

NOTICE OF MOTION

Interim Report of the Integrity Commissioner

Moved by: Mayor Miller

Seconded by: Deputy Mayor Bussin

“**WHEREAS** City Council appointed David Mullan as the Integrity Commissioner for the City of Toronto to provide independent and consistent complaint prevention and resolution, advice, opinion and education respecting the application of the Code of Conduct for Members of Council, and other by-laws/policies governing the ethical behaviour of members, including general interpretation of the *Municipal Conflict of Interest Act*; and

WHEREAS, in accordance with the duties established by Council, the Integrity Commissioner has submitted a report dated April 11, 2005, providing Council with an account of his activities since his appointment;

NOW THEREFORE BE IT RESOLVED THAT City Council consider the report dated April 11, 2005, from the Integrity Commissioner, and that the report be received for information;

AND BE IT FURTHER RESOLVED THAT, in accordance with the provisions of Chapter 27 of the City of Toronto Municipal Code, leave be granted to introduce and debate this Notice of Motion at the meeting of Council on April 12, 2005.”

April 12, 2005

Attachment

According to Chapter 27 of the Municipal Code, the foregoing Notice of Motion:

Notice was previously given	
Meets Municipal Code provisions and only requires a simple majority to introduce and debate – Integrity Commissioner Reporting Protocol	(v)
Requires two-thirds to waive notice	
Requires two-thirds to re-open	
Fiscal Impact Statement provided	*
Should have Fiscal Impact Statement prior to debate	*
Requires two-thirds to waive requirement if Council wishes to debate	
Should be referred to the Committee/Community Council	
Requires two-thirds to waive referral if Council wishes to debate	
Recommendations are time sensitive	

* See Financial Implications section in the report

Date: April 11, 2005
To: City Council
From: David Mullan, Integrity Commissioner
Subject: Interim Report

Purpose:

It is seven months since I became the City's first Integrity Commissioner. The object of this Report is to provide Councillors with an account of what I have been doing over the course of those seven months.

Financial Implications and Impact Statement:

There are no financial implications arising from this report.

Recommendations:

It is recommended:

That Council receive this report

Introduction:

Under the terms of the Council resolution providing for the appointment of a part-time Integrity Commissioner, my duties are fourfold: Advisory, Complaint Investigation, Complaint Adjudication, and Educational. In this Report, I deal with each of those four responsibilities. I will also provide details of the setting up of my office and the way it operates currently, as well as share with you what I learned in the course of interviews that I conducted with the Mayor and all Councillors on the subject of their expectations of the office of Integrity Commissioner.

(1) Setting up the Office:

During the first few months of my appointment, I was principally preoccupied with the setting up of my office.

That involved extensive discussions about the most appropriate form of contractual relationship between the City and an Integrity Commissioner. A range of legal considerations affected these

discussions, not the least of which was the reach of the *Municipal Freedom of Information and Protection of Privacy Act* and its potential impact on the functioning of my office.

There were also many briefing sessions at which I was introduced to those members of staff with whom I would be interacting, and the various policies and programmes for which they were responsible and which were relevant to my role. These meetings also provided an opportunity to start discussions about protocols (formal and informal) to govern situations in which the functions of the Integrity Commissioner and those of other officials and offices intersected. This was particularly important as Part B of the *Council Code of Conduct Complaint Protocol for a City Integrity Commissioner* (“Complaint Protocol”) makes it clear that the Integrity Commissioner is not to deal with complaints for which another process already exists. Thereafter, I followed up on these initial briefing meetings with more detailed discussions with those officials with whom I expected to interact regularly, such as the Mayor, City Clerk, the City Solicitor, the Acting Director of Corporate Access and Privacy, the Director of Council and Support Services, the Executive Director of Human Resources, the Director of Election Services, and the Auditor General. (I should add that there still remain outstanding items in relation to the issue of possibly conflicting jurisdictions, one of which will be before Council in a separate Report from me at its April 12, 2005 meeting.)

The location of my office and the physical, organizational, and support services for my office also had to be worked out. It was agreed that situating my office in City Hall would not compromise my independence, and office space was made available on the 15th Floor of the West Tower. By mid-October, the office was fully operational save that I was still looking for an Administrative Assistant. As of late November, that gap was filled with the hiring of Zorida Ali, who works for me two days a week.

