



OFFICE OF THE INTEGRITY COMMISSIONER

ANNUAL REPORT 2017

January 24, 2018

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Commissioner's Message

I am pleased to provide City Council with the 2017 Annual Report for the Office of the Integrity Commissioner.

As explained in more detail in the pages of this report, my Office uses the resources allocated by City Council to: provide education and advice to members of Council and local boards; investigate complaints; provide information and advice to City and agency staff; engage in policy review in the area of ethics and integrity; develop the Office's institutional capacity; and, work with and provide advice and support to other similar offices.

In 2017, the priorities of the Office were: investigations; direct education and outreach to local boards; advice-giving to members of Council and local boards; policy review required as a result of coming changes to the jurisdiction of the Office; policy review requested by City Council regarding the code of conduct for local boards.

In this message, I will highlight progress in developing a culture of advice-seeking across local boards, the impact of upcoming changes to the jurisdiction of this Office and highlight how the Toronto accountability officers work together.

Local Boards are Seeking Advice

In 2017, I provided educational sessions to 23 of Toronto's local boards, as well as additional sessions to umbrella groups representing or supporting local boards. This outreach is vital because many boards do not have the same level of staff support as City Council and those who serve on these boards are volunteers. Yet, these volunteers are expected to meet the same high standards of conduct to which members of Council are bound. In order to meet the standards, one must know about them and have a resource available to seek advice. My Office has a role to play in raising this awareness.

Core Objectives of the Integrity Commissioner

Provide timely, accurate, consistent and practical responses to requests for advice (policy and compliance) from members of Council and local boards.

Carry out investigations in a fair and appropriately thorough manner to respond to formal complaints.

Provide and deliver education and outreach to stakeholder groups.

Provide resources for all stakeholders that are consistent, accessible, practical and clear.

Position the Office of the Integrity Commissioner to perform all duties in as transparent a manner as possible, consistent with the principles of open government, while respecting the secrecy obligations imposed by the *City of Toronto Act, 2006*.

Maintain and build on the Office of the Integrity Commissioner's reputation as thought leader in the field of ethics and integrity for elected officials.

Maintain and build on the Office of the Integrity Commissioner's reputation as a key resource within the City of Toronto for advice, information and guidance about ethics and integrity.

Build up the Office of the Integrity Commissioner's institutional structures for long term sustainability.

Direct outreach to local boards is having an impact. In 2015, I provided 15 pieces of advice to members of local boards. This number has increased significantly and in each of 2016 and 2017, I provided about 40 pieces of advice to board members.

Changes to the Jurisdiction of the Integrity Commissioner

In 2017, *Bill 68 – Modernizing Ontario's Municipal Legislation Act, 2016* ("Bill 68") was passed into law and we learned that the changes will come into force on March 1, 2019. As I have previously advised City Council, the changes in Bill 68 represent a watershed moment for local government ethics and integrity in Ontario. Bill 68 amends the *Municipal Act*, the *City of Toronto Act, 2006* and the *Municipal Conflict of Interest Act* to require that all municipalities have an integrity commissioner to carry out a full range of functions including:

- providing advice about the application of codes of conduct, city policies and the *Municipal Conflict of Interest Act*;
- providing education to members of councils, local boards and the public about the codes of conduct and the *Municipal Conflict of Interest Act*;
- receiving and investigating complaints about compliance with codes of conduct and the *Municipal Conflict of Interest Act*; and,
- after an investigation, bringing applications to Court regarding contraventions of the *Municipal Conflict of Interest Act*.

In addition to these changes, amendments to the *Municipal Conflict of Interest Act* will:

- expressly enable a judge reviewing a *Municipal Conflict of Interest Act* application to consider whether the member sought and followed the advice of an integrity commissioner;
- require members of councils and local boards to file written declarations of pecuniary interest with city clerks who will establish a public registry of such interests;
- clarify that it is a contrary to the *Municipal Conflict of Interest Act* for members of councils or local boards to attempt to influence decisions or recommendations made by city or board staff where the member has a pecuniary interest;
- include additional remedies available to a Court upon a finding of a contravention (i.e., suspension of pay for up to 90 days, imposition of a reprimand); and,
- enable members of councils and local boards to participate in council or board debates about the imposition of a penalty upon them after a report from an integrity commissioner.

Due to the magnitude of the changes, I provided information and offered a detailed briefing to members of Council. These briefings took place over the summer and fall. The changes will require revisions to the Toronto Municipal Code as it relates to the Integrity Commissioner and to the complaint procedures. I have been working in consultation with the Office of the City Manager with respect to necessary bylaw amendments.

The changes contained in Bill 68 entrench a number of features of the Toronto model established through Chapter 3 of the Toronto Municipal Code (Accountability Officers). Starting in March 2019, the model that Toronto City Council pioneered on its own initiative in 2004 will be replicated in every municipality in Ontario. In my view, Toronto City Council should be proud that the Ontario Legislature has made mandatory many of the features that have long been in place in Toronto.

The Need for More Resources

I remain concerned about the length of time it takes to complete investigations and it is for this reason that I have consistently made requests to City Council to increase funding to this Office to enable me to respond in a more timely fashion to high case volumes or complex cases. The need for additional funding is now acute because of the passage of Bill 68. My concerns regarding this issue are outlined in my November 27, 2017 report to Budget Committee.

Working Together with Other Accountability Officers

Together with the Auditor-General, the Lobbyist Registrar and the Ombudsman, this Office forms part of the most comprehensive accountability framework at the local level in Canada. While our work must be carried out independently due to distinct mandates and statutory responsibilities, our offices work proactively to cooperate and coordinate pursuant to the terms of the a Memorandum of Understanding dated October 19, 2015. Our Memorandum of Understanding is our charter document that enables us to transparently and effectively share information and support each other where appropriate.

The Year Ahead

For the first half of 2018, I have placed a priority on: finalizing policy work related to a review of the Code of Conduct for members of Local Boards (completed in early January); completing open investigations regarding members of Council; issuing clear and useful guidance to members of Council standing for re-election; and, preparing the Office for its new duties.

Due to competing priorities, I will conclude policy work regarding councillor offices partnering with unions and councillor's role in charitable fundraising at the beginning of the next term of Council.

Respectfully,



Valerie Jepson
Integrity Commissioner
January 24, 2018

Report on Activities

The Office of the Integrity Commissioner's work consists of four main activities:

- Providing timely advice to members of Council and local boards.¹
- Reviewing and investigating complaints about alleged Code of Conduct contraventions.
- Providing education and outreach to improve awareness of the Code of Conduct and the Integrity Commissioner as a resource.
- Providing policy recommendations.

What follows is a descriptive overview of the work completed in 2017. Detailed statistical information summarizing the Office's activities can be found in Appendix 1.

Section 1: Providing Timely Advice to Members of Council and Local Boards

Providing advice is the most important function that an integrity or ethics commissioner performs. The codes of conduct for elected and appointed officials are principles-based documents that often require application to specific circumstances. The Commissioner is available as a resource to members of Council and local boards to help understand how the codes of conduct apply to new circumstances and, hopefully, to prevent problems before they occur.

The Commissioner provided 193 pieces of advice during this reporting period and did so in a timely fashion. Advice was provided in two days or less to members of Council 94% of the time, and to members of local boards 87% of the time.

The following are samples of advice provided in 2017. These summaries are intended to help elected and appointed members identify possible issues under the relevant code of conduct, but are not a replacement for advice applicable to specific circumstances. Where necessary, the feminine pronoun is used throughout the summaries to ensure that advice remains anonymous.

¹ The Integrity Commissioner's jurisdiction respecting local boards is over "local boards (restricted definition)", as that term is defined in s. 156 of the *City of Toronto Act, 2006* ("COTA"). In this report, they are referred to as "local boards."

Sample Advice to Members of Local Boards

Sample 1 – Can an Adjudicative Board Member Engage in Political Activities?

Request

A member of an adjudicative board sought advice about whether she could become involved in a campaign respecting a community issue—such as writing to the Provincial Minister of the Environment and making submissions to Toronto City Council (or committees) regarding the issue.

Advice

In consideration of the circumstances, the Commissioner made the following observations:

- There was no overlap between the proposed activities and the board's jurisdiction.
- Public statements related to the campaign could reveal biases or perspectives that may concern members of the public who appear before the board.
- The proposed activities could carry a profile, and even if the member did not identify herself as a board member, her involvement could attract attention to the board.
- If the member decided to make representations to Council or its committees, she would need to ensure that she was clear which role she was playing when interacting with City staff.
- Article XVI (Independent Nature of Adjudicative Boards) of the Code of Conduct for Members of Adjudicative Boards identifies the chair of each adjudicative board as having a role to ensure that the actions of members are "consistent with the arm's-length, quasi-judicial nature of the adjudicative board."

