



**Evaluation of PSIC's
Outreach and Engagement
Strategy, Initiatives and Activities
(April 1, 2012 – March 31, 2015)**

Prepared for the Office of the Public Sector
Integrity Commissioner of Canada (PSIC)



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1) Background

In December 2016, PSIC retained the services of the OTUS Group to conduct an evaluation of the communication team's outreach and engagement initiatives and activities between April 1, 2012 and March 31, 2015.

It should be noted that the scheduling of this evaluation and the five-year review of the *Public Servants Disclosure Protection Act* ("the Act") launched in February 2017 by the House of Commons Standing Committee on Government Operations and Estimates was not planned; it is coincidental. The Request for Quote by PSIC was issued in October 2016 and this evaluation process was initiated in December 2016.

2) Objective

The main objective of this evaluation is two-fold:

- 1) Review the document *PSIC Outreach and Engagement Strategy 2012-2015 with Annual Activity Plans* (dated June 2012), as well as the follow-up document *PSIC Outreach and Engagement Strategy 2014-2015* (dated August 2014), to determine whether the strategies, initiatives and activities identified were implemented and whether they successfully contributed to raising awareness among stakeholders between April 1, 2012 and March 31, 2015.
- 2) Provide feedback and recommendations for improvements.

Note: It was requested that the evaluation should include a specific focus on assessing targeted outreaches and operational achievements.

3) Review Process

To effectively evaluate PSIC's outreach initiatives and activities, and to provide feedback and recommendations for improvements, research extended beyond a thorough review of the original 2012-2015 strategy and 2014-2015 follow-up document. Other resources consulted including the following:

- PSIC's website: <http://www.psic-ispc.gc.ca/>
- Online and social media presence including but not limited to:
 - Google searches for PSIC to view Page 1-3 results, Wikipedia entries, media articles, Government of Canada website, websites or links referred to by interview participants
 - Twitter: https://twitter.com/PS_Integrity and https://twitter.com/SP_Integrite
 - YouTube: <https://www.youtube.com/channel/UCUTeAtfK56CJPHBaq73P4wQ> and <https://www.youtube.com/channel/UCNTvTgb00FO-tFoeyJycVA>



- The *Public Servants Disclosure Protection Act* (“the Act”) to gain an understanding of the parameters by which PSIC is mandated to meet the needs of public servants who make protected disclosures of wrongdoing or reprisal complaints
- Historic documents
 - *Restoring Trust* communications strategy (2011)
 - Two Focus Group Testing reports (2011 and 2016)
 - Calendars of past speaking engagements (fiscal years 2012-13, 2013-14, 2014-15)
 - Promotional items inventory tracking document (2011, last modified in 2016)
 - Social media strategy (2014)
 - Standard case report tabling strategy (2011, last modified in 2013)
 - *PSIC Risk Assessment Report to Audit Committee* (December 2014)
 - Annual Reports: 2012-2013, 2013-2014 and 2014-2015
- Communication materials and products (hard copies received and online versions reviewed):
<http://www.psic-isp.gc.ca/eng/resources/communications-material-and-products>

By design, the evaluation process was largely based on a participant-oriented model to connect with coordinators/implementers, recipients, affiliates and observers of PSIC’s outreach and engagement initiatives and activities. In January and February 2017, invitations to participate in one-on-one interviews with Andrée Paige of the OTUS Group were sent to:

- members of the PSIC communication team
- other PSIC employees associated with executive administration, policy, research, and investigations
- members of the Senior Officer community
- members of the Advisory Committee and the Audit and Evaluation Committee
- members of the media

Accepted one-on-one interviews averaged 30 minutes each, providing ample opportunity for candid feedback and practical recommendations. In all, 18 people participated. Participants demonstrated professional expertise, experience or interest in one or more of the following: values, ethics, integrity, conflict management, internal audits, internal disclosures, accountability, tribunals, unions, policy, finances, correctional services, and national security.

Given the various perspectives and experiences shared by interview participants, it should be noted that their feedback is more qualitative than quantitative in nature.

As such, evaluation results include an indication of participants’ views about the questions and issues explored, but cannot be generalized to all PSIC staff, the full population of the Senior Officer community, all members of the Advisory and Audit and Evaluation committees, or all federal public servants to which raising awareness about the Office of the Public Sector Integrity Commissioner was a major focus of PSIC’s Outreach and Engagement Strategy.

4) Review Emphasis and Time Frame

The OTUS Group was directed to focus on the effectiveness of PSIC's outreach and engagement strategy and supporting activity plans between April 1, 2012 and March 31, 2015.

