

2024 ANNUAL REPORT

City of Atlanta
Ethics Office



Ethics Office



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T A B L E O F C O N T E N T S

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MESSAGE FROM THE ETHICS OFFICER

As we approach the end of another productive year, I wanted to take a moment to reflect on our ongoing commitment to ethical conduct and compliance within our city government.

Over the past year, we have made significant strides in fostering a culture of integrity, transparency, and accountability. Our team has been diligent in ensuring that all employees are well-versed in our Code of Ethics and understand the importance of maintaining the highest standards in their daily operations.

Here are some of our key achievements this year:

- **Ethics Training Programs:** We have successfully conducted comprehensive ethics training sessions for all city employees, focusing on real-life scenarios and practical applications. Our completion rate was 90%, which is the highest rate we have achieved.
- **Reporting Mechanisms:** Our anonymous reporting systems have been enhanced, encouraging employees to voice their concerns without fear of retaliation. This has led to a marked increase in the number of reported issues and timely resolutions.
- **Outreach Engagement:** We have continued to engage with our officials and employees through programming and messaging, ensuring that our actions reflect our commitment to ethical practices and social responsibility.

Looking ahead, we are committed to further strengthening our ethics framework. Our goals for the upcoming year include:

- Expanding our ethics training programs to include more interactive and engaging content.
- Enhancing our monitoring and auditing processes to ensure compliance with all relevant regulations and policies.
- Increasing our transparency efforts through our newly launched automated audit program.

I am grateful for your unwavering support and dedication to upholding the ethical standards that define our city government. Together, we can continue to build a trustworthy and accountable institution that serves our community with integrity.

Best regards,

Jabu M. Sengova

Jabu M. Sengova, Ethics Officer



MISSION

“To build an ethical culture and promote awareness for the City of Atlanta and its constituents through guidance, transparency, and accountability to prevent conflicts in the delivery of government services.”

VISION

“To be a leader in ethical excellence by empowering people to make the right decisions and fostering the public’s trust.”

The Atlanta Ethics Office: Our Impact Today and Looking Ahead

The Atlanta Ethics Office is deeply committed to upholding the highest standards of ethical conduct. Our ethics program is designed to foster a culture of integrity, trust, and accountability, guiding our actions and decisions across all levels of the organization. We are proud to be the gold standard for other ethics offices, boards, and commissions.

Highlights of Our Ethics Program

1. Commitment to Integrity

- Every decision and action we take is underpinned by our core values of honesty, fairness, and transparency.
- We strive to build trust with our stakeholders by consistently adhering to ethical practices.

2. Ethics Training and Awareness

- We provide extensive ethics training to all employees, ensuring they are well-versed in our Code of Conduct and understand their role in maintaining ethical standards.
- We host interactive workshops and seminars to address common ethical dilemmas and promote ethical decision-making.

3. Ethical Leadership

- We encourage ethical leadership at all levels, with senior management leading by example and reinforcing the importance of ethical behavior.
- We develop training sessions to support officials and employees in navigating ethical challenges and fostering a culture of integrity.

4. Reporting and Accountability

- We have implemented robust mechanisms for reporting unethical behavior, such as our anonymous hotline (Integrity Line) and online reporting tools.
- We ensure thorough investigations and resolution of reported incidents, maintaining transparency and accountability throughout the process.

5. Community and Social Responsibility

- We engage in initiatives that reflect our strong ethical values through community engagement, social messaging, and relevant events.

Future Goals

Looking ahead, we aim to:

- Continue enhancing our ethics training programs, incorporating feedback and best practices to stay ahead of emerging ethical challenges.
- Strengthen our reporting mechanisms to ensure they remain accessible, effective, and trusted by all employees.
- Deepen our commitment to social responsibility, encouraging leadership to incorporate strong ethical practices into the City's business strategies and community engagements.

At the City of Atlanta, ethical conduct is not just a requirement; it is a fundamental aspect of who we are. Our unwavering dedication to ethics drives our success and helps us build enduring trust with city officials, employees, and our community.