The Commissioner advised the member to first discuss the potential activities with the Chair to seek views about whether the Chair had any concerns. The Commissioner further advised that if the Chair did not raise any concerns, the member could become involved with the campaign, under the following conditions:

- The member should not personally make any written or verbal representations directly to City Council or a committee.
- The member should not use her title as a board member when engaging in the proposed activities.

Sample 2 – Can a Board Member Sit on the Board of a Major Stakeholder Organization?

Request

A member of a local board asked whether it was permissible to sit on the board of a major stakeholder organization of the local board.

Advice

In consideration of the fact that the stakeholder organization is a major stakeholder of the local board, the Commissioner advised that it would be best for the member to be on one board or the other, but not both. The Commissioner explained that due to the magnitude of the interest of the stakeholder organization in the work of the local board, it would be difficult for the member to reconcile competing duties to each board.

For example, the Commissioner explained that the member, while acting for one board, could easily come into contact with confidential information that was of interest to the other board, and it would be difficult to manage these competing interests and, in fact, could give rise to reasonable concerns on the part of other stakeholders about whether the stakeholder organization stood to receive preferential treatment.

Sample 3 – Can a Board Member Sit on the Board of a Possible Stakeholder Organization and if so What Actions are Required to Deal with a Possible Conflict?

Request

A member of a local board sought advice about how to meet the obligations in the Code of Conduct and/or the *Municipal Conflict of Interest Act* respecting her duties as a board member of a corporation that could possibly be impacted by decisions of the local board.

Advice

The Integrity Commissioner advised that because the member did not stand to personally receive any financial benefit from the corporation, the *Municipal Conflict of Interest Act* did not *prohibit* her from participating in any decision relating to the corporation that may come before the Board.

However, the Commissioner advised that as a director of the corporation the member owed a fiduciary duty to that corporation, and it would be impossible to participate in any decision *of the local board* about the corporation in a neutral and open-minded way. Therefore, the Commissioner advised that the member should recuse herself from participating in any decision about the corporation. The Commissioner recommended

that the member disclose her involvement with the corporation so that matters relating to the corporation – should they arise – could be screened from her.

Sample 4 – Providing Services to the Local Board

Request

On an emergency basis, a local board hired one of its board members to provide services to the board, for payment. The services provided related to a key project of the board and the board member was paid a significant amount of money for the services. The member sought advice about whether she could maintain both roles in the future.

Advice

The Commissioner acknowledged that the board found itself in a difficult situation in the past, causing it to hire a board member to provide the services. However, the Commissioner advised that due to the magnitude of the project and the amount of money, the board member should not maintain both roles in the future.

Sample 5 – Can a Committee of Adjustment ("CoA") Member Attend a Toronto Local Appeal Body ("TLAB") Meeting as an Observer?

Request

A member of the CoA sought advice about whether she could attend a TLAB hearing – the body which considers appeals from the CoA – as an observer, regarding a property that the member lives near.

Advice

The Commissioner advised that it would be best if the member did not attend the TLAB hearing. The Commissioner explained that it would be improper for any CoA member to advocate or present a view about the merits of an appeal from one of its decisions and the member's attendance could be viewed as supportive of the CoA's initial decision.

Sample 6 – Seeking Employment with an Organization Overseen by the Board

Request

A member of a local board was interested in applying for a job with the City organization for which she served as a board member, and she sought advice about whether there were any relevant Code of Conduct considerations. The hiring decision was to be made by one of the main staff liaisons to the board.

Advice

The Integrity Commissioner advised the member that if she wished to apply for the job, it would be best to resign from her current position as a board member. In providing this advice, the Commissioner considered the board member's duty not to use her position as a board member for improper influence (Article VIII (Improper Use of Influence)); and, how the situation could raise questions about the integrity of the hiring process and place the staff liaison person in a difficult situation.

Sample Advice to Members of Council

Sample 1 – Promotion of Fundraising Campaign in an E-newsletter

Request

A member of Council sought advice about whether she could include information in her E-newsletter about a volunteer and fundraising initiative for a hospital. The member had no personal connection or role to the hospital.

Advice

The Commissioner reviewed the information that the Councillor sought to include and previous e-newsletters. The Commissioner advised that the Councillor could include the information in the E-newsletter and provided suggested language to ensure that it was clear that the purpose of the posting was to raise awareness of the initiative and that it was not a request for donations from the Councillor.

Sample 2 – Managing Constituent Concerns When a Councillor has a Conflict of Interest

Request

A member of Council sought advice about how to manage constituent concerns about a property that the Councillor lived near and for which the Councillor intended to declare an interest under the *Municipal Conflict of Interest Act*. The Councillor wanted to ensure that residents were being properly represented, but recognized that she could not be involved. Another councillor had agreed to assist with constituent calls in relation to the property.

Advice

The Commissioner advised the Councillor to: document the agreement of the other councillor to assist with the matter; inform all staff in her office that calls regarding the property should not be answered but referred to the other councillor; and, be clear with callers about the reason why the Councillor could not be involved.

Sample 3 – Request to Provide a Generic Reference Letter by a Developer for Use in Another Municipality

Request

A member of Council was asked by a developer with whom the Councillor had dealings to provide a reference letter addressed "To Whom it May Concern" for use by the developer in another municipality. The Councillor asked whether it was permissible to provide such a letter.

Advice

The Commissioner explained that if the Councillor had sufficient information to provide a meaningful reference, it would be permissible to write a letter of reference, but it should be addressed to a specific person in the municipality and not "To Whom it May Concern." Further, the Commissioner explained that in consideration of Article VIII (Improper Use of Influence) of the Code of Conduct the letter should be neutral and not give the impression that she spoke for either City Planning or City Council.

However, the Commissioner advised that if the Councillor wished to remain neutral toward this particular developer – and there was a possibility of future development activity in Toronto – it would be best for the Councillor to decline to provide the letter.

Sample 4 – Councillor Attendance at Toronto Local Appeal Body ("TLAB") Hearings

Request

A member of Council asked whether it was permissible to attend and observe a TLAB hearing.

Advice

The Commissioner referred the member to the September 2016 report titled "Councillor Conduct in Relation to the Toronto Local Appeal Body,"² in which the Commissioner recommended to Council that members and their staff not appear before the TLAB to make representations regarding specific matters. The Commissioner advised that attending a TLAB hearing as an observer was different than making representations and the Councillor's proposed actions were in accordance with the advice provided in the 2016 report.

² [Councillor Conduct in Relation to the Toronto Local Appeal Body](#), September 28, 2016.

Sample 5 – Attending a Fundraiser for a Provincial Election Candidate

Request

A member of Council sought advice about whether or not she could attend a provincial candidate's fundraising event.

Advice

The Commissioner advised that the member could attend the event as long as there was no use of City resources.

Sample 6 – Invitation to Attend a Developer's "Open House" Marketing Event

Request

A local developer invited a member of Council to an open house regarding an upcoming development proposal. The Councillor sought advice, as she was concerned her attendance would send a message that she supported the application, which had not yet been submitted.

Advice

The Integrity Commissioner acknowledged that in consideration of the circumstances, the Councillor's caution to minimize the perception of support was warranted. The Commissioner advised that because the setting and event could not be controlled, and nor could the perception of support be minimized, it would be better if the Councillor did not attend the event. (The event was not a pre-application community meeting.)

Sample 7 – Appearance at the Ontario Municipal Board ("OMB")

Request

A member of Council sought advice about whether she could appear at the OMB to make representations regarding a particular land-use planning matter in her ward.

Advice

The Commissioner advised that the member could make representations to the OMB. The Commissioner contrasted the OMB with the TLAB (see Sample 4, above) and explained that there are no independence issues at stake with the OMB because it is a provincially-appointed adjudicative board. The Commissioner also advised the member that she should inform the City Solicitor of her intention to appear.

Sample 8 – Request to Solicit Referrals from a Local Business

Request

A local business contacted the Councillor's office to request that the Councillor refer constituents to the local business to take advantage of *pro bono* services being offered. The Councillor sought advice about how to respond.

Advice

The Integrity Commissioner advised that it was inappropriate for a Councillor to refer constituents to local businesses whether the service offered was *pro bono* or for a fee. Referrals are not part of routine councillor business, and to do so would raise a number of concerns including creation of the appearance of a business connection when one did not exist.

Sample 9 – Sponsored Travel Declarations

Members of Council are invited by other governments or conference organizers to travel to participate in conferences, tours or other similar engagements. This is commonly referred to as sponsored travel. Exception (f) in Article IV (Gifts and Benefits) of the Code of Conduct permits this type of benefit and requires public disclosure.

Although the Code of Conduct only requires disclosure after the councillor returns, the Commissioner recommends that members of Council seek advice prior to accepting travel so that any issues can be resolved before the funds are spent. If sponsored travel is not permitted, the member may be required to reimburse the funds.

Several Councillors sought advice about whether they could accept sponsored travel from conference organizers and other governments prior to travelling. When advice is sought in advance, the post-travel disclosure becomes an administrative process and reduces the risk of repayment.

