

## COMPLIANCE REVIEW MEMORANDUM

To: Steven Cullen, Executive Director  
From: Mark E. Bannon, Senior Investigator  
Re: A15-014 – Ethics Training Compliance (Village of Wellington- Advisory and Other Boards)

- **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 appointed officials serving on Village advisory and other boards. In order to complete this task I contacted Ms. Awilda Rodriguez, Village Clerk and Ms. Kimberly Gibbons, Director of Human Resources for the Village. They provided me with a an Alpha list as well as individual Ethics Training Acknowledgement Forms for all active officials appointed to Village advisory and other boards. The Village currently has a policy of ethics retraining for its employees and elected officials on an annual basis, as required by the Code, but the policy allows for appointed officials to be trained within 30 days of appointment to any Village board, which occurs on June 1<sup>st</sup> every two years. The Village is currently working on development of a new policy to require ethics retraining every two years for all officials and employees.

- **Scope**

The scope included a review of all Village of Wellington appointed officials serving on advisory or other boards, 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 nine (9) standing boards to which seven (7) individuals may be appointed. There are currently 57 appointed officials on the boards and six (6) vacancies. The Village also has one (1) temporary board having five (5) members (Charter Review Task Force), which is scheduled to sunset on January 1, 2016. As of this date, all 57 officials appointed to standing Village boards, and the five (5) officials appointed to the temporary board are in compliance with the training requirement established by the Palm Beach County Code of Ethics and current Village policy.

- **Conclusion**

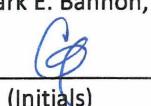
Based on the aforementioned information, the Village of Wellington is in full compliance with the ethics training requirement for all appointed officials.

Submitted by:



Mark E. Bannon, Senior Investigator

Reviewed by:

  
(Initials)

9/10/15

Date

9/10/15

Date