

MUNICIPAL PROPERTY ASSESSMENT CORPORATION

2022 Annual Whistleblowing Program Report



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PROPERTY
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Table of Contents

- Introduction3
- Overview3
- Reporting Methods4
- Confidentiality and Whistleblower Protection5
- Communication.....6
- Whistleblowing Program Statistics6
- Total Number of Whistleblowing Program Reports7
- 2022 Reports Received (by Month) to MPAC’s Whistleblowing Program.....8
- Highlights of Results8
- Report Categories9
- Reports by Reporter Type10
- Method of Submission10
- Reporters Who Subsequently Accessed Their Report.....11
- Position of Accused (Management/Bargaining Unit).....12
- Substantiated Issues Arising from the Whistleblowing Program12
- 2023 Outlook13
- Appendix A: Fraud and Other Irregularities Reporting Categories.....14



Introduction

This report on MPAC's 2022 Whistleblowing Program includes information about the fraud and other irregularities reports collected through MPAC's Fraud and Other Irregularities Hotline. It highlights the reports that have been received and demonstrates MPAC's commitment to maintain a governance framework that supports a high level of ethics and integrity.

Overview

MPAC's Whistleblowing Program and Fraud and Other Irregularities Policy was launched with the ClearView Connects™ platform to both internal staff and the external public in 2016. The Whistleblowing Program provides MPAC employees, stakeholders, and the public with an avenue to raise concerns of observed or suspected fraud, impropriety or other irregularities involving MPAC resources through an anonymous, confidential, and protective disclosure service. All MPAC employees are responsible for reporting an occurrence of irregular conduct or a suspected occurrence in accordance with MPAC's Fraud and Other Irregularities Policy.

Both the Policy and Program complement MPAC's existing Code of Conduct, which together provide employees with a set of standards and guidelines that ensure all staff maintain the highest degree of integrity and ethical behaviour in all MPAC business operations and relationships. The Whistleblowing Program supports the concept of openness and transparency in the delivery of public service and helps to strengthen confidence in MPAC. The Fraud and Other Irregularities Policy provides the guidance that empowers people to take appropriate action on any allegations of wrongdoing by outlining the appropriate steps to be followed to investigate fraud and other irregularities. These governance instruments, policies, electronic platforms, and programs serve to prevent, identify, report, investigate, and resolve instances of suspected or actual fraud and other irregularities. The existence of

MPAC's Whistleblowing Program discourages those that may be considering unethical or fraudulent activities and prevents future losses.

The Fraud and Other Irregularities Policy and supporting Whistleblowing Program is aligned with leading industry standards and practices by establishing a strong "speak up" culture. The Whistleblowing Program is managed and administered by MPAC's Risk Management Branch, which is independent and accountable to MPAC's Board of Directors.

Reporting Methods

MPAC's Fraud and Other Irregularities Hotline is the Program's primary reporting channel and is a confidential, secure, and anonymous service available 24 hours a day, seven days a week.

There are three ways to report a concern through this channel:

1. Call the Fraud and Other Irregularities Hotline: 1 844 863-6313
2. Complete and submit an online report through the confidential, secure website at: www.clearviewconnects.com/
3. Submit your concern by mail
PO Box 11017
Toronto, ON M1E 1N0

The Hotline is operated independently by ClearView Connects™, a third-party service agent that was engaged by MPAC. All reports and contacts are handled in confidence in accordance with MPAC's Fraud and Other Irregularities Policy. A reporter is not required to provide their name or any other personal information when submitting a report of suspected fraud or other irregularity. A person's identity will not be revealed to MPAC unless the reporter chooses to identify themselves with its submission.

All reports, including those that may come through other channels like an MPAC department or benefits investigation initiated by a benefits insurer, are collected by or inputted into the ClearView Connects™ platform. This platform is an

independent, external, and secure reporting service provider. All reports and contacts are handled in confidence in accordance with MPAC's Fraud and Other Irregularities Policy. Reports submitted through ClearView Connects™ have the functionality to facilitate anonymous two-way communication that allows reporters to access their report to track the progress of their report, submit additional information or respond to requests for additional information after submitting their original report.