Given that the evaluation process was not initiated until 21 months later—in December 2016 for the review of background and supporting documents, and continuing through January and February 2017 for interviews—it proved difficult to limit the scope of the evaluation to March 31, 2015 and earlier. For example, information consulted on the website for the purposes of this evaluation would certainly have been updated since March 2015.

Participants of the interviews naturally provided historical, evolutionary and current perspectives. It was not realistic for them to be expected to recall, let alone limit, their feedback about initiatives or activities to April 1, 2012 – March 31, 2015 only.

Out of necessity and for practical reasons, this evaluation includes an emphasis on initiatives and activities that unfolded between April 1, 2012 and March 31, 2015, but it also takes into account how these initiatives and activities may have continued to evolve throughout the remainder of 2015 and through all of 2016, until and including January-February 2017.

5) Challenges and Realities Impacting PSIC

During the course of the evaluation, it became evident that PSIC faces a number of challenges and realities that need to be considered. These include:

- **PSIC's reputation prior to April 1, 2012:** It is well documented that PSIC's formative years were the subject of public scrutiny, distrust and criticism. These perceptions are still prevalent in online searches and through ongoing backlash from its earliest critics.
 - As but one example, the Wikipedia entry for the *Public Servants Disclosure Protection Act* (https://en.wikipedia.org/wiki/Public_Servants_Disclosure_Protection_Act) discusses the first three years of the legislation and concludes with the resignation of the first Commissioner in October 2010. Although modifications to the page were made as recently as 2014, there is no information about the subsequent appointment of two Commissioners, nor are there updates about more current views regarding the legislation.
 - In a Wikipedia entry regarding the Public Sector Integrity Commissioner, (https://en.wikipedia.org/wiki/Public_Sector_Integrity_Commissioner), the appointment of the current Commissioner is not mentioned.
 - Note: Although Wikipedia is by far not the only source of information online, it is currently ranked the fifth most popular website globally, behind Google, YouTube, Facebook, and Baidu (the leading Chinese language search engine). Source: <http://www.alex.com/topsites>
The existence of outdated information and negative perceptions about individuals or activities that were replaced or changed 7-10 years ago are serious obstacles. (See *Observations, Perceptions and Recommendations*, page 15, for recommended solution.)

- **Definition of wrongdoing:** The Act’s definition of wrongdoing is much narrower than the dictionary definition of wrongdoing. Not everyone reads or understands the Act.
- **Interpretation of the Act:** The same Act can be interpreted differently by different parties, resulting in different practices. For example, the Treasury Board of Canada Secretariat (TBS) does not report anonymous disclosures. PSIC does report them. As another example, if a person has more than one allegation, TBS will report each allegation as a separate disclosure. In contrast, PSIC considers all allegations made by the same person to be a single act of disclosure (i.e. one form, one case, one investigation). These differing interpretations of the Act, and the resulting variances in their reporting statistics about the total number of disclosures, has led to inconsistencies and confusion.
- **The culture of whistleblowing:** Most interview participants acknowledged that the term “whistleblowing” and the act of whistleblowing are often viewed as negative, even if it is becoming more acceptable to disclose wrongdoing. Participants were asked to propose words they or their employees might associate with whistleblowers or whistleblowing and these included *tattletale, rat, snitch, squealer, sneak, informant, betray, punish, retaliate, stigma, reputation*, etc. It is culturally ingrained in many people not to “stir the pot” or get involved. In addition, if someone were to actually blow a whistle, the loud, shrill sound it emitted would actually attract attention—an effect that actually contradicts PSIC’s assurance that a complainant’s identity is protected. At the same time, participants acknowledged that if disclosures aren’t made, improvements are not possible. Complainants and witnesses may in fact experience relief that someone has had the courage and integrity to blow the whistle. Overall, the challenge is not unique to PSIC. All of society is impacted by this culture. PSIC already recognizes the need to contribute to a shift in the culture of whistleblowing to make it not only acceptable, but also encouraged.
- **Reluctance to use whistleblowing services:** There are many reasons why there might be a reluctance to approach PSIC and follow through with reporting a wrongdoing or an act of reprisal. These include, but are not limited to:
 - According to first-hand accounts from interview participants, PSIC seems “scary” to some public sector employees. It’s “a big deal” to formally disclose wrongdoing or submit a complaint about a reprisal. Complainants may fear the process will be long-winded, time-consuming, exhausting, or intimidating. There may be fears that their involvement will be suspected by others and that there will be repercussions, even if there is assurance their identity is protected and they are also protected from reprisal. Will they feel satisfied by the outcome? Overall, the psychological and/or emotional effects on someone who is considering blowing the whistle could be greater than their will power to report a wrongdoing or act of reprisal.
 - In the Act (subject to subsection 19.4(4)), the filing of a complaint under subsection (1) precludes the complainant from commencing any procedure under any other Act of Parliament or collective agreement in respect of the measure alleged to constitute the reprisal. This may deter employees from approaching PSIC if they believe they will have better success through another recourse.
 - According to the Act, the Commissioner cannot investigate former or retired public servants (ss. 29(3)). If a public servant quits or retires before an employee has a chance to approach PSIC, the disclosure of wrongdoing or alleged act of reprisal cannot be investigated.

