



OFFICE OF THE INTEGRITY COMMISSIONER

**OFFICE OF THE INTEGRITY COMMISSIONER
ANNUAL REPORT
JULY 2014 – JUNE 2015**

**Valerie Jepson
Integrity Commissioner
Date: June 30, 2015**

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INTRODUCTION

This is the Annual Report for the Office of the Integrity Commissioner for the period of July 1, 2014 to June 30, 2015, made pursuant to section 162(1) of the *City of Toronto Act, 2006* and section 3-7 of Chapter 3 of the *Toronto Municipal Code*. In the future, the Office of the Integrity Commissioner will file an annual report on the basis of the calendar year. The next annual report will therefore be filed for the period January 1 to December 31, 2015.

COMMISSIONER'S MESSAGE

My term as Integrity Commissioner began on September 8, 2014. The first ten months of my term have been productive, focusing on activities related to transition, meeting with members of City Council, providing advice and dealing with a high volume of complaints.

A number of accomplishments have been achieved during this reporting period. The website for the Office was refreshed, a Twitter account was established ([@TO Integrity](#)) and significant outreach activities have been undertaken to coincide with the commencement of a new term of City Council. In addition, my predecessor and I issued thirteen (13) reports concluding sixteen (16) complaints. Together, Commissioner Janet Leiper and I responded to more than 190¹ requests for advice from members of Council or Local Boards and to more than 400² requests for advice or information from residents and city staff.

At present, the biggest challenge the Office faces is the growing backlog of complaint files. While many case files have been closed, the high volume and complex nature of the complaints before me at this time has led to delay in disposition of matters. The uptick in the number of complaints and the resource challenges faced by the Office were noted in Commissioner Leiper's final Annual Report.

To address this pressing issue, I sought and obtained an additional staff position through the budget process to attempt to reduce the time it takes for complaints to proceed through the Office. I am working to fill this position as soon as possible. I will be seeking additional resources for the 2016 budget year.

¹ Please refer to Table 2 of Appendix 1 for a complete statistical breakdown.

² Please refer to Table 3 of Appendix 1 for a complete statistical breakdown

With limited resources, I have been required to prioritize the work before the Office. As I stated publicly in my online Commissioner's Message³, I have placed a priority on activities that improve awareness of the standards of conduct and advice-giving. I have chosen to prioritize these aspects of my work because education and advice are the most effective tools available to assist elected and appointed officials meet the standards required of them. In order to fully encourage and support individuals who choose to stand for elected or appointed public office, we must offer resources to enable them to meet the highest standards of ethical conduct expected of them.

Although it is early in my term, I am glad to observe that there is a strong culture of advice seeking among members of Council.

I cannot say the same about the Local Boards (Restricted Definition) sector. There are more than 1000 people appointed to Local Boards (Restricted Definition). All appointees are bound by a Code of Conduct and are able to seek advice from the Integrity Commissioner. Historically, this Office has received two to three requests for advice from this sector each year. This level of activity is out of proportion with the size of the sector and I hope to improve outreach and education in this sector to improve this level of activity.

I trust that this report will provide members of Council and the public with information to assist with understanding the role and duties of the Office.

A note of thanks

I am indebted to all of the former Integrity Commissioners and my fellow Accountability Officers for the time and support they have lent to me as I moved into this role. In particular, Commissioner Leiper has been exceedingly generous with her time and has therefore been instrumental in smoothing the transition.

I wish to thank the Office of the City Clerk, the Office of the City Manager, the Office of the City Solicitor and the several division heads who have also aided the transition by providing collegial support and advice.

I am also grateful for the support and assistance provided by Wendy Wilson, Administrative Assistant who retired from the Office in January 2015, and Tracy Francis, Intake and Office Assistant who joined in March 2015. Both Wendy and Tracy acquit themselves to their jobs with skill, wisdom and good humour for which I am grateful.

