



Office of the Conflict of Interest Commissioner

Bureau du commissaire aux conflits d'intérêts

Three-Year Business Plan
2018-19 to 2020-21

Table of Contents

Executive Summary	3
Mandate	4
Legislative Background.....	4
Governance and Accountability	5
Environmental Scan	5
External Factors.....	5
Internal Factors.....	6
Strategic Direction	7
Overview of Current and Future Activities	8
Resources Needed to Meet Goals and Objectives.....	12
Financial	12
Human Resources	14
Organizational Chart.....	14
Risk Assessment and Mitigation Strategies	15
Information Technology Plan.....	16
Initiatives Involving Third Parties	17
Performance Measures	18
Communication Plan	19

Executive Summary

The Office of the Conflict of Interest Commissioner (COIC) ensures that the mandate of the commissioner, as set out in the *Public Service of Ontario Act, 2006* (PSOA) and *Adjudicative Tribunals Accountability, Governance and Appointments Act, 2009* (ATAGAA), is implemented and that the necessary supporting administrative structures and procedures are in place, in keeping with the Agencies and Appointments Directive.

In addition to providing advice and making determinations on specific conflict of interest and political activity matters, the COIC assists other designated ethics executives in carrying out their responsibilities, contributes to organizational best practices and procedures to minimize the risk that situations of concern will arise and, more generally, raises public servants' awareness of their ethical obligations when carrying out their duties to the Crown.

The common element to all the COIC's activities is a focus on education. This focus supports the underlying principle of the Ontario government's ethical framework, which requires public servants to be knowledgeable about what activities may give rise to a conflict of interest or may be restricted, and to disclose situations of concern to their ethics executive. The focus on education also supports the principles of good governance and accountability as it aids decision-makers in carrying out their oversight responsibilities. Finally, a sound appreciation of the standards of conduct expected of Ontario's public servants alleviates reliance on the COIC as a single or only resource, thereby better enabling the office to fulfill the role the government expects of it with its limited resources.

The COIC will continue to assign priority to education and awareness, with the objective of building capacity among ethics executives in public bodies in particular, and among public servants generally. In that regard, during the planning period, 2018/19 to 2020/21, the COIC will continue to offer presentations and workshops to public bodies, as requested, in order to assist them in building capacity from within to identify and address conflict of interest issues in their organization. The commissioner will also continue to author a periodic blog to educate public servants on current and important conflict of interest and political activity issues. As indicated in the last business plan, the commissioner's inventory of "shared stories" is continually being expanded to include decision summaries from ministries and public bodies, and this will be ongoing during the three-year planning period.

In addition, the new search tool launched in 2017-18 allows users to quickly and more easily find relevant decision summaries by type of matter (e.g., conflict of interest, political activity), by a particular rule (e.g., accepting gifts, hiring family members, switching sides), and by source of decision (i.e., Conflict of Interest Commissioner, ministry ethics executive, or public body ethics executive). The hope is that this facility will greatly assist

ethics executives with the consistent interpretation and application of Ontario's conflict of interest and political activity rules.

In terms of financial declarations, the COIC will continue to work with the Public Service Commission to implement the declaration process for public servants in ministries and, as necessary, support the implementation of any regulatory changes introduced to clarify the issues of regulation interpretation and application to public bodies.

Building on the success of the first public sector ethics conference hosted in September 2016, the COIC will work with its partners at the federal, municipal and post-secondary levels to host a follow-up conference in 2018-19. This conference will be national in scope and should attract participants in the public sector ethics field from across the country.

In 2017-18, the COIC and the Office of the Integrity Commissioner (OIC) commissioned a consultant study to develop a business case to support the possible consolidation of the two offices. This business case will be presented to the government for a decision. During the planning period, the COIC would work with the OIC and the government to implement the decision should the government approve this recommendation.

Mandate

Legislative Background

The PSOA was proclaimed in August 2007. In enacting this legislation, the government intended to strengthen the ethical and accountability framework governing the public service of Ontario.