KEY ACHIEVEMENTS

AUDIT



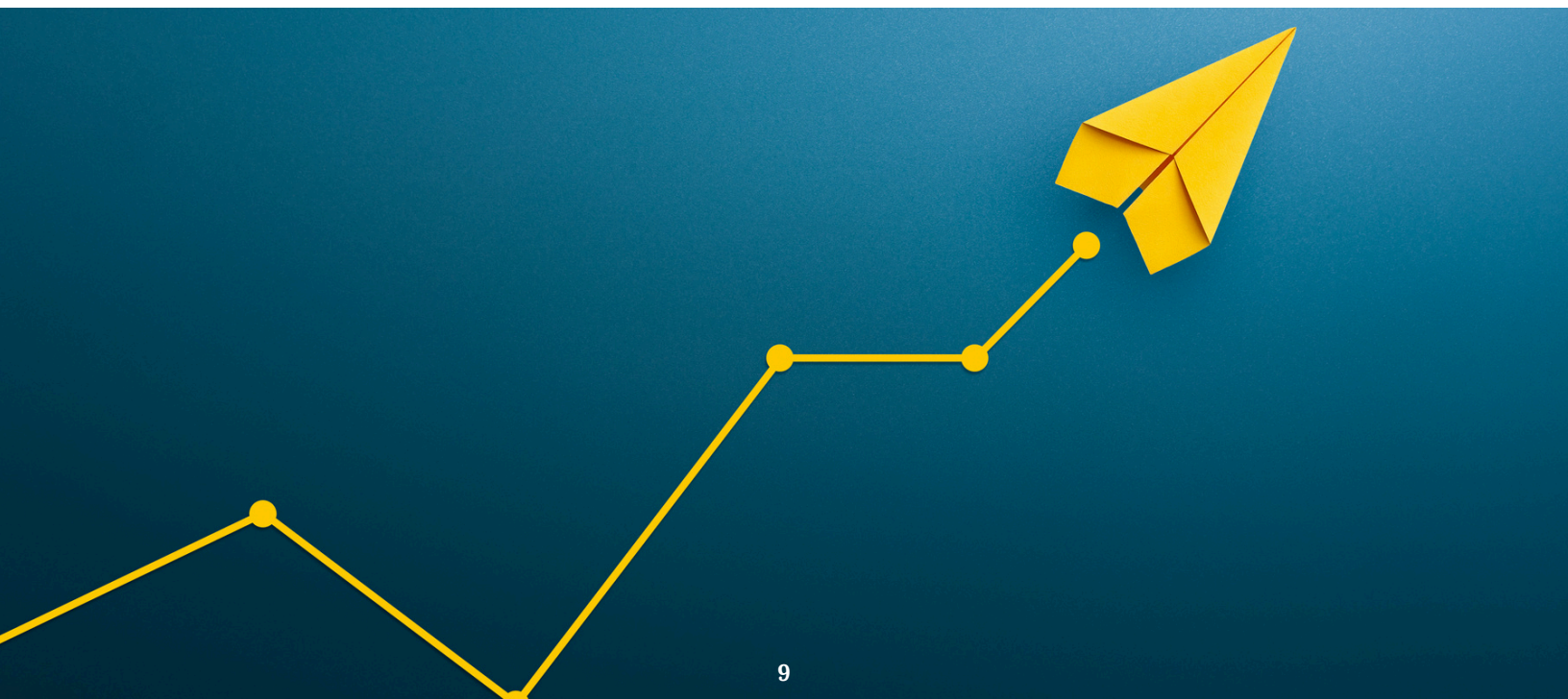
- 1 The Ethics Office introduced its **Genie Bot**.
- 2 Genie represents a shift from manual auditing of a percentage of statement to automated auditing of **all** statements.
- 3 Genie reviews all financial disclosure statements and amendments seeking:
 - Discrepancies in outside sources of income
 - Comparisons of family member transactions year over year
 - Omissions of investment information by elected officials and high-level employees
 - Accuracy in job category reflected

PUBLIC OUTREACH AND EDUCATION

- 1 Launched the first **Ethics Day** event, which improved office visibility and accessibility to employees through face-to-face interaction with Ethics Office personnel and engagement with ethics topics outside of the workplace.
- 2 Over 150 employees attended the event and over 50 participated in our post-event interactive trivia session, which included ethics rules refresher questions.
- 3 The event provided a great avenue to test ideas for future events, including helping to build a framework for the launch of a planned “**Ethics Week**” in 2025.

PROFESSIONAL DEVELOPMENT

- 1 Each member of the Ethics Office staff attended at least one professional development event this year, which included several national organization in-person conferences.
- 2 Ethics staff attended events hosted by SCCE, COGEL, and other organizations to broaden their understanding of the field, gain knowledge and insights into emerging challenges, and develop new strategies to improve their service to the city.
- 3 By partnering with Coursera, all Ethics staff have new opportunities for professional development through courses in fields such as project management, data analytics, and compliance program development.
- 4 The office is extremely excited to be involved in the planning and organization of the **2025 COGEL Annual Conference**, which will be hosted in Atlanta. The conference will feature a broad spectrum of attendees across national and international jurisdictions.



The image features an abstract geometric design. On the left side, there are three overlapping, light blue parallelogram shapes that appear to be part of a larger, stepped structure. These shapes are set against a white background. On the right side, a dark blue triangular shape points towards the bottom right corner. The text 'ETHICS ADVICE' is written in white, uppercase, sans-serif font, slanted upwards from left to right, and is positioned within the dark blue area.

ETHICS ADVICE

HIGHLIGHTS BY THE NUMBERS

- Provided timely ethics advice in **205** requests for written and verbal advice and for general information on ethics
- Issued **one** informal advisory opinion
- Responded to **97** percent of all requests for advice within seven days

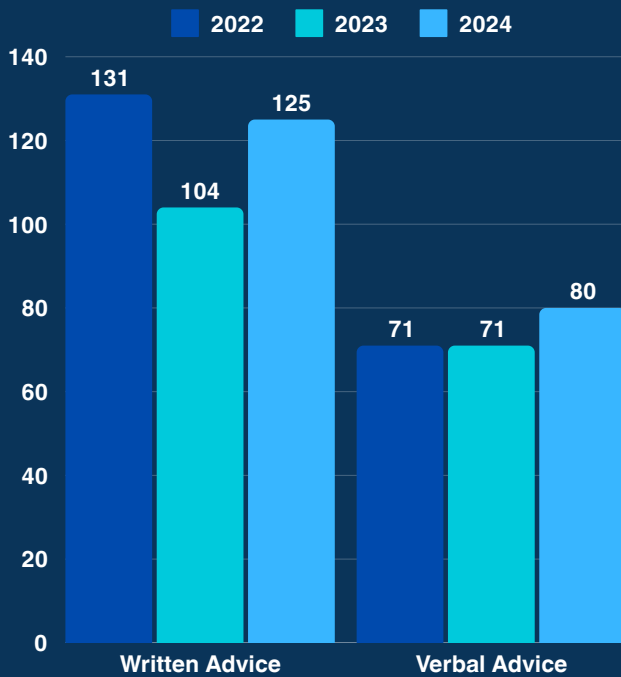
REPORT ON ETHICS ADVICE

In 2024, the Ethics Office achieved significant progress in fostering ethical city governance through the dedicated efforts of the Office's advisory team. By providing city employees with clear and practical guidance on the application of the city's Code of Ethics, the Office's advisory function continues to play a pivotal role in improving workplace decision-making, reducing ethical lapses, and strengthening public trust in city operations.

