

## COMPLIANCE REVIEW MEMORANDUM

To: Mark E. Bannon, Interim Executive Director  
From: Anthony C. Bennett, Investigator  
Re: A15-021 – Ethics Training Compliance (Village of Golf)

- **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 Village of Golf employees and elected/appointed officials required to submit an ethics training acknowledgement form. Based on their Administrative Policy and Procedure (dated May 21, 2014) 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. In addition, mandatory follow-up training is required of all employees and elected officials within three (3) years of initial training. All forms were maintained in a central training file folder within Village of Golf Administrative Offices.

- **Assessment**

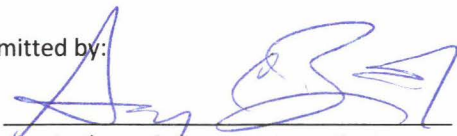
On Wednesday, November 10, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Village of Golf (the Village) for ethics training compliance. In order to complete this task I contacted Ms. Christine Thrower, Golf Village Clerk, to schedule a review of the ethics training files. Ms. Thrower advised the city keeps all ethics training records in a centralized folder in the Village Administrative Office. I scheduled a time to meet and review the folder.

On Monday, November 16, 2015, I traveled to the village to complete a review of the ethics training forms for all listed employees and officials. As of that date, the Village of Golf 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**

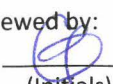
The Village of Golf is in full compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:

  
Anthony C. Bennett, Investigator  
PB County Commission on Ethics

11/19/2015  
Date

Reviewed by:

  
(Initials)

11/30/2015  
Date