The intent of the PSOA is to achieve greater consistency in the application of conflict of interest and political activity rules throughout the public service. The legislation also clarifies lines of accountability in applying these rules, thereby contributing to transparency and understanding, within and outside government, with regard to conflict of interest, political activity and related best practices. Among other things, the PSOA creates the role of ethics executive, essentially a senior designated official in each organization, and provides for the appointment of a Conflict of Interest Commissioner.

The PSOA assigns the commissioner a leadership role in contributing to public servants' understanding and interpretation of the conflict of interest and political activity rules. As well, the PSOA explicitly assigns the commissioner responsibility for certain conflict of interest and political activity matters with respect to employees of ministries and employees and appointees of public bodies.

In April 2010, with the proclamation of the *Adjudicative Tribunals Accountability, Governance and Appointments Act, 2009* (ATAGAA), the commissioner was assigned responsibility for the approval of tribunals' ethics plans. The objective of these plans is to

ensure that tribunal board members are familiar with their ethical requirements. The ethical requirements are set out in Parts IV (Conflict of Interest) and V (Political Activity) of the PSOA and in the code of conduct that is part of the member accountability framework.

Governance and Accountability

The Conflict of Interest Commissioner is appointed by the Lieutenant Governor-in-Council for a fixed term. The commissioner is accountable to the President of Treasury Board for fulfilling the mandate prescribed in the PSOA and is required to report to the minister annually on the activities of the office during the preceding year. However, with respect to the commissioner's procedural and statutory decision-making, the commissioner is, and must be seen to be, independent and impartial.

The COIC is a classified agency (regulatory) under the Agency and Appointments Directive and all Management Board of Cabinet, Public Service Commission and Ministry of Finance directives and guidelines apply to COIC's operations. A memorandum of understanding between the President of Treasury Board and the COIC sets out additional reporting and other responsibilities related to the management, administration, and operation of the office.

Environmental Scan

During the planning period 2018/19 to 2020/21, several external and internal factors may influence the COIC's operations.

External Factors

The commissioner is responsible for public servants who work in ministries and who work in or are appointed to public bodies. Nonetheless, trends, developments and issues external to this jurisdiction may impact on the COIC.

Interest in public sector ethics: Growing and more vocal public interest in, and concern about, the conduct of government officials at all levels, elected and non-elected, heightens attention paid to Ontario government's appointment and employment decisions and to Ontario public servants' conduct while undertaking their duties. Greater scrutiny of public servants' conduct may impact the volume of matters about which the commissioner's advice or direction is sought. Similarly, as society's interest in issues regarding ethical conduct grows and findings of municipal and provincial Integrity Commissioners on infractions by elected officials are reported in the media, the commissioner anticipates that he may be required to play a more prominent leadership role in contributing and influencing the dialogue in a positive manner.

Transparency: There has been growing public demand for greater transparency of decisions in various sectors. For example, there are calls for disciplinary decisions related

to breach of trust and prohibited conduct made by regulatory bodies that oversee such professionals as judges, justices of the peace and medical practitioners, to be made public. Such decisions were previously shielded from public scrutiny because of privacy and confidentiality considerations and were only made public under very strict circumstances. In addition, the government's open government initiative, underpinned by the *Public Sector and MPP Accountability and Transparency Act, 2014*, requires public sector organizations to embrace greater accountability and transparency. These trends could impact the COIC's operations. For example, the commissioner is not required to make his advice and determinations public and the office only releases, through its annual report, and on its website, anonymized summaries of key cases dealt with in previous years. In an environment where there is an increased focus on transparency and intense public interest in how ethical breaches in the public service are addressed, this could mean that the COIC may be called upon to publicly release detailed information relating to specific cases, and this could influence the way the COIC operates.

Given this heightened interest, the publication on the COIC website of anonymized decision summaries could potentially lead to media requests for more details on specific cases of interest, including details about the identity of the individual, ministry or public body involved.