³ [Commissioner's Message September 2014](http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=c67f6bc816e88410VgnVCM10000071d60f89RCRD&vgnextchannel=5df55699cb2b8410VgnVCM10000071d60f89RCRD)
(<http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=c67f6bc816e88410VgnVCM10000071d60f89RCRD&vgnextchannel=5df55699cb2b8410VgnVCM10000071d60f89RCRD>)

REPORT ON ACTIVITIES

The work of this Office consists of four main types of activities:

1. Providing timely advice to Members of Council and Local Boards (Restricted Definition);
2. Educational activities to raise awareness of the standards of conduct;
3. Receiving, reviewing and investigating complaints; and,
4. Policy work.

Statistical information about all of the activities of the Office can be found in Appendix 1 to this Annual Report. What follows immediately below is an overview discussion of the work underway in each of the areas.

1. *Providing Timely Advice to Members of Council and Local Boards (Restricted Definition)*

Providing advice is the most important function that an integrity or ethics commissioner performs. Residents rightfully require that elected and appointed officials meet the very highest standards of conduct. Elected and appointed officials operate in a complex environment often with several competing interests. It is not always obvious how to adhere to the standards of conduct when faced with multiple competing interests. It is not always easy to transition professional skills and attributes from other sectors to the work of City Hall. It is therefore just and necessary that elected and appointed officials have a resource available to them to assist in applying the standards to the often complex circumstances that arise.

Advice is provided to all requestors in a timely manner – usually within a few hours. A more complex piece of advice may require additional time. The Office provided 197 pieces of advice during this reporting period.

The following are samples of the requests for advice received during the reporting period and are produced below to assist elected and appointed members identify issues and to illuminate the approach taken by the Commissioner.

Sample Advice

Sample 1 – Dealing with possible conflict of interest issues stemming from a spouse's employment with a City stakeholder

A member of Council sought advice with respect to possible issues that may arise as a result of their membership on a particular committee and their spouse's employment with a City stakeholder. In consideration of the position held by the member's spouse and the nature of the decision before the member, advice was provided that the

member's role on the committee does not pose any issues under the *Municipal Conflict of Interest Act* or the Code of Conduct due to the fact that decisions made by the Committee would not impact any pecuniary interest on the part of the member's spouse. The member was reminded of their duty of confidentiality with respect to maintaining confidence over the information that is received in the capacity as a member of the committee and a Councillor.

Sample 2 – Providing an employment reference for a former colleague

A member of Council requested advice about whether the member could provide an employment reference for a former colleague. The advice was provided that it would be acceptable to provide a reference for a former colleague as long as it is provided in their personal capacity.

Sample 3 – Donating a personal item for use at a charity event

A member of Council sought advice about donating a personal item for use at a charitable event. The advice was provided that the donation was acceptable since it is being provided in their personal capacity. However, it was advised that any promotional material for the event should not indicate that the member is acting in their capacity as a Councillor nor should the member use public resources to facilitate the donation.

Sample 4 – Co-hosting a fundraising event for a non-profit organization

A member of Council requested advice on whether it is permissible for a member to co-host a fundraising event for a non-profit organization. The advice was provided that the member should, in general, refrain from involving themselves in direct appeal fundraising as there is a potential that a councillor could ask for funds from businesses or individuals who are interested in doing business with the City or seeking an appointment or permit on an unrelated matter.

Sample 5 – Dealing with possible conflict of interest issues stemming from holding a position on a non-profit organization's Board of Directors

A member of Council sought advice on the permissibility of accepting a position on the board of directors for a non-profit organization that uses City resources. The advice was provided that while there is generally no impediment to members becoming involved in community organizations, the member should exercise caution in accepting such positions if lobbying or seeking other forms of benefit or preference from the City is a predominant part of the organization's activities. It was advised that the member may be required to recuse themselves from dealing with matters in relation to the organization while performing Councillor duties as board members have a fiduciary duty to the organization they serve on.

Reporting of Gifts and Benefits

There are very few circumstances under which members of Council and Local Boards (Restricted Definition) can receive a gift or benefit. Unlike other components of the Code of Conduct – which is principles based – the gift rule is quite specific and prescriptive. The Office receives requests for advice about the appropriateness of gifts or benefits – primarily relating to invitations to attend dinners and receptions. There are exceptions within the gift rule to allow members to accommodate protocol or when attendance at an event fulfills an official function.