Another task that merited prompt attention was the design and launch of an Integrity Commissioner website. That site was up and running by October. It provides an invaluable source of information about the nature of my office as well as the rules and policies governing its functioning for Councillors, staff, and members of the public. As such, it fulfills part of the educational, outreach goals of the Office. It also facilitates ready access to the information needed to make a formal complaint – the *Councillors’ Code of Conduct* (“Code of Conduct”), the Complaint Protocol, and the form of affidavit that complainants have to complete.

There was initial media interest in the creation of the Office of Integrity Commissioner and I responded positively to all requests for interviews. In addition, I made contact with my provincial counterpart as well as academics working in the field of government ethics with a view to establishing contacts for the sharing of views and experiences. More recently, there have also been a number of invitations to speak about the nature of the office and my experience to this point. Here too, I have endeavoured to accommodate those requests.

(2) Advisory Role:

One of my tasks is the provision of advice to Councillors on activities that potentially implicate their obligations under the Code of Conduct. It is obvious that it is far better to pre-empt potential violations of the Code of Conduct than to have to deal with such matters after the event by way of a

complaint. This was a message that I sought to convey in interviewing all the Councillors during the last few weeks of 2004 and the first few weeks of 2005.

In fact, there are growing signs that that message has got across and that Councillors are prepared to utilize this service. I have now received nineteen requests for advice from fifteen different Councillors. In about half of those instances, I have committed my advice to writing. This has been particularly so in situations involving the Code of Conduct provision with respect to Gifts and Benefits.

The specifications for my Advisory Role also include giving advice to Council. Council has passed resolutions requesting me to look into two issues: the possible leak of the name of the nominee to a civilian position on the Police Services Board and the issue of whether Councillors should be able to intervene on a ward matter in another Councillor's ward. I will be reporting on the first of these references at the April 12 meeting of Council and the second is still under consideration.

My giving of advice has also extended beyond this. I have responded to a number of requests for advice from staff in relation to policy issues that might affect the office of the Integrity Commissioner or that have dimensions with an ethical or integrity component. As well, I endeavour to set members of the public on the right path when they approach me with requests for action in matters over which I have no jurisdiction. In many instances, that involves putting them in touch with either the relevant City official or a Councillor.

(3) Complaint Investigation and Adjudication

These two aspects of my role are inseparably linked. I have received nine formal complaints. The first was settled without involvement on my part. I am reporting on the next two at the April 12 meeting of Council. I rejected one of those for lack of jurisdiction and the other on the merits. Currently, the other six are still under investigation. Seven of the complaints came from members of the public and two from staff members.

While I am without power to compel anyone to meet with me, to this point, I have received full cooperation from Councillors and staff in my investigation of complaints. The same was also true of the inquiry that I conducted at the request of Council into the alleged leak of the name of the nominee to the vacant civilian position on the Police Services Board. That has certainly made my task easier.

The Complaint Protocol also makes provision for the informal settlement of complaints and, where feasible, I have encouraged those contacting my office about Code of Conduct matters to try to resolve the issue by making contact with the Councillor in question and expressing their concerns. I have no reliable data on whether this advice has been taken and, if so, whether it has resolved the issue. I do, however, have the impression that a number of potential complaints have not been pursued because of the formalities involved and, particularly, the requirement that a formal complaint be commenced by way of affidavit. At some later point, I will evaluate the merits of that requirement.

(4) Educational:

My job description calls on me to provide “outreach programs to members of Council and staff on legislation, protocols, and office procedures emphasising the importance of ethics for public confidence in municipal government.” To this point, I have not progressed very far in the furtherance of that task, though I have assembled a small group of advisors to assist in the development of an educational package. I have also, through my interviews with Councillors, endeavoured to emphasise the educational mission of the office. As well, as mentioned above, some of the material on my web site has been developed for the very purpose of providing information to the public, Councillors and staff about my office and the City’s commitment to the maintenance of integrity. Thus, my site has a link to FAQs, and I am working on adding a segment containing sample advice and summaries of complaints investigated.

(5) Workload:

At present, the position is a part-time one, and the expectation was that I would spend two and a half to three days a week on the work of the office. To this point, that estimate has proved accurate and I am generally at my office in City Hall half of each working week. Outside of that time, I am normally readily available by phone or email at my home in Kingston.

Over the past few weeks, the pace and amount of the work has been growing. As a consequence, I do anticipate having to devote more time to the position in the second half of my year-long appointment than I did in the first half. Effective fulfillment of the educational part of my mandate will itself require that. Working only half a week will also be insufficient if there is any significant increase on the Complaint side of my responsibilities.