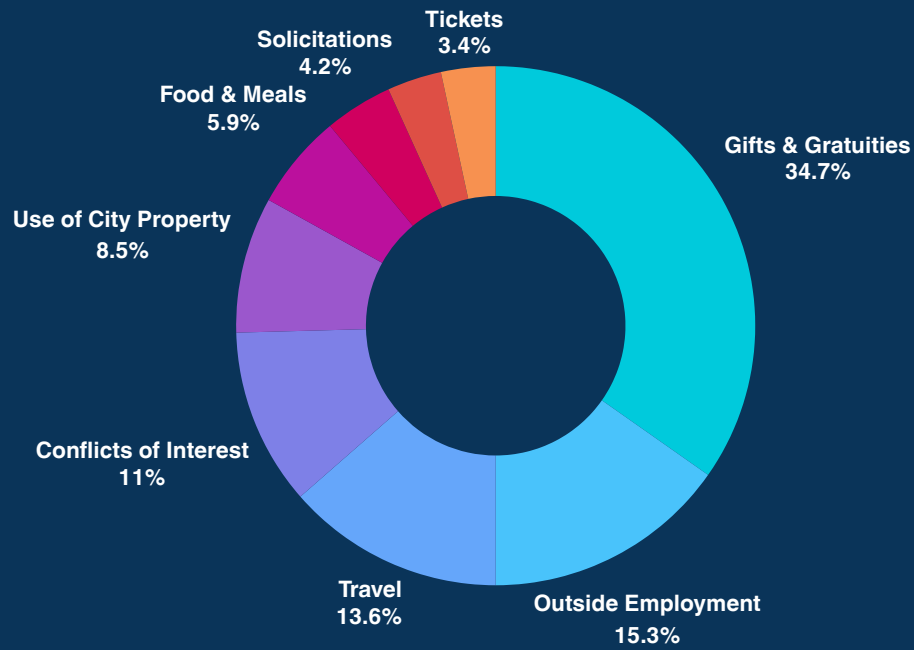
Ethics Office staff members worked proactively to empower city officials and employees with the tools and knowledge necessary to navigate complex ethical scenarios. Over the course of the year, staff members conducted interactive training sessions and programs, tailored to real-world situations faced by Atlanta's workforce. These initiatives were complemented by the availability and ongoing development of accessible resources, such as ethics advisories, formal advisory opinions, and general guidelines, in addition to the deployment of cross-departmental training, which simplified complex legal concepts and empowered employees to resolve ethical concerns independently. In addition, the advisory team provided over 200 answers to questions regarding the application of the Code of Ethics, providing employees with personalized advice to address specific challenges and build confidence in their decision-making.

The positive impacts of these advisory efforts were evident across several key areas. Employees demonstrated a heightened ability to identify ethical issues. A stronger advice-seeking culture also emerged, with a 17% increase in ethics advice requests from employees compared to 2023. This shift can largely be attributed to the efforts of Ethics Office staff in increasing visibility and trust in the office through interaction with employees across different departments.

