

2.10.6 Program-related principle. The "program-related" guideline applies as it relates to invitations to seminars, visits, speaking engagements, and similar events involving travel, accommodation, etc.: that is, if it is in the Department's interest, the Department should meet the costs. Missions and Branches should keep this in mind when preparing their budgets.

Determination of whether an invitation, etc., is "program related" will rest with the Head of Mission taking into account local factors in the area of accreditation. Where there is any doubt about an invitation Heads of Mission will consult with the responsible ADM and ABDE before accepting offers.

2.10.7 Criteria for acceptance. There will be occasions when acceptance of an invitation by an employee, which includes an offer to meet the costs of attendance, would not offend the spirit and letter of the Code. The criteria which would be applied, by the Head of Mission or the responsible ADM, in consultation with ABDE when necessary, in considering such invitations would include:

- (a) whether there was a clear, publicly defensible, interest of the Department involved.
- (b) the extent, if any, of a perceived "personal benefit".
- (c) the nature of the event, i.e., academic, social, technical, etc. and the role, if any, of a spouse.

2.10.8 Acceptable groups or organizations. Further, the determination of which groups or organizations "deal" with the government, and from whom benefits should be declined, will be based on a number of factors including whether the entity is in receipt of a federal government grant or is a "lobby" or "interest" group, etc. However, see paragraph 28 of the *Conflict of Interest and Post-Employment Code for the Public Service* which reads:

"Notwithstanding, acceptance of offers of incidental gifts, hospitality or other benefits arising out of activities associated with the performance of their official duties and responsibilities is not prohibited if such gifts, hospitality or other benefits:

- (a) are within the bounds of propriety, a normal expression of courtesy or within the normal standards of hospitality;
- (b) are not such as to bring suspicion on the employee's objectivity and impartiality; and
- (c) would not compromise the integrity of the government."

Sections (b) and (c) above should provide some discretion in determining the wisdom of accepting a benefit from one organization or another. Generally, where there is some doubt about any invitation the Head of Mission should consult Headquarters. Otherwise he/she will be responsible, and accountable, for decisions relating to free travel, accommodation, etc.

2.10.9 Invitation from Foreign governments. Invitations from foreign governments, or their agencies, involving free travel, etc., should be handled with particular care and reported in detail immediately.

2.10.10 Notification of HQ. Heads of Mission and other managers should advise the responsible area Division, with distribution to ABDE and others as appropriate, of offers and acceptances of invitations involving free transportation, accommodation, etc., to high profile events involving themselves or others at the mission, or in Ottawa, where the presence of the employee, or the event itself, may attract public comments; such advice would alert the Department to the possible need for a response to enquiries.

2.10.11 Records. Heads of Mission and Managers in Ottawa will maintain a record of free travel, accommodation, etc., received in connection with invitations accepted (or declined) by themselves or their personnel in sufficient detail to permit headquarters monitoring of this experimental process.