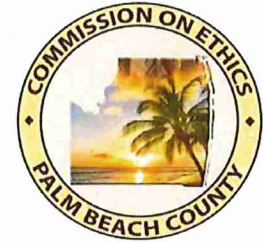


POLICY REVIEW AND COMPLIANCE MEMORANDUM



Honesty - Integrity - Character

To: Christie Kelley, Executive Director
From: Abigail Irizarry, Investigator
Re: A22-002 – Village of Wellington - Ethics Policy Review and Training Compliance (Employees and Elected Officials)

- **Background**

The Code of Ethics (Code) states in part, under Section 2-446(a), that Palm Beach County and each municipality within Commission on Ethics (COE) jurisdiction is required to maintain, by policy, a mandatory training schedule for all employees and elected/appointed officials. Additionally, each municipality has the responsibility of overseeing participation of their own employees and elected official's Ethics Training Acknowledgment Form and ethics refresher training.

The COE is required to develop and deliver training programs. Furthermore, the COE coordinates and cooperates with the municipalities to ensure training of employees and elected officials.

The COE last audited the Village of Wellington (Village) employees and elected officials on September 10, 2015.

- **Objectives and Scope**

Objectives include:

- Ensuring the agency has an ethics training policy.
- Ensuring the ethics training policy appropriately conveys information to officials and employees so clear parameters are determined, including initial training (with a defined deadline and grace period) and retraining cycle timeline (with a defined deadline and grace period).
- Ensuring the agency is requiring its officials and employees to comply with the training policy.

The scope for this memorandum included a review of all Village employees and elected officials required to submit an Ethics Training Acknowledgment Form. Internal tracking and delivery method of ethics training compliance were not part of the scope.

- **Approach and Methodology**

On Monday, January 30, 2022, on behalf of the COE, I emailed Village Human Resources (HR) Director Kimberly Gibbons to request the ethics training files for employees and elected officials. Gibbons advised that she is the correct contact person for the Village's employee and elected official's ethics training records.

On Wednesday, February 16, 2022, I received the Ethics Training Acknowledgment Forms and ethics training records for the Village employees and elected officials.

Based on their Administrative Policy and Procedure, which was amended in 2015, all public elected and appointed officials and employees must take the initial Code of Ethics training within ninety (90) days of Village employment or appointment. Additionally, mandatory follow-up training is required of all employees and elected officials every two (2) years thereafter.

- Findings

At the time of this report, the Village had three hundred and sixty six (366) active full-time employees and five (5) elected officials. Upon review of the records, all full-time employees and elected officials have been trained.

- Recommendations

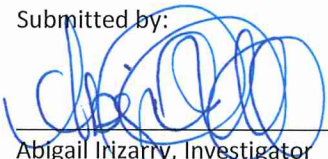
After reviewing the Village's policy, the following recommendation should be implemented to provide clarification regarding the training cycle and deadlines.

1. The follow-up training for employees and elected/appointed officials should have a specific timeframe to complete ethics refresher training. For example, the suggested follow-up language for employees and elected/appointed officials could be changed to read as follows: **"After initial training, periodic mandatory follow-up ethics refresher training is required for all employees and elected/appointed officials every two (2) years during the training cycle. The two-year ethics refresher training cycle is effective January 1, 2023, and all employees who take ethics refresher training and read the Code of Ethics between January 1 – March 1, 2023 will be considered trained and in compliance with this policy."**

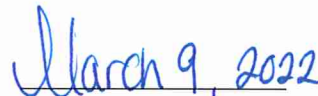
- Conclusion

The Village of Wellington is in full compliance with the ethics training requirement for its employees and appointed officials. Additionally, the review identified one area of the policy that may be updated for practicality, so the requirements are clear.

Submitted by:



Abigail Irizarry, Investigator
PB County Commission on Ethics




Date

Reviewed by:



(Initials)



Date