(5) Meetings with Councillors:

(a) Introduction

When Council appointed me as its first Integrity Commissioner, I determined that I should meet personally with all City Councillors to seek their opinions and advice on not only my role but also the contents of the Code of Conduct. What should I be doing as Integrity Commissioner? How can I best serve the City? What is the level of awareness of the contents of the current Code of Conduct for Councillors? Are there any problems with the nature and content of that Code? Does it need improvement? If so, in what respects? Are there species of conduct that the Code does not cover currently but should? These were the matters that I intended to raise with Councillors.

At the beginning, I regarded this as an exercise principally for my own information and education. However, about half way through the process, I determined that, once it was completed, I should share a synopsis of what I had heard with all Councillors with a view not only to informing them but also to encouraging discussion about contentious matters. (Indeed, some Councillors also suggested that I do this.) I also hoped that this process might assist me in identifying how best to fulfill the educational and outreach portion of my mandate.

In the course of an interview process extending over three months, I saw every Councillor and am ready to recount what I have heard (without, I hope, breaking any confidences). In so doing, I will also incorporate into the discussion issues that have arisen out of my role as a provider of advice to Councillors on specific Code of Conduct issues (once again, without breaking any confidences).

Finally, I will add a section identifying some of the issues that have arisen out of my involvement with the Protocol for handling formal complaints.

(b) Awareness of the Code of Conduct

I did not presume to test Councillors on their knowledge of the Code of Conduct nor, indeed, did I systematically ask whether they were aware of its existence. However, at least one Councillor did express surprise that there was such a document and another seemed to think that, provided he/she avoided conflicts of interest as prohibited by the *Municipal Conflict of Interest Act*, all would be well. Others suggested that the awareness level of the details of the Code of Conduct was low and asserted that it was part of my role to ensure a heightening of that awareness. I agree with that and one of the purposes of this exercise is to solicit suggestions as to how this might be done: a symposium on the Code of Conduct for Councillors and their office staff, more frequent communications about Code of Conduct issues, an expanded range of Code of Conduct FAQs on my web page, or all of these and more.

(c) Scope of my Mandate

A number of Councillors did not know that my mandate was confined to the Code of Conduct governing the activities of Councillors. I have no jurisdiction over complaints about other City Officials or staff generally. This prompted the observation that either I should have that jurisdiction or, alternatively, that the City should be moving in the direction of a more general Ombuds-type office. Given that, as opposed to the situation in some provinces, Ontario's Ombudsman does not have jurisdiction over municipalities, there may be merit in that proposal. For the present, however, these are matters which rest ultimately with the Chief Administrative Officer (or City Manager) and, to a certain extent, the Auditor General, particularly through the Fraud and Waste Hotline.

Let me, however, offer three observations from my limited experience to this point. First, in terms of inquiries by members of the public, a majority are about matters quite outside my jurisdiction and are more in the nature of complaints about administrative failures, or the conduct of staff, or both. They assume that is what I am there to look after and are not unnaturally disappointed when I have to tell them to go elsewhere. Secondly, I have had a limited number of inquiries from staff looking for advice not just in relation to their interactions with Councillors but also about their own ethical and Code of Conduct issues. I have not turned them away. Thirdly, when staff make complaints against Councillors, it almost certainly will not be uncommon for Councillors to respond by making counter-complaints against the relevant member or members of staff. The fact that I have no authority over staff raises logistical difficulties in the satisfactory resolution of such complaints.

(d) Specific Aspects of the Code of Conduct

(i) Lobbying

The views of Councillors on the very practice of lobbying ran the gamut from those who see their role as Councillors in terms of constant exposure to and evaluation of lobbying to those who want nothing whatsoever to do with lobbyists.

As far as the current Lobbying rules are concerned, there were a number of questions.