Section 2: Receiving, Reviewing and Investigating Complaints

The Office handles all complaints received in accordance with the applicable Complaint Protocol, which provides both formal and informal procedures to resolve complaints. The Office's activities in relation to each are described below.

Formal Complaints

Complaints Dismissed at Intake Review

When a formal complaint is received, it is reviewed before a full investigation is commenced. The Complaint Protocol provides that the Integrity Commissioner shall

dismiss complaints for which there are insufficient grounds to cause an inquiry, or when the complaint's subject matter is not within the scope of the Code of Conduct—such as dissatisfaction with the way a member of Council represents a resident's interests, or an allegation that a member has contravened the *Municipal Conflict of Interest Act*, which as of 2017 remained the jurisdiction of the courts.

In 2017, complaints involving 10 members were dismissed on the basis of being outside the Commissioner's jurisdiction or there being insufficient grounds to investigate.

Below are sample case summaries of reports dismissed at the intake stage; they are provided to raise awareness about the Integrity Commissioner's jurisdiction. When necessary, the masculine pronoun is used throughout the summaries to ensure that the complaints remain confidential.

Case Summary 1 – Allegation of Theft of Intellectual Property

A member of the public submitted a formal complaint that a former councillor contravened Articles V (Confidential Information), VIII (Improper Use of Influence), IX (Business Relations), and XIV (Discreditable Conduct) of the Code of Conduct for Members of Council due to the Councillor's alleged unauthorized use of the Complainant's idea in a new program at a City agency.

The Complainant did not include any information to support how his idea was communicated to the agency or the former councillor. There was therefore insufficient information to require an investigation.

The Commissioner considered whether a complaint can be made about a person who – at the time of the complaint – is no longer a member of Council. The *City of Toronto Act, 2006* and Chapter 3 of the Toronto Municipal Code do not specifically address the Commissioner's jurisdiction to receive new complaints about former members of Council. The Commissioner previously determined that the Office has jurisdiction to complete an investigation into a former member when the complaint was made while the person was a member of Council. The Commissioner did not make a final determination on this issue in this case, because the complaint contained insufficient information and was dismissed on that basis.

Case Summary 2 — Allegations of Failure to Adhere to Local Board Policies or Procedures (Activities Unrelated to Board Work)

A member of the public submitted a formal complaint that a member of a local board contravened Article XV (Failure to Adhere to Council or Local Board Policies and Procedures) of the Code of Conduct for Members of Local Boards (Restricted Definition) for actions taken in relation to a building owned by the member.

The complaint alleged that the member completed construction without a required building permit and accordingly contravened Article XV of the Code. However, the conduct alleged in the complaint was unrelated to the Respondent's position as a board member. The Commissioner therefore determined that the Code did not apply and dismissed the complaint on that basis.

Case Summary 3 – Allegations of Failure to Follow Local Board and City Policies (Challenge to Quasi-Judicial Decision-Making)

A member of the public submitted a formal complaint that certain Committee of Adjustment ("CoA") members contravened Article XVIII (Failure to Adhere to Council or Adjudicative Board Policies and Procedures) of the Code of Conduct for Members of Adjudicative Boards on the basis of decisions rendered in their capacities as members of the Committee. The Complainant alleged that the Respondents failed in their decisions to correctly interpret and apply the City of Toronto's Official Plan and information published by the City Planning Department.

The Commissioner determined that the complaint was not about non-compliance with the Code of Conduct (or City policies), but rather about the merits of the decisions made by panels of the CoA and whether those decisions were reasonable or correct. The Commissioner dismissed the complaint on the basis that a determination about the correctness or reasonableness of a decision made by a quasi-judicial body is not within the jurisdiction of the Integrity Commissioner.

Case Summary 4 – Allegations of Lack of Constituency Representation

A member of the public submitted a formal complaint that a member of Council contravened the Code of Conduct for Members of Council for failing to take actions supporting the Complainant's position on a matter before City Council. The Complainant believed his ward councillor should have made greater advocacy efforts on his behalf.

The Commissioner dismissed the complaint on the basis that dissatisfaction with the manner of representation provided by a local councillor is an insufficient basis, without other alleged misconduct, for a Code of Conduct complaint. These types of issues can be raised directly with the councillor, or ultimately be taken into consideration by the constituent at election time.

Investigations

When a complaint is within jurisdiction and sets out sufficient grounds to cause an inquiry, the Commissioner follows the process set out in the Complaint Protocol. The Protocol requires that the complaint be provided to the member whom the complaint is about for response. The Complainant is then provided with the response, and an

opportunity to provide a reply. The Commissioner then commences an investigation. Investigations are thorough, and consist of: research; compelling City and witness records; reviewing documents; and, interviews, often under oath.

If the Commissioner concludes that a member of Council or a local board contravened the Code of Conduct, she is required to bring the report to Council or the local board, as well as to the Complainant and the Respondent (together "the parties"). In the case of a finding that the Code of Conduct was not contravened, the Commissioner is only required to provide a report to the parties, but can exercise discretion to additionally file the report with Council or the local board.

Reports filed with City Council are available within the record of City Council proceedings, but links can also be found on the Office of the Integrity Commissioner website. Reports filed with local boards are public documents and can be requested from the local board. Some boards post reports with their agendas and minutes on their websites. In certain cases, anonymized forms of reports regarding local boards are available on the Office of the Integrity Commissioner website.

Complaints sustained after investigation

In 2017, two complaints were sustained with findings that a member of Council or a local board contravened the Code of Conduct.

Complaints dismissed after investigation

In 2017, six complaints were dismissed after investigations which found that there were no contraventions of the Code of Conduct. In all cases, the Commissioner exercised discretion to file the reports with Council or the local board because the complaints were well-known, and the reports provided opportunities to assist members of Council or the local board to understand their Code of Conduct obligations.

Complaints settled, withdrawn, or abandoned

In 2017, three complaints were settled, withdrawn, or abandoned.

Complaints still under investigation, suspended or deferred

At the end of 2017, 11 cases remained open, including cases that have been suspended or deferred.

Informal Complaints

The Complaint Protocol contemplates that Code contraventions can be resolved through an informal procedure that is geared toward empowering Complainants to raise Code of Conduct concerns directly with a member. This can be an optimal method of

resolution when the alleged transgression is minor or the issue relates to personal interactions.

Where the parties consent, the Integrity Commissioner can assist in resolving informal complaints. The Commissioner was engaged in four informal complaints during 2017.

Section 3: Outreach Activities

Local Board Outreach and Resource Development

The Integrity Commissioner frequently meets with local boards to improve awareness of the Code of Conduct. Over the past year, the Commissioner personally conducted 23 orientation sessions for local board members. In addition, the Commissioner met with the managers of the City's eight board-managed arenas, senior staff in facilities management, and presented at a session at the National BIA Conference.

The Commissioner also made progress toward improving resources for members of local boards. In October 2017 the Commissioner issued an Interpretation Bulletin³ to assist arena board members to understand how the *Municipal Conflict of Interest Act* and Article VIII (Improper Use of Influence) of the Code of Conduct apply to board decisions about vendors, organizations, and teams that use the arena, but for which the member is also affiliated (e.g., as a player, parent, or member).

Outreach to Members of Council

As in previous years, the Commissioner sent members of Council periodic reminders and updates about Code of Conduct and City policy obligations. In January the Commissioner reminded members of Council of pertinent rules in the Code of Conduct and the *Policy on Use of City Resources During an Election*, in advance of the February 2017 Ward 42 by-election. In March the Commissioner provided members of Council with a reminder of the City's policies and protocols relevant to Community Environment Days. In September the Commissioner provided members of Council with reminders about the use of City resources and social media respecting the 2018 provincial and municipal elections.

Copies of the outreach letters can be found at Appendix 2.

The Commissioner also met individually most members of Council in 2017. The purpose of the meeting was to provide information about upcoming changes to Bill 68

³ Interpretation Bulletin—[Guidance for Arena Board Members About Article VIII of the Code of Conduct and the *Municipal Conflict of Interest Act*](#), October 2017.

(summarized in the Commissioner's Message portion of this Report) and to discuss the issue of councillors' role in charitable fundraising.

Resident, Staff and Media Inquiries

A key part of outreach is responding to the large volume of calls the Office receives from residents, City staff and members of the media. In this reporting period, the Office responded to 266 such inquiries.

The inquiries the Office receives are extremely diverse, but commonly include requests for information about the complaint process and the Code of Conduct, and informal requests for advice about reasonable expectations for appropriate conduct of officials and interpretation of City policies.

External outreach

In 2017, the Commissioner presented to a handful of external groups interested in Toronto's accountability framework and the role of the Integrity Commissioner as well as participated in seminars regarding ethics or ethics programs held by the Council on Government Ethics Law ("COGEL"), the Osgoode Professional Development Program and the Canadian Institute Advanced Administrative Law Seminar.