As MPAC's Risk Management Branch collects the information from the ClearView Connects™ service provider, it reviews all disclosures to determine if a report warrants further investigative action. If so, the Risk Management Branch coordinates with other business areas to direct the investigative work necessary to bring timely closure to the case. If a case is deemed to be outside of the scope of the program as defined in the Fraud and Other Irregularities Policy, the reporter will be directed to the appropriate internal channel to address their concern.

Confidentiality and Whistleblower Protection

All information collected through MPAC's Whistleblowing Program is kept strictly confidential. MPAC respects the privacy of reporters and recognizes that anonymity and/or confidentiality is an essential key success factor for any ethics program. The information that is provided is further protected by the provisions of the *Municipal Freedom of Information and Protection of Privacy Act*. For instance, if a reporter provides any personal information, it will be collected under the *MPAC Act* and will be used strictly for the purposes of investigating the whistleblowing matter that is being reported.

Whistleblower protection does not stop with security and confidentiality. The effectiveness of MPAC's fraud prevention and detection activities, including its Fraud and Other Irregularities Hotline, is dependent on employees being able to report suspected cases of wrongdoing without fear of reprisal. Where reprisal is suspected or evident, the Whistleblower Protection Statement provides guidance on actions to be taken. Actions include invoking discipline if reprisals are evident.

Communication

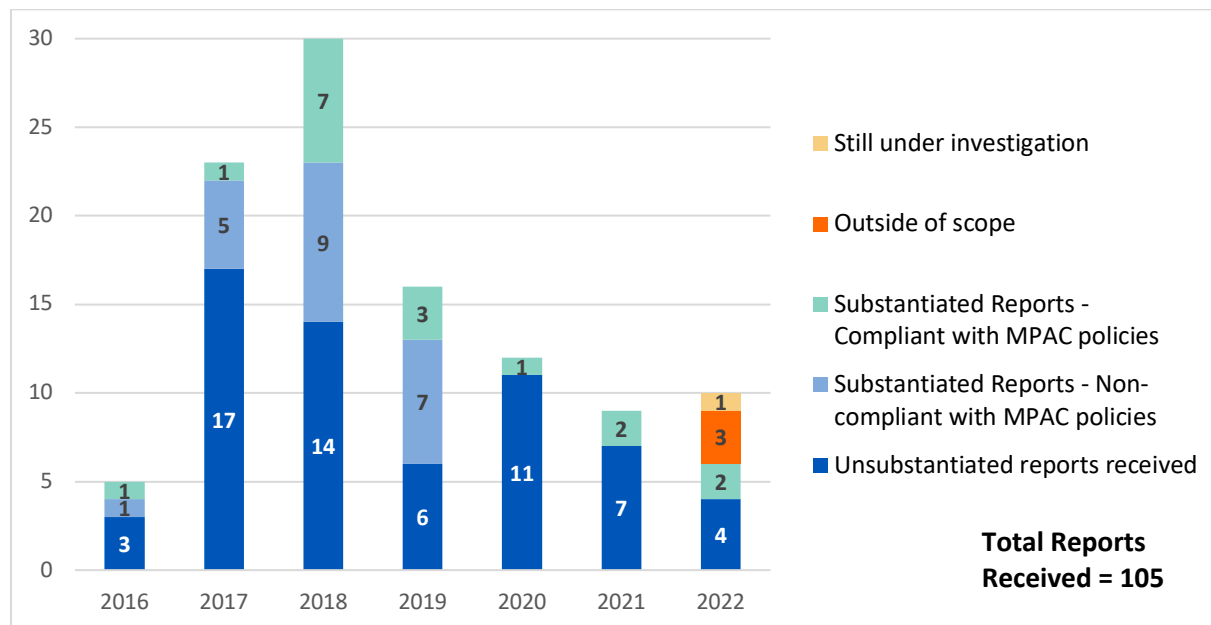
The primary communication objective for MPAC's Whistleblowing Program is to build trust and awareness among employees, property taxpayers and stakeholders about ethics reporting. The program's communication strategy also includes reinforcement of MPAC's commitment to an ethical workplace by encouraging use of the program, providing a clear and simple understanding of the reporting process, and instilling confidence that each report will be investigated thoroughly with appropriate action taken.

