



Annual Report 2018

Office of the Integrity Commissioner

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Commissioner's Message

I am pleased to provide City Council with the 2018 Annual Report for the Office of the Integrity Commissioner.

The City of Toronto has had an integrity commissioner since 2004. The Office continues to reap the benefits of Commissioner David Mullan's inaugural term for he set the foundation for many of the principles and practices that underpin the work of the Office today. Each successive commissioner has further developed and entrenched the role of the Office in important and meaningful ways. Commissioner Lorne Sossin made significant contributions to the governance framework in which the Office operates. Commissioner Janet Leiper promoted Integrity by Design, made several significant key rulings and she recommended that the commissioner hold the role on a full-time basis.

I would like to take this opportunity to highlight the activities I have undertaken during my term to build on the strong foundation set by my predecessors. As regular readers of the Office's annual reports will know, I set several core objectives for my term to help me prioritize activities within the Office. I will comment on each of these below, then I will discuss the work plan for the year ahead and, finally, observe some challenges the Office has faced.

A Look Back

Core Objective 1: Provide timely, accurate, consistent and practical responses to requests for advice (policy and compliance) from members of Council and local boards

I believe that the most important function an integrity commissioner can fulfill is the timely provision of practical advice. Proactive advice can assist elected and appointed officials to act in accordance with the standards of conduct and accordingly prevent contraventions. I observed at the outset of my term that Toronto City Council had a strong culture of advice-seeking. It is certain that the volume and complexity of requests will increase because of new duties of the Commissioner to provide specific advice under the *Municipal Conflict of Interest Act*.

On average, I have provided about 190 pieces of advice per year to members of Council and local boards. I am able to provide a response on the same or next day for the majority of advice requests. I am happy to report that the volume of requests from members of local boards has increased markedly since 2015, which I believe is a result of increased outreach efforts in the local board sector.

Over the course of my term, I concluded a number of significant policy reviews and projects, including comprehensive guidance for members' social media use, advice about the role of members of Council in relation to the Toronto Local Appeal Body, and a review of the local board code of conduct. Indeed, in January 2018, City Council passed important changes to strengthen the local board code of conduct as a result of this review. Relatedly, in 2018, I also worked closely with one of Toronto's newest local boards, the Toronto Investment Board, to implement a personal trading policy that I believe will be seen as a best practice for other similar boards.

Most recently, I have worked with City staff to prepare the Office for its new jurisdiction, which I will describe in more detail below.

Core Objective 2: Carry out investigations in a fair and appropriately thorough manner to respond to formal complaints

From September 2014 to the end of 2018, I concluded 28 investigations into allegations that the Code of Conduct was contravened by members of City Council or local boards. In my view, the Office has set a high bar for the quality of its investigations, but the length of time required to complete cases can sometimes be too long. During my term, I have attempted to develop concrete information to track this issue and to address it, with some success.

In 2015, City Council accepted my recommendation to provide additional resources to enable the Office to have an investigator. This additional position, coupled with the move to a full-time commissioner, served an immediate and acute need because of the backlog of investigations experienced in 2014 and 2015.

While the additional resources provided in 2015 helped to reduce the backlog, I remain concerned about the length of time taken to complete investigations and about the Office's ability to respond to high volumes and complex matters. Interestingly, this is an issue that Commissioner Mullan flagged in the early days of the Office's existence.¹

In order to develop concrete information about the need for more resources, the Office has been tracking the average time required to complete investigated cases using

¹ Annual Report for the Integrity Commissioner for the Period September 1, 2004 to December 31, 2005, p. 17; Integrity Commissioner Annual Report – 2006, p. 15; Integrity Commissioner Annual Report – 2007, p. 10; Integrity Commissioner Annual Report – 2008, p. 10; Integrity Commissioner Annual Report – 2009, p. 11.

statistics from complaints received after January 1, 2015. While some cases have been completed in as few as 139 days, the average time taken to conclude investigations is 277 days.

It is important to acknowledge that a number of factors unrelated to the finite resources of the Office can contribute to the length of time it takes to conclude cases.

Investigations must be carried out in an appropriately thorough and fair manner. This can take time. Those who are subject to investigations require time to respond and, as they are entitled to do, to hold the Office to account for the way investigations are conducted and concluded. This may require the Office to seek legal advice or to conduct legal research regarding procedural fairness and other matters of interpretation regarding the Office's jurisdiction. In addition to responding to these challenges, I regularly invoke the authorities under the *Public Inquiries Act* and engage in complex and time-consuming investigative tasks such as voluminous record review, open source research and interviews.

Although there are other causes for delay, the lack of contingency-based funding to respond to high volumes or complex matters has impacted the Office's ability to meet service standards in other areas. For example, in 2018, I prioritized investigations so that I could attempt to conclude open cases about members of Council prior to the election. The prioritization of investigations meant that the Office did not have sufficient resources to complete the same level of outreach activities as it normally does. In my view, these trade-offs are unfortunate and unnecessary. I will return to the issue of funding below.

Core Objective 3: Provide and deliver education and outreach to stakeholder groups

I have engaged in a variety of outreach initiatives over the course of my term, some of which are highlighted below.

- Targeted outreach to local boards. With the exception of 2018, I provided approximately 20 outreach sessions per year to members of local boards. Outreach to local boards has been one of the most rewarding and enlightening aspects of the job for me. I am particularly awed by the devotion that many volunteers across the City bring to working on City interests by volunteering for City boards. Members of the City's boards perform their City functions without the same level of support available to City councillors to help them adhere to City policies and to the Code of Conduct. As expectations and requirements

increase, such as new written disclosure obligations under the MCIA, the demand for such outreach will undoubtedly grow, which will be a challenge for my Office to meet in the future.

- Annual meetings with members of Council. These meetings are modelled after the requirement in most provincial jurisdictions that every elected official meet annually with the ethics or integrity commissioner. I am pleased that almost all members have agreed to these meetings and, I believe, find them to be a helpful forum to refresh their knowledge of the Code and ask informal questions.
- Letters to members of Council. I have periodically written to members of Council about a variety of issues over my term. Topics have included MCIA case law developments, the impact of the Toronto Public Service Bylaw on members, confidentiality obligations and seasonal topics such as common issues relating to Environment Days. I am hopeful that these efforts have made it easy for members to determine how the Code of Conduct applies in respect of current issues of the day.
- Lunch and learn training sessions for staff in councillors' offices. In my experience, members' staff at the City of Toronto are the unsung heroes who help members meet their own obligations and avoid contraventions. These staff are eager for education and training about how to do this and to meet their own obligations. I am confident that education targeted at those who support elected officials increases overall compliance with the standards of conduct.

Core Objective 4: Provide resources for all stakeholders that are consistent, accessible, practical and clear

I have refreshed or introduced several new interpretation or information bulletins applicable to members of Council and local boards. Interpretation bulletins are necessary because the Code of Conduct is a principles-based document and so there is a need for clarity about how it applies in specific circumstances. For example, I developed a special bulletin to help members of Arena Boards address unique and common issues that arise in that context. Conduct during the election is another example of how a clear and comprehensive bulletin can be an efficient and clear way to provide guidance.

The Office is continuously improving the content on the website to ensure that it is a helpful resource for members of Council, local boards and the public. With the help of the creative staff in my Office, and leveraging the skills and expertise of the City's web team, I hope to launch a new tool before the end of my term that will summarize and consolidate advice and analysis from investigations into a single resource so that

members and the public can quickly find examples of how the Code of Conduct has been interpreted in the past.

Core Objective 5: Position the Office of the Integrity Commissioner to perform all duties in a transparent manner, consistent with the principles of open government, while respecting the secrecy obligations imposed by the City of Toronto Act, 2006

Using Twitter, the website and annual reports like this one, the Office continues to provide information to the public so that its activities are understood. There can be challenges with the level of information available to the public because of the statutory duty of secrecy that I have to keep matters that come before me confidential. However, there are many things that the Office can report on that are of interest to the public. On the pages of this annual report, readers will find many examples of advice given and cases dismissed. This information achieves a dual purpose: it helps members of Council and local boards to spot issues and prompts them to seek advice; and, it also illustrates the very busy workflow of the Office. City Council and the public can be assured that the Office is well-used.

Core Objective 6: Maintain and build on the Office of the Integrity Commissioner's reputation as a thought leader in the field of ethics and integrity for elected officials

The Office continues to play a leadership role in the growing community of municipal integrity commissioners across Canada, although the new Provincial legislation requiring that all municipalities have an integrity commissioner has significantly and helpfully expanded the number of experts and leaders in the field. In 2018, the Office's contributions have directly led to accomplishments such as the inclusion of the decisions of Ontario municipal integrity commissioners in the Canadian Legal Information Institute (CanLII) database and hosting and assisting to coordinate meetings of the Municipal Integrity Commissioners of Ontario (MICO).

The Office is frequently contacted by other municipalities for input on developing integrity commissioner programs and by fellow integrity commissioners for consultation and advice. Likewise, I have also benefited from the strong professional network among many municipal integrity commissioners across Canada.

I have also represented the Office and the City of Toronto at a variety of key ethics and integrity conferences during the course of my term. In 2018, I was pleased to collaborate with counterpart colleagues and the Institute of Public Administration (IPAC) to plan and participate in the [2018 IPAC Second Biennial Public Sector Ethics Conference](#).

Core Objective 7: Maintain and build on the Office's reputation as a key resource within the City for advice, information and guidance about ethics and integrity

I am proud that the Office continues to be regularly consulted by City and board staff on matters of ethics and integrity. These consultations can be about topics ranging from members' obligations, staff-member relations and policy advice. The Office has a strong relationship with key City divisions that enables helpful collaboration to ensure that there is a consistent and practical approach on matters when there are overlapping jurisdictional lines. In my view, the joint effort between my Office and various City divisions about the use of City resources during the election is a good example of the success of this kind of collaboration.

Core Objective 8: Build up the Office of the Integrity Commissioner's institutional structures for long term sustainability

Before my term is over, the Office will have a comprehensive records management system, an increased capacity for internal legal advice because of the conversion of the investigator position into a legal counsel role with both investigative and legal advisory duties, improved statistics tracking functions as well as additional plain language resources and web content to make the Office more accessible.

The Year Ahead

New Duties for the Integrity Commissioner

One major development that occurred during my term – and one that was not on the horizon when I set the core objectives discussed above – was the significant legislative reform that occurred in 2017 through the *Modernizing Ontario's Municipal Legislation Act*. These changes, which came into force on March 1, 2019, materially expand the role of the integrity commissioner to provide advice and receive complaints about compliance with the *Municipal Conflict of Interest Act* (MCIA). In addition, the MCIA includes new obligations of members of Council and local boards to avoid influencing staff decisions when pecuniary interests are present and a requirement that verbally declared interests are also made in writing.