- (a) Some questioned the utility of a Code of Conduct Rule that speaks simply in terms of Councillors being “vigilant in their duty to serve public interests when faced with lobbying activities.” This was too vague and did not provide a precise enough standard by which Councillors could confidently self-regulate their interaction with lobbyists.
- (b) There is presently a voluntary lobbyist registry under which lobbyists are required to sign in when attending a Councillor’s City Hall office for the purpose of lobbying. Only a third or so of Councillors are part of that voluntary system. Even some of those question its worth. Among the issues raised were the utility of a system that applied only to City Hall contacts with lobbyists, and not, for example, to constituency or golf course meetings with lobbyists or various forms of electronic interaction. One Councillor was quite sceptical as to whether anyone ever bothered to look at the monthly lists of in-office meetings with lobbyists that participants in the voluntary register system submit monthly to the City Clerk’s Office. For her/him, it was an empty formalism. In contrast, most of those participating saw it as one important way in which a degree of openness and transparency could be brought to their activities. This is underscored by the fact that the registry is accessible on the City’s website. Moreover, contrary to the impressions of the one Councillor, the City Clerk’s Office informs me that there are requests from the public every month for access to the registry.
- (c) There was also a limited amount of criticism of the current Code of Conduct definition of what constitutes a “lobbyist”. One Councillor was strongly of the view that developers and other entities acting on behalf of their own financial interest should not come within the definition, while a few others were concerned (almost certainly without justification) that public interest organizations did not come within the current definition.

(ii) Gifts and Benefits

Reaction among Councillors to the current policies concerning gifts and benefits was extremely varied. At one extreme were those who would put a total ban on gifts or who have made a personal decision never to accept them. The vast majority were of the view that there should be at least some room for accepting gifts and benefits, particularly in many of the contexts dealt with in the current rules, and, in particular, gifts and benefits received as “an incident of protocol, custom or social obligations”, “food, lodging, transportation and entertainment provided by” various other governments, and “food and beverages consumed at banquets, receptions or similar events”.

However, there was a clear sense among many Councillors that the current language dealing with situations in which gifts and benefits could be accepted was vague and did not make bright line distinctions between the permissible and impermissible. Some also felt that the current wording left too much room for the receipt of gifts and benefits that were inappropriate.

To take an example that recently attracted some attention in the media, does the fact that an industry association has dined, wine and provided entertainment for Councillors and staff in the past make it a matter of “custom” about which no concerns can be raised? In other words, is what has happened previously on a number of occasions become an always acceptable custom or should there be some room within the rules for the reassessment of past practices? Does the allowance for “food and beverages consumed at banquets, receptions and other events” permit Councillors to

accept invitations to any and all such occasions irrespective of their lavishness and irrespective of who is staging the event? Indeed, the same questions can be applied to the instance of benefits and gifts provided by other governments, be they local, provincial, national or international.

More generally, there is a question as to where the line is to be drawn between the impermissible receipt of gifts and benefits “connected directly or indirectly with the performance of [a Councillor’s] duties or office” and the permissible categories of gifts and benefits – those that normally accompany the responsibilities of office and are received as an incident of protocol, custom, or social obligations.

Some Councillors question whether it is either appropriate or possible to be more specific or more restrictive as to what is permissible. Others favour closer regulation whether it be by way of clearer language, a reporting requirement, and/or a monetary limit. (As I understand it, there was at one time a monetary limit of \$200 which triggered reporting, refusal and return obligations. Monetary limits remain a feature of most other policies of which I am aware, including the policy governing receipt of gifts and benefits by members of staff (\$25) and the various provincial and territorial integrity regimes (ranging from \$200 to \$500)).

Suffice it to say that, in my limited experience, and as was accurately reported in the media, this policy is the one under which I have had greatest difficulty in rendering advice. As a result, I tend to support those who argue that the wording and the structure of the policy at least needs to be reworked. In particular, a policy that starts with a negative in the form of a seeming ban but then undercuts much of that ban with a series of broad exceptions is a problematic structure.

The range of Councillors' positions on this question also suggests that a full exchange of views on the subject would be useful. To this end, my assistant has been investigating the gifts and benefits policies of other municipalities and levels of government to see if there are any alternatives that might inform any debate that takes place.

(iii) Conflicts of Interest

(a) What constitutes a conflict of interest is becoming more complex particularly when Councillors serve on Agencies, Boards and Commissions, which have their own separate interests, and, with increasing regularity, when Councillors are members of/representatives on public/private partnerships in which the City is participating.

(b) At present, both the City Solicitor and the Integrity Commissioner are confined to providing general advice about the *Municipal Conflict of Interest Act*. Neither of us can provide specific advice about whether a particular situation actually gives rise to a prohibited conflict. Councillors are expected to obtain their own independent legal advice and the cost of that comes out of their own pockets. The City does not reimburse and it is not a legitimate claim on a Councillor’s office budget. Some Councillors are concerned about this. Obtaining independent legal advice on an issue that seems to be arising (at least for some) with increasing regularity is an expensive proposition. As a result, this can give rise to a tendency to either take a chance or to declare a conflict whenever any possible issue might arise. Neither of these situations is desirable.

