

COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director
From: Anthony C. Bennett, Investigator
Re: A15-012 – Ethics Training Compliance (Town of Gulf Stream)

- **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 (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 Town of Gulf Stream employees and elected/appointed officials required to submit an ethics training acknowledgement form. According to the Town of Gulf Stream Commission Policy, all ethics re-training will be conducted every three (3) years.

- **Assessment**


On August 13, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Town of Gulf Stream for ethics re-training compliance. In order to complete this task I contacted Ms. Rita Taylor, Town Clerk, to schedule a review of the files. Ms. Taylor advised the City keeps ethics training records of all employees, elected officials, and appointees in an electronic file and stated she would forward the file to me via email.

I received the electronic file to complete a review of the ethics training records. All employees, elected officials and appointees were compared against the records which showed previous and current ethics training dates. As of August 17, 2015, the Town of Gulf Stream had thirty-five (35) active full-time employees and elected/appointed officials. Upon review of the records, all employees and elected/appointed officials have been re-trained.

- **Conclusion**

The Town of Gulf Stream is in compliance with the ethics re-training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:



Anthony C. Bennett, Investigator
PB County Commission on Ethics

8/20/2015
Date

Reviewed by:



(Initials)

8/20/2015
Date