

Date: March 9, 2021

To: Deputy Ministers
Minister's Special Assistants
Minister's Executive Assistants
Executive Council Staff

From: Elliot Sims
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Subject: COMPLIMENTARY TICKET POLICY

Public servants and political staff must place the public interest first in carrying out their duties. This involves avoiding or effectively resolving conflict of interest situations where private or personal interests improperly influence, or could be reasonably perceived to improperly influence, the performance of their duties and responsibilities.

The General Manual of Administration (GMA) Policy 26.2.3 *Honoraria and Gifts* provides additional detail for public servants and political staff on how to implement this principle in their actions. ***Employees must not accept any gift, meal or other consideration from any person with whom they are conducting, have conducted, or could reasonably expect to conduct government business.*** This includes agencies and organizations that receive significant government funding or sponsorship. A full copy of the Policy is enclosed.

This policy affects complimentary tickets to events such as conferences, concerts, sports competitions, arts and cultural performances, networking luncheons, charity dinners or community fundraisers. The following guidance provides additional clarity on how to interpret these policies:

- Public servants and political staff shall not accept complimentary tickets to such events from individuals or organizations with whom they, their department, or the government at large is conducting business or may conceivably conduct business with in the future.
- Similarly, public servants and political staff must not accept complimentary tickets to such events from registered lobbyists.
- Public servants and political staff shall not accept discounted tickets unless the discounts are also available to a broad category of persons (e.g. retail loyalty card members) or the general public.
- Public servants and political staff may accept complimentary tickets when they are participating in the formal agenda in an official capacity. Similarly, they can accept a

complimentary ticket when they support a minister or senior public official (i.e. Deputy Minister, Assistant Deputy Minister) who is officially participating in the formal agenda.

- Public Servants and political staff may accept complimentary tickets when the tickets are not connected to, or be perceived to be connected to, the performance of their official duties. For example, tickets from family members or friends are allowable in many cases.

Caution is always advised when accepting any complimentary tickets, especially to events that have high ticket prices, limited availability, or other related factors.

Enclosure

cc Ministers
 Jonathan Scarth
 Jackie Maxted

General Manual of Administration Excerpt

26.2.3 Honoraria and Gifts

Employees must not accept any gift, meal or other consideration from any person with whom they are conducting (or have conducted, or could reasonably conduct or seek proposals to conduct in the future) government business, other than one of a token nature with limited value, and in no event should such gifts, meals or other consideration be of a value that creates any conflict of interest or could give rise to the perception of a conflict of interest, and in no event should such meals exceed the value of meals permitted under [this GMA] and liquor should never be accepted.

Employees may accept honoraria, gifts or other awards relative to approved work-related activities provided that:

- the activity is over and above what is regularly expected in the employee's job.
- full travel and related expenses are paid by the sponsor of the activity.
- the sponsoring organization does not receive funds from the Province of Manitoba.

Employees who violate this policy may be guilty of misconduct and subject to disciplinary action up to and including dismissal in accordance with *The Civil Service Act*.

26.3 Accountability

Deputy Ministers (and equivalents) are responsible for ensuring that:

- participation in work-related activities or acceptance of gifts does not present a conflict of interest
- normal operational requirements do not suffer.