(c) It is also the case that the *Municipal Conflict of Interest Act* and its provisions for court enforcement and removal from office has become too much of a sledgehammer for cracking what in many instances may be a mere nut. This all or nothing approach to conflict of interest issues certainly warrants rethinking, and, while this is not something directly within Council's jurisdiction, it might be a matter that could be addressed in the process of negotiating the overhaul of the *City of Toronto Act*.

(iv) Election Rules

Any number of Councillors predicted that the peak period of activity for the Integrity Commissioner would be during an election campaign and, in particular, that the Office would be called upon to police the prohibition on Councillors' using City resources (their expense account, their staff) on their campaigns. The most likely source of such complaints would be other candidates concerned about minimizing any advantage that accrues to sitting members in municipal elections. I was not sure whether this was simply a warning of what the Integrity Commissioner should expect or also a concern that the existing rules were not clear or tough enough.

In fact, I am without jurisdiction in relation to the rules governing the conduct of municipal elections. This is primarily the domain of the *Municipal Elections Act, 1996* with enforcement of its provisions through the regular courts. Also, with respect to the particular policies and programmes that are in place in the City of Toronto with respect to elections, responsibility for that rests with the City Clerk's Office acting through the Director of Election Services. Nonetheless, I do heed the warning that the Integrity Commissioner will likely become involved, particularly in matters involving the use of office expenses, facilities, and staff.

(v) Office Expenses

There is some concern about aspects of the current rules governing use of office expenses and, most notably, with what comes within the permissible range of "sponsorships and donations". What limits are imposed by virtue of the fact that any such sponsorship or donation must be linked to an "organization"? Does that exclude the use of the office expense budget to assist single or a discrete group of constituents? Some Councillors were also concerned that the current *per diem* rates for hospitality while attending a sanctioned Convention were too low given the high cost of many venues and the expectation of hospitality being extended by an attending Councillor. This perspective contrasted dramatically with the point of view of some that there should be no entertaining at all on the public purse.

(vi) Behaviour in Council Chamber and Committees

A few Councillors identified the behaviour of their peers in Council Chamber and Committees of Council as the most obvious integrity issue facing the City at the moment. Those concerns extended beyond general issues of decorum and interchanges between and among Councillors on the Council floor to the way in which Councillors dealt with staff members at Council and Committee meetings. However, among those who spoke to this issue, there was no unanimity as to whether this was an issue over which my Office did or should have jurisdiction. Some suggested that the Integrity Commissioner was ideally located to identify what constitutes inappropriate behaviour in Council or Committee, while others were of the view that this had to remain a matter for the Chair of

Council or the relevant Committee. At the April 12, 2005 meeting of Council, I am making recommendations on this matter in the context of a report on a complaint by a member of the public about the behaviour of a Councillor at a Council meeting.

(vii) Confidentiality

First term Councillors in particular tended to be astonished at the extent to which there are leaks to the media of confidential material, and most placed the blame for this primarily on their colleagues, not staff. On the part of some long-serving Councillors, there was almost a sense of resigned acceptance of the inevitability of the continuation of leaks. This led to reluctance on the part of some to provide certain kinds of information either at *in camera* meetings of Council and its Committees or in other processes where confidentiality is expected. The attitude of this group was very much to the effect that leaks are an ingrained part of the culture of City Hall, so one should not entrust to the system any information that you want kept confidential. I also received various suggestions as to how the situation might be improved. This is an issue that I deal with in greater detail in my report on the alleged leak to the media of the name of the recommended candidate to the civilian position on the Police Services Board.

(viii) Sanctions for Violations

“What power do you have when you find a violation of the Code of Conduct?” This was a frequent question to which I was forced to provide the answer: “Not very much!” At present, my powers are restricted to making a report to Council to the effect that I have found a violation of the Code and, if necessary, making recommendations for action by Council. However, Council itself has limited powers over such matters, the principal of which are probably formal censure, a call for an apology, and perhaps suspension from Council. Without amendment to the *City of Toronto Act*, it is unlikely that either Council or the Integrity Commissioner have or could be given much more authority than that. Nonetheless, the issue does deserve consideration particularly in the context of the current exercise to secure amendments to the Act.

