



INTEGRITY COMMISSIONER REPORT ACTION REQUIRED

INTEGRITY COMMISSIONER ANNUAL REPORT – 2013-2014

Date:	August 1, 2014
To:	City Council
From:	Integrity Commissioner
Wards:	All
Reference Number:	

SUMMARY

The Integrity Commissioner reports annually to Council on the work of the office. This report is for the period from July 1, 2013 to June 30, 2014.

RECOMMENDATIONS

The Integrity Commissioner recommends that City Council:

1. Waive Section 3.7 D of Toronto Municipal Code Chapter 3, Accountability Officers that requires policy-related reports to be submitted through Executive Committee and request the Integrity Commissioner to bring forward recommended changes to the Codes of Conduct for Members of City Council, Local Boards and Adjudicative Bodies directly to City Council in the new term;
2. Request the City Manager, in consultation with the Accountability Officers, to review Section 3.7 D, of Toronto Municipal Code Chapter 3, Accountability Officers that requires policy-related reports to be submitted through Executive Committee and report directly to City Council in the new term with any recommended changes.

FINANCIAL IMPACT

This report will have no financial impact on the City of Toronto.

DECISION HISTORY

Section 162(1) of the [City of Toronto Act, 2006 \("COTA"\)](#) requires the Integrity Commissioner to make "periodic reports to Council." Section 3.7 of the [Toronto Municipal Code](#) requires the Integrity Commissioner to report to Council annually on the activities of the office and the discharge of the officer's duties.

This report covers the period from July 1, 2013 - June 30, 2014.

COMMENTS

Introduction: Transition and Renewal

End of a Term

This report marks the end of the five year term for the outgoing Integrity Commissioner. The past five years have been a time of activity, including tests to the City's ethical infrastructure, increased access to the office, and new policy development. City Council has had the opportunity to consider multiple reports and recommendations made under the City's *Codes of Conduct* and *COTA*. In addition, during this term, the courts considered the sanction provisions available to Council as well as the question of when a member of Council may speak on a recommendation to Council for a sanction or remedial action under the *Code of Conduct*.

The City will welcome Ms. Val Jepson on September 6, 2014 as the incoming Integrity Commissioner. Ms. Jepson's experience with the Office of the Provincial Integrity Commissioner will serve the people of Toronto in good stead. Planning has already begun for this transition to ensure that members continue to be able to receive timely advice and the public can receive information about the work of the office during the election period.

2013-2014: The Year in Review

Last year, Council adopted a recommendation that the incoming Integrity Commissioner be appointed on a full time basis. This followed a trend of increased demand for the services of the office in all aspects of its work. At the time of last year's report, 12 formal complaint files were carried forward. In the past year, 11 of these complaints were considered and either dismissed or reported to Council. One formal complaint continues to be deferred pending the outcome of parallel proceedings. In addition, a number of policy reports were completed for Council on election policy, social media policy during an election and Council's process in relation to the Mayor at the Council meeting of November 13, 2013.

In 2013 – 2014, the office received 17 formal and 124 informal complaints representing a slight increase in formal complaints and a 110% increase in informal complaints since

last year's report. Five years ago in the first year of my term, there were 13 formal complaints and 2 informal complaints. This speaks to the growth of the informal complaint process as well as to the relatively stable number of formal complaints. The past year also included an increase in requests for advice, with a 46% increase in advice contacts over the past year.

Looking into the year ahead, July was marked by a surge in complaints. In July 2014 we received 9 formal complaints and hundreds of election-related informal complaints. Although these complaints are within the next reporting cycle, I am bringing this issue to the attention of members now to raise awareness during the current election. There is increased scrutiny on the actions of elected officials at the City of Toronto. With greater scrutiny comes greater demand for accountability.

Finally, as discussed with Council during the debate of last year's annual report, a review of the *Code of Conduct* and proposals for amendment were prepared by the working group created for the "Integrity by Design" project. The proposed amendments were presented to the Executive Committee at its meeting of May 27, 2014. This was done to enable the public to depute on the matter and was in accordance with Chapter 3 of the Toronto Municipal Code. Ultimately, no deputations were made due to the lateness of the hour at which the item was addressed. A majority of the Executive Committee voted to defer the report indefinitely. A copy of the report with attachments put before the Executive Committee in May is provided to Council for its information along with this report (see: Appendix 2). A copy of the press release inviting the public to comment on the report is provided with the report.

