

## COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director  
From: Mark E. Bannon, Senior Investigator  
Re: A15-011 – Ethics Training Compliance (Village of Wellington- elected officials and employees)

---

- **Background**

As of June 1, 2011, all municipalities within Palm Beach County came under the jurisdiction of the Palm Beach County 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 provide them with 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 employee and elected officials should be maintained for each municipality.

On August 20, 2015, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the Village of Wellington (Village) for ethics training compliance for all elected officials and employees. In order to complete this task I contacted Ms. Kimberly Gibbons, Human Resources Coordinator for the Village. Ms. Gibbons provided a USB drive containing an alpha list and individual Ethics Training Acknowledgement Forms for all active full-time and part-time Village employees and elected officials. The Village currently has a policy of ethics retraining for its employees and officials on an annual basis, which must be satisfied within 30 days of the January 1<sup>st</sup> date set in the policy. The policy also requires all new officials and employees to be trained within 30 days of employment, appointment or election. The Village is currently working to development a new policy to require ethics retraining every two years.

- **Scope**

The scope included a review of all Village of Wellington full-time and part-time employees and elected officials required to submit an Ethics Training Acknowledgement Form.

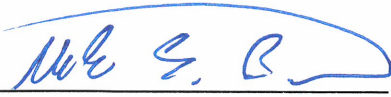
- **Assessment**

After obtaining the necessary information from the Village, I completed a compliance review on September 9, 2015. The review revealed that as of September 9, 2015, the Village had 337 active full-time and part-time employees and five (5) elected officials. As of this date, all 337 full-time and part-time employees as well as the five (5) elected officials are in compliance with the training requirement established by the Palm Beach County Code of Ethics and current Village policy.

- **Conclusion**


Based on the aforementioned information, the Village of Wellington is in full compliance with the ethics training requirement for all full-time and part-time employees as well as all elected officials.


Submitted by:

  
\_\_\_\_\_  
Mark E. Bannon, Senior Investigator

  
\_\_\_\_\_  
Date

Reviewed by:

  
\_\_\_\_\_  
(Initials)

  
\_\_\_\_\_  
Date