

## COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director  
From: Anthony C. Bennett, Investigator  
Re: A15-009 – Ethics Training Compliance (City of South Bay)

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- **Background**

As of June 1, 2011, all municipalities within Palm Beach County are under the jurisdiction of the Palm Beach County Commission on Ethics and subject to the Code of Ethics (the Code). Pursuant to Section 2-446 of the Code, each municipal administrator is required to establish, by policy, a mandatory training schedule for all employees and elected/appointed officials to participate in refresher training on their ethical responsibilities as prescribed by the code.

The Commission on Ethics is required to develop and deliver training programs and to coordinate and cooperate with the municipalities to ensure effective and meaningful training of elected/appointed officials and employees. For verification, a training acknowledgment form for each full-time employee and elected/appointed official should be maintained by each municipality.

- **Scope**

The scope included a review of all City of South Bay employees and elected/appointed officials required to submit an ethics training acknowledgement form. Based on their policy (Resolution 27-2013) all public elected officials, employees, volunteers, service board members and contracted employees must receive initial Code of Ethics training within ninety (90) days of employment or appointment and throughout the course of employment. All forms were maintained in a central training file folder alphabetically by last name.

- **Assessment**

On August 26, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of South Bay (the City) for ethics training compliance. In order to complete this task I contacted Ms. Vicky Del Bosquez, Director of Human Resources, to schedule a review of the ethics training files. Ms. Del Bosquez advised the city keeps all ethics training records in a centralized folder in Human Resources. I scheduled a time to meet and review the folder.

On September 2, 2015, I traveled to the city to complete a review of the ethics training forms for all listed employees and officials. As of that date, the City of South Bay had fifteen (15) active full-time employees and elected/appointed officials. Upon review of the records, all employees and elected/appointed officials have been trained.

- **Conclusion**


The City of South Bay is in full compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.


Submitted by:

  
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Anthony C. Bennett, Investigator  
PB County Commission on Ethics

  
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Date

Reviewed by:

  
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(Initials)

  
\_\_\_\_\_  
Date