Due to the fact that amendments to *Codes of Conduct* or *Complaint Protocols* are arguably legislative versus policy, I recommend that City Council provide clear direction to permit such reports to be placed directly before it. In order to be consistent with other accountability offices, I am also recommending that the Chapter 3 requirements for policy matters from Accountability Officers be put before Executive Committee, be considered by Council in the new term. This would be consistent with the independence of these offices and COTA.

Advice

The advice function of the office is available for all members and their staff on matters relating to the *Code of Conduct*. Advice is requested to avoid issues and to resolve complaints. Advice provided by the office is confidential, independent and where all the facts are disclosed and the advice is provided in writing, it is binding on the Integrity Commissioner.

The office continues to have a proportionally higher number of advice contacts than complaints. Although the public hears about publicly reported complaints throughout the year, the numbers reveal that a significant number of issues are dealt with through the giving of advice before these can become complaints. This is significant in measuring the effectiveness of the ethics environment at the City of Toronto. In addition, the fact

that 45 different members (composed primarily of members of Council) sought advice last year means that an array of Councillors have found this service useful. Members who request advice are identifying concerns and acting on those concerns: this indicates respect for the ethical framework put in place by Council.

Part of the work done by the Integrity by Design group this past year included the distribution of outreach items, including a poster and a contact information magnet to provide at-hand information to encourage members and staff to seek advice. Although posters alone are not an indication of an accessible ethics environment, the posting of contact information in areas where it can be seen can encourage the use of the office's services.

As in prior years, advice has been provided using formal and informal methods. The most common types of contacts are made by telephone or email. The number and nature of advice contacts for the past year are listed in Appendix 1, Part B.

Over the past year, advice was provided on a range of topics including:

- Election policies: use of staff; social media and City resources;
- Election policies: application of the Constituency Services and Office Budget Policy;
- Promotion of community groups and causes;
- Family members volunteering in the office of members of Council;
- Responding to constituents;
- Acceptance of tickets to functions;
- Lobbying of Members of Business Improvement Areas and the requirement that lobbyists register such contacts;
- Receipt of unsolicited gifts;
- Family members with interests in matters coming before Council;
- Voting on matters that could affect family members or appear to affect family members;
- Travel and expense policy questions;
- Donations for community events.

In addition to the confidential advice provided to members or staff on a one to one basis, there are times when advice and questions are discussed during reports that are presented to Council. Recently, a member asked about the role of the Mayor and whether there are additional responsibilities that accompany this office. All members of Council, including the Mayor, are subject to the *Code of Conduct*. It has been observed that a mayor is the public face of the City and the public holds the mayor the most accountable. In the *Report of the Toronto Computer Leasing Inquiry*, Justice Bellamy noted that "ethical culture trickles down from the mayor's office, but problems percolate back up."¹ Justice Bellamy has observed that the Mayor is the person who is

¹ *Report of the Toronto Computer Leasing Inquiry*, 2005, Volume 2 at 27

most visible to the public and as such has a special role to play in municipal government. The Mayor also has an influence over the productivity of council meetings. It was for these reasons that Justice Bellamy recommended that "for the Mayor, integrity in government should be a top priority."²

Sample Items of Anonymized Advice: 2013-2014

A member of Council requested advice on producing a novelty item to support the corporate United Way fundraising that the City of Toronto participates in annually. Advice was provided that this would not raise *Code of Conduct* concerns because it was being done for City of Toronto corporate fundraising: a caution was provided however that if a similar item was produced as part of a subsequent election campaign that there could be a question as to whether City resources used to create the item were being improperly applied to a campaign purpose. It was advised that the item should only be used for the purpose originally intended to avoid this issue.

A member of Council was approached by a local food company wishing to deliver a basket of food to the office for the member to sample. The company hoped to obtain business supplying its items to the City of Toronto. The member was advised to decline the gift because it did not meet any of the exceptions within the Gifts and Benefits provisions of the *Code of Conduct*.

A member of Council was provided with a mounted picture of a development within the ward as a demonstration piece for a meeting. This was a loaned presentation item and did not constitute a gift. Displaying the item was permissible under the *Code of Conduct*.

A staff member in a Council member's office asked about the ability to work on election related matters on a day taken in lieu of overtime: staff are permitted to volunteer on election campaigns when they are not being paid by the City of Toronto. Therefore, staff members may take vacation days and "lieu" days for this purpose.