Internal Factors

The commissioner, appointed by Order-in-Council, is currently supported by 3.6 FTEs: an executive director, a senior policy advisor, junior business analyst, a part-time administrative assistant and a legal counsel assigned by the Ministry of Attorney General (MAG) as seconded legal services. The term of the current commissioner's OIC appointment ends July 2019, with no possibility of renewal/extension.

Review of the ethical framework: Ontario has only ever had one Conflict of Interest Commissioner (COIC) since the PSOA was proclaimed in 2006 and the office established in 2007. While the separation of oversight responsibilities for the conflict of interest and political activity rules between the COIC for public servants and the Integrity Commissioner (IC) for elected officials worked well during the previous ten-year period, the expansion of the mandate of the Integrity Commissioner into oversight of public servants (whistleblowing and expense reviews) makes the distinction between the offices less clear. Should the government approve the recommendation to consolidate the offices of the COIC and OIC, it would have a direct impact on the future operations of the COIC during the three-year planning period.

Budget constraints: As the government continues to look for efficiencies through the Program Review Renewal and Transformation (PRRT) initiative, the COIC will be called upon to manage with a flat budget or meet savings targets. Given the size of the COIC budget, any decreases during the planning period will impact its ability to deliver on core

operational priorities beyond the basics of managing its case load. If that is to occur, activities related to education, outreach and awareness campaigns in support of creating a “culture of ethics” may need to be curtailed.

Ethics Executive Orientation Sessions: The COIC currently offers orientation sessions twice per fiscal year to newly appointed or reappointed ethics executives. The government’s recent approval of a 10-year term limit for Order-in-Council appointments could lead to a greater than normal turnover of appointees to public bodies and as such, result in increased demand for the COIC sessions over the planning period.

Strategic Direction

For the current planning period, the COIC intends to focus on a number of strategies to support its mandate and to further its goals. These strategies rest within the legislated mandate of the COIC, take into account both anticipated internal and external influences, constraints and assumptions, as described in the environmental scan above, as well as lessons learned in the ten years since the office was established.

- **Improving consistency & application of the PSOA**

The COIC will continue to work with TBS and public bodies’ ethics executives to address any perceived gaps identified in the PSOA, particularly the application and interpretation of the PSOA rules related to public bodies in areas such as the identification of positions that are designated senior positions and the application of the financial declaration requirement to public bodies.

- **Building ethics executives’ capacity & contributing to general understanding**

The PSOA introduced a decentralized regime of ethics executives, giving specified individuals within public service organizations a role to promote ethical conduct within their organizations. The PSOA also places the onus on public servants to raise conflict of interest and political activity matters of concern with their ethics executive.

- In view of the combination of these expectations, the operational constraints under which the office must function and the leadership role envisioned for the commissioner, the COIC will continue to assign priority to education and awareness, with the objective of building and leveraging the capacity of ethics executives in public bodies and among public servants, more generally. Improving the capacity of local ethics executives ultimately reduces reliance on the COIC to provide basic information/respond to routine inquiries while creating room to address more complex and systemic issues.

- **Measuring effectiveness**

Measuring the efficacy of an ethics agency is not an easy undertaking. The functions of this office go beyond easily quantifiable performance indicators. During the planning period, the COIC will continue to implement and work with the Centre for Evidence-Based Decision making to refine the performance measurement framework it first put in place in 2014-15 for assessing outcomes and impact of services on an ongoing basis.

- **Extending influence through partnerships and sharing of best practices**

Given its small budget and limited resources, the COIC will focus on achieving its mandate of promoting a culture of ethics by partnering with other organizations with similar mandates in order to reach a wider audience and have a greater impact. For example, the COIC will build on the success of its 2016 partnership with other levels of government, academic institutions and other ethics agencies to continue to host an annual conference on public sector ethics. The 2016 conference attracted major Canadian thinkers and practitioners in the field of public sector ethics. Conference proceedings were published in a special issue of IPAC's Public Sector Management magazine and important peer-reviewed academic papers will be published in a special issue of the Canadian Public Administration journal. This conference and subsequent publications are important contributions to the field of public sector ethics in Canada, and have the potential to propel Ontario into a key leadership position among Canadians, and possibly international, jurisdictions for learning about best practices in the field.