- Whistleblowing is rarely a quick decision. Senior officers reported that complainants can agonize for months before coming forward. They may take sick leave to escape the issue for as long as possible before coming forward, if at all.
- **Major stakeholders are widely dispersed and numerous:** About 60% of the Public Service of Canada is located outside of the National Capital Region and are working in as many as 1,600 locations across Canada. The government has about 6,000 executives and about 400,000 public servants overall. There are nearly 340 Members of Parliament and over 100 Senators (a federal election did not take place between April 1, 2012 and March 31, 2015). As an independent agency whose mandate is to report directly to Parliament and communicate directly with Chief Executives, PSIC may have access to the Government of Canada Directory but it would not be appropriate for it to begin sweeping through the directory to create vast internal email lists. Instead, PSIC must find resourceful ways to reach these internal target audiences by partnering with internal contacts.
- **PSIC's performance cannot be measured solely by the number of cases it publishes:** PSIC's mandate is narrow, other recourses are available to public servants and not all incidences of wrongdoing meet the definition of the Act. For example, an employee can make a disclosure within his or her organization to a supervisor, manager or the Senior Officer assigned to conduct internal disclosures. The drive to improve workplace well-being has made it easier for people to raise concerns, talk openly about them and get them resolved internally—thus avoiding the need to escalate a matter to the attention of PSIC. In addition, incidents of harassment, staffing issues and personal conflicts do not meet the definition of wrongdoing in the Act and are more appropriately dealt with by a manager, human resources advisor or union representative. Finally, the reality is that there is an absence of real, reliable data to confirm the actual number of reported incidences of wrongdoing throughout all reporting channels that exist within the federal government.
- **PSIC cannot enforce discipline for wrongdoing:** The purpose of investigations into disclosures is, according to the Act, to bring the existence of wrongdoing to the attention of the organization's Chief Executive (e.g. Deputy Minister or CEO) and to make recommendations for corrective action. Under the Act, PSIC cannot participate in or enforce appropriate disciplinary action, including termination of employment, of a public servant who is investigated and determined by PSIC to have committed a wrongdoing. Only in the case of a reprisal *might* the Commissioner have reason to believe it is in the public's best interest to refer the matter to a conciliator (to attempt to bring about a settlement) or refer the matter to the Public Servants Disclosure Protection Tribunal (which can order corrective action including reinstatement, compensation for, or disciplinary actions against those found to have taken the reprisal action). For anyone desiring or expecting punitive actions to arise from PSIC directly, it is simply not within its mandate.

Together, these challenges and realities do not prevent PSIC from successfully advancing an outreach and engagement strategy, but they do create potential obstacles such as misunderstandings, misperceptions and communication gaps that may prove difficult or time-consuming to overcome.



6) Review Findings

Trust and Awareness of the Act and PSIC (Public Sector Employees)

Throughout the course of the review, it was determined that awareness of the Act and PSIC has increased, although there is a general perception that many public servants still do not know what PSIC is or what it does.

For example, there is occasional confusion between PSIC and PSAC (the union) when only acronyms are used, since they sound so similar when spoken. In addition, several interview participants remarked that many employees who are focused aggressively on career advancement or more focused on “life” rather than “work” may feel indifferent towards any initiative or activity that doesn’t impact them directly.

Finally, there are many public servants who don’t really understand the government structure, let alone the function or even the meaning of an Agent of Parliament like PSIC. Despite improvements in awareness, even PSIC understands that outreach and engagement activities must continue to be prioritized and implemented.

For the growing numbers of public servants who have gained an awareness of PSIC, feedback from interview participants is that the information or training that employees received by PSIC, Senior Officers or managers strengthened their understanding that the Office is an important mechanism for whistleblowing and for increasing accountability in the federal government—even if the culture of whistleblowing is not yet viewed as positive by all employees.