A member of Council was approached to provide a letter to the Committee of Adjustment about an application in the member's neighbourhood. The Councillor sought advice about the appearance of a conflict between private interest and public role. The Councillor chose not to correspond on the matter due to the proximity of the subject property to the Councillor's property. This was in keeping with the principle in the *Code of Conduct* of avoiding conflicts of interest, both apparent and real.

² *Report of the Toronto Computer Leasing Inquiry*, 2005, Volume 2 at 65

Complaints Reported to Council

There were three complaints during the past year where breaches of the *Code of Conduct* were found to have occurred. Each one was resolved without formal sanction; the first two by way of apologies and the third because the member involved changed his behaviour months prior to the report to Council and there was no recurrence of the conduct.

The first two reports came to Council on July 16 and 17, 2013 and concerned unfair public comments made by Councillors Vaughan and Layton about the City Manager in the context of the casino debate. Council adopted a finding on each report that there had been a breach of Article XII (Conduct Respecting Staff) and took no further action because both Councillor Layton and Councillor Vaughan had apologized to the City Manager and their apologies were accepted.

A link to these reports can be found at:

1. *Report on Violation of Code of Conduct for Members of Council: Councillor Adam Vaughan:* <http://www.toronto.ca/legdocs/mmis/2013/cc/bgrd/backgroundfile-60183.pdf>
2. *Report on Violation of Code of Conduct for Members of Council: Councillor Mike Layton:* <http://www.toronto.ca/legdocs/mmis/2013/cc/bgrd/backgroundfile-60181.pdf>

The third report came to Council on November 13, 14, 15 and 18, 2013. It recommended that City Council adopt a finding that Mayor Ford breached Article VI of the *Code of Conduct* but impose no further sanction. A citizen had complained after receiving a request for donations from the Mayor for his personal charitable foundation. An investigation revealed that in February 2013, the Mayor used City property to create the mailing. By the time the complaint was received and the investigation conducted, the Mayor had followed all advice provided and had brought his personal fundraising activities into compliance with the *Code of Conduct*.

The Report To Council On Violation of Code of Conduct: Mayor Rob Ford can be found at: <http://www.toronto.ca/legdocs/mmis/2013/cc/bgrd/backgroundfile-63476.pdf>

It has been observed that a lack of complaints is not necessarily the mark of a good ethical environment. This is because citizens and government employees may be less likely to file complaints within an environment that is perceived to be weak or unfair. A good ethics environment will ensure that government officials "deal responsibly with possible conflicts before they exist, when they become relevant to a particular matter and after mistakes are made."³ In addition, when complaints are reported publicly to

³ Local Government Ethics Programs: A Resource for Ethics Commission Members, Ethics Reformers, Local Officials, Attorneys, Journalists, and Students, Director of Research City Ethics, Inc. 2012 at 52.

City Council, this provides an opportunity to demonstrate to the public that breaches of the *Code of Conduct* will be addressed by Council.

Appendix 1, Part B (III) tables the number of complaints received, dismissed and reported to Council over the past year. As in previous years, there has been growth in informal complaints and steady numbers of formal complaints with a recent post-reporting period "spike" in both formal and informal complaints.

Investigation of Complaints

During this past year, investigations into complaints have required either the use of the powers of the office found in *COTA* or the *Public Inquiries Act, 2009* (the "*PIA*"), or both. *COTA* authorizes the Integrity Commissioner to request documents and information from the municipality or a local board. The *PIA* provides a number of powers to integrity commissioners, including the power to summons witnesses or documents, the ability to state a case for contempt to the Superior Court of Justice and to require evidence under oath or affirmation. These provisions apply to inquiries into complaints under subsection 160(2) of *COTA*.

In addition to the powers in place to adequately investigate complaints, there are procedural protections for those who are the subject of complaints. These are found within the *Code of Conduct Complaint Protocol* (one for members of Council and the other for members of Local and Adjudicative Boards (the *Protocols*)). The *Protocols* ensure that a member is provided with time to make a written response to a complaint, the right to receive notice of the proposed findings and recommended sanctions and the protection afforded by the requirement that the Integrity Commissioner first assess whether a given complaint contains "reasonable and probable grounds" for the allegation that the member has contravened the *Code of Conduct*.

The *Protocols* also provide that the Integrity Commissioner may speak to anyone relevant to the complaint, access or examine any information referred to in 160(3) and 160(4) of *COTA* or enter any City work location for the purposes of investigation. A copy of section 160 of *COTA* is attached to this report at Appendix 3.