Section 4: Associations

The Commissioner attended two meetings of the Municipal Integrity Commissioners of Ontario ("MICO"), which is a gathering of integrity commissioners from municipalities across the province. This growing, informal group of practitioners in the field of municipal ethics and integrity has worked collectively to develop best practices and to coordinate responses and input regarding amendments to the *Municipal Act*, the *City of Toronto Act, 2006* and the *Municipal Conflict of Interest Act*.

The Office has also continued efforts initiated by former Integrity Commissioner Leiper, in conjunction with MICO, to establish a database for municipal Integrity Commissioner reports on the free public resource CanLII (Canadian Legal Information Institute). This is an exciting development for integrity commissioners throughout the province that will become more important when Bill 68 comes into force.

Section 5: Policy Work

In 2017, the Commissioner was engaged in several policy matters. The most significant of these was the ongoing work necessary to prepare the Office for changes to the *City of Toronto Act, 2006* and the *Municipal Conflict of Interest Act*. The Commissioner

worked in consultation with the City Manager's Office to determine what changes will need to be made to the Toronto Municipal Code.

Throughout 2017, the Commissioner was actively involved in monitoring progress with respect to Bill 68 and the introduction of a new regulation setting minimum standards for codes of conduct and in early 2018 made submissions to the regulation consultation process.

The Commissioner was also engaged in policy review with respect to review of the Code of Conduct for Members of Local Boards (Restricted Definition) in consideration of the duties of the new Toronto Investment Board and the Toronto Realty Agency Board. This work commenced in summer 2017 and concluded in early 2018.⁴

In 2015, Executive Committee requested that the Integrity Commissioner review the issue of councillors' role in relation to fundraising. This work has been ongoing and, due to competing priorities, the Commissioner plans to report about it early in the term of the next City Council.

In 2017, Executive Committee requested that the Integrity Commissioner review the propriety of Members of Council jointly hosting events with the City's Unions. This work will begin in 2018 and, due to competing priorities, the Commissioner plans to report about it early in the new term of the next City Council.

Budget and Financial Information

The 2017 approved budget for the Office is \$506.7 thousand. As of the date of this report the preliminary expenditures for 2017 are \$499.5 thousand. Details of the expenditures of the Office during the reporting period are attached to this report as Appendix 3.

⁴ [Review of Code of Conduct for Members of Local Boards \(Restricted Definition\), including Adjudicative Boards, the Toronto Investment Board and the Realty Agency Board.](#)

Appendix 1

Detailed Activities and Statistics Report – January 1 - December 31, 2017

Section 1: Advice

During this reporting period, members of Council and local board members received advice via telephone, in writing, or in person. Advice includes requests for information, application of the Code of Conduct or City policies to specific circumstances, and referrals to other resources.

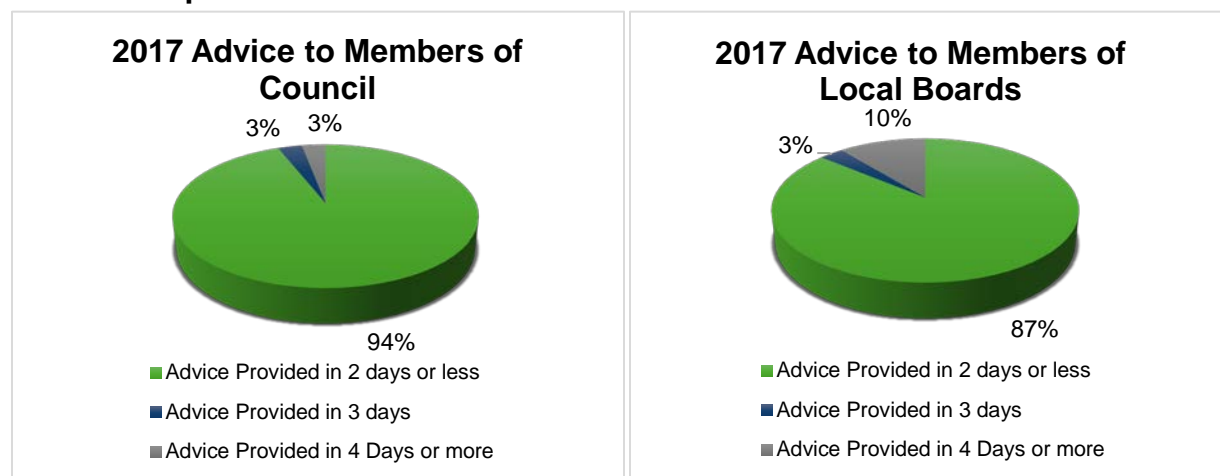
Members of Council

	2015	2016	2017
Advice Provided	170	136	155
Number of Members	39	37	41

Members of Local Boards

	2015	2016	2017
Advice Provided	15	48	38
Number of Boards	10	18	25

Advice Response Time



Section 2: Complaints

The Complaint Protocol sets out the procedure to follow for informal and formal complaints. Informal complaints are resolved by letter, discussion, or meetings without engaging the formal complaint process or requiring a report to Council. Informal resolutions do not require involvement of the Integrity Commissioner. Only those that involved the Integrity Commissioner are included in the statistics below.

Formal complaints are filed by way of sworn affidavit under Part B of the Complaint Protocol and the Integrity Commissioner is required to review the complaints and respond. The Integrity Commissioner receives complaints about members of Council and local boards. The number of complaints under each category and their disposition are set out below.

Members of Council

Total New Complaints Received about Members of Council

	2015	2016	2017
Informal Complaints	14	3	4
Formal Complaints	33	12	16
Total Complaints	47	15	20

Source of New Formal Complaints Received about Members of Council

	2015	2016	2017
Staff	0	2	2
Members of Public	33 ¹	10	11
Members of Local Boards	0	0	1
Members of Council	0	0	2
References from Council	0	0	0
Total:	33	12	16

¹ 18 Complaints were about same or similar conduct and were addressed in one report.

Disposition and Status of Formal Complaints about Members of Council
(Includes complaints carried over from prior year.)

	2015	2016	2017
Dismissed at intake stage (Outside jurisdiction, insufficient information or bad faith)	27	6	5
Dismissed after investigation – No contravention of the Code of Conduct	3	3	2
Sustained after investigation – Code of Conduct contravened	2	7	1
Settled, Withdrawn or Abandoned	0	3	2
Still Under Investigation, Suspended or Deferred	11	4	10

Members of Local Boards

Total New Complaints Received about Members of Local Boards

	2015	2016	2017
Informal Complaints	0	0	0
Formal Complaints	1	9	8
Total Complaints	1	9	8

Source of New Formal Complaints Received about Members of Local Boards

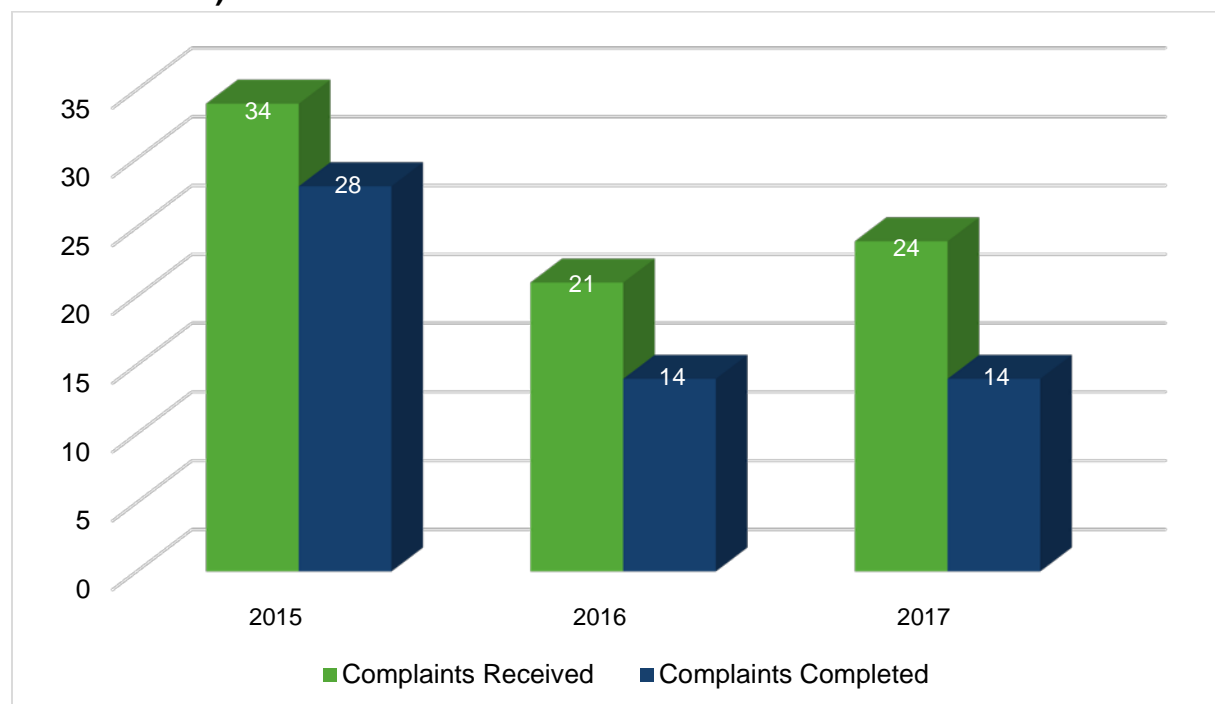
	2015	2016	2017
Staff	0	2	0
Members of Public	0	5	6
Members of Local Boards	1	1	1
Members of Council	0	1	0
References from Council	0	0	1
Total	1	9	8

Disposition and Status of Formal Complaints about Members of Local Boards (Includes complaints carried over from prior year.)