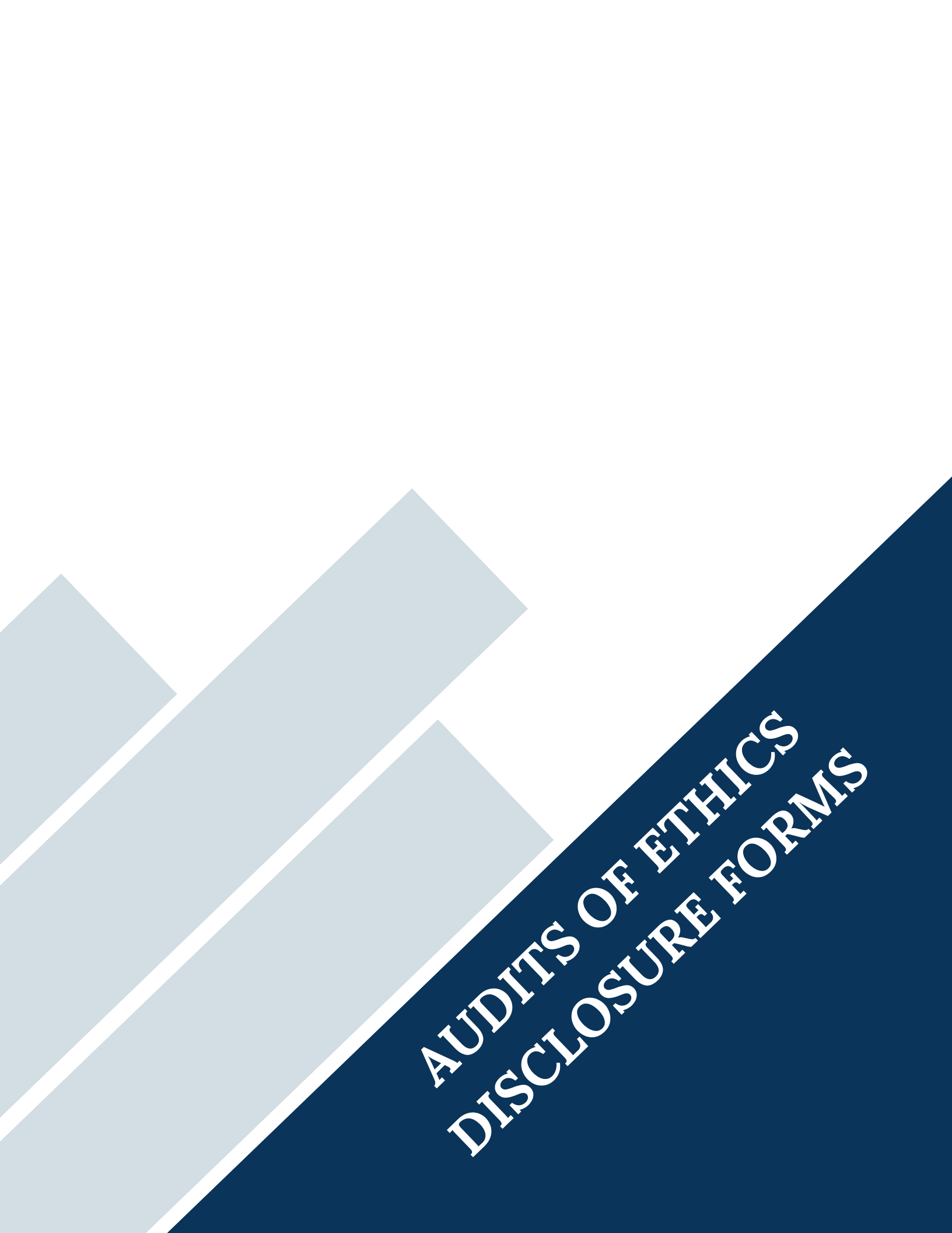
Written vs. Verbal Advice 2022 – 2024



Top Subjects for Written Advice 2024



The successes of 2024 highlight the importance of continued education and accessible advisory services in promoting ethical conduct. The achievements of 2024 demonstrate the transformative power of legal guidance and serve as a testament to the dedication of city employees working to promote ethical leadership and public trust.



**AUDITS OF ETHICS
DISCLOSURE FORMS**

HIGHLIGHTS BY THE NUMBERS

2023 Audit Report released May 2024

- **438** audited out of a total **3,671** filers (**12%**)
- **18** filers were sent letters by the Ethics Office requesting clarification
- **5** filers filed amendments

2023 Audit Samples included:

- Elected officials
- High-level employees
- Specific departments
- Filers flagged in prior years' audits

2023 report may be found at www.atlantaethics.org

2024 Financial Disclosure Statements are currently being audited



AUDITING OF 2023 FINANCIAL DISCLOSURES AND INTRODUCING GENIE: THE FUTURE OF OUR AUDIT PROCESS

Pursuant to Section 2-814 of the Atlanta Code of Ethics, elected officials, certain employees, and city board members must annually disclose their assets and income sources to the Ethics Office. This ensures transparency and helps identify potential conflicts of interest.

Required disclosures include:

- Employment positions outside of city income, including personal business entities.
- Sources of income above \$5,000 per year.
- Family members' employment with the city.
- Family members' contractual agreements with the city.
- Ownership of real estate in Georgia.
- Debt obligations for certain filers.

Filers are not required to disclose the amount of their income.

Since 2017, the audit process has reviewed a percentage of these statements for completeness and accuracy. Currently, the audit follows a two-tier system:

- Tier 1: Elected officials and high-level employees
- Tier 2: Employees flagged in previous audits and specific departments. In 2023, the departments selected for Tier 2 included AIM, the Department of Parks and Recreation, and the Office of the City Auditor.

In 2023, out of 3,671 required filers, 438 were reviewed. The audit found that 18 filers needed to clarify their statements, leading to five amendments. Four filers were referred for further review, and one filer who had left employment required no action.

Starting in 2025, the financial disclosure statement audit process will undergo a significant transformation as Genie, an automated auditing bot, takes over. Genie will include all filers in the annual audit, eliminating the tier system. Currently, Genie is auditing 2024 statements alongside the existing process, demonstrating its impact.

In 2025, Genie will audit all financial disclosure statements for officials and employees, enabling more extensive audits by comparing current responses with previous years' statements to identify discrepancies. This will help uphold high standards of integrity in city governance, reinforcing ethical practices and public trust in Atlanta.

The impact of the Ethics Office's automation of the audit process with Genie aims to ensure that Atlanta's city operations remain transparent and ethical, enhancing overall accountability and integrity in city governance.



FINANCIAL DISCLOSURE

HIGHLIGHTS BY THE NUMBERS



Achieved a **94** percent timely filing rate with **2578** persons required to file the 2024 City Financial Disclosure Statement and a **96** percent overall filing rate.



Awarded **27** Transparent Diamond Awards and **23** Board Award Certificates honoring compliance with the City's Financial Disclosure law.



Collected **\$1,250** in filing penalties (Deposited in City of Atlanta General Fund)

IMPACT OF FINANCIAL DISCLOSURE FILING IN ATLANTA

The City of Atlanta requires elected officials, some employees, and board members to file an annual financial disclosure statement, managed by the Ethics Office. This process reflects a commitment to ethical governance, transparency, and public trust.