Trust and Awareness of the Act and PSIC (Other Key Stakeholders)

Beyond Chief Executives, managers, supervisors, and public sector employees in general, other major stakeholders identified in the PSIC Outreach and Engagement Strategy (2012-2015) are listed below. Many interview participants specified various stakeholders when commenting on the perceived level of trust and awareness of the Act and PSIC. The communication team provided input and updates about all stakeholders as part of the evaluation:

- **Parliamentarians:** Even though PSIC reports to Members of Parliament and Senators, it is perceived that many of them don’t quite understand PSIC’s mandate and question why there aren’t more case reports. The five-year review of the Act may help remedy this.
- **Unions, professional associations, staff relations, and employee assistance:** Inroads have been made by PSIC into unions in particular.
- **Whistleblower advocates:** PSIC’s earliest critics remain vocal, largely about the lack of punitive powers of the Office as defined by the Act. Communication channels have remained open despite differing views.
- **Other Agents of Parliament:** PSIC worked through the network and collectively, Agents explored the option of a co-branding exercise. It was determined that there are too many complexities and differences between what each Agent of Parliament does. Grouping them together in an attempt to simplify their functions might in fact raise more questions rather than answers.

- **Public Servants Disclosure Protection Tribunal:** Formed as a result of the same Act, the role of the Public Servants Disclosure Protection Tribunal is to determine whether or not a reprisal action has been taken. It can grant appropriate remedies to recipients of reprisals and, when requested by the Commissioner, order disciplinary action against those who made the reprisal. Only one person was interviewed who had an affiliation with the Tribunal. The participant provided feedback that focused on how PSIC and the Tribunal's mandates are not clearly understood until or unless a complainant goes through the process. The participant suggested that the upcoming review of the Act and ongoing efforts to educate public servants about PSIC's mandate will help to transition the culture of whistleblowing. More qualitative information, such as "Why should you disclose?" would help people understand why disclosure is so important if we are to make improvements to work environments.
- **Public:** The website provides useful information and most interview participants stated that enquiries are answered within a reasonable time frame upon request. Although the public may participate in reporting wrongdoing, most interview participants felt that apart from the publication of case reports and reprisal referrals to ensure media and the general public have access, PSIC and the Act are far more relevant to public servants. Several interview participants also remarked that public apathy may play a role—that the general public may not feel concerned about an issue within the federal government if it doesn't impact them directly.
- **Media:** Information and questions are readily provided by PSIC to media. One interview participant from the media stated this is done in a "responsive, quick and helpful" manner. Some media have become well-informed of the Act and PSIC's mandate, resulting in more accurate reporting.
- **Other governments (provincial and municipal):** Information was gathered by PSIC to compare wrongdoing and reprisal systems. Travel was limited due to budgetary constraints.
- **International counterparts and governments (other countries):** Considerable work was done to reach out to international counterparts and governments to meet with and exchange research and best practices. Travel was limited due to budgetary constraints.

In PSIC's 2014-2015 follow-up strategy document, the development of key messages tailored for each key stakeholder demonstrates the communication team's growing awareness of the issues or perspectives that resonated most with each group.

Increase in Caseload

The number of case reports (findings of wrongdoing) increased from one to nine between April 1, 2012 and March 31, 2015.

In 2014, there were three cases that were referred to the Public Servants Disclosure Protection Tribunal (compared to two cases in 2011 tabled after April 1 and one case in 2012 tabled before March 31).

An increase in trust and awareness may have contributed to a greater number of cases. In fact, the Commissioner makes this statement in the 2012-2013 annual report. Increasing awareness is also mentioned in the 2013-2014 and 2014-2015 annual reports.