Building on the success of the 2016 conference, a follow-up conference is planned for early 2018-19. Working with the same partners, this conference would be national in scope and should attract ethics practitioners and academics from across the country.

Overview of Current and Future Activities

The vision of the Office of the Conflict of Interest Commissioner is to help create "a province where people trust government". The activities and actions undertaken by the organization are intended to achieve that vision.

It is recognized that the COIC alone cannot achieve that vision, but in partnership with other public sector institutions, we play an important role to:

- Contribute to public servants' understanding of, and compliance with, ethics rules
- Encourage excellence and consistency in the application of ethics rules
- Be a leader in promoting ethical conduct
- Building organizational capacity in the area of public sector ethics

The office's ability to carry out these roles requires that appropriate organizational capacity exist and/or is built.

- **Contribute to public servants' understanding of, and compliance with, ethics rules**

Acts as ethics executive

The commissioner is the ethics executive for certain public servants and former public servants. In this capacity, the commissioner is responsible for providing these individuals with advice or direction on specific in-service and post-service activities or concerns, including political activities that may have an impact on their ability to fulfill their duties as public servants.

The COIC will continue to provide well-researched and reasoned advice and determinations to our clients. The commissioner has an exemplary record of success in fulfilling this mandated role. Of the almost 2,000 matters the commissioner has dealt with since the office's inception, not a single case has been judicially reviewed. This record is a positive reflection on the clarity and transparency of the COIC's processes and the quality and soundness of the advice and determinations provided. The COIC has instituted a process to follow-up with recipients of determination letters to track if the COIC instructions are being implemented.

Assists other ethics executives and/or government offices

Ethics executives are individuals to whom the PSOA assigns responsibility to promote ethical conduct within their organization. These individuals may seek the commissioner's advice on conflict of interest or political activity matters involving public servants in their organizations or they may seek to refer matters to the commissioner for a determination.

- The COIC will continue to build the capacity of other ethics executives by delivering 'group' orientation sessions for newly-appointed and re-appointed chairs of public bodies, other designated executives and their senior staff. The group session approach will advance the government's interest in establishing a 'community of practice' among ethics executives, promote a collaborative approach with the Integrity Commissioner, and help the COIC to realize efficiencies given limited COIC resources.
- The COIC will continue to implement an outreach agenda to deliver targeted presentations to public bodies that request it. A previous annual targeted outreach program by the COIC to small public bodies (less than 50 employees) has been very successful and will now be made available to all public bodies.

- The COIC decision summaries posted on its website will be expanded to include anonymized summaries of decisions from public bodies. This inventory of summaries is intended to support consistency in decision making by providing examples and models of past decisions of ethics executives that can be helpful in guiding future deliberations on similar issues faced by other ethics executives.

Advises on financial declarations of certain public servants

Under the PSOA Regulation 381/07, identified public servants in ministries who routinely work on matters that might involve the private sector are required to make a financial declaration to the commissioner. The commissioner will review and, as necessary, provide a letter of advice and/or alert the ministry/public body ethics executive of potential conflicts.

- The COIC will continue to work with TBS, the Public Service Commission (PSC) and public bodies' ethics executives to implement the financial declaration process.

Considers political activity requests

The PSOA sets out political activity rights and restrictions for all public servants. Public servants may request a leave of absence from their ethics executive to participate in some activities that are otherwise not permitted. Some part-time appointees may seek the commissioner's authorization to participate in activities that are otherwise prohibited under the PSOA.

- The COIC will continue to seek opportunities to work with the Public Appointments Secretariat to identify and introduce means to raise candidates' awareness, prior to appointment, and upon the completion of their term of appointment, of their PSOA obligations.
- **Encourage excellence and consistency in the application of ethics rules**

Serves as a best practice resource

In addition to developing a body of knowledge and experience in Ontario, the commissioner makes it a priority to learn about methods and approaches used by other offices with comparable responsibilities, in other jurisdictions within and outside Ontario. This assists the commissioner in providing information and advice on best practices that support the intent of the PSOA.