	2015	2016	2017
Dismissed at intake stage (Outside jurisdiction, insufficient information or bad faith)	1	2	5
Dismissed – No contravention of the Code of Conduct	0	1	4
Sustained – Code of Conduct contravened	2	1	1
Settled, Withdrawn or Abandoned	0	2	1
Still Under Investigation, Suspended or Deferred	1	3	1

Efficiency Measurements

Proportion of New Cases Closed in the Year Received (Members of Council and Local Boards)



Time Taken to Close Complaints (Members of Council and Local Boards)

Average Time Taken to Complete Complaints (Tracked since January 1, 2015)	
Complaint Type	Number of Days (Calendar Days)
Investigated complaints	271
Dismissed without investigation	52

Section 3: Inquiries from Residents, Staff and Media

The Office handles request for information from staff, residents, and the media about topics such as how to make a complaint, how complaints are handled through the formal and informal procedures, information about the Code of Conduct, and where appropriate, referrals to other offices and institutions. The Office also responds to inquiries from the Ontario Ombudsman when it receives complaints about matters under the Integrity Commissioner's jurisdiction. All of these inquiries are reported below.

Inquiries

	2015 Inquiries	2016 Inquiries	2017 Inquiries
Resident	222	248	216
Staff	62	48	45
Media	21	17	5
Ontario Ombudsman	N/A	1	1
Total	305	314	267

Section 4: Reporting of Gifts and Benefits

During this reporting period, members of Council made a number of disclosures for gifts and benefits, sponsored travel, and donations to councillor-sponsored community events.

Number of Gifts and Benefits Disclosure Forms Received

	2015	2016	2017
Donor Declaration Forms (Community Events)	16	6	14
Travel declaration Forms	14	11	7
General Gifts and Benefit Declarations Forms	0	0	0
Total:	30	17	21

Section 5: Policy Development, Outreach and Education Summary

The duties of the Commissioner include providing education and outreach and consulting on City policies that involve City of Toronto accountability and transparency. Within the City, this means informing staff and local boards of the Integrity Commissioner's role as a resource for advice and of the obligations of City officials set out in the codes of conduct. As the first municipal integrity commissioner in Canada, the Office also serves as a model and educational resource for other governments and ethics officials.

Outreach and Education

Winter Activities 2017

- Jan 25, 2017 – Downtown Yonge BIA Board of Management Presentation – Role of the Integrity Commissioner
- Feb 10, 2017 – Toronto Local Appeal Body Presentation – Role of the Integrity Commissioner
- Mar 13, 2017 – Crossroads of the Danforth BIA Board of Management Presentation – Role of the Integrity Commissioner
- Mar 20, 2017 – Mount Pleasant BIA Board of Management Presentation – Role of the Integrity Commissioner
- Mar 22, 2017 – Facilities Management Presentation – Role of the Integrity Commissioner

Spring/Summer Activities 2017

- Apr 3, 2017 – National BIA Conference – Role of Integrity Commissioners
- Apr 7, 2017 – Upper Village BIA Board of Management Presentation – Role of the Integrity Commissioner
- Apr 11, 2017 – York-Eglinton BIA Board of Management Presentation – Role of the Integrity Commissioner
- Apr 19, 2017 – Baby Point Gates BIA Board of Management Presentation – Role of the Integrity Commissioner
- Apr 25, 2017 – Eglinton Hill BIA Board of Management Presentation – Role of the Integrity Commissioner
- Apr 25, 2017 – Toronto Licensing Tribunal Presentation – Role of the Integrity Commissioner
- May 31, 2017 – Bloor-Yorkville BIA Board of Management Presentation – Role of the Integrity Commissioner
- Jun 22, 2017 – Toronto Realty Agency Board Presentation – Role of the Integrity Commissioner
- July 19, 2017 – Heritage Toronto Board of Directors Presentation – Role of the Integrity Commissioner
- Aug 9, 2017 – Kensington Market BIA Board of Management Presentation – Role of the Integrity Commissioner
- Aug 28, 2017 – Toronto Administrative Penalty Tribunal Presentation – Role of the Integrity Commissioner

Fall Activities 2017

- Sep 6, 2017 – Weston Village BIA Board of Management Presentation – Role of the Integrity Commissioner
- Sep 26, 2017 – Central Eglinton Community Centre Board of Management Presentation – Role of the Integrity Commissioner
- Sep 27, 2017 – Toronto Atmospheric Fund Board of Directors Presentation – Role of the Integrity Commissioner
- Sep 28, 2017 – Seneca Post Graduate Program Presentation – Integrity Commissioner and Accountability Framework
- Oct 5, 2017 – Property Standards Committee Presentation – Role of the Integrity Commissioner
- Oct 18, 2017 – Bill Bolton Arena Board of Management Presentation – Role of the Integrity Commissioner
- Oct 20, 2017 – York University Public Policy Students Presentation – Integrity Commissioner and Accountability Framework
- Oct 24, 2017 – Annual Advanced Administrative Law & Practice – Interactive Roundtable: A Discussion about Ethics
- Nov 6, 2017 – Toronto Investment Board Presentation – Role of the Integrity Commissioner
- Nov 15, 2017 – Chinatown BIA Board of Management Presentation – Role of the Integrity Commissioner
- Nov 22, 2017 – Leaside Memorial Gardens Arena Board of Management Presentation – Role of the Integrity Commissioner
- Nov 29, 2017 – City of Toronto Arena Managers Presentation – Role of the Integrity Commissioner
- Nov 30, 2017 – Toronto Zoo Board of Director Presentation – Role of the Integrity Commissioner
- Dec 4, 2017 – Council on Government Ethics (COGEL) Presentation – Municipal Ethics Regimes and the Toronto Model

Direct Outreach to Members of Council

- Jan 09, 2017 – Letter re Guidance for the Ward 42 By-Election
- Mar 20, 2017 – Letter re Environment Days 2017
- Sep 11, 2017 – Letter re Election Related Activities
- Summer – Fall 2017 – Consultation meetings regarding Bill 68

Policy Work, Reports and Guidance

Ongoing policy review of Chapter 3 – Accountability Officers of the Toronto Municipal Code and the complaint protocols to prepare for amendments to the *City of Toronto Act, 2006* and the *Municipal Conflict of Interest Act*

Ongoing policy review with respect to review of the Code of Conduct for Members of Local Boards (Restricted Definition) in consideration of the new Toronto Investment Board and the Toronto Realty Agency Board. (Report filed in 2018)

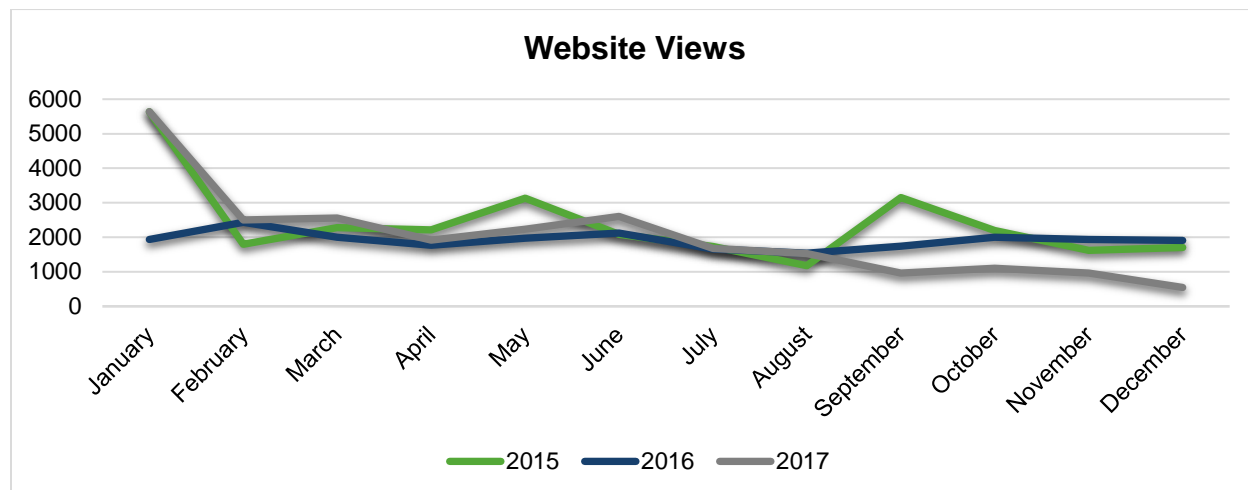
Ongoing work in relation to review of councillor's role in relation to fundraising.