MPAC made a strategic decision to maximize the program's visibility to the staff and public by referencing it in prominent places on well-used channels like mpac.ca, MPAC's internal intranet, and on posters located throughout MPAC's offices. All new staff are also required to complete training on the Whistleblowing Program. New ways to promote and improve the understanding of MPAC's Whistleblowing Program will continue to be explored throughout 2023.

Whistleblowing Program Statistics

Since the inception of MPAC's Whistleblowing Program in October 2016, MPAC has received a total of 105 Whistleblowing reports. Of the closed reports, 37% were found to be substantiated, with 56% of substantiated cases being non-compliant with MPAC policies and 44% being substantiated but compliant with MPAC policies.

Total Number of Whistleblowing Program Reports



In 2022, MPAC received a total of 10 Whistleblowing reports, which is a consistent number of reports received compared to the previous year. There were six reports submitted by external resources and four reports submitted by internal MPAC staff.

Of these reports, nine were received through ClearView Connects™, which is MPAC’s independent external service provider’s hotline, and one report was transcribed into the ClearView Connects™ portal. All the reports submitted directly through ClearView Connects™ to the Whistleblowing Program were anonymous submissions. There have been no reports of any acts of reprisal occurring against any MPAC employee who submitted a Whistleblowing report in good faith.

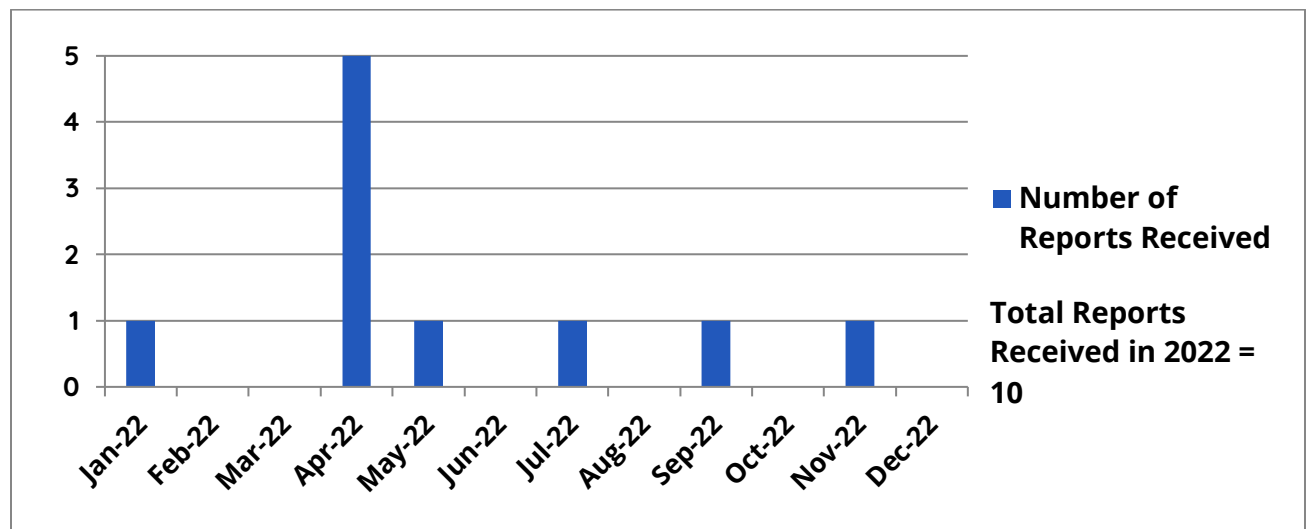
Substantiated reports are divided into two sub-categories to provide more clarity:

1. *Substantiated – Non-compliant with MPAC Policies* - allegation was accurate and constituted as fraud or other irregularity (e.g., pure fraud or other irregularity by an MPAC employee). Typically, intentional in nature.
2. *Substantiated - Compliant with MPAC policies* – allegation was accurate but does not constitute fraud or other irregularity (e.g., issue, error, process or

policy gap identified needing action however no direct violation of an MPAC policy). These instances are typically unintentional in nature.