- The COIC will continue to participate actively in the Council of Government Ethics Laws (COGEL), to obtain (and share) information on trends and best practices in ethics oversight.

- The COIC continues to refine its robust performance measurement framework and activities and over the planning period should be in a position to share results with others that can be used as a best practice approach to measuring the efficacy of an ethics organization.
- The COIC will continue to capture and highlight best practices that are uncovered throughout the year and publish them in our Annual Report. Sharing these best practices allows other organizations to observe appropriate models of practice that could potentially be adopted by their organizations.

Identifies organizational policies and practices of concern or potential concern

The commissioner may advise public bodies or other entities on organizational policies or practices that, if adopted, could minimize the risk that conflict situations will arise or may suggest modifying existing policies, practices or procedures to ensure they are aligned with the PSOA.

The commissioner is also required to review and approve adjudicative tribunals' ethics plans in accordance with ATAGAA.

- **Be a leader in promoting ethical conduct**

Shares knowledge and experience

Each year, the commissioner's annual report includes a selected summary of conflict of interest and political activity matters addressed during the year. These summaries, which are also posted on the COIC's website, are intended to assist Ontario public servants to consistently interpret and apply the conflict of interest and political activity rules in similar situations.

- The commissioner will use his periodic online blog to share his thoughts, expertise and insights on current and emerging ethical issues for the benefit of the broader ethics community. The COIC also hosts periodic lunch and learns at its offices in which local experts (academics and practitioners) are invited to share their knowledge and experiences with COIC staff in an informal setting.

Identifies and responds to education opportunities

The commissioner assists public servants in increasing their understanding of the rules and their roles and responsibilities under the PSOA. This is particularly important for public servants in public bodies who are subject to the same rules as ministry employees, but who don't always have access to training and information available within ministries.

- The COIC will accommodate the OPS' and public bodies' requests for orientation to the PSOA on a limited basis as resources permit (e.g., presentations to newly appointed deputy ministers, assistant deputy ministers and board appointees).
- The COIC will maximize the impact of its redesigned website as a primary means of engaging with its key stakeholders by posting instructional videos, linking to current news items and hosting a regular blog by the commissioner that would further the objective of building the capacity of decision-makers and raising general awareness.
- The COIC will continue to work with other ethics agencies, other levels of government and academic institutions to plan and host an annual public sector ethics conference as a forum for sharing experiences and best practices.
- **Building organizational capacity**

The commissioner has devoted considerable attention to defining the scope of his responsibilities as set out in the PSOA and to developing the procedures and tools for carrying out those responsibilities. These are continually assessed in light of accumulated experience and practical application. Ongoing review helps ensure that the office continues to serve as a useful resource for Ontario public servants and others and maximizes the capacity of this small office. Best practices (e.g. procedural, administrative, etc.) and training and development opportunities are monitored for relevance and application. During the planning period, the COIC will:

- Fully implement its updated performance measurement framework by reporting annually, through its Annual Report, on its performance against the recently established 2016-17 baseline data in the areas of efficiency, effectiveness and satisfaction.
- Continue to host two to three lunch and learn sessions annually, with leading experts (practitioners and academics) to benefit from an exchange of ideas/experiences.

Resources Needed to Meet Goals and Objectives

The ability of the COIC to deliver on its mandate and undertake the activities described above is dependent on its allocated financial and human resources.

Financial

In 2018-19, COIC is planning to operate on a budget of \$857,500 with \$547,700 or almost 64% allocated for salaries, wages and benefits (Table 1). The COIC's appropriations reflect the fact that counsel's salary, (seconded legal services) benefits and professional

fees are charged against the services standard account. The 2017-18 salary increase for the commissioner represents a pressure in the out-years.

The out-year expenditure allocations are flat over the planning period. About 36% of the COIC’s budget is dedicated to mandatory, non-discretionary operating requirements for which costs are increasing (e.g., seconded legal services, lease charges, IT support, and French translation). In addition, there is a requirement to ensure that the critically important case management database is appropriately maintained and enhanced, as necessary. As a result, the COIC has little flexibility to respond to any higher, unanticipated costs or competing demands that may occur and must therefore look for innovative ways to manage its limited resources to support public servants in meeting their ethical obligations.