New interpretation bulletin regarding special considerations of Arena Board Members.

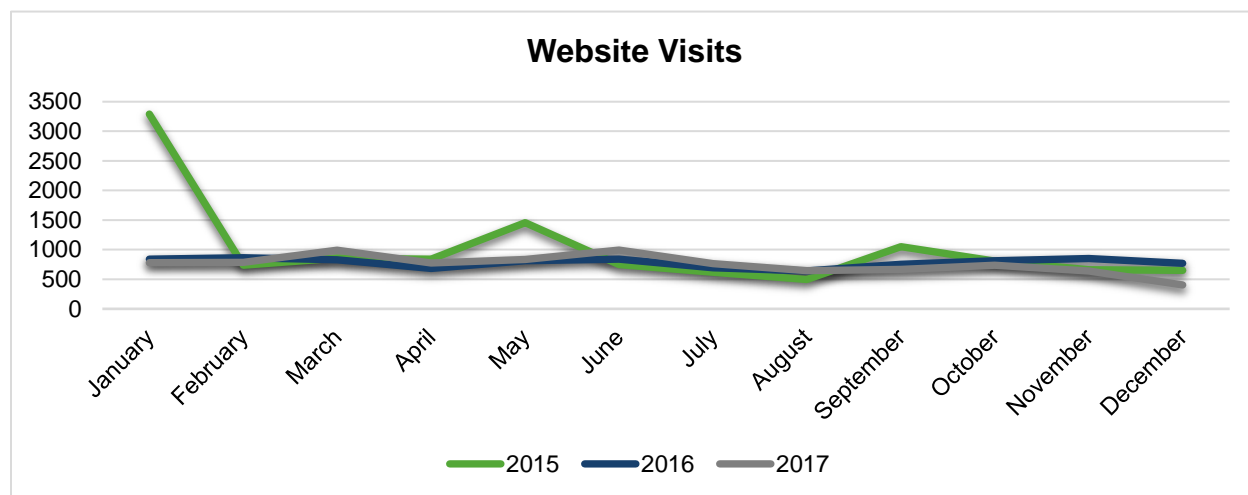
Section 6: Website Visits² and Views³

In addition to receiving direct requests for advice and information, the Office of the Integrity Commissioner's website provides visitors with access to the Codes of Conduct, City protocols and policies, reports to Council, and information for City officials. The following table shows activity for the web site during the reporting period.

Website Views



Website Visits



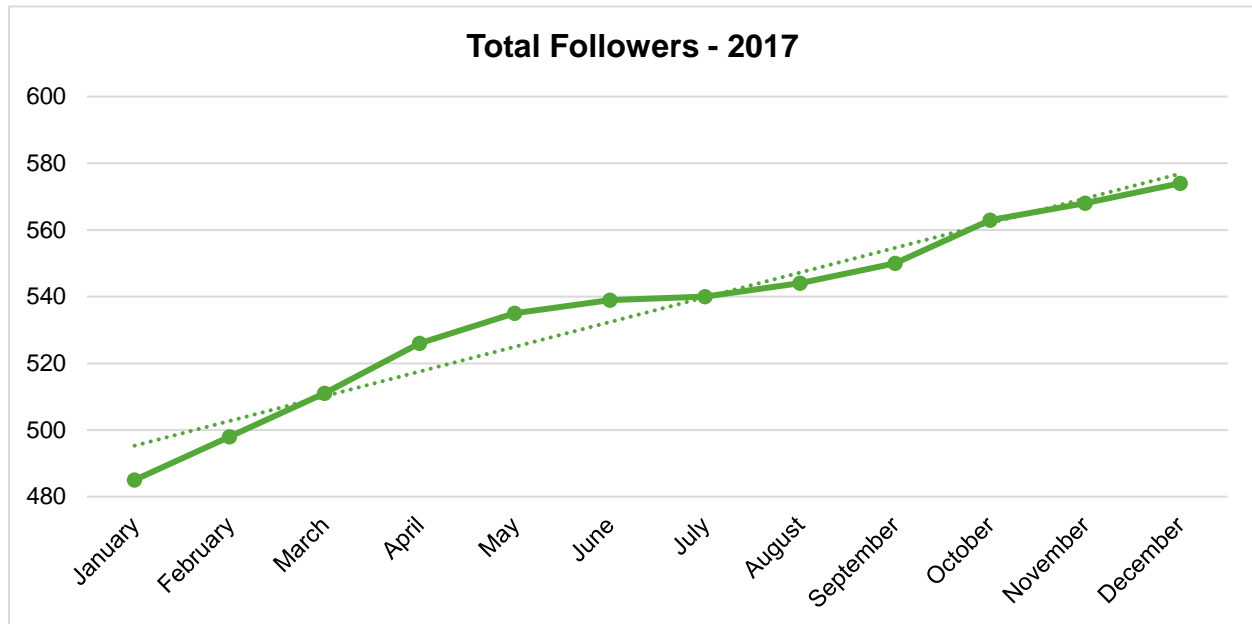
² A visit is a series of page views, beginning when a visitor's browser requests the first page from the internet server, and ending when the visitor leaves the site or remains idle beyond the idle-time limit.

³ A view is a page view that is displayed by a browser. [Web trends Glossary, page 58](http://insidetoronto.ca/itweb/computertraining/pdf/WebTrendsInDepthGuide.pdf) (<http://insidetoronto.ca/itweb/computertraining/pdf/WebTrendsInDepthGuide.pdf>).

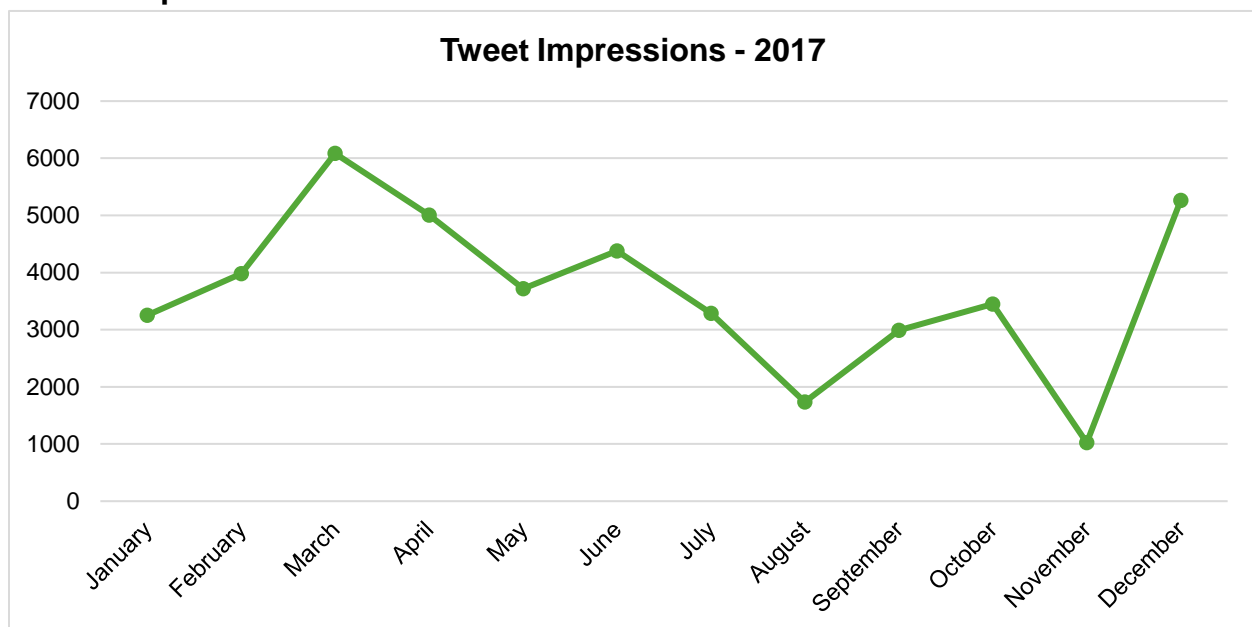
Section 7: Twitter Analytics

The Office of the Integrity Commissioner uses Twitter (@TO_Integrity) to raise awareness of the Office. The following information highlights the Office's Twitter impact.