If a permissible gift is received – and its value is over \$300 – it must be disclosed to the Integrity Commissioner.

There are two types of permissible benefits that are routinely received and disclosed by members of Council: donations to member-organized community events and sponsored travel.

In this reporting period, the Office received five (5) Donor Declaration Forms from the office of the City Clerk for Council Member-Organized Community Events. The number is lower than usual because such donations were not permitted in the lead up to the municipal election.

In addition, seven (7) Travel Declaration Forms were received from members of Council that were in compliance with the disclosure obligations outlined in Part IV (Gifts and Benefits) of the Code of Conduct.

Members of Council are strongly encouraged to seek advice from the Integrity Commissioner prior to accepting donations for events or upon receiving an invitation for travel to be paid for by a third party to ensure that the donation or event are permissible under the Code of Conduct. This will avoid the problem of having to repay donations or travel costs that may later be found to have been improperly received.

2. Educational Activities to Raise Awareness of the Standards of Conduct

One of my predominant tasks following the election was to conduct one-on-one meetings with members of Council. My main message to members of Council was to remind them that this Office is a key resource available to them for receiving information and assistance with complying with the very high standards of conduct expected of them.

Of all of the activities I have undertaken to date, I found the meetings with members of Council to be most invigorating because they provided an opportunity to deepen my appreciation for the important work carried out by Toronto City Council. In addition, I

was struck by the level of interest and knowledge that most members expressed about the work of the Office.

In addition to these one-on-one sessions, I have been involved in several general orientation or training sessions for members of council, their staff and a few local boards.

On two occasions, once with the Lobbyist Registrar, I wrote a letter to all members of Council to remind them of their Code of Conduct obligations in relation to issues on the Council agenda or other matters.

I have also been consulted by representatives from jurisdictions outside of Ontario that are interested in establishing an Integrity Commissioner position. Toronto City Council remains a leader in this area, mainly due to the careful and comprehensive accountability framework set out in Chapter 3 of the *Toronto Municipal Code*.

I have also had the pleasure of sharing information about the work of the Office with several external groups such as the Municipal Commission for Discipline Inspection and Supervision Bureau from Beijing, China, the Privileges and Ethics Standing Committee of the Gauteng Provincial Legislature from South Africa, the Canadian Centre for Ethics and Corporate Policy and McLaughlin College at York University.

Finally, the Office was proud to host the semi-annual meeting of the Municipal Integrity Commissioners of Ontario. The meeting was hosted at the Etobicoke Civic Centre and was well attended with twenty-five (25) participants. As of the time of this report, sixty (60) municipalities in Ontario have integrity commissioners.

Resident and Staff Inquiries

One component of outreach is responding to the high number of calls the Office receives from residents and city staff. In this reporting period, the Office responded to 499 resident and staff inquiries.

These inquiries range from purely informational requests about the complaint process or the Code of Conduct to requests for informal advice about reasonable expectations about appropriate conduct of officials bound by the Code of Conduct and interpretation of city policies in relation to the Code of Conduct.

3. Receiving, Reviewing and Investigating Complaints

All complaints before the Office are dealt with in accordance with the applicable Complaint Protocol.⁴ The Complaint Protocol provides for an informal and formal procedure to resolve complaints. The Office's activities in relation to each are described below.

Formal Complaints

There are two main components of a formal complaint: intake and investigation.

Intake

When a complaint is received, it is first reviewed before an investigation is commenced. The Complaint Protocol provides that the Integrity Commissioner must refuse to deal with complaints where the subject matter is not within the scope of the Code of Conduct such as dissatisfaction with manner in which a member of Council represents the interests of a particular resident or an allegation that a member has contravened the *Municipal Conflict of Interest Act*.