There are occasions when this office and the Office of the Lobbyist Registrar have overlapping or concurrent roles in providing advice or conducting inquiries into matters involving lobbyists and public officials at the City of Toronto. As a result, during this reporting period, the offices sought legal advice and entered into a Memorandum of Understanding ("*MOU*"). The *MOU* was created to ensure consistency, clarity and comprehensiveness in the provision of advice and interpretation of the *Code of Conduct* and the Lobbying By-Law. In relation to investigations, it was created to enable the offices to share information on joint or concurrent inquiries where to do so would achieve fairness and efficient use of resources, avoid unnecessary service of process, eliminate duplication of effort and enhance the effectiveness of inquiries.

A copy of the *MOU* is attached to this report for Council's information at Appendix 4.

A question was raised in the media in July 2014 about the status of open investigations. My office is bound by legislation to observe a duty of confidentiality. (See Section 161, COTA). In addition, the *Code of Conduct Complaint Protocol for Members of Council* ("*Complaint Protocol*") includes provisions on the threshold for investigating formal complaints, the timing of responses from members of Council and the manner in which reports on breaches of the *Code of Conduct* are made public. A link to the *Complaint Protocol* is provided here:

<http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=0ab6186e20ee0410VgnVCM10000071d60f89RCRD&vgnextchannel=e64f40efd8f30410VgnVCM10000071d60f89RCRD>

When a formal complaint is made, it is classified to ensure it is within the jurisdiction of this office and that the complaint has met the threshold of including "reasonable and probable grounds" to conclude that there may have been a breach of a provision of the *Code of Conduct*. If so, a copy is provided to the member of Council and an opportunity is provided for a reply. A copy of this reply is provided to the complainant and if there is further information or a response at that stage, the member is again provided with an opportunity to comment on the complaint. If an investigation is required, this takes place after classification of the complaint.

The length of time required to complete an investigation will depend on a number of factors, including but not limited to, the issues raised by the complaint, the factual foundation, the volume of material review, whether the issues are unique, whether there are multiple complaints, the need for communications to various complainants and other investigative exigencies which may include any of the following:

- Seeking information and documents from the City of Toronto;
- Issuing summonses and interviewing witnesses;
- Issuing summonses for the production of documents;
- Seeking legal advice;
- Responding to jurisdictional or other interim issues;
- Online research;
- Reviewing related policies;
- Reviewing past reports, the policies, the *Code of Conduct* and relevant case law;
- Following up on new information gleaned from the prior investigative steps;
- Analyzing the information obtained;
- In the event of a breach of the *Code of Conduct*, determining the appropriate sanction to be recommended;
- The requirement to provide the member of Council with notice of any findings made and any recommended sanction.

The length of time that an investigation requires is also affected by the number of outstanding matters that are part of the work plan of our office. The office is presently

staffed by one part-time Integrity Commissioner and one administrative staff person. In addition to investigative and report writing responsibilities, the office provides advice to members of Council, members of Local Boards and Adjudicative tribunals, educational presentations, and informal complaint resolution of those complaints received by email, telephone and regular mail that are not made within the formal complaint process. We also field inquiries from staff, the media and the public at large about the work of the office.

Preliminary Decisions on the Threshold to Investigate a Complaint

On two occasions in the past year, members of Council raised the question of whether media reports can provide the necessary "reasonable and probable grounds" for a formal complaint under the *Complaint Protocol* to conduct an inquiry. In each case, I concluded that the media reports and materials published by the media met the required threshold. In both cases, there were photographs of documents related to the alleged breaches. There were named individuals who had received impugned invitations or requests from the members of Council. There is no reason to refuse to investigate a complaint that is based on information available via the media or social media if the content provides reliable objective information that otherwise meets the threshold.

A link to the report concerning the first jurisdictional ruling can be found here:
<http://www.toronto.ca/legdocs/mmis/2013/cc/bgrd/backgroundfile-63476.pdf>

The second jurisdictional ruling was released along with a report to Council at its meeting of July 8, 9, 10 and 11, 2014. This report falls into next year's reporting cycle. The preliminary decision in that case is presently the subject of judicial review proceedings. The outcome of those proceedings will be reported to Council once they are complete.