I issued a new interpretation bulletin to assist members of Council and local boards to understand some of their new obligations under the MCIA, and I worked in collaboration with the Office of the City Clerk to coordinate communications about this change. I expect that additional resources and interpretation bulletins will be necessary as time goes by. I am closely monitoring this issue.

The changes required that the City's bylaws that set out the jurisdiction of the Integrity Commissioner be updated. I was pleased to work with City staff over the course of 2017, 2018 and early 2019 to develop necessary amendments, and I am glad that these changes were implemented in time for the new duties to come into force.

I was also very pleased that when City Council updated the City's bylaws to prepare for the new duties, it also made other important amendments to the bylaws to further enhance the independence of the Office by empowering the Commissioner to issue procedures directly. This is an important step forward that has had immediate impacts because it enabled my Office to issue new, plain language procedures for both Code of Conduct complaints and MCIA applications and to issue new more accessible forms and procedures for raising concerns.

Other Activities

In addition to monitoring and refining the Office's response to new duties, in the year ahead, I hope to accomplish the following key activities:

- Continue to prioritize advice-giving. It is noteworthy that despite the smaller Council size, our statistics for advice are keeping pace with the prior year.
- Commence policy review requests relating to the role of unions in community events and a report back on the role of Councillors in relation to the TLAB.
- Participate in consultations with respect to improvements to the accountability officer budget review process.
- Continued examination of the feasibility of proactive financial disclosure for members of Toronto City Council.
- Prepare the Office for and assist with a successful transition to a new commissioner.

Challenges

Accountability Officer Budgets

Each year during my term, I have recommended that City Council approve a contingency-based budget for necessary external and investigative support. I had hoped that the expanded role of the Office would mean that City Council would accept my recommendation for the 2019 budget year, but it did not.

On several occasions over the past few years, my fellow accountability officers and I have recommended enhanced resources for the purpose of fulfilling our statutory mandates. While City Council has always agreed to increase the accountability officers' base budgets to adjust for cost of living increases and other similar expenses and adjustments, the enhancement requests are sometimes overruled, although not always – as noted above, City Council did increase the Office of the Integrity Commissioner's budget in 2015.

When I look back on the budget processes in which I have participated, I observe that there is a risk that when City Council refuses the recommendations of its independent officers about what is needed to fulfill their roles, it has the effect of undermining the independence and mandate of each of the offices. Put another way, while it is clear that City Council cannot interfere with the administration of each accountability office, I believe that it risks doing so indirectly when it refuses to accept recommendations about resources needed to fulfill our statutory roles.

Another explanation is that the budgets of the accountability officers are simply competing for scarce funding. And, accountability offices, like all publicly-funded offices, must achieve more with less; we are not and should not be immune from this imperative.

However, when one considers that accountability officers – and in particular this Office – are responsible for holding members of City Council to account, there is a real risk that refusals to provide recommended resources are in fact indirect attempts to interfere with the administration of accountability offices. It is because of this risk that I believe the current model is unsustainable. I, therefore, enthusiastically welcome City Council's recent decision to request that City staff review how the accountability officers' budgets are determined. I look forward to participating in this review and am optimistic that a more productive method can be achieved that minimizes or reduces the risk of Council improperly interfering in the administration of our offices.

Council's Receipt of Investigation Reports

Another challenge I have observed during my term is that members sometimes struggle when required to consider a report that a fellow member has contravened the Code of Conduct. Investigation reports must come to City Council when the Commissioner believes that a penalty or remedial action is necessary. The *City of Toronto Act, 2006* assigns to the integrity commissioner the duty to investigate and make findings and to City Council the imposition (or not) of any penalty or remedial action on the basis of those findings.

Sometimes, to defend a colleague or to advance a personal grudge, members may seek to undermine the findings by asking questions about the lines of inquiry undertaken or the analysis that led to a finding. This happens across Ontario and although it is not the norm in Toronto, it has happened often enough during my term that I believe it is worthy of comment.

My predecessors commented on this general issue as well. Commissioner Mullan raised concerns that when City Council failed to adopt recommendations of the integrity commissioner regarding penalty, Council showed a lack of confidence in the Office; he also questioned whether it was appropriate for Council to ask questions about information that the Integrity Commissioner deemed unnecessary to include in an investigation report.² Commissioner Leiper reminded members that when considering a report about misconduct, Council is performing an adjudicative function and it must act with greater neutrality than when it deals with other City business.³ I echo both Commissioner Mullan and Leiper's comments and observations.

I see the issue this way. City Council selects an expert, neutral person to be the Integrity Commissioner and in so doing assigns to that person the responsibility of ensuring that appropriately thorough investigations and reports are conducted and, when necessary, brought to Council. Leaving aside the expectations set by City Council, the Integrity Commissioner is bound by statutory and common law duties to be fair. Further, a large amount of discretion is statutorily granted to the Commissioner. As Commissioner Mullan reminded City Council in 2008, the Integrity Commissioner is in fact obligated by the *City of Toronto Act, 2006* to only include information in reports to Council that are, "in the Commissioner's opinion," necessary for the purpose of the report.

² Integrity Commissioner Annual Report – 2007, p. 10-11; Integrity Commissioner Annual Report – 2008, p. 7, 16-17.

³ Integrity Commissioner Annual Report – 2012-2013, p. 5-6

It is plain to see that any value gained by assigning a neutral, independent, expert officer to investigate misconduct on City Council's behalf is lost when Council attempts to go behind the findings or challenge the lines of inquiry or analysis undertaken. It is also unfair to the parties and others involved and has the overall impact of undermining the accountability framework and the Office of the Integrity Commissioner itself.

This is not to say that members of Council must agree with every report and finding. Rather, I believe that in order to protect the integrity *of the accountability framework and the role of the integrity commissioner* in it, members must restrict their questioning and deliberations to the appropriate penalty or remedial action only. This limited scope of review is consistent with similar procedures in other jurisdictions. For example, when the Ontario integrity commissioner reports about a contravention to the Legislature, the only possible action available to the Legislature is the imposition or not of a recommended penalty. The Legislature cannot replace the penalty, nor can it inquire into the circumstances investigated by the commissioner (section 34, *Members' Integrity Act, 1994*). There is a wisdom contained in the *Members' Integrity Act, 1994* that I believe members of Toronto City Council can emulate without a statutory requirement to do so.

Conclusion

I have a deep sense of gratitude for those who raise their hand to stand for elected or appointed office. Our society simply could not function if well-intentioned and qualified people did not make the difficult choice to stand for public office. The public expects those who stand for public office to adhere to high standards of conduct. And, those who stand for public office rightly expect clear guidance and fair oversight. In Toronto, the Office of the Integrity Commissioner has a role to play in meeting these sometimes competing, but often overlapping, expectations. I am hopeful that the information contained in this annual report illustrates how the Office has attempted to meet these expectations in 2018.

All of the accomplishments that have been achieved during my term have been possible because of the skills, resourcefulness and creativity of the small staff in my Office who have been required to do a lot with little and do so with good humour, care and concern for the mandate of the Office.

While this is my final year, it may be the busiest and most challenging part of my term as the Office adapts to significant new duties. I look forward to the year ahead.

Respectfully,



Valerie Jepson
Integrity Commissioner

Report on Activities

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



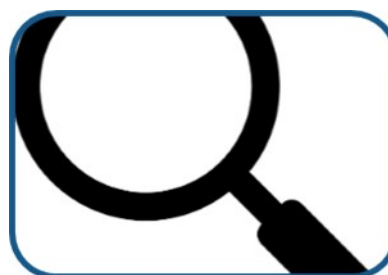
Providing timely confidential advice to members of Council and local boards about their own situations respecting the applicable Code of Conduct, MCIA and other bylaws and policies governing ethical behaviour.



Providing educational programs and information to members of Council, local boards, City and board staff and the public about the Code of Conduct, MCIA and ethical obligations of elected and appointed officials.



Providing policy recommendations and advice to Council, local boards and City staff.



Investigating complaints about alleged breaches of the codes of conduct and (after March 1, 2019) the MCIA .

What follows is a descriptive overview of the work completed in 2018.

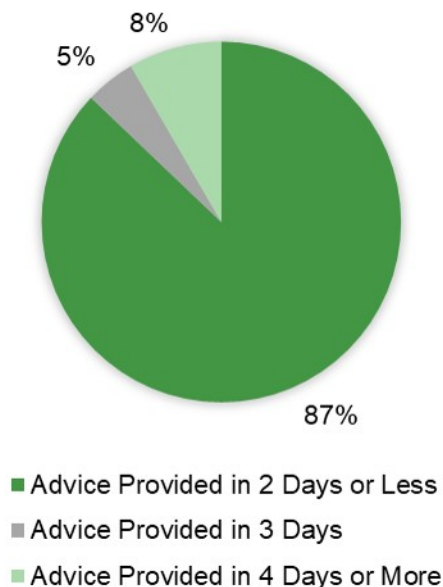
Section 1: Providing Timely Advice to Members of Council and Local Boards

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 *Municipal Conflict of Interest Act* (MCIA) is technical and similarly principles-based. The Commissioner is available as a resource to help members of Council and local boards understand how the codes of conduct apply to new circumstances to prevent problems before they occur.

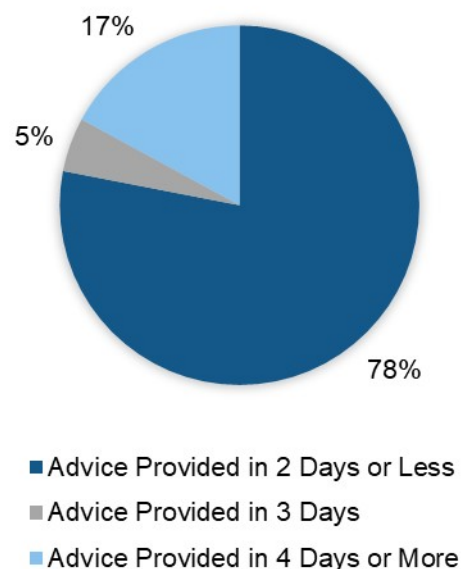
In 2018, members of Council and local boards received advice via telephone, in writing, and in person. Advice includes requests for information, referrals to other resources, and application of the codes of conduct, the MCIA or City policies to specific circumstances.

The Commissioner provided 196 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 87% of the time and to members of local boards 78% of the time. The following charts summarize the time taken to respond to requests for advice, the source of the requests, and – new information this year – the breakdown of subject matters.

