

Most organizations are required to register before they lobby about a grant application. Not-for-profit community services organizations are exempt from this requirement.

Communicating with assigned grants review staff does not require registration

The City has established application processes specific to its different grants programs. In general, staff consults with applicants, provides direction and assistance, reviews the applications, and makes recommendations to Council concerning grants and appeals.

The lobbyist registration requirement does not apply to grant and funding applicants when they communicate with staff who have a role in the administration of the application review process.

Communicating with other public office holders does require registration

However, if the applicant communicates with Councillors, or staff who do not have a role in the administration of the application review process, in order to encourage support of their application, it is lobbying for the purposes of the lobbyist registration requirement. The applicant must be registered.

In the course of making a grant application, the appropriate people for applicants to speak to should be made known to them in order for the application to be filed and processed. In other words, the staff that are in the process of handling the application should be evident.

Relationships with Councillors

Those not-for-profit organizations that are applying for grants, like all city constituents, are free to establish a relationship with their City of Toronto Councillors, particularly those in their Ward. This typically involves meetings to explain the mandate and services of the organization, inviting Councillors to visit their establishment or participate in events they hold or participate in as an organization. None of these activities are lobbying that requires registration and should be encouraged as part of engagement with the City government. It is given that the grant application will not be discussed at such events. The Municipal Code Chapter 140 is clear that lobbying is not to occur at special events; however, if the lobbying is registered and both parties agree in advance, then such discussions may occur at any venue.

Should an event be staged for the purpose of lobbying and it includes any gratuitous offerings to City Officials, then this must be evaluated both in relationship to the Lobbyist Registrar, the Councillors Code of Conduct, the employee Conflict of Interest Policy, and the City's procurement protocols.

Definitions for the Purposes of Grant Applicants:

Lobbyist – a person who for payment of fee or salary or a volunteer communicates with a public office holder for the purpose of lobbying regarding a grant application.

Lobby – to communicate with a public office holder about matters of interest or benefit to the lobbyist and/or whom they represent. That would be either their organization or business or client. The communication would be regarding a decision, award or approval to be recommended or made by a public office holder.

Communication – you do not have to register if you are communicating on a grant application in the following circumstances:

- Communicating with public office holders in situations that are part of the public record, such as communication during a meeting of Council or a local board, a City-sponsored public meeting, hearing, open house, consultation or media event related to an application.
- Requesting information, materials, instructions, direction, etc. regarding the grant process.
- Providing compliments, making complaints or providing feedback on services or programs related to the grant application process.
- Responding directly to a written request from a public office holder.
- Communicating about the application of the grant requirements.
- Making applications for a service, grant, or taking part in the formal application review or approval process.
- Communicating about a personal matter unless it is for the special benefit of the individual, business or organization.

**For more detailed information and registration, please visit our website
www.toronto.ca/lobbying**