Operational Achievements

- **Case reports:** An increase in the number of case reports, backed by a diligent approach to post case reports online and release information and results to media, politicians and Canadians in a timely manner, demonstrated PSIC's proactive focus on raising awareness about the Act, the role of PSIC and its operational achievements.
- **Applications to and decisions by the Tribunal:** While the Tribunal's independent role and processes may not be widely understood by middle management and public sector employees in general, interview participants felt that Chief Executives and Senior Officers do tend to generally understand the independent role and processes of the Tribunal. PSIC carried through with communicating applications to and decisions by the Tribunal as judiciously as it did with case reports.
- **Media relations:** Proactive media relations with access to the Commissioner were viewed favourably. Social media tools were used sparingly because of the sensitive and highly confidential nature of cases.
- **Website:** With few exceptions, the website was praised as an informative, well-organized and resourceful tool. The menu titles are worded simply, enabling users to find topics or files fairly easily. The "Meet Joe Friday" video was very well-received because it "humanized" the Commissioner and the role of PSIC. Posting case reports and tribunal referrals/outcomes in both PDF and on-page format ensured the information was both print-friendly and searchable.
 - The number of unique visitors per fiscal year was 20,783 (2012-2013), 22,127 (2013-2014) and 21,024 (2014-2015). It should be noted that there were spikes in visits whenever case reports or tribunal referrals/outcomes were announced. During the 2013-2014 fiscal year when the number of unique visitors was highest, there were six case reports and three tribunal referrals—the most combined activity related to case studies and tribunal referrals within a fiscal year to date. The fact numbers were highest during that specific fiscal year are not surprising.
- **Commissioner and office speaking engagements:** Speaking engagements by the Commissioner and PSIC staff were substantial. Detailed documents and schedules provided by PSIC demonstrated both scheduled and completed speaking commitments in 2012-2013, 2013-2014 and 2014-2015. These engagements—which include but are not limited to conferences, staff meetings, executive committee meetings, working group learning days, webcasts, and hosting delegations from other countries—are also listed in the Outreach and Engagement chapters of the 2012-2013, 2013-2014 and 2014-2015 annual reports. Regarding ideas to approach the Canada School of Public Service and 10 federal institutions per year, these outreaches were also completed. For example, a video launched in December 2014 that provides a summary of what wrongdoing and reprisals are under the Act was shared with the heads of all federal departments, agencies and crown corporations as well as all Senior Officers, to name a few. The Canada School of Public Service was included in this outreach and integrated the video as part of its training curriculum for managers and new employees. Federal institutions were also approached and provided with briefings. Subsequently, it was determined that it would be more productive to find more direct ways to get information through to middle management and employees at all levels.
- **Exhibit strategy:** PSIC made great strides in developing a branded exhibit and promotional material to help raise awareness about the Act and the role of PSIC. Although one-on-one discussions take far

more time than broader outreaches, members of the communication team reported that many employees found it less intimidating to approach “two people at a booth” compared to more formal enquiries through 1-800 numbers or emails. Face-to-face exchanges are also more personal than a website visit. The exhibit strategy facilitated quality discussions and the likelihood that employees would tell others about PSIC and their positive experience.

- **Pamphlets and other promotional items:** Well-branded pamphlets and promotional items were created which were consistent with and therefore complemented the branding and messages applied in the exhibit strategy. Cyclical reviews were conducted which, in the case of a pamphlet entitled “Five questions to ask yourself before making a protected disclosure,” resulted in a re-write of the tone and message to ensure it resonated better with public sector employees (based on constructive feedback that was openly received and quickly acted upon). This ongoing focus on making improvements to information is commendable.

Targeted Stakeholder Engagement

- **One-on-one engagement with federal public service unions:** PSIC followed through in contacting ACFO, PIPSC, PSAC, CAPE and APEX to discuss mutually beneficial awareness strategies and to cross-promote the value of each other’s role. While some unions remain cautious about freely encouraging employees to contact PSIC, this is the result of the one-on-one relationships they create with the individuals they counsel. PSIC has been advised that the caution is the result of the need to manage expectations, given that unions could not advise on the outcome of an independent investigative process. Regardless, union members now sit on PSIC’s Advisory Committee.
- **Advisory Committee:** There appear to be no issues with the structure and inclusiveness of the Advisory Committee, however, feedback from interview participants suggested the agenda and frequency of meetings could be revisited (see *Observations, Perceptions and Recommendations* for more details).
- **Provincial and international relations:** PSIC followed through on monitoring international activity, conducting a comparative analysis between provincial disclosure regimes, and identifying areas for PSIC participation.
- **Agent of Parliament Networks:** As described in the Key Stakeholder list on page 7, a co-branding exercise was explored with other Agents and they mutually agreed not to pursue the project.
- **Internal Disclosure Working Group (IDWG):** Perceptions vary as to whether PSIC played an “active role” in this group. Although its role is ex officio, feedback from some interview participants suggested PSIC could be doing more (see *Observations, Perceptions and Recommendations* for more details).
- **Appearances before Parliamentary Committees:** A binder, bilingual opening remarks and Q&As were prepared for every Parliamentary appearance. Ongoing monitoring of other Agents’ appearances was also conducted to help ensure the Commissioner was prepared.
- **Annual report:** PSIC’s annual report was tabled on time and posted to facilitate access and review. PSIC followed through with its intent to introduce a clarification of PSIC’s mandate as well as its vision, mission and values in the 2012-2013 annual report. In the 2013-2014 annual report, it introduced an entire chapter (Chapter 3) dedicated to “Did you know?” to further clarify some aspects of the Act and PSIC’s role. In the 2014-2015 annual report, a compendium of the types of cases handled by PSIC was included. These incremental improvements met the intent of the strategy.

Measuring the Effectiveness of Outreach and Engagement Activities

In the PSIC Outreach and Engagement Strategy (2012-2015), it was acknowledged how important it is to measure the effectiveness of outreach and engagement activities.