Continued and growing government-wide financial and staffing resource constraints will require the COIC to carefully monitor its capacity to respond to its case load and to new responsibilities and increasing expectations.

Table 1: Allocations, Fiscal Years 2017-18 to 2020-21

Standard Account	2017-18 Allocation	2018-19 Expected Allocation	2019-20 Expected Allocation	2020-21 Expected Allocation
Salaries and Wages	482,700	482,700	482,700	482,700
Benefits	65,000	65,000	65,000	65,000
Transportation and Communication	22,000	22,000	22,000	22,000
Services (including counsel’s salary)	281,800	281,800	281,800	281,800
Supplies and Equipment	6,000	6,000	6,000	6,000
Total	857,500	857,500	857,500	857,500

Human Resources

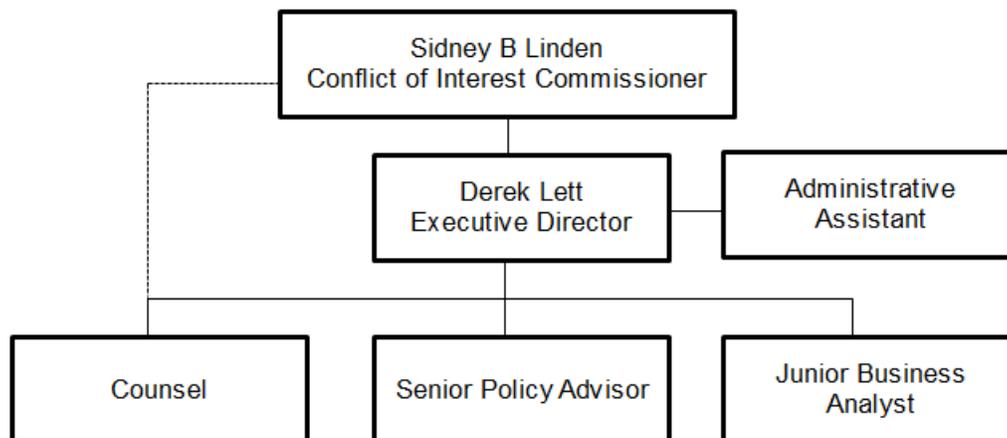
The COIC is planning to operate with 3.6 FTEs – an executive director, a senior policy advisor, a junior business analyst, and a part-time administrative assistant. Legal counsel is seconded from the Ministry of the Attorney General and is not counted as an FTE of the COIC. With this staff complement, the COIC delivers on its responsibilities in the areas of education and awareness and case management including the review and processing of financial declarations, research, policy analysis and performance measurement and reporting.

During the planning period, this staff complement is not expected to change. When project-specific assistance is required, temporary help will be acquired either through the vendor of record procurement process or through arrangements with academic institutions with practicum or internship programs.

Organizational Chart

Table 2: Organizational Chart, Office of the Conflict of Interest Commissioner
The chart below shows the following structure:

- Commissioner, Sidney B Linden
 - Executive Director, Derek Lett
 - Administrative Assistant
 - Counsel reports to both the Director and the Commissioner
 - Senior Policy Advisor
 - Junior Business Analyst



Risk Assessment and Mitigation Strategies

A number of internal and external factors were identified in earlier sections that could potentially have an impact on the COIC's ability to deliver on its mandate efficiently and effectively. The table below presents the potential risks to COIC operations in this environment and the mitigation strategies the COIC has, and will, put in place to address those risks.

1. Potential Risk: Pressure to publicly report on individual COIC decisions.

Low to Medium: Given the heightened public and media sensitivity for organizations to be transparent about how ethical breaches, real and apparent, are addressed when there is a public interest, it will not be inconceivable for a similar request to be made to the COIC to make public the commissioner's advice or determination on a specific matter.