The Complaint Protocol also allows for the refusal of dealing with a complaint if there are insufficient grounds to cause an inquiry. While complainants need not come with all the evidence in hand, they must have more than a mere suspicion and present reasonable and probable grounds that a contravention has occurred.

In this reporting period, there were nine (9) complaints that were dismissed on the basis of being beyond the jurisdiction of this Office or having insufficient grounds to investigate.

Below are sample case summaries of reports dismissing complaints at the intake stage. These summaries are provided to assist with awareness about the jurisdiction of the Integrity Commissioner. Not all cases can be described because may risk revealing the identity of the parties, which is not permitted pursuant to section 162(1) of the *City of Toronto Act, 2006*.

⁴ 1. [Code of Conduct Complaint Protocol for Members of Council](http://www1.toronto.ca/City%20Of%20Toronto/Integrity%20Commissioner/Shared%20Content/Files/cod-e-of-conduct-complaint-protocol-for-members-of-council.pdf)
(<http://www1.toronto.ca/City%20Of%20Toronto/Integrity%20Commissioner/Shared%20Content/Files/cod-e-of-conduct-complaint-protocol-for-members-of-council.pdf>)

2. [Code of Conduct Complaint Protocol for Members of Local Boards \(Restricted Definition\) including Adjudicative Boards](http://www1.toronto.ca/City%20Of%20Toronto/Integrity%20Commissioner/Shared%20Content/Files/cod-e-of-conduct-complaint-protocol-for-members-of-local-boards.pdf)
(<http://www1.toronto.ca/City%20Of%20Toronto/Integrity%20Commissioner/Shared%20Content/Files/cod-e-of-conduct-complaint-protocol-for-members-of-local-boards.pdf>)

Case Summary 1 – Allegations of breach stemming from a complaint about a the manner in which a member dealt with a neighbourhood dispute

In one dismissed complaint, the complainant alleged that the member violated various provisions of the Code of Conduct by failing to properly represent the complainant's interests in relation to several issues stemming from an ongoing dispute between the complainant and the complainant's neighbours.

In the report dismissing the complaint, I concluded that some allegations involved dissatisfaction with the manner in which the member handled ward matters which do not fall within the jurisdiction of this Office. I adopted the long-standing approach by my predecessors that dissatisfaction with a manner of representation is a matter to be addressed in an election campaign. For those reasons, the complaint was dismissed.

Case Summary 2 – Allegations of breach stemming from a complaint about a member's conduct during media interviews

In another dismissed complaint, the complainant alleged that a member violated the Code of Conduct for the manner in which the member portrayed themselves in a media interview. The complainant did not cite any specific Code of Conduct provisions that were alleged to have been violated nor were specific occasions or documented evidence provided in support of the allegations.

The complaint was dismissed on the basis that there were insufficient grounds to investigate the matter.

Investigations

Dismissed or Withdrawn Complaints

During this reporting period, three (3) cases were dismissed on their merits following an investigation and two (2) cases were withdrawn during the investigation of the matters.

Below are sample case summaries of reports for dismissed or withdrawn complaints. Not all cases can be described because may risk revealing the identity of the parties, which is not permitted pursuant to section 162(1) of the *City of Toronto Act, 2006*.

Sample 1 - Dismissed Complaint Summary

In one dismissed complaint, the complainant alleged that the member contravened the Code of Conduct by exercising improper influence over City Staff in relation to an application made by the complainant. Following the investigation, which included reviewing materials provided by both parties, reviewing records sought and received from relevant City staff and interviewing both parties and City staff, I concluded that the member engaged in vigorous advocacy with City staff on behalf of a group of residents whose interests were at odds with those of the complainant. The complaint was

dismissed based on my findings that the member did not act in furtherance of a private interest or in a manner that was outside of the member's authority in relation to City staff.

Sample 2 – Withdrawn Complaint Summary

In one of the withdrawn complaints, a complainant alleged that a member violated the Code of Conduct by making comments in the media about a citizen who made a complaint to this office on another matter. During the investigation of the complaint, the member apologized personally to the citizen who was the subject of the media comments and the apology was accepted. Upon learning of the resolution, the complainant withdrew the complaint on the basis that the desired outcome of the complaint was achieved.

