

REVISED COMPLIANCE REVIEW MEMORANDUM

To: Mark E. Bannon, Interim Executive Director
From: Anthony C. Bennett, Investigator
Re: A15-013 - Ethics Training Compliance (Town of Lake Clarke Shores)

- **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 or part-time employee and elected/appointed official should be maintained by each municipality.

- **Scope**

The scope included a review of all Town of Lake Clarke Shores (the Town) employees and elected/appointed officials who are required to submit an ethics training acknowledgement form. Based on their policy (dated: December 4, 2012) all public employees must receive initial Code of Ethics (COE) training within sixty (60) days of employment. The training may consist of live training by COE staff, on-line training through the use of the training video available on the COE website or DVD presentation. After completing training, employees must complete an approved acknowledgement form. All forms will be maintained in a central training file folder alphabetically by last name and department. After the initial training, periodic mandatory follow-up training is required of all employees every two (2) years.

- **Assessment**

As of the initial review of Ethics Training for Town officials and employees on September 23, 2015, of the fifty-six (56) employees and elected/appointed officials, only fifty (50) had met the retraining requirement. Six employees and officials were not in compliance with the re-training requirement.

On October 7, 2015, the Town provided via fax signed Ethics Training Acknowledgement Forms for the six (6) employees that had not timely completed mandatory retraining during the initial review.

- **Conclusion**

Based on the aforementioned facts The Town of Lake Clarke Shores is now in full compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

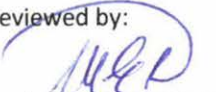
Submitted by:



Anthony C. Bennett, Investigator
PB County Commission on Ethics

12/22/2015
Date

Reviewed by:



(Initials)

12/22/2015
Date