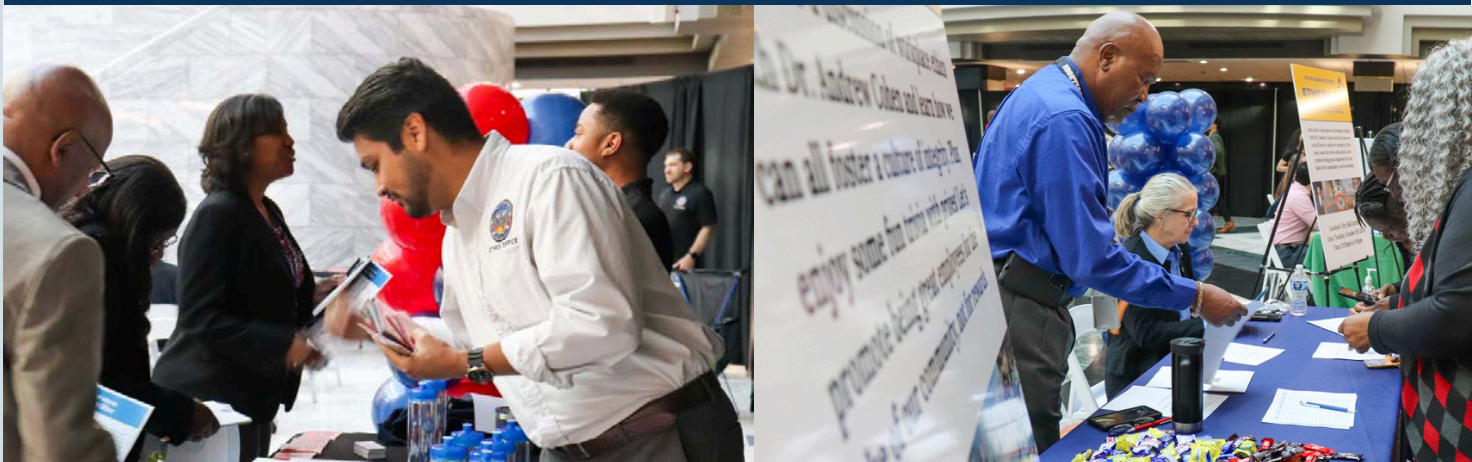
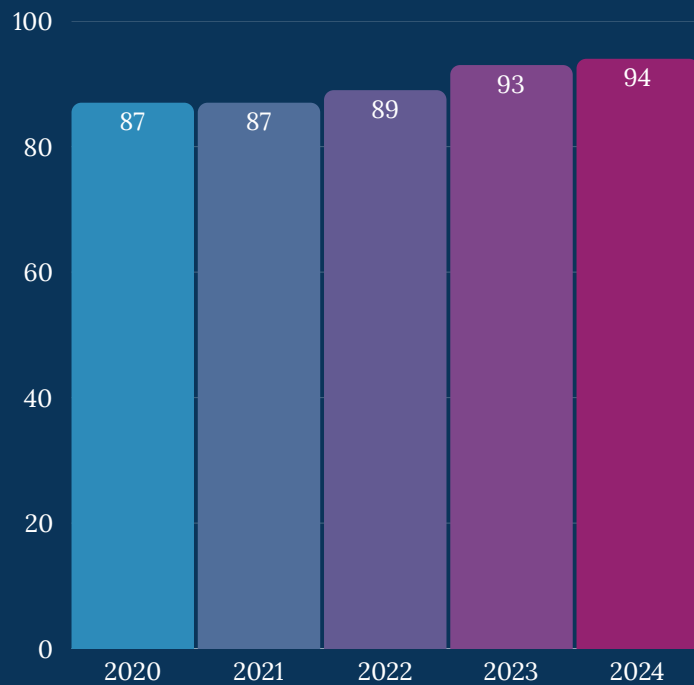
The Ethics Office ensures that the personal and financial interests of public servants are visible, allowing citizens to understand potential influences on decisions and identify conflicts of interest. By making this information public, the Ethics Office fosters an environment of openness and accountability, impacting the integrity of the city's operations and building trust between leadership and citizens.

Each year, the Ethics Office strives to enhance the ease and efficiency of filing the annual financial disclosure statement. For the 2024 filing season, staff reviewed and updated the list of required filers, identified positions vulnerable to conflicts of interest, and implemented a Standard Operating Procedure (SOP) with phone and email support. Comprehensive training sessions, annual E-file day, and five onsite E-file days were conducted to make the process more accessible and user-friendly.

Data shows that for the first time, all 27 city departments and boards achieved a 90% or greater compliance rate. Additionally, 96% of required filers completed their 2024 City Financial Disclosure Statement, demonstrating the positive impact of the new procedures, training, and leadership support.

The Ethics Office's commitment to continuous improvement is evident in the significant increases seen this year. The hard work and dedication of the Ethics Office staff, collaboration with department leaders, liaisons, and the Mayor's Office, have had a profound impact. The ongoing efforts to make the process more efficient and user-friendly reflect our collective dedication to transparency, accountability, and ethical governance. Thank you for your support and collaboration.