Dismissed Complaints

As in prior years, a number of complaints made to this office did not meet the threshold for investigation. The threshold for an investigation in the *Complaint Protocol* ensures that Councillors are not called upon to respond to complaints that are groundless or outside the jurisdiction of the office. In cases where the Councillor's explanation is sufficient, the complaint may be closed without any investigation. Where there is additional information and material examined, the complaint may still be dismissed if it is found that there has been no breach of the *Code of Conduct*. In other cases, a resolution may be found that leads to a complainant deciding to withdraw the formal complaint.

In this reporting year, there were no publicly reported dismissals of complaints. There were a number of complaints dismissed by way of reports to members of Council and complainants. Complaints are often dismissed because there are insufficient grounds to investigate based on the material provided, or where a complaint is based on speculation or assumptions. The threshold required by the *Complaint Protocol* is

"reasonable and probable grounds" which requires not only a belief that a breach of the *Code of Conduct* has taken place, but some objective basis for that belief.

In one dismissed complaint, the complainant alleged that the member had failed to act in accordance with the statements of principle found within the Preamble to the *Code of Conduct*. The complainant provided information about a number of actions taken by the member which amounted to:

- failing to uphold the letter and spirit of the laws cited in the Preamble;
- failing to perform the member's duties and arrange the member's public affairs in a manner that promotes public confidence and bears close public scrutiny; and
- avoiding the improper use of influence of the office and conflicts of interest, apparent and real.

The complainant did not cite any specific provisions of the *Code of Conduct* beyond the statements of principle as a basis for the complaint. In the report dismissing the complaint for lack of jurisdiction, I followed a legal opinion provided to former Integrity Commissioner, David Mullan, and reported to Council on July 19, 20, 21 and 26, 2005 in which it was concluded that the statement of principle did not constitute stand alone provisions that the Integrity Commissioner may deal with by way of a finding of breach. On that basis, the complaint was dismissed.

Informal Complaints

Informal complaints include potential breaches of the *Code of Conduct*, as well as conduct which may create the perception of conflict, or lead to a future issue but on its own would fall short of amounting to a breach of the *Code of Conduct*.

The informal complaints received during this reporting period included a number of communications complaints ranging from complaints of unwanted "robocalls" to complaints about receiving mass emails from members of Council. Other informal complaints concerned the manner in which members of Council or their staff handled requests for service and the treatment of citizens at public meetings. This latter point deserves attention because it requires leadership from other members of Council. The City of Toronto is served by the participation of citizens and the best advice from members of staff.

At the time the election period began with the opening of nomination in January of 2014, our office began to receive queries and requests for advice relative to election matters including member use of resources, appropriate use of constituent information and use of social media. Since the end of June, as noted above the inquiries and complaints have increased in number. Citizens are using social media to discuss these concerns and as a result we are seeing more instances of multiple complainants being made that arise from a single issue.

All informal complaints are tracked and outcomes are recorded. The results for this reporting period indicate that of the 124 informal complaints received, citizens engaged with the member and satisfactorily resolved the issue in 21 of the complaints. In 87 of the complaints, there was citizen engagement but the outcome was either not able to be determined or the issue was not resolved to the satisfaction of the complainant. Finally, in 16 of these complaints, complainants chose not to pursue further engagement with the member.

Policy Reports

Three policy reports were provided to Council during this reporting period. The first emanated from a series of actions taken by City Council at its meeting on November 13, 2013 when it adopted a six-part motion (MM41.25) regarding the conduct of Mayor Ford. The motion requested the Integrity Commissioner to report back to City Council on the concerns raised in the motion. That report:

- 1) identified the *Code of Conduct* concerns which arose from MM41.25;
- 2) identified other issues arising from MM41.25;
- 3) discussed Member of Council accountability and the enforcement of the *Code of Conduct*;
- 4) recommended no additional *Code of Conduct* investigation or action be taken in relation to MM41.25.

A link to the report can be found at:

<http://www.toronto.ca/legdocs/mmis/2013/cc/bgrd/backgroundfile-64720.pdf>

At City Council's December 2013 meeting, the Office of the Integrity Commissioner, in conjunction with the Office of the City Clerk and the Office of the Lobbyist Registrar, gave a presentation to Council on election year policies. The subjects discussed included key dates, the policy foundations to the election provisions in the *Code of Conduct*, the election provisions found in the Council-Member Organized Community Events Policy as well as the specific limitations found in the Constituency Services and Office Budget Policy. A link to the materials provided to City Council for this presentation can be found at:

<http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=e82583cf89870410VgnVCM10000071d60f89RCRD>

During the debate on the application of the policies to social media by members, Council requested a report on a social media policy during elections for its consideration. Accordingly, a report dated February 11, 2014 was prepared and brought to Council for that purpose. City Council debated the merits and adopted a social media policy which is in place for this election. A link to the original report can be found at:

<http://www.toronto.ca/legdocs/mmis/2014/cc/bgrd/backgroundfile-66935.pdf>.