Twitter Followers

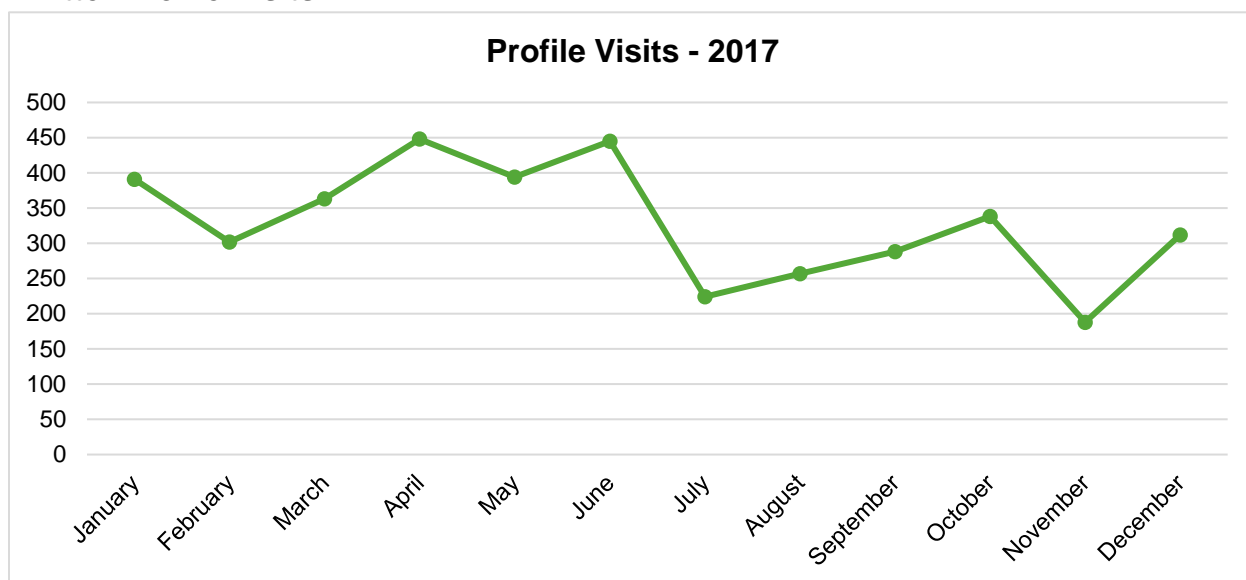


Twitter Impressions⁴



⁴ Tweet Impression – Number of times users are served your Tweet in timeline, search results, or from your profile. (That is, the number of people who saw a tweet from @TO_Integrity.)
<https://support.twitter.com/articles/20172496>.

Twitter Profile Visits⁵



⁵ Profile Visits – Number of times users visited your profile page.
<https://support.twitter.com/articles/20172496>.

Appendix 2



Office of the Integrity Commissioner

375 University Avenue, Suite 202
Toronto, Ontario M5G 2J5

Valerie Jepson
Integrity Commissioner

Tel: 416-397-7770
Fax: 416-696-3615
vjepson@toronto.ca
toronto.ca/integrity

January 9, 2017

Sent By Email (No Original to Follow)

Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Members of Council:

Re: Guidance for the Ward 42 By-Election

The Ward 42 By-Election will occur on February 13, 2017. I am writing to remind members of Council that if you wish to volunteer or support a candidate in the election, you must be guided by [Articles VII and XII](#) of the *Code of Conduct for Members of Council*, the City's Policy on [Use of City Resources during an Election](#) and recent [guidance with respect to use of social media](#).

If you or your staff are interested in supporting or volunteering in the by-election, please keep the following general principles in mind:

- You and your staff may support or volunteer for candidates, but you may not use any City resources, including staff time, smartphones, tablets, your office, your website or computers.
- You may not use your councillor title in any communication, including on social media, related to the election or your support for a candidate.
- You may not use or share constituency contacts for election purposes.

I encourage you to seek advice from this Office about your specific circumstances.

Sincerely,

(Original Signed by Valerie Jepson)

Valerie Jepson
Integrity Commissioner

March 20, 2017

Via Email

Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Members of Council:

Re: Environment Days 2017

At this time of year, many members of Council are working with Solid Waste Management Services (SWMS) to host Community Environment Days. This letter includes some reminders and resources about Environment Days.

Members should keep in mind that Environment Days are co-sponsored by the City and therefore must comply with all of the City's policies and protocols. SWMS has prepared helpful internal guidelines to ensure that the events remain compliant with all necessary policies. A copy of the guidelines is attached for ease of reference.

As noted in the guidelines, members can invite groups that "promote and educate the public on various waste diversion initiatives as well as raising awareness about ongoing environmental issues." Members should consult with staff in SWMS about possible invitees before the request is made to ensure that each invitee is suitable and consistent with the program objectives.

Members who wish to offer services outside of the standard scope of Environment Days should consult with staff in SWMS to ensure that the service is compatible with City programming objectives and City procedures. If members decide to offer such services, they must do so in accordance with the Constituency Services and Office Budget policy.

Donations

Members sometime explore options for obtaining donations for food, beverages or other similar amenities. Members are reminded that such requests must be made in accordance with the Council-Member Organized Community Event Policy and therefore cannot be made to lobbyists, such as Enbridge or Tim Horton's. To be consistent with the Policy, members should not ask third parties or SWMS to seek such donations for the event.

Groups that offer or sell goods or services

Members are sometimes contacted by groups who wish to provide, offer, or showcase a program, product or service at Environment Days.

Members should exercise caution when responding to these unsolicited offers. To gain visibility and to promote itself, a vendor may offer a service to a member at a discounted rate, which would constitute a benefit or a donation to the member. Such vendors may be lobbyists within the meaning of the *Lobbying Bylaw* and are therefore barred from offering any benefit or donation to members of Council. For this reason, members should: (1) confirm that vendors who solicit goods or services are referred to the Office of the Lobbyist Registrar to seek advice about the registry and the Lobbyists' Code of Conduct; and, (2) ensure that any goods and services are purchased at market value. Members can use informal means to determine market value, such as obtaining quotes for similar services.

Similar concerns arise when not-for-profit entities solicit opportunities at Environment Days. If you wish to have such a group attend your Environment Day, you must work with SWMS to see whether their booth is compatible and suitable for the event.

An Environment Day is increasingly seen as an opportunity for businesses and other groups to raise awareness of their business or cause. Members of Council – who represent all interests – may be asked why a particular business or group has been provided the Environment Days platform. Therefore, if you wish to accommodate requests from any group, you must be prepared to answer questions from the public and other similar groups about why you selected the group to appear. My advice is not that you refrain all requests but that you plan ahead, recognize that you are accountable for the complement of groups that do appear and make choices that appear equitable and can be easily explained. I am available to you and your staff to help you weigh the pros and cons of each request.

When in doubt, seek advice

As noted, I am available to you to provide case-specific confidential advice. You can reach me at valerie.jepson@toronto.ca or 416.397.7770.

Best wishes for a successful Environment Day season!

Yours truly,

(Original Signed by Valerie Jepson)

Valerie Jepson
Integrity Commissioner

cc. Cristina De Caprio, Lobbyist Registrar
Winnie Li, Deputy City Clerk, Strategic Integration & Excellence
Derek Tung, Supervisor Solid Waste Management, CS&WDI
Nicole Dufort, Manager Communications Cluster B, Strategic Communications

Enclosure (1): City of Toronto Environment Day Program Internal Guidelines
(1 page)

City of Toronto Environment Day Program Internal Guidelines

As a reminder, Community Environment Days are organized and operated by Solid Waste Management Services. As such, event policies are consistent with City of Toronto and Solid Waste Management Services' policies.

All Community Environment Day participants are to abide by these policies and procedures:

1. Office of the Integrity Commissioner
 - All City staff and Council staff shall be compliant to the high standards of conduct set out by The Office of the Integrity Commissioner
 - For more information, please visit:
<http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=e64f40efd8f30410VgnVCM10000071d60f89RCRD>
2. Purchasing Materials Management Division procedures
 - As per PMMD procedures, the procurement of goods must be made in a fair and competitive process through proper RFP's and RFQ's;
 - City and Council staff must refrain from permitting groups from selling/offering goods and services for monetary gain;
 - For more information please visit <http://insideto.toronto.ca/purchasing/index.htm>
3. Anti-scavenging policy
 - SWMS does not allow the scavenging of waste;
 - Scavenging is also not permitted under Environmental Protection Act R.R.O 1990, Regulation 347;
 - For more information, please visit <http://insideto.toronto.ca/solidwaste/pnp/memo-anti-scavenging-policy.pdf> or <https://www.ontario.ca/laws/regulation/900347>
4. Permit rules, regulations and conditions
 - All City and Council staff shall abide by the rules, regulations and conditions stipulated by the permit for the issued Environment Day location.
5. City Clerk's Office protocols
 - All City and Council staff shall refrain from endorsing any politician or political activity;
 - For more information, please visit <http://insideto.toronto.ca/clerks/>
6. Office of Lobbyist Registrars policy
 - Lobbying By-Laws must be adhered to at all times;
 - For more information, please visit <http://insideto.toronto.ca/lobbyist-registry/index.htm>
7. Guidelines for community groups
 - Community Environment Days is a program designed to promote and educate the public on various waste diversion initiatives as well as raising awareness about ongoing environmental issues;
 - We ask that when inviting groups to attend events, that they are related to the theme of the Community Environment Day program;
 - Please ensure all groups adhere to and sign the "Community Group Participation" Release and Waiver form prior to their arrival. Failure to do so can result in a refusal of their attendance;
 - All participants should report to the event Supervisor upon arrival. No unauthorized person may climb into event trailers or bins. The on-site Supervisor has the authority to ask a person to refrain from any activities deemed unsafe.