Advice Response Time: Members of Council



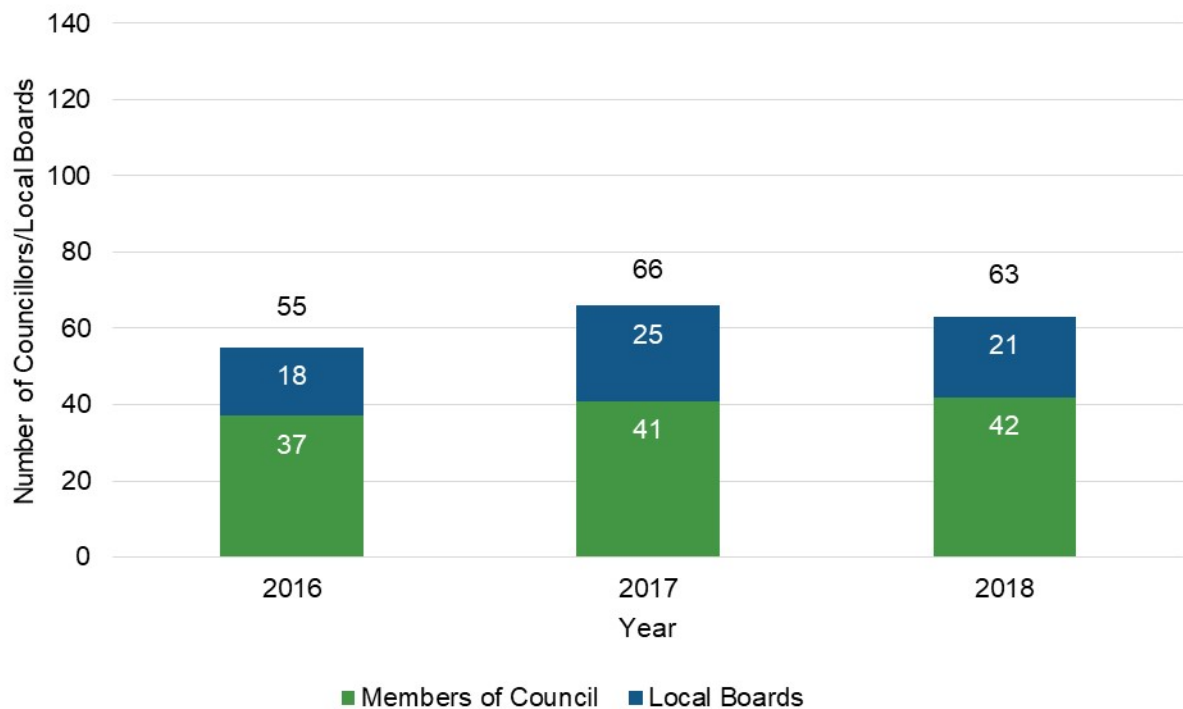
Advice Response Time: Members of Local Boards



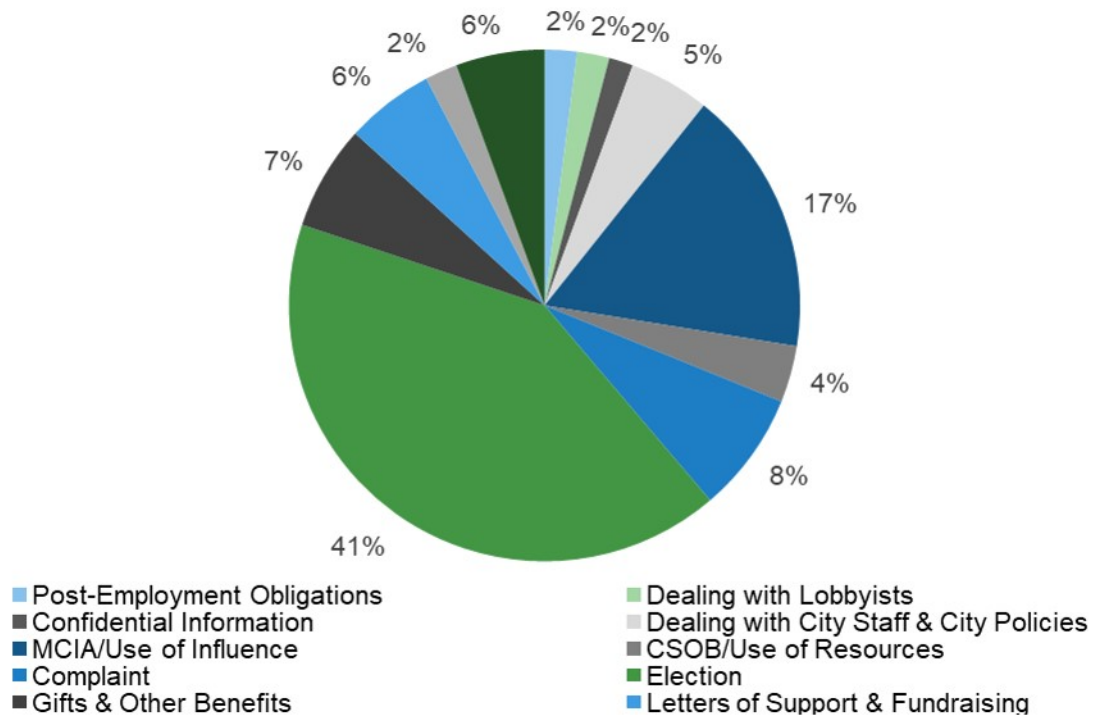
Amount of Advice Issued to Members of Council and Local Boards



Number of Councillors and Local Boards who Sought Advice



Subject of Advice Requests



Sample Advice to Members of Council

The following are samples of advice provided in 2018. These summaries are intended to help elected and appointed members identify possible issues under the relevant code of conduct, but they are not a replacement for advice applicable to specific circumstances. Where necessary, the masculine pronoun is used throughout the summaries to ensure that advice remains anonymous. In the samples below, unless otherwise specified, "Code of Conduct" refers to the *Code of Conduct for Members of Council*.

Sample 1: A Proposed Development in Close Proximity to a Member's Home

A member of Council sought advice about the role he could play with respect to a proposed development near his home.

The Commissioner advised that the MCIA states that members of Council cannot participate in decisions about matters for which they have a pecuniary interest. The value of real estate can be impacted by nearby or adjacent developments, and as a member of Council, the Councillor has a role to play in the land use planning approval process. In this case, the member had a pecuniary interest. Article VIII (Improper Use of

Influence) of the Code of Conduct also prohibits members from using the influence of their Office to improperly benefit themselves.

In consideration of the Councillor's duties and obligations, the Commissioner advised that the Councillor should refrain from any involvement in the development and designate another councillor to carry out the duties normally performed by the local councillor. The Commissioner provided the Councillor with advice about how best to respond to inquiries about the development from City staff and residents.

Sample 2: Providing Letters of Support to Constituents

A member of Council requested advice about providing a letter of support to an individual with whom the councillor had never met.

The Commissioner advised the member not to provide the letter of support because the Councillor could not provide any substantive information about the resident. The Commissioner referred to the [policy on reference letters](#) which states:

Unless the circumstances clearly indicate otherwise, Members of Council:

A. should not provide references where the only basis for doing so is to use the influence of your office or to help someone you know merely as a constituent, friend or relative; and

B. should confine the provision of references to situations where you have relevant personal experience with the candidate.

Sample 3: Claims against the City

A member of Council inquired about the role that members can play to assist a resident pursue a legal claim against the City.

The Commissioner advised that depending on the claim, it may be permissible to provide the resident with information about policies and procedures, but that councillors should first consult with and follow City staff's advice and direction about their possible involvement in relation to any particular matter.

Sample 4: Providing Letters of Support for City-issued Grants

A member of Council sought advice about whether it would be a conflict of interest to provide a letter of support to a group applying for City-issued grants.

The grant application in question required a "show-of-support" from the local councillor, so the Commissioner advised the member that it was permissible to provide a letter of support. The Commissioner advised that the letter could include information about the group but not place undue pressure on the decision-makers.

Sample 5: Personal Interest in a Ward Development

An employee in a councillor's office wished to register for information about a rental unit in a planned development in the Councillor's ward. The staff member learned about the registration opportunity from the developer in the course of dealings between the Councillor and the developer. The Councillor requested the Commissioner to assist him in advising his staff member.

The Commissioner considered the Code of Conduct and the *Human Resources Management and Ethical Framework for Councillors' Staff* and advised that the employee could register as long as he refrained from discussing his registration or interest with any representative of the developer that he had interacted with to date.

If the employee eventually decides to formally apply for a unit in the development, the Councillor should be informed and, subject to the Councillor's views, further advice from the Commissioner should be sought at that time.

Sample 6: Accepting an Honorarium

A member of Council sought advice about whether or not he could accept an honorarium for attending an event at which he was speaking in his capacity as member of Council.

The Commissioner advised that the honorarium should be declined because it is an impermissible gift and, therefore, prohibited by Article IV (Gifts and Benefits) of the Code of Conduct. Members of Council do not require additional compensation for representing the City at speaking engagements.

Sample 7: Participating in Fundraising Initiatives

A member of Council sought advice about whether or not he could participate in a fundraising auction for a not-for-profit group. It was requested that the Councillor donate a "coffee with the councillor".

The Commissioner advised that the Councillor decline the request as the circumstances did not allow for control over who could participate in this particular auction, and it was

possible that a lobbyist could participate in the auction. She advised that elected officials should not be seen to sell access to themselves even if it is for a good cause. The Commissioner advised that the Councillor find a different way to support the cause if he wished to do so.

Sample 8: Receiving Unsolicited Business Proposals

A member of Council was approached by a constituent with respect to a new business venture that the constituent believed could have a broad application across the City. The Councillor sought advice about how he could assist.

The Commissioner agreed that the Councillor should refer the matter to the Toronto Office for Partnerships for consideration under the City's [Unsolicited Quotations for Proposals Policy](#).

Sample 9: Receiving Unsolicited Gifts

A member of Council sought advice about how to forfeit a small unsolicited monetary gift that was received from an unknown sender.

The Commissioner agreed that the money was an impermissible gift according to Article IV (Gifts and Benefits) of the Code of Conduct. As the sender was unknown and no return address was provided, the standard advice to return/decline the gift was not an option. The Commissioner offered to assist by receiving and anonymously donating the money. The Commissioner also advised that the Councillor maintain a written record of the events that transpired and the actions taken.

Sample 10: Member-Organized Community Events

A member of Council sought advice about accepting a donation for a Member-Organized Community Event. Upon review, it became apparent that the donor was recently involved with an organization that benefitted from a decision made by a committee of which the Councillor was a member and for which the Councillor moved a motion.