Reports to Council

During this reporting period, four (4) complaints were reported to Council.

Report 1 – Report on Violation of Code of Conduct: Mayor Rob Ford

The first two reports came to Council on July 8, 9, 10 and 11, 2014. The first report concerned robocall messages sent to Ward 43 residents by Mayor Ford. A breach of the Code of Conduct was found to have occurred. Council decided to receive the report for information and no further action was taken.

The report can be found at:

[April 28, 2014 - Report on Violation of Code of Conduct: Mayor Rob Ford.
http://www.toronto.ca/legdocs/mmis/2014/cc/bgrd/backgroundfile-71089.pdf](http://www.toronto.ca/legdocs/mmis/2014/cc/bgrd/backgroundfile-71089.pdf)

Report 2 – Report on Violation of Code of Conduct: Councillor Mammoliti

The second report concerned improper acceptance of a gift by Councillor Mammoliti from the profit generated by ticket sales for an event organized by the Councillor's office. Council made the following decisions with respect to this matter:

- adopted the finding that Councillor Mammoliti breached Article IV of the Code of Conduct;
- suspended the remuneration paid to Councillor Mammoliti in respect of his services as a member of Council for a period of 90 days, commencing September 1, 2014; and
- requested the City Solicitor retain outside counsel with expertise in criminal law to review the Integrity Commissioner's report to determine if there are grounds to refer this matter to the Chief of Police, Toronto Police Services, for further investigation.

The report can be found at:

[June 24, 2014 – Report on Violation of Code of Conduct: Councillor Mammoliti.
http://www.toronto.ca/legdocs/mmis/2014/cc/bgrd/backgroundfile-71097.pdf](http://www.toronto.ca/legdocs/mmis/2014/cc/bgrd/backgroundfile-71097.pdf)

***Report 3 – Report on Violation of Code of Conduct for Members of Council:
Councillor Augimeri***

The third report came to Council on August 25 and 26, 2014. It concerned comments made about a citizen by Councillor Augimeri in the print and online edition of a Toronto-based Italian language daily newspaper. Council made the following decisions with respect to this report:

- adopted a finding that Councillor Augimeri breached Article XIV (Discreditable Conduct) of the Code of Conduct;
- adopted the recommendation that no sanction be imposed on the councillor; and
- authorized the use of the Council General Expense budget to reimburse the complainant for actual and reasonable costs up to a maximum of \$5000 as provided in section 11(2) of the Complaint Protocol.

A copy of this report can be found at:

[August 1, 2014 - Report on Violation of Code of Conduct for Members of Council:
Councillor Maria Augimeri.
http://www.toronto.ca/legdocs/mmis/2014/cc/bgrd/backgroundfile-72911.pdf](http://www.toronto.ca/legdocs/mmis/2014/cc/bgrd/backgroundfile-72911.pdf)

Report 4 – Integrity Commissioner Report Regarding Conduct of Mayor Rob Ford

The fourth report came to Council on March 31, April 1 and 2, 2015. The report concerned the use of racial slurs by Mayor Ford on two occasions. Council adopted the finding that Councillor Ford violated Article XIV (Discreditable Conduct) of the Code of Conduct while acting in his capacity as Mayor of Toronto. Councillor Ford addressed City Council and offered an apology for his conduct.

A copy of this report may be found at:

[March 25, 2015 – Integrity Commissioner Report Regarding Conduct of Then-Mayor
Rob Ford. http://www.toronto.ca/legdocs/mmis/2015/cc/bgrd/backgroundfile-78435.pdf](http://www.toronto.ca/legdocs/mmis/2015/cc/bgrd/backgroundfile-78435.pdf)

Informal Complaints

The Complaint Protocol includes an informal procedure. It is geared toward enabling and empowering a complainant to raise concerns about Code of Conduct complaints directly with the member. This is often an optimum method of resolution when the alleged transgression is minor or the issue relates to personal circumstances. Often

times I am copied on correspondence between the complainant and a member under the informal complaint protocol. I can provide advice and information about ways to resolve the matter.