Of the 10 reports submitted to MPAC’s Whistleblowing Program, two were substantiated and four were found to be unsubstantiated. The two substantiated reports were compliant with MPAC policies (allegation was accurate but does not constitute fraud or other irregularity). Three cases were deemed as outside of the scope of the Whistleblowing Program and were submitted to the appropriate department for handling. One case was still under investigation at the end of 2022.

2022 Reports Received (by Month) to MPAC’s Whistleblowing Program



Highlights of Results

Whether a case is substantiated or not, there are many intangible benefits resulting from every investigation and the program including:

- Improved awareness and education of ethics, fraud, freedom of information and privacy
- Targeted review and communication of MPAC’s Code of Conduct and other relevant policies

- Improved processes and adherence to policies
- Opportunity to educate the public on MPAC’s processes and policies
- Strengthened internal management controls and mitigation of risks
- Improved accuracy of MPAC’s data
- Deterrence of fraud and other wrongdoing

Report Categories

The table below summarizes the number of reports received to December 2022 by report category since the inception of the Fraud and Other Irregularities Hotline in 2016.

Report Category	Number of Reports							Total
	2016	2017	2018	2019	2020	2021	2022	
Violation of Laws, Regulations, Policies or Procedures	1	14	16	8	8	8	3	58
Theft, Embezzlement, Fraud	1	3	4	3	0	1	2	14
Unethical Conduct and Conflict of Interest	2	2	4	2	3	0	1	14
Manipulation or Falsification of Data	1	1	2	0	1	0	1	6
Data Security and Privacy	0	2	2	3	0	0	0	7
Management/Supervisor	0	0	1	0	0	0	3	4
Products and Customer Service	0	0	1	0	0	0	0	1
Other – Miscellaneous/Undefined	0	1	0	0	0	0	0	1
Total	5	23	30	16	12	9	10	105

Most cases noted above in the Violation of Laws, Regulations, Policies or Procedures category are related to potential violations of the Code of Conduct and procedures relating to completing accurate property assessments.

Reports by Reporter Type

When submitting a report, a whistleblower can identify if they have a relationship to the organization or not. In 2022, four reports were received by people who are an employee of MPAC, and six reports were received from people who identified as having no relationship to the organization.

Reporter Type	Number of Reports							Total
	2016	2017	2018	2019	2020	2021	2022	
Public (no relationship to MPAC)	1	18	16	8	10	8	6	67
Employee	3	5	14	8	2	1	4	37
MPAC Stakeholder (i.e., Supplier, Municipality)	1	0	0	0	0	0	0	1
Total	5	23	30	16	12	9	10	105

MPAC always investigates suspected acts of fraud or other irregularities that are brought to its attention. We continue to promote the Whistleblowing Program and encourage both employees and external stakeholders to use the program to report any suspected acts of fraud or other irregularity.

Method of Submission

Reporters may file a report by Internet, by phone using a toll-free number, by email and by traditional mail. Additional reports are also collected from other departments across MPAC and transcribed into the ClearView Connects™ system.

The table below shows the reports received by method of submission. In 2022, nine reports received were through the ClearView Connects™ website or by telephone to the Fraud and Other Irregularities Hotline. One report was received through other internal departments and transcribed into the ClearView Connects™ System.

Method of Submission	Number of Reports							Total
	2016	2017	2018	2019	2020	2021	2022	
Website	1	12	16	4	7	5	7	52
Phone – Live Agent	0	4	3	5	5	4	2	23
Mail	0	0	1	0	0	0	0	1
Outside of ClearView Connects™ Hotline (Transcribed)	4	7	10	7	0	0	1	29
Total	5	23	30	16	12	9	10	105

Although reports to the Fraud and Other Irregularities hotline have decreased since the pandemic, MPAC has seen consistent use of the ClearView Connects™ platform representing 72% of the total cases received. This demonstrates the value of having a secure, confidential reporting system through which an employee or member of the public may submit an anonymous report with confidence that it will be investigated.

Reporters Who Subsequently Accessed Their Report

The Fraud and Other Irregularities Hotline allows a reporter to access their report and to communicate with MPAC's reviewer while remaining anonymous after submitting their original report. This feature allows the reporter to submit additional information, track the progress of the case, and respond to any follow-up questions. In 2022, three reporters accessed their report after submission of the original report.