CITY FINANCIAL DISCLOSURE STATEMENT TIMELY FILING RATE (%)





**INVESTIGATIONS AND
ENFORCEMENT**

HIGHLIGHTS BY THE NUMBERS

- Received **152** Integrity Line Reports and **41** additional complaints
- Referred **48** matters to other agencies/departments for further review/investigation and received **24** report backs on those matters
- Opened **21** preliminary reviews/investigations of potential ethics matters
- Closed **nine** ethics investigations resulting in **three** Final Decisions issued where ethics violations were found
- Assessed **\$33,095.50** in sanctions in ethics matters and collected **\$7,000** in fine payments to date (Deposited in the City of Atlanta General Fund)

INVESTIGATIONS AND ENFORCEMENT

The Ethics Office's investigation and enforcement function plays a critical role in promoting accountability and integrity in city government. The Office's investigation team diligently investigates all ethics complaints under the Office's jurisdiction. The team's commitment to the principles of due process, diligence in the conduct of investigations, and even-handed accountability builds trust in the work of the Ethics Office and discourages misconduct by city officials, employees, contractors and vendors. As officials and employees observe that their colleagues are being held accountable for unethical behavior, it reinforces the belief that adherence to ethical standards is a shared responsibility, resulting in an ethical organizational culture that pushes the city toward collective success.

The benefits to the city and to the public of the ethics investigation team's work extend beyond any one investigation or the findings of ethics violations in any given case.

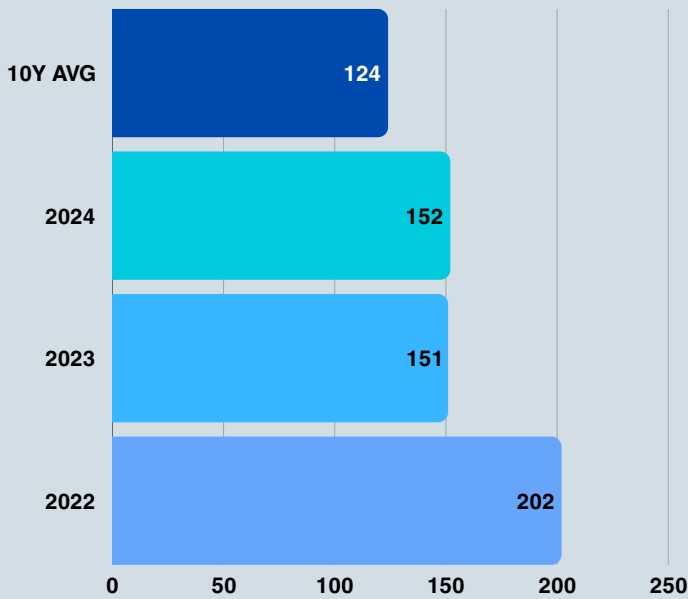
As the Office conducts investigations and addresses ethical misconduct, systemic ethics and compliance issues may be discovered which benefit and inform other city functions. The findings of an objective ethics investigation can greatly benefit city leaders to help inform ethical decision making, enhancing institutional integrity. This results in a city government that operates more effectively, enjoys greater public trust, and upholds its commitment to responsible stewardship of public resources.

REPORT ON THE INTEGRITY LINE

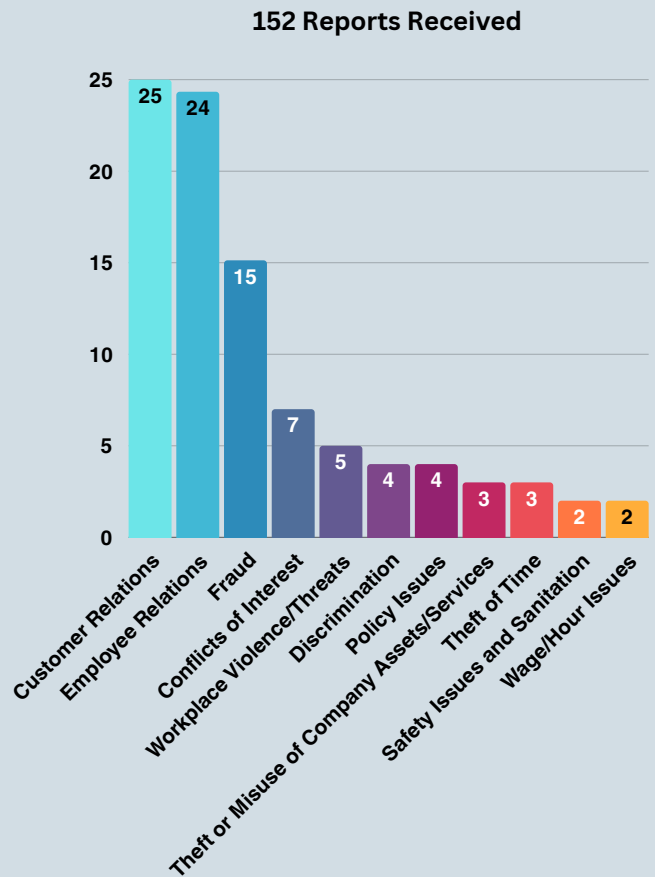
The investigation team manages the city’s confidential “Integrity Line” reporting system. Reports received through the Integrity Line are initially reviewed for jurisdiction by the Ethics Office and either handled directly or referred to the appropriate agency or department for further review and investigation, if necessary. City departments provide report backs to the Ethics Office indicating whether allegations have been substantiated so the Office may determine whether further action is required.

The Ethics Office received a total of **152** Integrity Line Reports in 2024, consistent with the historically high reporting volume seen in 2023. As with 2023, the steady reporting level in 2024 is most likely attributed to the Ethics Office’s ongoing education and outreach efforts about the Integrity Line.