The Commissioner considered the proximity in time between the Councillor's motion, and the donation. The Commissioner concluded that the sequence of events could lead a reasonable person to believe that there was a connection between the donation and the motion, which is contrary to the spirit of the *Council Member-Organized Community Events Policy* and Article IV (Gifts and Benefits) of the Code of Conduct.

The Commissioner advised that the Councillor reconsider the donation for this year. The Councillor agreed with this advice.

Sample Election-Related Advice to Members of Council

Sample 11 – Communicating with Constituents during an Election Period

A member of Council sought advice about whether it was permissible for the Councillor to send out a communication advising residents in which ward he intended to run in the 47-ward configuration as his Office was receiving a high volume of calls regarding this matter.

The Commissioner advised that the Councillor should not send out information advising of his selected ward because it was election-related and, therefore, an improper use of resources (Article VII – Election Campaign Work).

Sample 12 – Receiving Campaign/Election Communications at City Hall

A member of Council sought advice about how to respond to communications received at City Hall from residents regarding his upcoming election campaign.

The Commissioner advised that the resident should be redirected to the City's Election Services website and referred the member to the scripts provided in the [Commissioner's election guidance](#). For hybrid inquiries, the Councillor's Office should clarify the reason for the inquiry; if there are components of the inquiry that are unrelated to the campaign and would normally be responded to, a response could be provided.

Sample 13: Using a Photo of City Hall for Election-Related Purposes

A member of Council sought advice about using a photo of the Councillor in front of City Hall for his campaign literature.

The Commissioner advised that it was permissible to use a photo of the Councillor with City Hall in the background as long as the City's logo, flag and coat of arms were not in the shot and no City resources were used to take the picture.

Sample Advice to Members of Local Boards

In the samples below, unless otherwise specified, "Code of Conduct" refers to the *Code of Conduct for Members of Local Boards (Restricted Definition)*.

Sample 1: Accepting a Conference Invitation

A member of a local board sought advice about whether he could accept a complimentary pass to attend a conference. The conference was educational in nature and relevant to his role on the Board, although he would not be speaking at the conference.

The Commissioner advised the board member to decline the invitation because it was offered in part because of his role as a board member and because there were a number of sponsors that could possibly be interested in providing services to the Board.

Article IV (Gift and Benefits) of the Code of Conduct does not contain an exception for this kind of benefit. If the member was participating in the conference as a speaker or representative of the Board, the analysis would be different because the exemptions in sections (d) or (e) of Article IV may apply.

Sample 2: Providing Services to the Board

A Board issued a Request for Proposal (RFP) to seek required services. A board member's business specializes in the services sought, and the member asked whether it was permissible for his business to bid on the RFP.

Citing Article IX (Business Relations) of the Code of Conduct, the Integrity Commissioner advised that as long as he is a board member, his company should not bid for the RFP. Article IX prohibits board members from providing goods, consultation, or other services for payment to the local board—either directly or through a partnership or closely held corporation.

If his company still intended to pursue the bid, then the Commissioner advised that the member resign from the Board in advance of the bid being submitted in order to prevent the appearance of any influence on the bids before the Board. If he should decide to resign and participate in the bid process, the Commissioner advised that he should use extra caution not to have any conversations with any board members about the competition, the criteria, etc.

Sample 3: Member's Employer is the Board's Landlord

A member of a local board sought advice about how to manage a potential conflict of interest. The board member is a representative on the Board for his

employer—an organization that leases office space to the Board. The member has no equity interests in his employer.

The Commissioner summarized the obligations in Article IX (Business Relations) of the Code of Conduct and advised that the member and his employer establish an ethical screen so that the member has no role at his employer in relation to the lease agreement.

The Commissioner also advised that the member avoid participating in any decisions of the Board relating to its lease of office space. The member should request that the Board chair refrain from providing him with agenda information about the lease of office space, and he should not participate in debates, discussions or voting about decisions relating to office space.

Sample 4: Accepting an Honorarium

An adjudicative board member also volunteers for a City of Toronto-organized event. The volunteer responsibilities are completely unrelated to the member's role on the adjudicative board. As a volunteer, he was offered an honorarium and sought advice about whether or not he could accept it.

The Commissioner advised that the honorarium does not pose any issues under the Code of Conduct because the honorarium is given for reasons unrelated to the member's role on the Board. The Commissioner also suggested that the Board member consult with the Public Appointments division to confirm that the volunteer commitment did not contravene any board eligibility requirements.

Sample 5: Working with a Spouse

The spouse of a local board employee was considering becoming a member on the same board. The employee and prospective member sought advice about whether such a situation was permissible.

The Commissioner advised that the employee's spouse (prospective board member) would have a deemed pecuniary interest in any matter that could impact the employee's ongoing employment relationship with the Board. The MCI Act prevents board members from participating in any decisions for which the member has a deemed interest. In the event that the Board wished to reconsider or review the employee's role or salary, the spouse would have a direct conflict of interest. In addition, if the Board had any performance problems with his work, his spouse would be bound by Article VIII

(Improper Use of Influence) of the Code of Conduct not to influence Board decisions in his favour.

For all of these reasons, the Commissioner advised that the prospective board member not stand for appointment on this board.

Sample Election-Related Advice to Members of Local Boards

Sample 6 – Running for Elected Office

A board member sought advice about member obligations when running for elected office.

The Commissioner advised that Section 4.12 of the [City's Public Appointments Policy](#) states that board members who run for elected office must take a leave of absence from the date of nomination. Additionally, a member must not use any City resources or his influence as a board member to assist with political activity. There must be a clear line of separation between the member's board activities and his campaign activities.

Sample 7 – Engaging with Political Campaigns

A local board member sought advice about engaging with political campaigns in a personal capacity by volunteering for a councillor's re-election campaign.

The Integrity Commissioner advised that board members are permitted to volunteer for political campaigns; however, the member would not be permitted to use any board resources nor his title as board member to support the campaign. A member's campaign activity and board activity must remain separate.

Reporting of Gifts and Benefits

In 2018, members of Council made a number of disclosures for sponsored travel and donations to Member-Organized Community Events. Article IV (Gifts and Benefits) of the Code of Conduct describes the limited circumstances under which a member can receive gifts or benefits. Members are required to disclose gifts or benefits received when the value of the gift is over \$300. Members who wish to solicit donations for community events must do so in accordance with the [Member-Organized Community Events Policy](#), which permits members to solicit cash and in-kind donations for community events. Members can accept sponsored travel when the donor is a government or conference organizer. Gift disclosure forms are available on the [Office of the Integrity Commissioner's website](#).

As it was an election year, members were not permitted to solicit donations for a Member-Organized Community Event unless that event was staged in the previous two years. Furthermore, members were not permitted to organize community events in their wards after August 1, 2018.

Number of Gift and Benefit Disclosure Forms Received

	2016	2017	2018
Member-Organized Community Event - Donor Declaration Forms	6	14	14
Travel Declaration Forms	11	7	6
General Gifts and Benefit Declaration Forms	0	0	0
Total	17	21	20

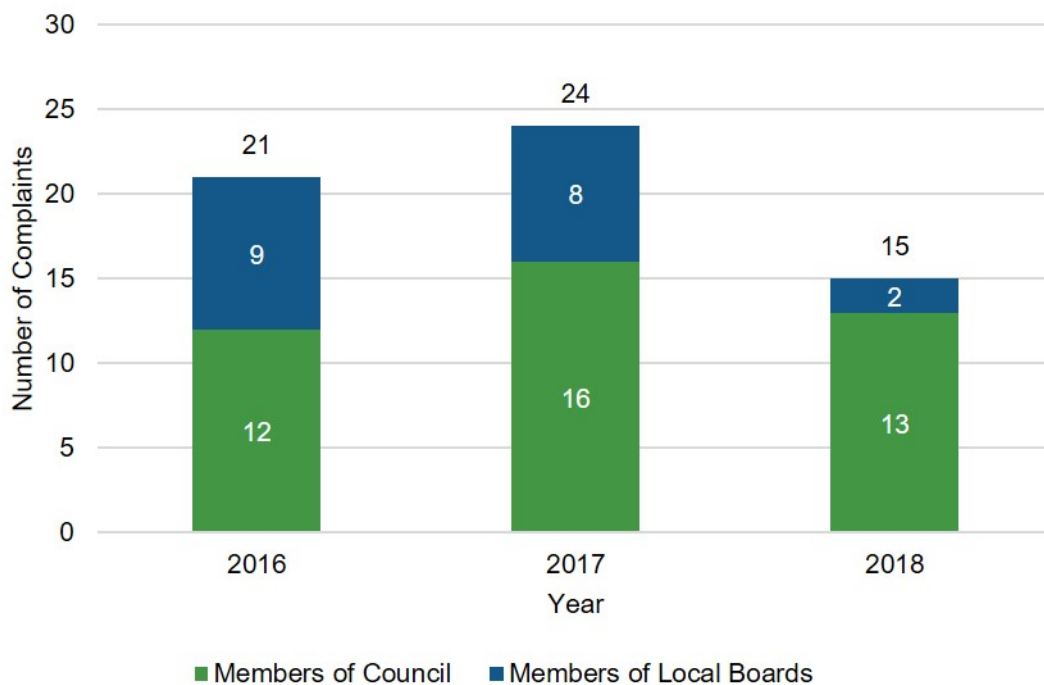
Section 2: Receiving, Reviewing and Investigating Complaints

The Office handles all complaints received in accordance with the *Complaint Protocol for Members of Council* and the *Complaint Protocol for Members of Local Boards including Adjudicative Boards*, which provide both formal and informal procedures to resolve complaints.

Formal Complaints

As illustrated in the chart below, the Office received slightly fewer formal complaints in 2018 than in recent years. This may be attributed to the election period limitation against receiving new complaints from August 6 to November 30, 2018.