Reviewed Report	Number of Reports In 2022	Percentage
Yes	5	50%
No	4	40%
N/A – Report transcribed into ClearView Connects™	1	10%
Total	10	100%

On average, investigations submitted through MPAC’s Fraud and Other Irregularities Hotline have taken four to six weeks to complete. An investigation is completed as quickly as possible, and many cases are closed within one month of receipt. More complex investigations or where additional information is required before proceeding with the investigation may take more time.

Position of Accused (Management/Bargaining Unit)

Position	Number of Reports							Total
	2016	2017	2018	2019	2020	2021	2022	
Bargaining Unit Employee	3	5	10	9	1	3	2	33
Management	2	2	4	3	2	1	3	17
MPAC (General) – Process related/Data accuracy	0	10	15	4	9	4	5	47
Other - e.g., MPAC Stakeholder (i.e., Supplier, Municipality)	0	6	0	0	0	0	0	6
Outside of Scope	0	0	1	0	0	1	0	2
Total	5	23	30	16	12	9	10	105

Substantiated Issues Arising from the Whistleblowing Program

Below is a summary of the two substantiated reports that were investigated and closed in 2022.

Incorrect or missing assessment data

Both substantiated reports noted issues of having incorrect or missing assessment data on a property. The field offices were notified for possible re-inspection of each property. The accuracy of data and property details were updated to reflect findings resulting from the property inspection or investigation of the property details. The results of these cases are classified as substantiated but compliant with

MPAC polices since there was no indication of fraud or other irregularity, however the allegation of missing or incorrect information was accurate.

2023 Outlook

In 2023, the focus of the Whistleblowing Program will continue to be on maintaining awareness and building trust through consistent messaging and effective follow through on investigating all reports. Management uses knowledge gained through investigations to provide guidance on and reinforce acceptable conduct for all employees.

MPAC will continue to explore potential improvements to the reporting and investigation process. Communication and awareness of the program will continue through encouraging the Program's use, making sure the Fraud and Other Irregularities hotline is easy to access, building trust by consistent follow through of investigations, ensuring the completion of e-learning material for new staff and reminder messaging for all staff. MPAC will also continue to explore additional ways to communicate and promote the Program to staff and the public.

Appendix A: Fraud and Other Irregularities Reporting Categories

Category	Description
Financial Reporting and Accounting	Items regarding: The accuracy and completeness of financial statements and other financial reporting Accounting, internal accounting controls or auditing matters
Unethical Conduct	Any situation involving: Unethical or dishonest conduct Conduct that is contrary to the values of the organization Improper business conduct relating to suppliers or procurement
Conflict of Interest	Any situation or action that puts an employee in conflict, or could be perceived as putting them in conflict, with the interests of the organization
Manipulation or Falsification of Data	Authorized or unauthorized changes made to any data, information or reports in order to manipulate or falsify documents or records for purposes such as: Covering mistakes or fraud Improving financial or operational results Gaining unfair advantage in a contract
Fraud	Any attempt or action to gain personal monetary or other advantage by using deceitful methods, including: Falsification of data, transactions, or documents Cover up of illegal activities
Theft	Any situation or action involving: An act of stealing from an organization or individual Attempts to conceal acts of stealing
Violation of Laws, Regulations, Policies, Procedures	Any situation involving a violation of: A law, regulation or policy established by an organization or regulatory authority, including securities commissions A policy or procedure established by the board, management, or other authorized level of the organization
Data Security and Privacy	Any activity or situation that could pose a risk to data, data security or privacy of information including unauthorized access, hacking, theft or tampering
Compensation and Benefits	Issues or concerns related to compensation and benefits

Products and Customer Service	Issues or concerns related to products and services
Management/Supervisor	Issues or concerns related to management actions
Whistleblower Protection	Any retaliation or reprisal occurring as a result of an ethics report made in good faith. Reprisal could include: Exclusion from work activity Job loss, demotion, or reduction of pay or hours Relocation or reassignment Verbal or online abuse by co-worker or manager Actual or threatened physical harm