In addition to the indicators set out in the Performance Management Framework, the PSIC communication team committed to considering other measures. These included the number of events attended by the Commissioner and/or PSIC staff, the number and frequency of meetings with the Advisory Committee, IDWG, etc., feedback received from stakeholders, the number and type of stakeholders reached through exhibits, and the number of hits on the website.

Through interviews with the PSIC communication team and after reviewing the team's internal documentation, review findings confirm that checklists, task lists, inventory lists and spreadsheets were created to measure multiple outreach and engagement activities (e.g. The Speaking Engagements Master Calendar, versions 2012-2013, 2013-2014 and 2014-2015).

More importantly, these lists and spreadsheets were revisited and updated regularly, demonstrating diligence by the PSIC communication team to ensure a well-organized, systematic approach to scheduling and completing activities.

Specific to spreadsheets created to map all outreach and engagement strategies, a column created by the PSIC communication team to comment on the status of activities became a guiding source for next steps. The Status/Comment column in each document was populated with ideas and remarks on how to progress further and/or make improvements. Here is but a small sampling:

- “**contact** [person/group]”
- “**update** [e.g. the communications product suite, a calendar of events for tracking purposes, file folders, a web banner, a PowerPoint template, display banners, etc.]”
- “**post** [e.g. with the strategic plan]”
- “**review** [e.g. case load to identify institutions that could benefit from these presentations per fiscal year]”
- “**establish** [contract, budget, opportunities, etc.]”
- “**gather** [e.g. knowledge to increase visibility, awareness and trust; focus group results with examples to emulate, etc.]”
- “**develop** [e.g. “a calendar of events, short facts about disclosures, examples of six different types of wrongdoing,” etc.]”

Between the 2012 and 2015 fiscal years, the status, comments, and the person(s) accountable for following through on outreach and engagement activities were carried forward into an annual strategy document, where the systematic process of scheduling and following through were continued. With few exceptions, the Status/Comment column contained different remarks from one year to the next.

Overall, the communication team demonstrated a commitment not only to develop or update each annual strategy, but also to implement, measure and continually improve upon it.

7) Observations, Perspectives and Recommendations

In this section, observations, perceptions and recommendations are a culmination of a review of the *PSIC Outreach and Engagement Strategy 2012-2015*, reviews of relevant publications (print, online, etc.) and discussions with interview participants.

Specific to feedback from interview participants:

- **Broader Considerations:** It was clearly communicated to interview participants that the objective of this evaluation is to focus solely on the PSIC communication team. Regardless, many interview participants made a point of expressing that effective communication is in fact a shared responsibility. As a direct result, some feedback is directed at the Commissioner and all PSIC staff, not only to the communication team, with the hope it will be received and considered. Given that this feedback is broader in scope than the focus of this evaluation, implementation of recommendations is at the discretion of PSIC.
- **Relevance:** Interview participants who wanted their recommendations submitted, but which either contradict or fall outside of the scope of PSIC's mandate as per the *Public Servants Disclosure Protection Act*, have not been included in this document. In good faith, these recommendations have been provided to PSIC in a briefing document, submitted and discussed separately.

The following observations, perception and recommendations are presented in no particular order of precedence:

1) *Reporting or Unveiling More than Case Reports to Demonstrate "Results"*

OBSERVATIONS OR PERCEPTIONS: There is an understanding that PSIC may be misperceived as not being busy or productive between cases. In general, people want to see results and currently, the number of complaints, investigations, case reports and referrals to the Tribunal may be the only statistics that key stakeholders are looking at as "evidence" of progress.

- **RECOMMENDATIONS:** Overcome misperceptions that progress is not being made between cases by releasing more information about the Commissioner's leadership, speaking opportunities by the Commissioner and staff, updates about new service standards, notices about website revamps, the number of exhibits attended, new pamphlets and promotional materials, etc.

Currently, this information is available but dispersed or not easily found (for example, users may not think to look for this type of information in a “What’s New” section). Organized as at-a-glance achievements in a single column on the same webpage, these operational achievements could be posted in the Results section of the website. In other words, the idea of “Results” should not be limited to case reports and referrals to the Tribunal. “Results” can also be achievements in supporting these processes as well as awareness and engagement milestones.