Number of New Formal Complaints Received about Members of Council and Local Boards

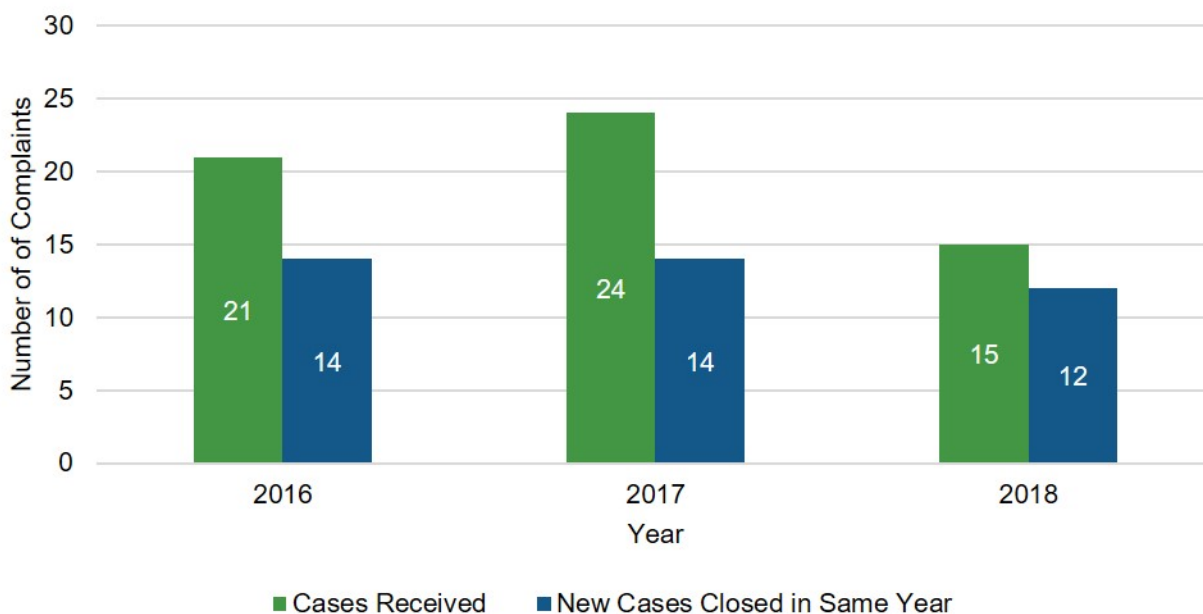


Source of Formal Complaints Received in 2018

In 2018, four formal complaints were received by this Office as referrals from other accountability officers under the [Memorandum of Understanding Between the Four Accountability Offices](#). The Complaint Protocol was followed with necessary modifications to account for the referral source.

Since 2015, the Office has developed statistics to track the length of time taken to respond to formal complaints, which are summarized in the following figures.

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

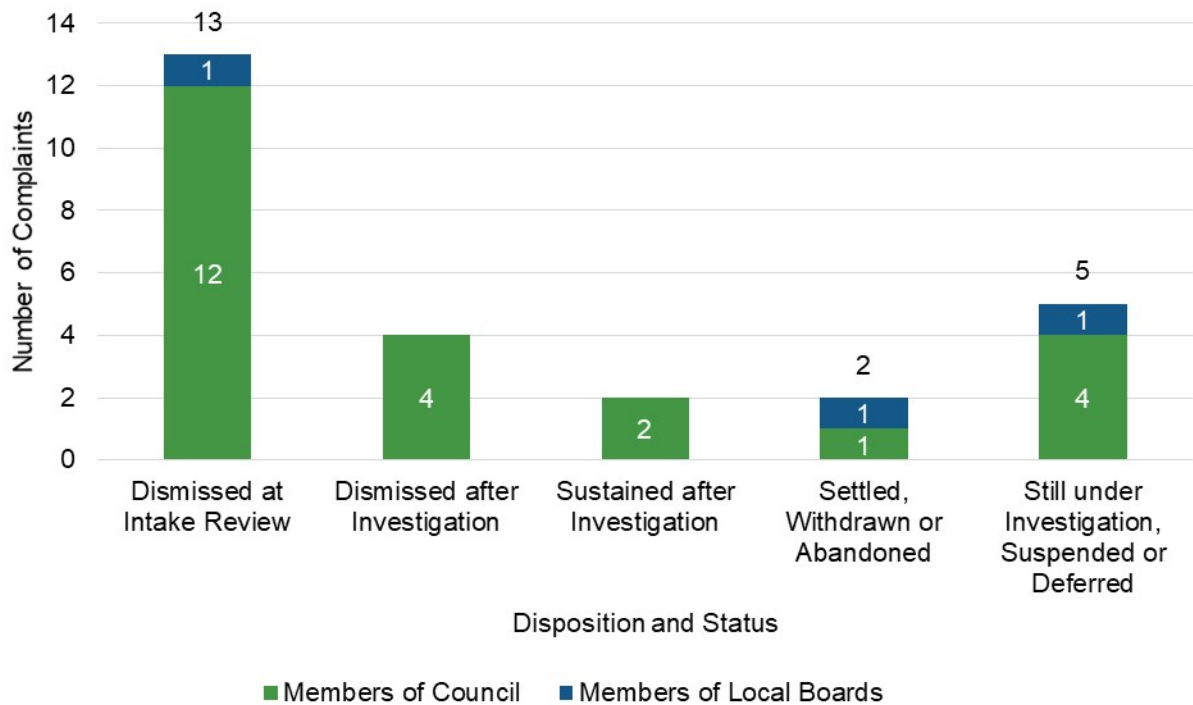


Average and Median Time Taken to Close Complaints Received Post-January 1, 2015⁴

Complaint Type	Number of Cases	Average Number of Days	Median Number of Days	Least Number of Days	Most Number of Days
Investigated Complaints	20	277	258	139	514
Dismissed without Investigation	33	50	37	12	244

⁴ In the event that multiple complaints were addressed by one investigation or report, only a single case is counted.

Disposition and Status of Formal Complaints (2018)



Complaints Dismissed at Intake Review

In 2018, 13 formal complaints were dismissed at the Intake Review stage. The following summaries are provided to raise awareness of how the codes of conduct are interpreted and to provide the public and Council with information about the work of the Office.

In the samples below, unless otherwise specified, "Code of Conduct" refers to the *Code of Conduct for Members of Council*.

Case Summary 1

A member of the public submitted a formal complaint alleging that a member of Council contravened Article XIV (Discreditable Conduct) of the Code of Conduct because of the manner in which the Councillor responded to the complainant at a Community Council meeting. The complainant alleged that the Councillor made inappropriate comments that were intended to make him feel uncomfortable and intimidated.

The Integrity Commissioner dismissed the complaint as the allegations did not give rise to a possible Code of Conduct contravention. The Commissioner reviewed the archived video and deemed that the Councillor's questions were similar in tone and nature to

those asked by other Community Council members, and there was no basis to suggest that they were abusive, bullying, or intimidating.

Case Summary 2

A member of the public submitted a formal complaint alleging that a member of Council contravened Article XIV (Discreditable Conduct) of the Code of Conduct by tweeting a disrespectful photo that was profane and provocative.

The Integrity Commissioner declined to investigate the complaint. When considering Article XIV of the Code of Conduct in the context of this complaint, the Commissioner deemed that the circumstances took place in the context of political debate and discourse and were not bullying or harassing toward any particular person. Further, the Councillor's actions were also supportive of a campaign initiated by residents.

Case Summary 3

A member of the public submitted a formal complaint alleging that a member of Council contravened Article VIII (Improper Use of Influence) of the Code of Conduct by allegedly assisting another constituent to make a complaint about the complainant to the police.

The Integrity Commissioner dismissed the complaint as the allegations did not give rise to a possible Code of Conduct contravention. The Commissioner explained that there is no restriction in the Code of Conduct to prevent a member of Council from assisting or supporting a resident if the assistance is at odds with the interests of another resident. The information contained in the complaint was insufficient to require an inquiry into whether the Councillor's actions were an exercise of influence intended to prefer or advantage a friend or other associate.

Case Summary 4

A member of the public submitted a formal complaint alleging that a member of Council contravened Articles XIV (Discreditable Conduct), XV (Failure to Adhere to Council Policies and Procedures), and XVI (Reprisals and Obstruction) of the Code of Conduct due to the manner in which the Councillor responded—or failed to respond—to the complainant's concerns regarding certain property standards and bylaw issues adjacent to the complainant's home.

It was not clear to the Commissioner how the alleged conduct contravened the stated Articles XV and XVI. The Commissioner considered whether the allegations could

possibly give rise to a contravention of Article XIV which obliges members of Council to treat members of the public appropriately and without abuse, bullying or intimidation. However, the complaint contained no allegations of conduct that could be found to be abusive, bullying or intimidating, and there was no allegation that the Councillor used abusive or harassing language.

The Commissioner determined that the allegations involved dissatisfaction with the manner in which the Councillor carried out his duties, which is not addressed by the Code of Conduct. Rather, it is a matter of democratic accountability and an issue for the electorate to opine upon. The complaint was dismissed.

Case Summary 5

A formal complaint was made by a member of the public alleging that during a Council committee meeting, two members of the committee violated Article XIV (Discreditable Conduct) of the Code of Conduct because of the way they treated the complainant. In one case, the complainant felt that one councillor was disrespectful and that the other, who was also the Chair of the meeting, failed to deal with him objectively.

The Commissioner reviewed the archived video of the meeting and noted that the complainant had raised the concerns about the alleged disrespectful conduct, which was addressed by the Chair. The Complaint was dismissed on the basis that the issues complained about were resolved by another process – the procedural rules governing the committee and the rulings made by the Chair to facilitate the orderly conduct of the meeting.

Case Summary 6

A formal complaint was made by a member of the public, alleging that a member of Council and his staff contravened the Code of Conduct by failing to advocate on behalf of the complainant. The complainant did not specify which provisions of the Code of Conduct he believed the member and staff contravened.

The complainant believed his ward councillor should have made greater advocacy efforts on his behalf and by not doing so, the complainant alleged he was discriminated against.

Although the complainant did not specify which provision the Councillor and staff contravened, the Commissioner reviewed the complaint and information provided to determine whether the circumstances described could raise a Code of Conduct issue.

The Commissioner dismissed the complaint on the basis that there was insufficient information to require an inquiry and that the complainant's allegations of discrimination were purely speculative.

The Commissioner also addressed the issue of constituency advocacy and stated that while a constituent may be dissatisfied with the manner in which a councillor carries out his duties, these types of issues can be raised directly with the councillor or can ultimately be taken into consideration by the constituent at election time. Dissatisfaction with the manner of representation provided by a local councillor is not a possible basis, without other alleged misconduct, for a Code of Conduct violation.

Case Summary 7

Pursuant to the *Memorandum of Understanding Between the Four Accountability Offices*, an accountability officer requested an inquiry into whether two members of Council contravened Article IV (Gifts and Benefits), Article XII (Conduct Respecting Staff), and Article XIV (Discreditable Conduct) of the Code of Conduct on the basis of documents received from an anonymous complainant.

The Integrity Commissioner dismissed the complaint as there was insufficient information to cause an inquiry into whether the Code of Conduct was contravened. She stated that there were no specific allegations that any member of Council directed City staff, nor received improper gifts or benefits from third parties other than permissible sponsored travel and accommodations.

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 subsequently commences an investigation. Investigations are thorough and consist of research, compelling City and witness records, reviewing documents and conducting interviews, often under oath.

If the Commissioner concludes that a member of Council or local board contravened the Code of Conduct, she is required to bring the report to Council or to the local board, as well as to the complainant and respondent. 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 versions of reports regarding local boards are available on the [Office of the Integrity Commissioner website](#).