Mitigation Strategy: The COIC's internal processes for case management, research and factors considered in providing advice or making determinations are well documented (in writing). These are supported by fact sheets and decision trees that are publicly available on the COIC website. In addition, the commissioner's final letters clearly state the factors the commissioner considered in each case and how he arrived at his conclusion. Should there be pressure to publicly release any documents pertaining to a specific matter dealt with by the commissioner; the COIC would make such a determination based on an assessment of the requirements in Section 3 of O. Reg. 384/07 and the requirements of FIPPA.

2. Potential Risk: COI Commissioner term ends within the three-year planning period (July 2019).

Low to Medium: The appointment term for the COI Commissioner expires during the three-year planning period.

Mitigation Strategy: Prior knowledge of the COI Commissioner's term expiration date allows sufficient time for planning and recruitment for a suitable replacement.

3. Potential Risk: Consolidation of the COIC operations with that of the Office of the Integrity Commissioner (OIC).

Low to Medium: In 2017-18, both commissioners authorized a consultant study to develop a business case in support of a consolidated office in which the COIC is absorbed within the OIC. If supported by the government, this would be a major transformation of the ethics oversight regime in Ontario.

Mitigation Strategy: Business as usual until a decision is made. If approved, implementation will be phased in so time will be available to develop a comprehensive transition plan.

4. Potential Risk: Requests for the COIC to assume an expanded role or to begin to implement aspects of its mandate that have not been exercised.

Low to Medium: There have been very few instances when the commissioner has been requested to assume an expanded role (recent examples include the role to support the Premier's Advisory Council on Government Assets, screening of potential appointees to advisory boards and the processing of the high volume of financial declarations related to Hydro One privatization) that could be accommodated within the COIC's existing operations. However, there are areas of the COIC's existing mandate that have not been exercised before – such as reviewing financial declarations from public servants working in public bodies or providing post-service advice to large numbers of former public servants who worked in public bodies and for whom the commissioner is the ethics executive, that could become burdensome if they become government priorities and activities should ramp up.

Mitigation Strategy: Any future request for the COIC to take on new activities or to reallocate resources to responsibilities within its current mandate that have become priorities, will be assessed against, and be contingent upon, the office's resource capacity to deliver and the clear alignment of the request with the COIC's legislated mandate.

5. Potential Risk: Requirement for COIC to find additional savings to contribute to the TBS's annual savings target.

Low to Medium: The COIC may be required to provide savings on its annual allocation. Given that the majority of the COIC budget is comprised of non-discretionary expenditures, contributing to additional savings targets would be difficult.

Mitigation Strategy: If necessary, the COIC will identify core programs and activities that could be curtailed or for which partnerships with others could supplement (e.g. education and outreach) so that funds could be found to contribute to additional savings.

Information Technology Plan

The COIC case management system is a powerful tool used to accomplish a number of related operational tasks. New functionality has been added to allow the office to track organizational best practices, complexity of cases, attendance at orientation sessions, etc. Additional fixes and enhancements have been undertaken to optimize the potential of the database but this needed to be balanced against the risk of overextending its capabilities.

The database was developed on an Access platform by an external vendor and sits on a print server. The vendor was awarded a three-year contract to enhance and provide ongoing maintenance of the database. The enhancements and maintenance contract expires in March 2018. During the planning period, there may be a need to consider a replacement application that that would provide a more stable environment and platform for this critical piece of infrastructure for the COIC.

The COIC's website was designed and developed with the help of the central agency cluster and built on a Word Press platform. This platform provides COIC staff responsibility for managing website content directly. COIC needs to ensure that staff members are readily trained to manage website content as this service will not be provided by the ministry or the cluster. In addition, should there be any corporate OPS changes to nature of website platforms or technology to be used, the COIC will need resources and/or support in order to be compliant.

The COIC will participate in the OPS-mandated desk top and blackberry refresh that is planned for Q1 2017/18.