2) *Becoming More Proactive at Advisory Committee Meetings and Internal Disclosure Working Group (IDWG) Meetings*

OBSERVATION OR PERCEPTION: Several interview participants suggested that PSIC could be taking on a more proactive role at Advisory Committee or IDWG meetings. Upon reviewing the PSIC communication team’s Outreach and Engagement Activities document (2012-2013):

- **Specific to Advisory Committee**—“Anticipated Results” are to “increase trust and understanding of the Office’s role and responsibilities under the Act,” “increase engagement of key stakeholders including TBS,” and “assist in developing partnerships to support the federal disclosure regime”
 - **In the Status/Comment column**—there are no remarks or action items identified. In the 2013-2014 document, there is a commitment to review the terms of reference annually to assess if changes need to be made in order to achieve the objectives of the committee.
- **Specific to IDWG meetings**—“Anticipated Results” are to “increase collaboration with the Senior Officer Disclosure community including TBS” and to “assist in a consistent approach in the implementation of the Act which in turn helps build trust in the federal disclosure regime by public sector employees.”
 - **In the Status/Comment column**—there is a commitment to “attend meetings” but there are no other action items. This column was not updated in the 2013-2014 document.
- **RECOMMENDATIONS:** Plan Advisory Committee meetings that are longer in duration but less frequent, with guest presentations or new topics that offer learning opportunities. Secure the date for these meetings further in advance. In other words, consider making the meetings more of an event rather than a gathering to receive updates. This idea could be discussed at the next meeting to determine whether it resonates with Advisory Committee members.

In addition, get more involved in contributing to IDWG agenda items and making presentations, even if PSIC sits as an ex-officio member. This may include sharing research acquired through international or other networks, or reviewing a case report to discuss lessons learned. This idea could be discussed at the next meeting to determine whether it resonates with IDWG members.

3) *Ideas to Improve the Website*

OBSERVATION OR PERSPECTIVE: The website currently serves as a comprehensive resource for all people. During interviews, most interview participants had no issues with the website’s clarity and organization, although some offered some suggestions. Upon review of the PSIC website, here are some helpful suggestions on how to make improvements:

- **RECOMMENDATIONS:** The website might benefit from a section that identifies which key stakeholders that PSIC can help—for example, information for Senior Officers, information for managers, information for whistleblowers, information for complainants of reprisals, etc. Similar to how the Joe Friday video “humanizes” his role, organizing or reorganizing some information according to “who” rather than “what” it can support may help visitors recognize themselves in the content and relate to it better.

As previously suggested, reorganizing the “Results” page to include other milestones besides case reports and referrals to Tribunal is recommended.

Finally, consider reformatting the Tools menu. Currently, the Communication Material and Products page found at <http://www.psic-ispc.gc.ca/eng/resources/communications-material-and-products> could benefit from the addition of subtitles to group/re-organize the materials. It could also benefit from some eye-catching visuals to warm up the page. It is recommended that this page should be more prominently promoted. It contains valuable information and resources that may be underused if stakeholders don’t know about it.

4) *Ideas for New Communication Materials*

OBSERVATION OR PERSPECTIVE: Currently, there is a flow chart on the website that explains how a file is processed. Visuals of this nature might resonate more with some people and PSIC might consider creating other flow charts or visually-appealing comparative charts.

- **RECOMMENDATIONS:** Create a series of at-a-glance, one-page visual documents with brief, simple captions (or adapt from existing documents or visuals). These would help shed light on how PSIC fits into a bigger picture, rather than focus solely on PSIC. They could also help diminish the number of complaints received that don’t fall within PSIC’s mandate. Once they are completed, they can be made more prominent on the website by placing them in a dedicated section or creating clearer subtitles to organize the Communication Material and Products webpage. While it’s understood that this information may exist elsewhere, it is proposed that these one-page, highly-visual documents could resonate more with readers who like more images, less text. Possible themes or topics:
 - Addressing confusion or explaining the difference between PSIC and other recourse mechanisms (internal disclosures, human resources advisors, or unions)

- Describing examples of wrongdoing recognized by the Act versus examples of harassment, staffing issues and personal conflicts that are not recognized by the Act
- Expanding the “cards” that address factors for determining wrongdoing so there is a complete set
- Comparing/contrasting the roles of an Auditor General, Ombudsman and Commissioners
- Presenting some highlights of the Act as it pertains to protected disclosures of wrongdoing
- Presenting some highlights of the Act as it pertains to protection from reprisals

5) *Using Case Reports as Learning Tools*

OBSERVATION OR PERCEPTION: Some interview participants suggested that the tone and presentation of case reports is very “narrative,” “dense,” or “carefully written.” Given their importance and widespread appeal to readers, researchers and media, consider ways to do more with them after completing due diligence activities to post and share them.

- **RECOMMENDATIONS:** Can case reports be used as learning tools? Recognizing that the Act prevents certain details about investigations from being released publicly, there may still be opportunities to speak more generally about issues that risk becoming future complaints.

For example, there may be trends emerging from the disclosure process and through investigations, such as pressure points or roadblocks, that could be generally discussed.