We ask that all staff members abide by these policies and procedures. If there are questions or concerns, feel free to contact Derek Tung, Environment Day Supervisor (Derek.Tung@toronto.ca). Thank you for taking part in the City of Toronto Community Environment Day program.

Appendix 2

September 11, 2017

Via Email

Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Members of Council:

Re: Reminder regarding election-related activities

I write further to my education and outreach mandate with some reminders about use of City resources in relation to upcoming elections. Although the provincial and municipal elections are several months away, I have received an increase in the number of inquiries about this issue in recent weeks.

Members are reminded that the election period for the 2018 municipal election does not begin until May 1, 2018. Comprehensive guidance and resources will be provided in time for the election. At this time, please review the following high level advice to help members meet their obligations in the Code of Conduct.

The Code of Conduct and the City's [Policy on Use of City Resources during an Election](#) prohibits use of City resources for any municipal, provincial or federal campaign purpose. City resources include, but are not limited to, City employees (e.g. members' staff), City events, City facilities, City funds, City information and City infrastructure.

Members should review [guidance about use of social media](#) and not post content that promotes any candidate or political party in a municipal or provincial election on any social media account that:

- uses any toronto.ca email address as a point of contact for registration purposes;
- identifies the Councillor as a current member of Toronto City Council in the handle name, the user name or the profile description;
- is publicized on the member's constituency website or the City of Toronto's contact page for members of Council;

- is publicized on business cards, newsletters or other publications eligible to be paid for out of the Constituency Services and Office Budget for the duration of the currency of the publication;
- uses the logo or any other proprietary mark of the City of Toronto;
- contains contact information for the member at City Hall, a ward constituency office, or any other official contact information;
- is managed using City of Toronto resources including computers, smart phones, or tablets; or
- is managed or maintained by City staff, the member's staff or volunteers, or using services eligible to be paid for out of the Constituency Services and Office Budget.

I urge members to err on the side of caution when applying the policies and principles relating to appropriate use of City resources. The Code of Conduct requires members of Council to proactively promote trust and confidence in the integrity of decision-making at the City of Toronto. When members of Council use – or appear to use – City resources for campaign purposes, reasonable people can lose trust in the integrity of decision-making at City Hall.

I am available to members of Council to answer questions about specific scenarios.

Yours truly,

(Original Signed by Valerie Jepson)

Valerie Jepson
Integrity Commissioner

Appendix 3

City of Toronto														
Integrity Commissioner Office Expense Budget														
Actuals January - December 2017														
Charged to Cost Centre IG0001														
OFFICE OF THE INTEGRITY COMMISSIONER														
		January '17	February '17	March '17	April '17	May '17	June '17	July '17	August '17	September '17	October '17	November '17	December '17	January - December '17
Cost Element	Cost Element Name	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Totals
		\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
1015	Full Time Regular Pay	17,282.12	28,803.61	28,803.60	28,803.61	28,803.60	44,418.08	25,495.12	21,583.80	21,583.80	24,329.94	29,157.02	55,916.89	354,981.19
1050	Permanent - Vacation Pay													-
1555	Separation - Salary													-
1711	Comprehensive Medical	419.21	695.72	695.72	695.72	695.72	1,043.58	406.48	406.48	406.48	644.07	695.72	1,321.88	8,126.78
1712	Dental Plan	235.75	392.92	392.92	392.92	392.92	589.38	227.42	227.42	227.42	363.37	392.92	746.55	4,581.91
1720	Long Term Disability	376.47	588.76	588.76	588.76	588.76	908.11	521.74	441.18	441.18	572.92	601.56	1,142.96	7,361.16
1730	Group Life Insurance	129.38	215.62	215.62	215.62	215.62	332.23	189.45	161.36	161.36	209.46	219.92	417.85	2,683.49
1740	Employment Insurance	553.92	553.92	553.92	313.93	247.64	371.47	161.19	104.98	94.20	62.67	179.06	268.59	3,465.39
1745	El Rebate	26.06	43.44	43.44	24.71	19.42	29.13	12.80	8.24	7.43				227.70
1750	Ontario Health Tax	344.08	566.72	566.72	566.35	566.24	873.05	500.65	424.20	424.18	478.53	572.86	1,098.79	6,982.37
1760	Canada Pension Plan	1,398.64	1,398.64	1,398.64	834.26	616.52	924.78	453.05	259.30	259.26	230.14	377.96	566.94	8,718.13
1770	Pension Plan (OMERS)	2,138.44	3,522.14	3,522.14	3,522.14	3,522.14	5,460.56	2,875.26	2,698.34	2,698.34	2,949.82	3,614.20	5,421.30	41,944.82
1903	Separation - Benefit													-
Total Salaries and Benefits		22,904.07	36,781.49	36,781.48	35,957.92	35,668.58	54,950.37	30,843.16	26,315.30	26,303.65	29,840.92	35,811.22	66,914.78	439,072.94
2010	Stationery		10.18									74.03	15.63	99.84
2020	Books & Magazines													-
2040	Paper & Print Supplies							71.13					50.31	121.44
2099	Miscellaneous Office Supplies											33.11		33.11
2260	Gasoline													-
2650	Computer and Printer Supplies													-
2999	Miscellaneous Materials		29.58								91.33			120.91
3020	M & E - Communications			477.26										477.26
3310	Furnishings													-
3410	Computers - Hardware													-
3420	Computers - Software													-
4010	Professional Services - Legal			50.88		432.48		1,236.38		12,282.43	5,805.41	4,920.10	9,300.35	34,028.03
4086	Translation & Interpreters													-
4122	Transcripts													-
4130	Process Server Fees													-
4132	Conduct Money					119.32	313.40		61.05				212.00	705.77
4144	Investigative Expense									12,156.53	2,289.60			14,446.13
4199	Other Professional & Technical Services													-
4225	Business Travel - Public Transit													-
4252	Conference/Seminar - Accommodation													-
4253	Conference/Seminar - Air/Rail/Bus Travel													-
4254	Conference/Seminar - Ground Transportation													-
4256	Conference/Seminar - Registration Fee											750.79		750.79
4310	Train/Development - External			1,409.38							1,016.58			2,425.96
4410	Contracted Services - Electrical													-
4414	Advertising & Promotion													-
4415	Janitorial													-
4416	Transfer, Haulage & Storage													-
4452	Transportation - Taxis													-
4472	Computer Hardware Maintenance - RSA Token													-
4473	Managed Print Charges						50.08		49.70	12.61			142.24	254.63
4510	Rental of Vehicles & Equipment													-
4530	Rental of Property													-
4760	Membership Fees											566.27		566.27
4770	Parking													-
4775	Kilometrage													-
4805	Postage													-
4808	Network Cabling													-
4810	Telephone													-
4811	Cellular Phones		151.26	63.19			165.93	55.31		110.62		55.31	110.62	712.24
4815	Courier Services													-
4820	Business Meetings													-
4822	Receptions & Public Relations													-
4825	Printing & Reproduction - External												52.69	52.69
4827	Online Services Fees			910.88			94.95							1,005.83
4985	Cash Over/Under					(0.02)								(0.02)
4995	Other Expenses						107.00						75.00	182.00
6031	Contribution - Insurance Reserve Fund						4,365.48						99.05	4,464.53
6570	Bank Service Charges													-
7025	IDC - Postage & Courier													-
7030	IDC - Printing													-
7035	IDC - Photocopying													-
7130	IDC - User Hardware & Operational Syst Support													-
9451	Trade A/P Discounts Received													-
Total Office Expenditures		\$ -	\$ 191.02	\$ 2,911.59	\$ -	\$ 551.78	\$ 5,096.84	\$ 1,362.82	\$ 110.75	\$ 24,562.19	\$ 9,202.92	\$ 6,399.61	\$ 10,057.89	\$ 60,447.41
Total Monthly Expenditures		\$22,904.07	\$36,972.51	\$ 39,693.07	\$35,957.92	\$36,220.36	\$ 60,047.21	\$32,205.98	\$26,426.05	\$ 50,865.84	\$39,043.84	\$42,210.83	\$76,972.67	\$ 499,520.35