If the parties consent, I can take a more active role in resolving informal complaints. Since September, I have been engaged in two (2) complex informal complaints.

4. Policy Work

On an ongoing basis, the Office is working to evaluate and improve the resources available for members, including web page redesign and refinement, consolidation and reissuance of bulletins and memoranda issued by the Commissioner.

During my term, I hope to consult and bring recommendations forward to modernize the Code of Conduct (including the recommendations made by Commissioner Leiper during her term) and the Complaint Protocol. I intend to provide more specific observations about these areas in the 2015 annual report.

In addition to these ongoing activities, there are three significant policy matters in progress: Participation and development of submissions in relation to the recently-announced Provincial Review of Municipal Legislation; Review and development of social media policy; and, roll out of the Toronto Public Service Bylaw. I will address each of these in turn.

Provincial Review of Municipal Legislation

On June 5, 2015, the Ministry of Municipal Affairs and Housing announced a long-awaited review of the provincial legislation that deals with the conduct of members of City Council across Ontario. The review includes the *Municipal Act, 2001*, the *City of Toronto Act, 2006* and the *Municipal Conflict of Interest Act*.

At present, the accountability framework for members of Council is fragmented, inaccessible and unnecessarily complex. This is because there exists two regimes for compliance. Members of Council and Local Boards (Restricted Definition) are bound by the *Municipal Conflict of Interest Act* in relation to conflicts of interests that arise from pecuniary interests. Members are also bound by a Code of Conduct and can be subject to investigation for failure to comply. Members of Council in Toronto are free to seek binding advice from the Integrity Commissioner in relation to Code compliance but not compliance with the *Municipal Conflict of Interest Act*. The problems with the existing

regime are well documented in the annual reports of this Office⁵ and in the Inquiry Report authored by Justice Cunningham in relation to the Mississauga Judicial Inquiry⁶.

It is therefore extremely welcome news that the Province has decided to consult and review the framework so that it can be modernized and improved. The first part of the review is the consultation.

I have already begun my work to participate in this review. In mid-June I, along with several other municipal integrity commissioners and other accountability officers, participated in a half-day consultation session with senior ministry staff to provide perspectives on the role of integrity commissioners. The meeting was extremely productive and launched the start of a conversation that will last throughout the summer and fall.

Although my preparations to make formal submissions to the Ministry are in their preliminary stages, my recommendations will focus on the following themes:

- Simplifying and bringing together the *Municipal Conflict of Interest Act* with Part V of the *City of Toronto Act, 2006*. The end result ought to be a unified framework that enables Councillors to seek and rely on advice sought in good faith from the Integrity Commissioner in relation to both conflicts of interest and other code compliance. Conflicts of interest ought to have a meaning consistent with the definitions used at the Provincial and Federal levels and not be restricted to avoidance of conflicts relating to pecuniary interests only.
- Formally enhancing the independence of the Integrity Commissioner.
- Introducing mandatory disclosure of financial interests of elected officials similar to the model in place for Members of Provincial Parliament or Members of Parliament. There are no mandatory financial disclosure reporting obligations at the municipal order of government in Ontario. In my view, there is no reasonable basis for the disparity of financial disclosure obligations for elected officials among the various orders of government.

⁵ 1. [Interim Report of the Integrity Commissioner – April 11, 2005, page 7](http://www.toronto.ca/legdocs/2005/agendas/council/cc050412/nomj%2834%29.pdf)
(<http://www.toronto.ca/legdocs/2005/agendas/council/cc050412/nomj%2834%29.pdf>)

2. [May 8, 2006 – Integrity Commissioner Annual Report for September 1, 2004 to December 31, 2005, page 14](http://www1.toronto.ca/City%20Of%20Toronto/Integrity%20Commissioner/Shared%20Content/Files/integrity-commissioner-annual-report-2005-2006.pdf)
(<http://www1.toronto.ca/City%20Of%20Toronto/Integrity%20Commissioner/Shared%20Content/Files/integrity-commissioner-annual-report-2005-2006.pdf>)