Initiatives Involving Third Parties

The COIC partners and collaborates with external institutions and other Ontario government offices/agencies, as appropriate. These efforts stem not only from the COIC's desire to minimize duplication of effort and/or eliminate gaps in the interpretation and application of the PSOA but from the limited capacity to achieve its mandated objectives with a small office.

For example, the COIC will:

- Partner with Human Resource Policy and Planning Branch, TBS to implement any potential changes to the PSOA regulations and communications products on conflict of interest and political activity matters (e.g. training videos), as appropriate;
- Partner with academic institutions, other levels of government and other ethics agencies to host conferences on public sector ethics in the future years of the planning period; and
- Continue to partner with the Office of the Integrity Commissioner to deliver orientation sessions to designated ethics executives.

Performance Measures

The COIC has a robust performance measurement framework and system in place. Input, output and outcome measures have been identified and linked to the three key themes of efficiency, effectiveness and satisfaction. Data sources have been identified and data is being collected on an ongoing basis and will be reported on more fully through the annual reports throughout the planning period.

More specifically, in support of TBS's goal of supporting an open, transparent and accountable government, the COIC will be tracking and reporting on the following performance measures:

- The number of attendees at ethics executive orientation sessions (held twice per year)
- Percentage increase in clients' assessment of their understanding of conflict of interest and political activity rules, the role of ethics executives and the role of the commissioner based on survey responses from the ethics executive orientation sessions. A target of 20% improvement in pre- and post-surveys is set.

The COIC's performance in all of its mandate areas is guided by the established organizational values:

- **Efficient:** We maximize our resources to deliver quality services.
- **Transparent:** Our procedures are accessible, easy to understand and open.
- **Helpful:** We support public servants to be non-partisan, professional, ethical and competent.
- **Independent:** Our determinations and advice are free from the control and influence of others.
- **Consistent:** We treat people fairly but not necessarily the same.
- **Strategic:** We leverage our unique position of trust and responsibility within Ontario's ethical framework.

As in the past, the COIC is required to adhere to the Ontario government's customer service standards for timeliness in responding to enquiries. Every effort is made to meet or exceed those targets. Over the planning period, the COIC will strive to exceed the 90% target rate for acknowledging inquiries or holding the meeting within five business days and the 90% target for resolving cases within 10 business days of initial contact.

As required by policy, a mechanism, through the COIC website and general email inbox, is in place for “customers” to submit formal complaints about the service they receive from our office. This mechanism will be monitored and reported on in all annual reports.

Communication Plan

The COIC is integral to Ontario’s ethical framework which includes laws, regulations, policies, institutions and oversight bodies. Over the planning period, the COIC will focus on broadening its reach and influence in order to create greater awareness of ethical conduct and the role of the commissioner in building a culture of ethics in the public service.

Some key communications activities in support of the above objective, include:

- Keeping the COIC website current and up-to-date so that as the primary communications vehicle it becomes a place that public servants and/or members of the public would visit and re-visit for information on conflict of interest and political activity of public servants and to learn about best practices.
- Continuing a periodic commissioner’s blog on conflict of interest issues that may be in the public consciousness and for which the commissioner’s insights can be helpful in shaping the public discourse and understanding.
- Producing Annual Reports that, although a legislated requirement, would continue to include summaries of instructive cases the commissioner has dealt with in the previous year that can serve as a guide to other ethics executives in their interpretation and application of the public service ethics rules.
- Broadening the inventory of decision summaries to include summaries from ethics executives from ministries and public bodies, and making it accessible to all ethics executives to assist them with the consistent interpretation and application of Ontario’s public service ethics rules.
- Providing timely responses to inquiries received through the COIC corporate mailbox.
- Hosting and broadening the participation of ethics executives, and those who support them, in orientation sessions and other educational outreach activities as a means of contributing to the education and greater awareness of senior public servants.

- Partnering with other levels of government, academic institutions and other ethics agencies to plan and host conferences on public sector ethics themes in future years during the planning period.
- Presenting to international/foreign delegations visiting Ontario about Ontario's ethical framework and conflict of interest regime.
- Keeping strategic communications plan and inventory of questions and answers up-to-date.