INTEGRITY LINE REPORTS RECEIVED (PHONE AND WEB)



TOP REPORTING CATEGORIES BY PRIMARY ISSUE TYPE (%)





Efforts to raise awareness about the Integrity Line were further supported by the rollout of the updated version of the online ethics training course for city employees, which encourages employees to report potential violations using available reporting channels, including the Integrity Line.

The ability to independently report misconduct and do so anonymously, if necessary, provides added protection against potential retaliation and encourages the timely reporting of matters of concern. When individuals trust their concerns will be treated seriously and investigated thoroughly, the reporting of suspected violations increases significantly, providing the Ethics Office and the city's oversight entities with valuable insights to identify and address brewing issues before they boil over into larger problems.

“

Unethical, illegal or fraudulent activity harms the City of Atlanta and our future. With your help, we can prevent this activity and uphold our high organizational standards.

”

INTEGRITY MATTERS



**TRAINING AND
OUTREACH EFFORTS**

HIGHLIGHTS BY THE NUMBERS

- Participated in the 2024 *Annual Supplier Outreach and Networking Expo* Event hosted by the Department of Procurement.
- Sent out city-wide email blasts throughout the year to promote ethics awareness.
- Published three **Ethics in Action** newsletters, including the Winter Holiday Gift Reminder.
- Provided year-round program updates and ethics tips/reminders using the Ethics Office's LinkedIn and Twitter social media accounts.

REPORT ON ETHICS TRAINING



Updated city-wide online Ethics training course, and achieved a **90** percent completion rate by city employees

Attended **37** Pre-bid conferences hosted by the Department of Procurement and attended by prospective city contractors/vendors



Provided virtual and live ethics training to city officials, employees, board members, vendors, and contractors

- **9,018** total Individuals trained
 - **8,012** Ethics Acknowledgements/Pledges received
-

Conducted in-person training sessions for various off-site city departments

REPORT ON ETHICS TRAINING

The Ethics Office remains committed to fostering an ethical workplace and promoting a culture of ethics through the ongoing training of city employees, officials and contractors/vendors on the standards of conduct outlined in the city's Code of Ethics. The training team's ongoing emphasis on the importance of ethical decision-making works to empower and help equip all employees with the requisite knowledge and tools necessary to navigate ethical dilemmas and uphold the City's values.

In 2024, the Ethics Office successfully completed and deployed its latest round of updates to its online ethics eLearning course, which all city employees are required to complete annually. This year's updates better aligned the questions posed to employees with current and emerging ethical issues and dilemmas employees may encounter in their city roles.

For 2024, we observed record participation with the city's annual ethics training requirement with a 90% overall completion rate, the highest completion rate since the launch of the Department of Human Resources annual compliance module.

With this level of participation, the training team observed a heightened awareness of ethical issues by employees, especially those working outside of city hall.

In-person training sessions conducted allowed and encouraged employees to proactively ask questions, discuss ethical challenges and the implications of their actions, and voice concerns in a collaborative environment where they felt supported to talk about ethics without fear of reprisal. This proactive engagement helped to foster a cooperative relationship between employees and the Ethics Office and provided valuable insight into training gaps, allowing us to address those gaps with subsequent in-person training and the ability to apply the gained knowledge in the creation of future training.

The Office's training offerings, both in-person and online, are designed to help the city's employees become more aware of their responsibilities and the ethical standards expected of them. The training team engages employees with real-life scenarios to help them recognize potential ethical issues and consider the consequences of their actions.

By providing comprehensive training that addresses the nuances of ethical behavior, the training program serves as a preventative measure against misconduct rather than a reactive one.

Additionally, the training program ties directly into the Office’s ethics advisory function, as we have observed an increase this year in city officials, employees, and contractors seeking ethics advice following the annual launch of city-wide training and other training sessions. The training team also found that employees often contacted the Office to ask more nuanced ethical questions after participating in ethics training.