A copy of the social media policy produced as a result of Council's resolution is attached to this report at Appendix 5.

Reporting of Gifts and Benefits

In this reporting period, the Integrity Commissioner's office received 10 Donor Declaration Forms from the office of the City Clerk for [Council Member-Organized Community Events](#). These forms are required to be filed with the Office of the Clerk for "in kind" and cash donations to community events. This form is used to ensure that donations are kept within the allowable limits, to ensure that donations received are for specific events and that Article IV (Gifts and Benefits) in the *Code of Conduct* is being followed by members of Council. When the donation does not fall within the exceptions provided by the *Code of Conduct*, the member is advised so that the donation can be returned. In the past year, one member was required to return a donation for a community event after the status of the donor as the client of a registered lobbyist was confirmed.

In addition, 8 travel declaration forms were received from members of Council consistent with the obligation to make such disclosure under Article IV (Gifts and Benefits) of the *Code of Conduct*.

As in prior years, members of Council are encouraged to consult with the office of the [Lobbyist Registrar](#) to check the status of potential donors prior to accepting a donation for a community event, or for travel paid for by a third party government, organization or conference organizer for members' attendance at national or international engagements as elected representatives of the City. This will avoid the problem of having to repay donations or travel costs that may later be found to have been improperly received.

BUDGET

The 2014 approved budget for the Integrity Commissioner's office is \$299.1 thousand. The Office has two members: the Integrity Commissioner and an Administrative Assistant. The expenses of the office during this reporting period are attached as Appendix 6. This year the budget will accommodate the transition from a part time Integrity Commissioner to a full time Integrity Commissioner.

CONCLUSION

I want to express my admiration and thanks to those members of the public service who have variously provided operational support, services and engagement with the office over the past five years. Particular mention must be made of the Office of the City Clerk, the Office of the City Manager, the Office of the City Solicitor and the Office of Strategic Communications; the public is well served by your professionalism and dedication to your work.

This City has been served well by its first two Integrity Commissioners, David Mullan and Lorne Sossin. Being first means breaking the trail and this is tough work. I have been the beneficiary of the work done by Commissioner Mullan and Commissioner Sossin. Their decisions and precedents have stood the test of time and are still applicable to issues arising in 2014.

The Office of the Integrity Commissioner has enjoyed the highest quality administrative support, each individual providing dedication at every step of the development of the office over the past 10 years: Zorida Ali, Carol Birkett, Lauren Hollywood and Wendy Wilson. Thank you all for bringing such an impressive array of skills to the many tasks that accompany a position like this one. You brought patience, discretion and integrity to a challenging role.

To my fellow Accountability Officers, the Auditor-General, the Lobbyist Registrar and the Ombudsman: you and your staff understand the responsibilities and unique challenges that accompany oversight in a political milieu. Thank you for working with this office on areas of shared interest and concern. Your ability to collaborate while maintaining independence has been appreciated.

Finally, I leave the City of Toronto and City Council with this idea about public service articulated by Justice Denise Bellamy in her report which was the catalyst for the accountability and ethical infrastructure that has been developed over the past 10 years in the City of Toronto:

Public service is a noble calling and the word "servant" in public servant is meant in the most admirable sense of contributing to something greater than one's own self-interest"⁴

Thank you. I am grateful for having had the opportunity to contribute.

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SIGNATURE

(original signed)

Janet Leiper, Integrity Commissioner

⁴ Report of the Toronto Computer Leasing Inquiry, 2005, Volume 2 at 26

ATTACHMENTS

- Appendix 1:** Summary of Activities of the Integrity Commissioner: July 1, 2013 – June 30, 2014
- Appendix 2:** *Integrity by Design: Report on the Review of the Code of Conduct for Members of Council.* Proposed Amendments to the Code of Conduct: Black Line Version and Clean Version
- Appendix 3:** COTA, 2006: Section 160
- Appendix 4:** Memorandum of Understanding between the Office of the Lobbyist Registrar and the Office of the Integrity Commissioner
- Appendix 5:** Social Media Policy During 2014 Election
- Appendix 6:** Integrity Commissioner's Office Budget and Expenditures July 1, 2013 - June 30, 2014