3. [July 8, 2008 – Integrity Commissioner End of Term Report – 2008, page 10-11](http://www.toronto.ca/legdocs/mmis/2008/cc/bgrd/backgroundfile-14756.pdf)
(<http://www.toronto.ca/legdocs/mmis/2008/cc/bgrd/backgroundfile-14756.pdf>)

4. [July 29, 2009 – Integrity Commissioner Annual Report 2009, page 11](http://www.toronto.ca/legdocs/mmis/2009/cc/bgrd/backgroundfile-22620.pdf)
(<http://www.toronto.ca/legdocs/mmis/2009/cc/bgrd/backgroundfile-22620.pdf>)

⁶ [Report of the Mississauga Judicial Inquiry: Updating the Ethical Infrastructure](http://www.mississaugainquiry.ca/report/pdf/MJI_Report.pdf) by The Honourable J. Douglas Cunningham (http://www.mississaugainquiry.ca/report/pdf/MJI_Report.pdf)

Review of Social Media Policy

Prior to the October 2014 municipal election, Commissioner Leiper provided a comprehensive report and recommendations about the use of social media during the election. Council debated the matter and approved an interim policy for the 2014 election, requiring the Integrity Commissioner to review and make recommendations for a comprehensive policy after the election.

I have begun the work to review and recommend a new policy. I plan to bring forward a comprehensive proposal for social media use at all times in early 2016 or sooner. My review will allow an opportunity for councillors and the public to comment on social media use.

Toronto Public Service Bylaw

The Toronto Public Service Bylaw has two key implications on the Office of the Integrity Commissioner. First, the Bylaw provides additional duties to the Commissioner to receive and deal with allegations of wrongdoing by members of council (distinct from breaches of the Code of Conduct). This function may require development of new processes.

Secondly, passage of the Bylaw presents an opportunity to reaffirm and deepen the understanding of the unique roles held by City Council, members of council and the Toronto Public Service. I plan to develop resources and raise awareness among members of council about how the Toronto Public Service Bylaw correlates with their duties under the Code of Conduct.

BUDGET AND FINANCIAL INFORMATION

The 2015 approved budget for the Office is \$427.6 thousand, which includes the annualization impact of transitioning from a part-time to full time Commissioner and an enhancement for the creation of one Investigator/Analyst position.

The recruitment process for the new position is in its final stages and I hope to have the position filled in the very near future. With the addition of this position, the Office has three members: the Integrity Commissioner, the Intake & Office Assistant and the Investigator/Analyst.

The expenses of the Office during the reporting period are attached to this report as Appendix 2.

LOOKING AHEAD

It is my goal that the work of this Office will help to enhance the confidence and trust residents have in their local government. This can be achieved by: helping elected and

appointed officials understand the high standards of conduct expected of them; providing advice to assist elected and appointed officials to meet these standards; and, by investigating when allegations of Code of Conduct contraventions are made.

Like City Council and Local Boards, the past year has been at time of transition. But, also like City Council and Local Boards, the work continues. The Office will build on the foundation established by City Council through its establishment of Chapter 3 of the *Toronto Municipal Code*, the Code of Conduct and the Complaint Protocol; and, by my predecessors who brought wisdom, principle and optimism to the role.

Toronto's first Integrity Commissioner, David Mullan, was appointed on September 1, 2004. Therefore, during this reporting period, the City of Toronto marked its tenth year with an Integrity Commissioner, a significant milestone. It is a great privilege for me to work within what is now a mature and high-functioning accountability framework at the City of Toronto. I look forward to the term ahead.

Valerie Jepson
Integrity Commissioner
June 30, 2015

Attachment(s): Appendix 1 – Summary of Activities of the Office of the Integrity Commissioner July 1, 2014 – June 30, 2015 (5 pages)
 Appendix 2 – Integrity Commissioner Office Expense Budget Actuals July 2014 – June 2015 (1 page)