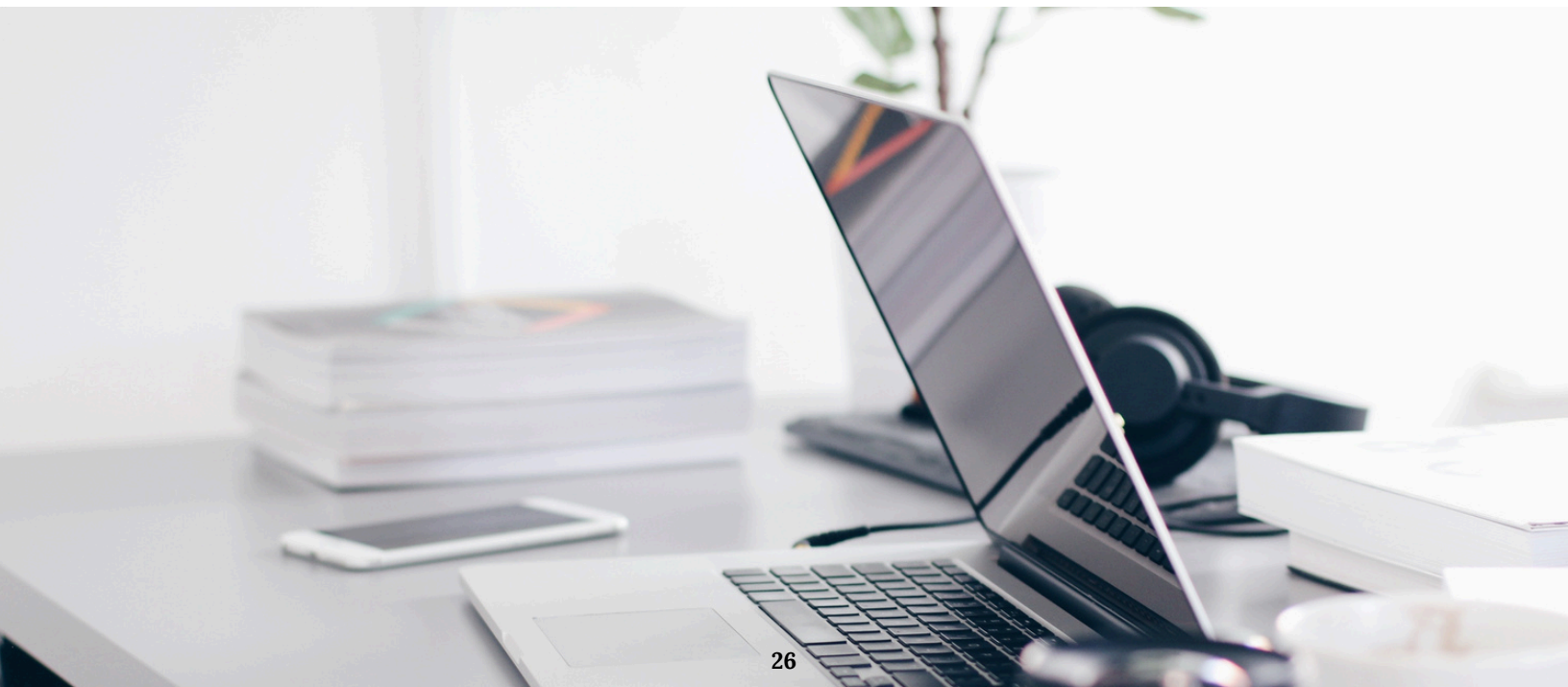
When the city’s employees, officials and contractors value the importance of ethical conduct and decision making, they are more likely to act in alignment with the City’s core values, thereby fostering a workplace environment grounded in trust and accountability. Ongoing ethics training, combined with public outreach and other resources made available by the Ethics Office continue to position the Office as a valuable resource to the benefit of the city and the public we serve.

“

We are pleased at the partnership we have created, and the progress we’ve made in 2024. In addition to the outstanding employee completion status for the “City of Atlanta Code of Ethics” annual compliance training, working hand in hand with the Ethics Team has been an AWESOME experience. We look forward to our continued partnership with the Ethics Team and expect more greatness in 2025!

— DHR, Organizational Development Team

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**ORGANIZATIONAL
UPDATES**

HIGHLIGHTS BY THE NUMBERS

OPERATIONS

- Organized **8** regular board meetings and **one** board retreat (with OIG staff)
- Ethics Office staff attended professional development seminars and conferences
- **One** staff member received a professional certification: ICMA-ESP (Effective Supervisory Practices)
- Commenced restack project to prepare for new office space buildout to begin in 2025
- Hired **two** new staff members (Investigator Specialist, Ethics Advisor)
- Received funding for **one** open position

ORGANIZATIONAL UPDATES

- Documenting '**standard operating procedures**' to capture historical and current knowledge and ensure efficient growth and succession planning
- **Ethics Office Audit program** – this program will assist with the Financial Disclosure Statements
- **Risk Assessment program** – the program will capture and provide areas of risks at certain levels (operational, residual, and acceptance)
- **Website Developments** - Redesign existing Atlantaga.gov and Ethics Office websites, creating an enhanced user experience and information sharing

REPORT ON ORGANIZATIONAL UPDATES

To support our commitment with promoting an ethical culture, we have launched various programs and projects to ensure we continue to move in that direction. There are several programs and projects that are in progress and one major program has been completed.

The major program completed during 2024 was our **audit program bot**. The purpose of the audit program was to reduce the manual effort in place and create increased efficiencies. Previously, the audit team was only able to audit roughly 400 financial disclosure statements annually. By automating our audit program, we are now able to audit all financial disclosure statements. In 2024, there were 2,593 required filers and all statements will be audited. That is a **548%** improvement in the number of filers being audited!

The above program ties directly into our risk assessment program. The risk assessment program is being established to capture and provide areas of risks at certain levels (operational, acceptance, and residual). This program will integrate into our operations, advice, financial disclosure, training, and as mentioned above, our auditing program.

To support our investigations, we will be implementing a case management system to track, manage, and enhance our ability to improve this function. In doing so, we will greatly reduce the current manual effort and increase our overall efficiency.

In addition to the above, we are redesigning the existing ethics website to create an enhanced user experience, information sharing, and streamline its functions.

“

The City of Atlanta Ethics Office has been an exceptional partner ... We are grateful for the opportunity to work with such a dedicated team and look forward to continuing our partnership with the Ethics Office and the City of Atlanta.

— The Canton Group

”



GOALS FOR 2025

Investigations Case Management System

Enhance, strengthen, increase efficiency, and possibly reduce the overall time required to complete thorough investigations

Ethics Advice Automation

Develop auto-BOT to address basic ethics questions and informational inquiries

Revise City Financial Disclosure Statement

Clarify and simplify questions

Lunch and Learn Series

Launch the Ethics Office's *Lunch and Learn Series* and *Ethics Week programming*

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Website and Social Media

Stay updated with our latest news, announcements, and insights by following us online:



www.atlantaethics.org



City of Atlanta Ethics Office



@COAEthics



