she takes on this important responsibility.





**APPENDIX – FINANCIAL RESOURCES SUMMARY** (from page 31)

	(thousands of dollars)				
Program Activity	2015-16 Actual Spending	2016-17			Alignment to Government of Canada Outcomes
		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>	5,157	6,178	6,178	5,595	Government Affairs
Contributions to Employee Benefit Plans	600	792	792	638	
<b>Total Spending</b>	5,757	6,970	6,970	6,233	
Plus: Cost of services received without charge	1,084	n/a	n/a	1,138	
<b>Net Cost of Department</b>	6,841	6,970	6,970	7,371	

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>.