(e) Possible Addition to the Code

(i) Trespassing in Other Councillors’ Wards

Some Councillors are concerned about the extent to which other Councillors and their staff are becoming involved in activities in Wards other than their own. This involvement typically takes the form of providing assistance to citizens who are not their constituents in relation to matters within another Councillor’s Ward, and attending (either in person or through a staff member) and participating in meetings in other Councillors’ Wards. This group of Councillors wants the Code of Conduct amended to regulate such conduct explicitly.

In fact, at its February meeting, City Council referred this issue to me for consideration and I will be reporting back to Council when that work is concluded.

(f) The Complaints Protocol

(i) Citizen-Initiated Complaints

The vast majority of Councillors had no problem with the fact that members of the public have the right to complain to the Integrity Commissioner that Councillors have violated the Code of Conduct. However, the concern was expressed that it is likely that citizens will use this route as vehicle for trying to re-fight the merits of lost causes. In my limited experience, there is some sense that this is precisely what some members of the public do want to do. However, provided my office is sensitive to this kind of inappropriate complaint, my own position continues to be that this is not a reason for eliminating citizen access to the complaint mechanism.

There was, however, a suggestion that citizens (and others) making a complaint should be obliged to refrain from giving the complaint any publicity as a condition of having the Integrity Commissioner consider it. This concern was motivated by the sense that harm is done to a Councillor's reputation by the mere reporting of the fact that a complaint has been filed and that that harm is never completely eliminated by subsequent vindication of the Councillor.

When the Integrity Commissioner investigates a complaint, that process is conducted "privately" at present and there is no contact with the media over the details or progress of the investigation. Whether it is feasible and proper to impose a similar obligation of confidentiality on complainants (and respondent Councillors, for that matter) is another question and one on which I would appreciate comment.

(ii) Miscellaneous

Other issues have also arisen with respect to the Complaint Protocol. Are there circumstances under which I should be able to take anonymous complaints or start an investigation of my own initiative and without a formal complaint? Is it too cumbersome to require that a formal complaint be commenced by filing an affidavit? Is my ability to recommend that Council pay the costs of a successful party on a complaint restricted to the costs of a lawyer or does it extend to other costs such as out of pocket expenses? After I have more experience with the wording and operation of the present Complaint Protocol, I will almost certainly be reporting further on these and other aspects of it.

(g) Conclusions

The information contained in this synopsis does not pretend to be the result of scientific or empirical research. It is not based on a set of responses to a standard set of questions. Rather, it is the product of a series of unstructured interviews, the length of which and the direction and format of which varied dramatically. However, I do believe that it provides a starting point for further consideration of and possibly work on at least some of the areas discussed.

While we would certainly all agree that certain species of conduct are unethical or without integrity (accepting out and out bribes, harassment contrary to the *Ontario Human Rights Code*), there are many ethical and integrity questions for which there are no absolute answers. In these uncertain domains, there is considerable room for institutions to make choices about the way in which they conduct and regulate themselves. What does matter, however, is that those choices are made after informed and full consideration and debate.

With this in mind, I would appreciate further views on the matters raised in this Report. In particular, what suggestions do you have for the furtherance of the educational mission of the Office of the Integrity Commissioner? Would you be interested in some form of seminar or symposium, and, if so, how should that be structured to make you want to attend? Which of the issues canvassed in this part of my report do you believe to be most in need of consideration and debate? Does the discussion of the various concerns about particular aspects of the Code of Conduct and the Complaint Protocol reflect your views adequately? If not, what further dimensions need to be added to the discussion of those issues? Are there any matters in particular that should be fast-tracked for review?

(6) Summary

Thanks to the support and advice I have received from many members of Staff, Councillors and my Administrative Assistant, the Office of the Integrity Commissioner has taken a shape and direction that seems to me to be in accord with the objectives of Council in its resolution creating the position. With the exception of the Office's educational and outreach mission, it is fully operational. While there were a number of initial teething difficulties (some anticipated, others not) in setting up the Office, most of these have now been overcome. Over the second half of my appointment, my intention is not only to continue to fulfill the core responsibilities that Council has assigned to me but also to continue to reevaluate the policies and procedures that constitute the core of the City's integrity regime. In that endeavour, I hope to be informed by reaction to this Report and, in particular, that part of it in which I outline the matters that have come out of my interactions with Councillors over the first seven months of my appointment.

David Mullan,
Integrity Commissioner
April 11, 2005

Contact:

David Mullan
Integrity Commissioner
Tel: 416-397-7770/Fax: 416-392-3840
Email: dmullan@toronto.ca