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Management Response and Action Plan: Audit of Conflict of Interest at the Public Health Agency of Canada

Public Health Agency of Canada

Office of Audit and Evaluation

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Recommendation 1

The Assistant Deputy Minister (ADM) of the Corporate Services Branch (CSB), with the support of Chief Science Officer and the VP of the Data, Surveillance and Foresight Branch (DSFB), should clarify and communicate the roles, responsibilities, and accountabilities, related to corrective action implementation and monitoring, employee training, stakeholder communication, data collection, and reporting.

Management response and planned management action

Management agrees with the recommendation.

1. The COI Guide will be updated to reflect roles, responsibilities and corrective action.
 - Deliverable: The COI Guide to be updated.
 - Expected completion date: Quarters 1 and 2 of fiscal year 2024-25.
2. Following completion of the audit exercise, a new automated system for receiving, tracking and reporting on data was developed and implemented.
 - Deliverable: An automated system for receiving, tracking and reporting on data.
 - Expected completion date: Quarter 2 of fiscal year 2024-25.
3. Currently, Statistical data and high-profile cases are reviewed and provided at LR Updates with Branch Heads that take place a minimum of twice per year.
 - Deliverable: Regular COI updates to branch heads.
 - Expected completion date: Completed.
4. A plan to provide overarching information, quarterly, in a comprehensive report that includes the above as well as communication plans and trends within the Agency will be developed.
 - Deliverable: Agency-wide update reports to be prepared quarterly.
 - Expected completion date: Quarters 2 and 4 of fiscal year 2024-25.
5. In order to ensure compliance, the intention is to adopt a follow up system to remind individuals in high-risk situations. This would include an email sent out annually after an employee receives a response to their declaration. The email would remind them and their immediate supervisor of the parameters they have committed to. In some cases EX management would be cc'd.

- Deliverable: Annual follow ups on high-risk cases.
- Expected completion date: Quarter 4 of fiscal year 2024-25.

Responsibility: Corporate Services Branch (CSB)

Recommendation 2

The ADM of CSB, with the support of Chief Science Officer and VP of DSFB, should review and implement training and outreach activities to better support managers on COI obligations.

Management response and planned management action

Management agrees with the recommendation.

1. The existing training package will be enhanced to provide scenarios for discussion on the role of management vis a vis their employees.
 - Deliverable: COI training will be amended to include management scenario for discussion.
 - Expected completion date: Quarter 2 of fiscal year 2024-25.
2. Management specific messages will be developed and shared with all employees to further emphasize the importance of management's role in the COI process.
 - Deliverable: Management-specific messaging will be developed and shared.
 - Expected completion date: Quarter 3 of fiscal year 2024-25.
3. The COI office will create an assessment tool for managers similar to the one that employees use for their own situation.
 - Deliverable: A management assessment tool will be implemented and added to the COI MySource page.
 - Expected completion date: Quarter 4 of fiscal year 2024-25.

Responsibility: Corporate Services Branch (CSB)

Recommendation 3

The ADM of CSB, with the support of Chief Science Officer and VP of DSFB, should review and update the guidance document suite to ensure better alignment with all policies, procedures, and guidelines on COI.

Management response and planned management action

Management agrees with the recommendation.

All related documents must align.

Deliverables:

1. Guidance document suite will be reviewed and required changes identified. Expected completion date: Quarter 3 of 2024-25.
2. Guidance document suite updated. Expected completion date: Quarter 4 of 2024-25.

Responsibility: Corporate Services Branch (CSB)

Recommendation 4

The ADM of CSB, with the support of Chief Science Officer and VP of DSFB, should develop a risk-based monitoring approach to optimize resources, processing timelines and reduce backlogs as well as develop and implement standard operating procedures to ensure COI declarations and affiliation approval records are analysed and mitigation measures are applied consistently.

Management response and planned management action

1. There is a need for a more comprehensive and formal risk assessment exercise. Deliverable: Risk management profile will be developed. Expected completion date: Quarter 3 of fiscal year 2024-25.
2. An informal risk-based approach is currently used to prioritize files given heavy volume and available resources. This approach can be formalized and a SOP will be created. Deliverable: Standard Operating Procedures will be created and implemented. Expected completion date: Quarter 4 of fiscal year 2024-25.
3. With current external pressures, coupled with the completion of the Academic Affiliation Policy, these tools will assist in ensuring a more targeted and consistent outcome, thereby enhancing the ethical fabric of the Agency and securing the Public's trust. Deliverable: Integration with Academic Affiliation reviews and approvals will be developed. Expected completion date: Quarter 4 of fiscal year 2024-25.
4. Finally, with the collaboration and risk management profile, a more accurate service standard can be developed, prioritizing higher risk files. Deliverable: Review and develop service standards as per risk management profile and prioritization. Expected completion date: Quarter 4 of fiscal year 2024-25.

Responsibility: Corporate Services Branch (CSB)

Recommendation 5

The ADM of CSB, with the support of Chief Science Officer and VP of DSFB, should establish a communication protocol for regular information sharing between various functions implicated in COI-related areas, such as the

Centre for Ombuds, Resolution and Ethics (CORE), Internal Disclosure Services (IDS), and the Intellectual Property (IP) Office.

Management response and planned management action

1. LRD and the OCSO will collaborate to ensure that increased awareness of employee and management responsibilities are communicated, and processes are aligned within the constraints of current systems.
Deliverable: Targeted discussions will take place between LRD and OCSO to plan and implement an immediate way forward. Expected completion date: Quarter 1 of 2024-25.
2. A working group will be created to ensure continued alignment and development of processes, ongoing consistency in communications, and alignment on overarching issues. Expected completion date: Quarter 4 of 2024-25.

Responsibility: Corporate Services Branch (CSB)

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