Complaints Sustained After Investigation

In 2018, two complaints were sustained with findings that a member of Council or a local board contravened the Code of Conduct. City Council accepted the recommendations of the Commissioner in one of these cases.

Complaints Dismissed After Investigation

In 2018, four complaints were dismissed after investigations which found that there were no contraventions of the Code of Conduct. For one of these dismissed cases, the Commissioner exercised her discretion to file it with Council in 2018.

In the samples below, unless otherwise specified, "Code of Conduct" refers to the *Code of Conduct for Members of Council*.

Case Summary 1

A member of the public submitted a formal complaint alleging that a member of Council contravened Article VI (Use of City Property, Services and Other Resources) of the Code of Conduct because the Councillor's constituency staff assisted with his appearance at a provincial tribunal to oppose a Council decision. The complainant was also concerned with the Councillor's opposition to Council's decision.

Following an investigation, which consisted mainly of a review of policies and conventions, the Integrity Commissioner dismissed the complaint. In relation to Article VI (Use of City Property, Services and Other Resources) of the Code of Conduct, the Commissioner considered the Councillor's justification of his activities as an extension of his intention to represent his constituents' concerns and interests. Unlike other jurisdictions, neither the Code of Conduct nor any City policies, contain any restrictions against the ability of members of Council to disagree with decisions made by City

Council or to appear at provincial tribunals for this purpose. This omission disposed of the issues in this complaint.

The Commissioner commented that either the policy framework or the Code of Conduct could be amended to explicitly prohibit the use of resources to oppose decisions already made by City Council. However, the Commissioner noted that care must be taken not to impede the ability of members of Council to respectfully express their views about decisions made by City Council.

Case Summary 2

An organization requested an inquiry into whether a member of Council contravened Article VIII (Improper Use of Influence) of the Code of Conduct based on information received by the agency suggesting possible impropriety in relation to an approval granted by a City tribunal. The complaint alleged that the Councillor may have violated Article VIII (Improper Use of Influence) of the Code of Conduct by improperly using his influence to request donations to charities as a condition of support. There was no allegation that the tribunal acted improperly.

Following an investigation, the Integrity Commissioner concluded that the Councillor did not contravene the Code of Conduct. It would have been an improper use of influence for the Councillor to have requested or directed donations to the organizations as a condition of support; however, the Councillor stated that he did not request or direct that the donations be made. After thoroughly testing it, the Commissioner accepted the Councillor's denial of making such a request or imposing any condition on his support. The complaint involved the action of lobbyists, and so the Commissioner referred the matter to the Office of the Lobbyist Registrar for further review.

Complaints Settled, Withdrawn, or Abandoned

In 2018, two complaints were settled, withdrawn, or abandoned.

Complaints Still Under Investigation, Suspended or Deferred

At the end of 2018, five cases remained open, including cases that were suspended or deferred.

One of the cases suspended in 2017 has been commented on by the Ontario Provincial Police (OPP). The Commissioner has made no public comment on this case. In light of public statements made by the OPP, the Integrity Commissioner provides the

following additional information to Council.

In August 2016, the Office received a formal complaint alleging that then-Councillor Justin Di Ciano contravened the *Code of Conduct for Members of Council*. In the course of that investigation, the Commissioner made a referral to the Toronto Police Service on August 15, 2017 because of her duty under section 164 of the *City of Toronto Act, 2006*. As a result of the referral, the Commissioner suspended this investigation, and it was, accordingly, included in the total number of matters “still under investigation, suspended or deferred” items in the 2017 Annual Report. The Commissioner will resume the investigation when “any resulting police investigation and charge have been finally disposed of.”

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 the member. This can be an optimal method of resolution when the alleged transgression is minor, the issue relates to personal interactions or is time-sensitive.

Informal complaints involving the Integrity Commissioner are resolved by letter, discussion or meetings without engaging the formal complaint process nor requiring a report to Council.

Where the parties consent, the Integrity Commissioner can assist in resolving informal complaints. The Commissioner was engaged in four informal complaints during 2018.

Number of New Informal Complaints Received about Members of Council and Local Boards

Complaint Type	2016	2017	2018
Members of Council	3	4	4
Members of Local Boards	0	0	0

Section 3: Policy Work

At the request of City Council, the Integrity Commissioner reviewed the codes of conduct for members of local and adjudicative boards in 2017 and 2018. The review resulted in the Commissioner recommending her amendments to the [Code of Conduct for Members of Local Boards \(Restricted Definition\)](#) and the [Code of Conduct for Members of Adjudicative Boards](#). The amendments were [adopted by City Council in its January 31, February 1 and 2, 2018 meeting](#). The amendments modified and strengthened member obligations in regards to gifts and benefits, confidential information, business relations, outside activities and lobbyists. These changes were put in place to strengthen and clarify the Code of Conduct for all local boards.

Related to this work, the Commissioner also worked with City staff to develop a Personal Trading Policy for the Toronto Investment Board (TIB). The *Personal Trading Policy for Board Members* was [adopted by the TIB at their November 13, 2018 meeting](#). The policy is a practical and proportionate policy that will assist the members of the TIB to meet the obligations set out in the Code of Conduct and is necessary in light of the nature of the work of the TIB.

In 2018, the Commissioner continued her ongoing policy review of Chapter 3 – Accountability Officers of the Toronto Municipal Code and the complaint procedures to prepare for amendments to the *City of Toronto Act, 2006* and the *Municipal Conflict of Interest Act* as a result of Provincial legislation.

In this reporting period, the Integrity Commissioner issued six Interpretation Bulletins. These bulletins are issued to highlight key responsibilities and obligations of members. They also provide clarification to address ambiguity and explain related procedures in regards to conduct standards.

On April 18, 2016, Executive Committee asked that the Integrity Commissioner review the ways in which members of Council can engage in not for profit fundraising. In 2016 and 2017, the Integrity Commissioner consulted with members of Council about this issue. The Commissioner concluded that the current guidance with respect to councillor involvement in fundraising for charitable causes is sufficient and clear, and there is no need for further reform at this time. The Integrity Commissioner will not be making any further report back to Executive Committee on this topic during her term but will brief the next commissioner on the topic.

Members of Council

[2018 Election-Related Activities](#) (Issued March 2018; Updated August 2018)

[Post-Employment Obligations](#) (Issued November 2018)

Members of Local Boards (Restricted Definition)

[Article IX of the Code of Conduct \(Business Relations\)](#) (Issued March 2018)

[2018 Election-Related Activities](#) (Issued April 2018)

Members of Adjudicative Boards

[Article XI of the Code of Conduct \(Business Relations\)](#) (Issued March 2018)

[2018 Election-Related Activities](#) (Issued April 2018)

Section 4: Outreach Activities

Local Board Outreach and Resource Development

In 2018, the Integrity Commissioner met with six local boards to provide outreach and awareness of the Code of Conduct. The number of outreach sessions was lower in 2018 due to the demands on the Integrity Commissioner's time to attend to complaints and requests for advice. The training included information about changes to the Code of Conduct in January 2018.

January 25:	Downtown Yonge BIA Board of Management Presentation – Role of the Integrity Commissioner
January 26:	Toronto Realty Agency Board Presentation – Role of the Integrity Commissioner
February 20:	TABIA – Changes to the Code of Conduct for Members of Local Boards
April 24:	Queen St. W. BIA – Board of Management Presentation
May 9:	Bloorwest Village BIA – Board of Management Presentation
October 25:	CreateTO – Changes to Code of Conduct for Members of Local Boards

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.

March 5:	Letter and Interpretation Bulletin - Election-Related Activities
April 18:	Letter - Environment Days
August 1:	Interpretation Bulletin - Election-Related Activities (Revised)
August 17:	Letter - Confidential Information
November 8:	Letter and Interpretation Bulletin – Post-Employment Obligations
November 29:	Welcome Letter and Orientation Materials
December 10:	Joint Letter with Lobbyist Registrar - Holiday Gift-giving and Events

Copies of the outreach letters can be found at Appendix 1.

The Commissioner began meeting individually with members of the new 2018-2022 Council in 2018 and is scheduled to meet with most remaining councillors in early 2019. The purpose of these meetings is to discuss the role of the Office and upcoming

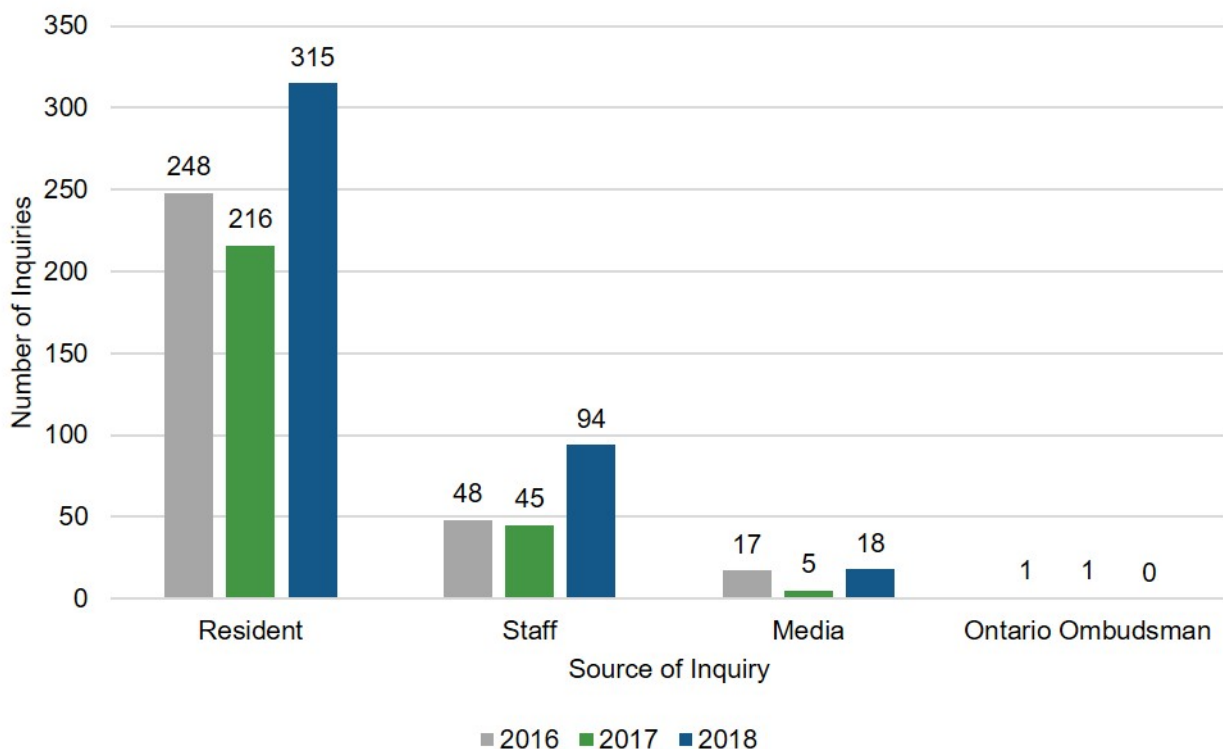
changes, to obtain feedback about election guidance provided and to create an opportunity for informal advice.