Scenarios can be extracted from actual case studies to provide actual examples of how whistleblowers were protected during the investigation or referral to the Tribunal process.

If there is a need for cultural change, what cultural challenges exist and how might they be overcome?

In addition, summaries of the case reports could attract more skim readers.

6) *A Desire to See More Videos*

OBSERVATION OR PERCEPTION: Everyone interviewed had seen the “Joe Friday” video. There was no mention of the video entitled *Disclosing Wrongdoing in the Federal Public Sector*.

- **RECOMMENDATIONS:** Budget for more videos that “humanize” the protected disclosure process. Consider addressing the question, “Why should you disclose?” to help change the whistleblowing culture to one that is more empowering and positive.

7) *Google, Wikipedia and Other Online Searches*

OBSERVATION OR PERCEPTION: As mentioned in the Challenges and Realities Impacting PSIC section on page 4, the Wikipedia entries https://en.wikipedia.org/wiki/Public_Servants_Disclosure_Protection_Act and https://en.wikipedia.org/wiki/Public_Sector_Integrity_Commissioner are out of date.

- **RECOMMENDATION:** Anyone can edit Wikipedia. There are options to edit the page (tab at top) or edit the section (click “edit” in the section). It is recommended to google PSIC or the Act to see if there are any other open source entries that could be corrected or updated.

8) Conclusion

The evaluation process allowed for a better understanding of how key stakeholders—both internal and external to PSIC—view the effectiveness of outreach and engagement initiatives and activities between April 1, 2012 and March 31, 2015, and for practical reasons, during the 21 months (and longer) since that fiscal year end concluded.

More specifically, the evaluation revealed the following:

1. There was improved awareness about the Act and PSIC’s role generally, and considerable effort was directed by PSIC’s communication team toward improving the effectiveness of targeted outreaches and operational achievements specifically.
2. With few exceptions, initiatives and activities identified in the Outreach and Engagement Strategy (2012-2015 and 2014-2015) were pursued and continually improved upon.
3. The communication team developed checklists, task lists, inventory lists and spreadsheets to systematically measure multiple outreach and engagement activities. These documents were regularly updated to indicate when activities were scheduled and completed. There were also columns dedicated to commenting on the status of activities. With few exceptions, these columns were updated with ideas and calls to action from year to year.
4. Significant progress was made to reach a greater variety of key stakeholders, particularly through a revamp of the website, frequent use of a branded exhibit, and introduction of more and better promotional materials.
5. The commitment to post and share results such as case reports and referrals to the Tribunal was consistent and generally well-received.
6. The annual speaking engagement master schedule was well-planned with a comprehensive follow-through on commitments.



Before recommendations could be formulated, there was a need to identify gaps or weaknesses in the *PSIC Outreach and Engagement Strategy 2012-2015 with Annual Activity Plans* (dated June 2012), as well as the follow-up document *PSIC Outreach and Engagement Strategy 2014-2015* (dated August 2014).

Were the strategies, initiatives and activities identified in these documents implemented? The answer, with few exceptions, is yes.

Was the PSIC communication team successful at contributing to raising awareness among stakeholders between April 1, 2012 and March 31, 2015? Findings from the evaluation, including feedback from those who were interviewed, suggest the communication team met expectations or continually improved despite multiple challenges and realities facing the Office of the Public Sector Integrity Commissioner as a whole (see *Challenges and Realities Impacting PSIC*, page 4).

The more gaps and weaknesses, the more recommendations are warranted. Given its meticulous approach to identifying, mapping, measuring and systematically improving upon its outreach and engagement activities, the PSIC communication team demonstrated few gaps and weaknesses.

Even after gaps and weaknesses were identified through the course of this evaluation, it was discovered that the PSIC communication team had already identified some of these gaps and weaknesses through a self-evaluation process and addressed these issues—or had begun to address them—through the remainder of 2015, throughout 2016 and during the first few weeks of 2017 (i.e. before this evaluation process, including formal interviews, were initiated).

As previously stated in the *Observations, Perspectives and Recommendations* section (page 12), any recommendations that interview participants specifically asked to be submitted, which either contradicted or fell outside of the scope of PSIC's mandate as per the *Public Servants Disclosure Protection Act*, have not been included in this document. PSIC has been provided a summary of those comments in a separate briefing document.

Therefore, the only recommendations for improvements that are presented in this document are relevant to PSIC's mandate and applicable as at March 31, 2017.

The PSIC communication team is encouraged to continue developing annual strategies and annual activity plans that include checklists, task lists, inventory lists and spreadsheets—and to continue systematically measuring multiple outreach and engagement activities to demonstrate follow-through and accountability in its commitments.