Resident, Staff and Media Inquiries

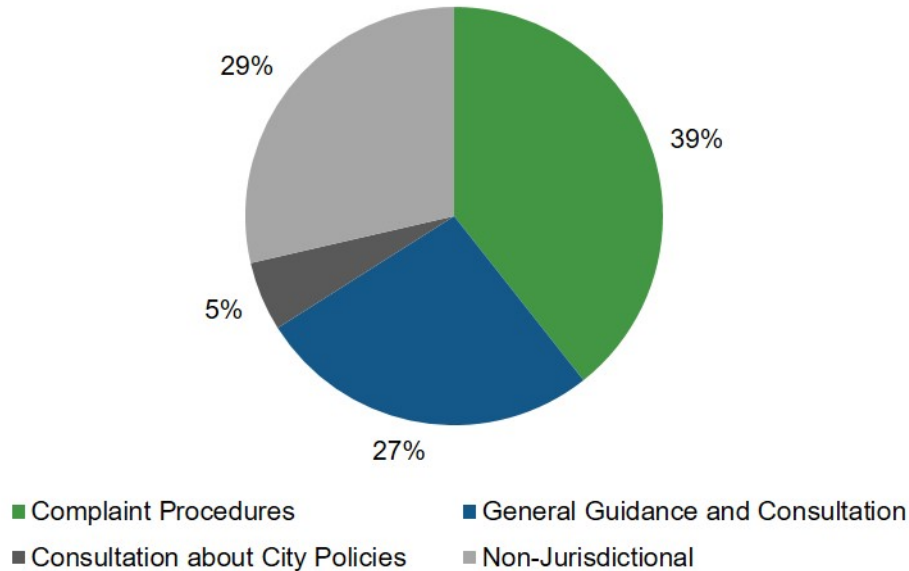
The Office responds to a high volume of inquiries from residents, City staff and members of the media. The Office handles requests for information from staff, residents and the media about topics such as how to make a complaint, how complaints are handled through the formal and informal procedures and information about the Code of Conduct. Where appropriate, the Office makes 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.

In this reporting period, the Office responded to 427 such inquiries. This represents a marked increase in inquiries from prior years.

Intake Inquiries



Nature of Citizen and Staff Inquiries



External Outreach

In 2018, the Commissioner presented to a handful of external groups from within Canada and abroad who were interested in Toronto's accountability framework and the role of the Integrity Commissioner. The Commissioner was also pleased to present to two sections of the Seneca Government Relations Post-Graduate program.

The Integrity Commissioner attended the 2018 [IPAC Second Biennial Public Sector Ethics Conference](#) in June 2018 and played a role in its organization and the development of the Ethics and Law Reform panel discussion.

Winter Activities 2018

January 10: Bermuda Ombudsman – Integrity Commissioner & Accountability Framework

Spring/Summer Activities 2018

May 30: Seneca Government Relations, Post-Graduate – Student Presentation

May 31 – June 1: Public Sector Ethics Conference

June 20: City Clerk Staff from Edmonton and Regina – Integrity

June 21: Commissioner and Accountability Framework
IPAC Kenyan Delegation – Panel Discussion

Fall Activities 2018

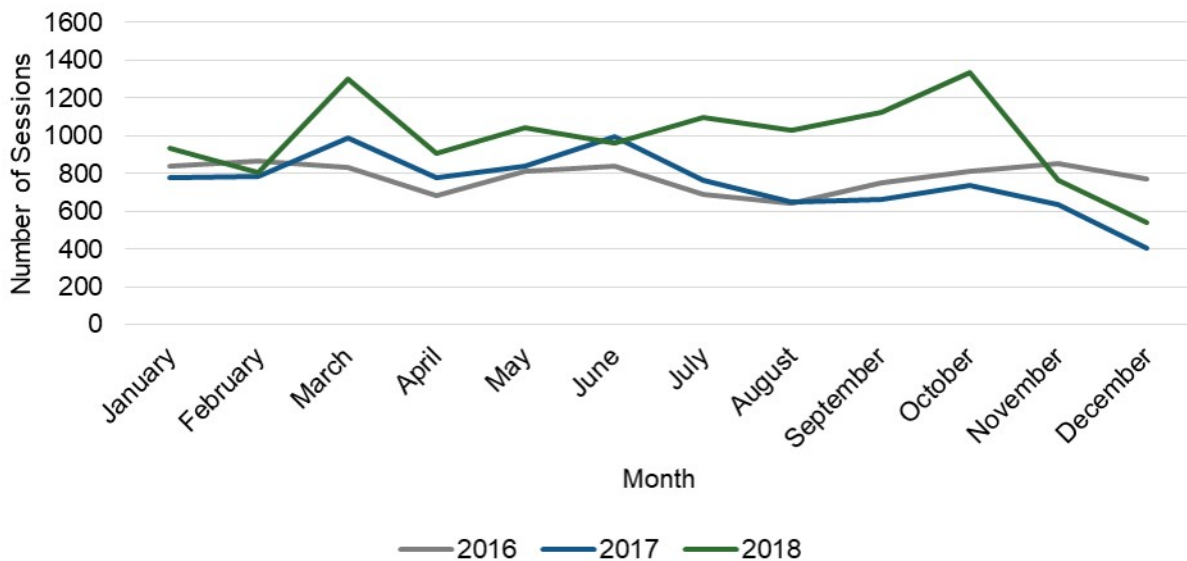
September 13: Seneca Government Relations, Post-Graduate – Student
Presentation
September 28: City of Edmonton Integrity Commissioner – Introductory Meeting
October 22: Elections Visitors Program (Ontario, Edmonton, Saskatoon) -
Presentation and Overview
December 11: City of Toronto New Employee Onboarding Session – Presentation
Materials

Website Sessions⁵ and Views⁶

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 website during the reporting period.

The Office is also undergoing a website revitalization and working with staff to ensure the site is accessible and user-friendly.

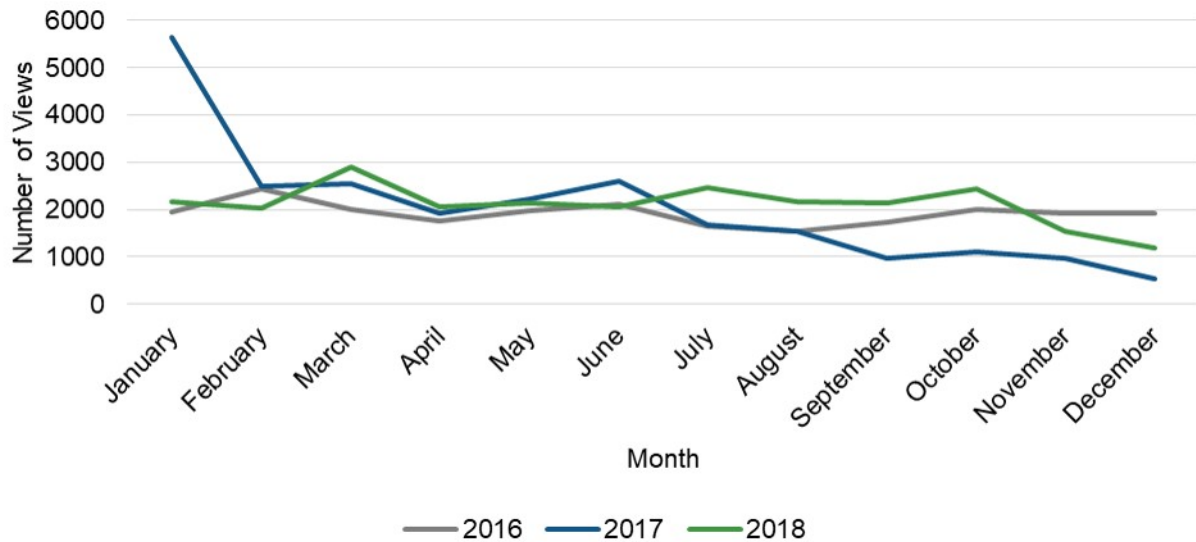
Number of Website Sessions



⁵ A session begins with the first event from the user and ends after 30 minutes of inactivity.

⁶ Views are the total number of pages that were loaded by visitors during the specified time interval.

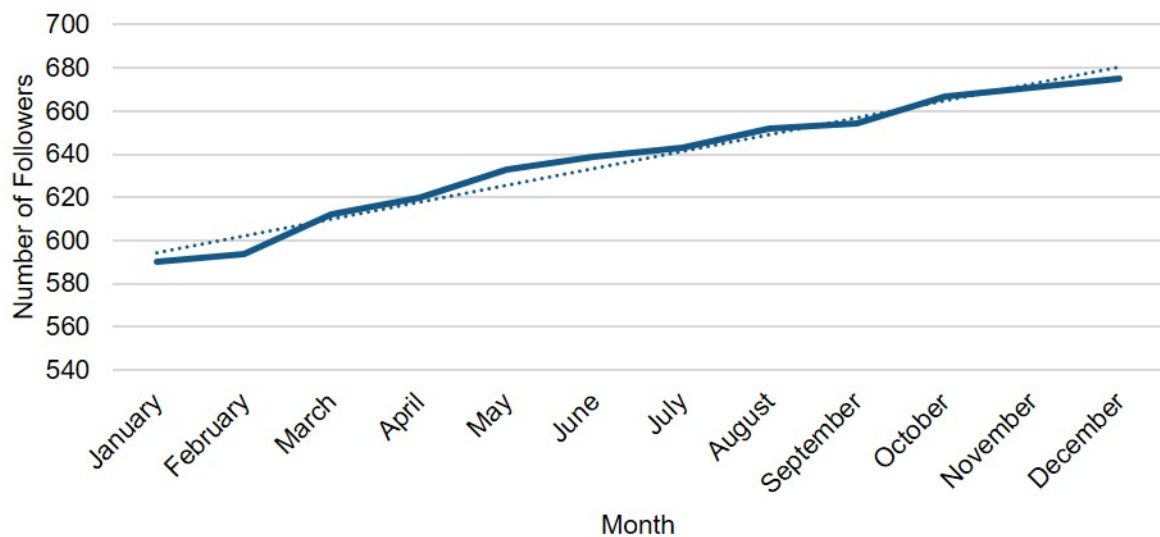
Number of Website Views



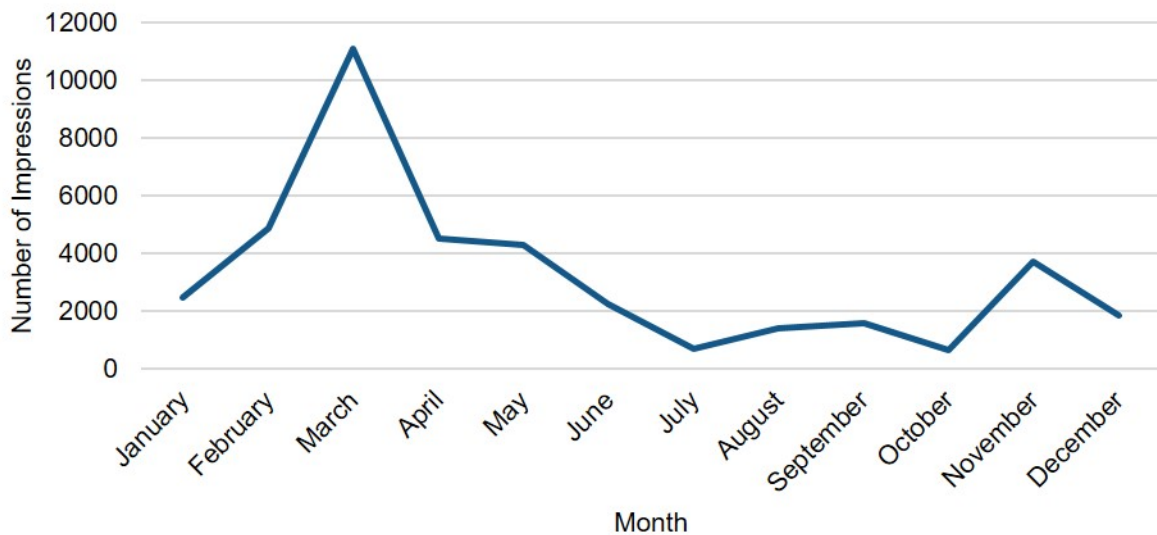
Twitter Analytics

The Office of the Integrity Commissioner uses Twitter ([@TO Integrity](https://twitter.com/TO_Integrity)) to raise awareness about the Office and share related information. The following information highlights the Office's Twitter impact.

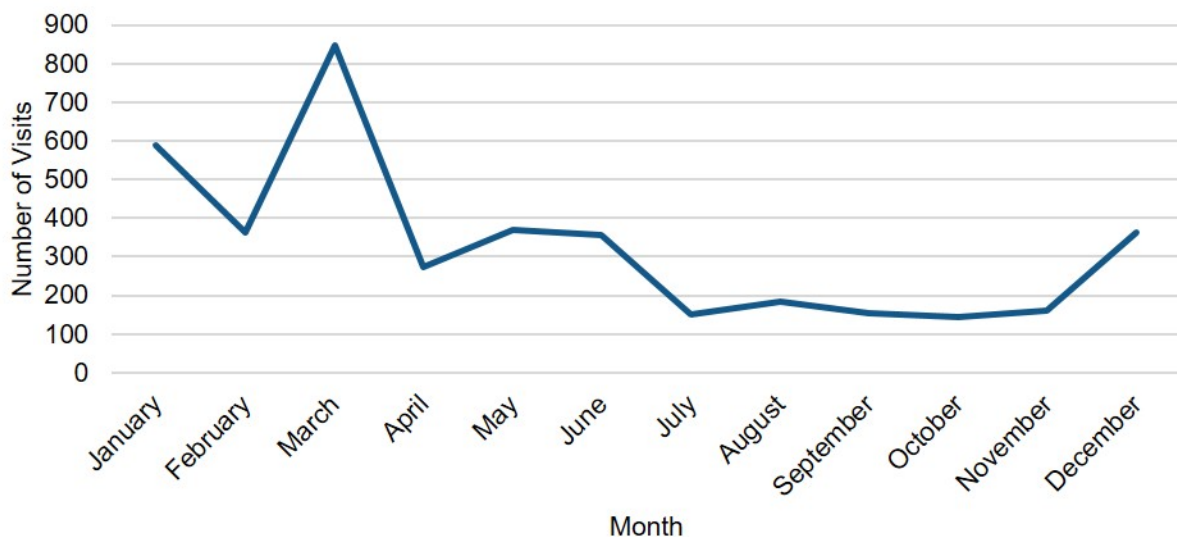
Total Number of Twitter Followers



Tweet Impressions⁷



Profile Visits⁸



⁷ Number of times users are served your Tweet in timeline, search results or from your profile. (The number of people who saw a tweet from @TO_Integrity) <https://help.twitter.com/en/managing-your-account/using-the-tweet-activity-dashboard>

⁸ See "User Profile Clicks": Number of times users visited our profile page. <https://help.twitter.com/en/managing-your-account/using-the-tweet-activity-dashboard>

Section 5: 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. The Commissioner was pleased to host the Spring Meeting in Toronto and assisted with the organization of the Fall Meeting in Windsor, Ontario. This growing, informal group of practitioners in the field of municipal ethics and integrity is an invaluable resource to the Office and will play a key role in developing a core set of best practices for municipal integrity commissioners in Canada.

The Office has taken a leadership role in MICO and has continued efforts to establish a database for municipal integrity commissioner reports on the free public resource CanLII (Canadian Legal Information Institute). At the end of this reporting period, MICO had a total of [35 decisions published on CanLII](#) from various municipalities in Ontario.

Section 6: Budget and Financial Information

The 2018 approved budget for the Office was \$517.6 thousand. The expenditures for 2018 were \$507.2 thousand. Details of the expenditures of the Office during 2018 are attached to this report as Appendix 2.

Appendices

Appendix 1 - Letters to Members of Council and Local Boards

Appendix 2 - Financial Information



Office of the Integrity Commissioner

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Toronto, Ontario M5G 2J5

Valerie Jepson
Integrity Commissioner

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Valerie.Jepson@toronto.ca
toronto.ca/integrity

March 5, 2018

Via Email and Hand-Delivered

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

Dear Members of Council:

Re: 2018 Election-Related Activities

I am pleased to provide an Interpretation Bulletin titled "2018 Election-Related Activities." The guidance in the Bulletin will help members of Council who are seeking re-election to maintain a clear separation between their campaign and constituency work.

As noted in the Bulletin, election years are a time of heightened scrutiny. Please take time to read the Bulletin and to ensure that your staff and volunteers working under your direction at City Hall are familiar with your obligations.

This guidance is not a campaign guide; members of Council should not be using any city resources, including asking their own City staff or volunteers to make inquiries, about how to prepare for their campaign.

I suggest that you begin your review of the Bulletin by starting with the "Key Dates" chart on the last page of the Bulletin. Please keep in mind that the electronic version contains links to resources referred to in the Bulletin.

I am available to members of Council to answer questions about specific scenarios. If it becomes clear that there are many common questions, I will update the Examples section of the Bulletin periodically.

Sincerely,

[original signed by Valerie Jepson]

Valerie Jepson
Integrity Commissioner

Enclosure (1): Interpretation Bulletin – 2018 Election-Related Activities (9 pages)

cc: Ulli Watkiss, City Clerk
Peter Wallace, City Manager

April 18, 2018

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 2018

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 about common issues that arise in relation to Environment Days, plus some special guidance because this is an election year.

Working with SWMS

Environment Days are co-sponsored with SWMS. That means:

- Members should be mindful of, and act in accordance with, SWMS' internal guidelines (attached).
- Before inviting any group to participate in an Environment Day, members should first consult with SWMS staff about possible invitees, to ensure that each invitee is suitable and consistent with the program objectives.
 - If, following this consultation with SWMS, members decide to offer additional services at the event, they must do so in accordance with the Constituency Services and Office Budget policy.

Dealing with unsolicited requests

Members are sometimes contacted by groups that wish to offer or showcase products or services at Environment Days. Members should exercise caution when responding to these unsolicited offers. To gain visibility, a vendor may offer a service to a member at a discounted rate—which would constitute a benefit or donation to the member. Such vendors may also be lobbyists within the meaning of the *Lobbying Bylaw*, who are thereby barred from offering any benefit or donation to members of Council. For this reason, members should confirm that vendors who solicit goods or services are referred

to the Office of the Lobbyist Registrar to seek advice about its registry and *the Lobbyists' Code of Conduct*, and ensure that any goods and services are purchased at market value. Members can determine market value informally, such as by obtaining quotes for similar services. Similar concerns also arise when not-for-profit entities solicit opportunities at Environment Days.

Environment Days are increasingly seen as opportunities 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 any such requests, you must be prepared to answer questions from the public about why you selected the group to appear. My advice is that you plan ahead, recognize that you are accountable for the complement of groups that 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.

Donations

Members sometime explore options for obtaining donations of food, beverages, and 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. Importantly, members should not ask third parties or SWMS to seek such donations.

Special Election Year Considerations for Environment Days

We are in an election year, which creates the following special implications for Environment Days in 2018:

- Members of Council cannot partner with SWMS for an Environment Day after August 1. I understand that all planned Environment Days have been scheduled to occur prior to then.
- Members of Council may not use any City resources for any campaign purpose. Accordingly, members running for re-election should ensure to establish a clear separation between campaign activities and Environment Days activities. This means that:
 - Members running for re-election should not organize campaign activities to coordinate with an Environment Day.
 - If a resident requests campaign information at an Environment Day, they should be informed that the event is unrelated to the campaign, and that no campaigning can occur at the event.
 - Members and staff should not hand out any campaign literature at an Environment Day.

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
Kelly McCarthy, Acting Deputy City Clerk, Strategic Integration & Excellence
Derek Tung, Supervisor Solid Waste Management, CS&WDI

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

August 1, 2018

Via Email

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

Dear Members of Council:

Re: 2018 Election-Related Activities – Updated Bulletin

Attached is a revised Interpretation Bulletin regarding 2018 Election-Related Activities. As a result of motion 3 in relation to item MM44.128 passed at the June 30, 2018 City Council meeting, paragraphs 12 to 14 have been amended, as well as related examples on page 7. I consulted with the Offices of the City Clerk, City Solicitor and City Manager to ensure that there is a consistent understanding of the changes arising from motion 3 and Council's intention.

In addition to these changes, unrelated new sample advice has been incorporated on pages 8 and 9.

Although members of Council can use City resources for City-related communications purposes until September 7, 2018, members should be mindful that it is never permissible to use City resources for any campaign purpose. Furthermore, members' communications should only be targeted to residents in members' existing wards. I urge members of Council to act with caution and appropriate care to respect both the letter and spirit of the City's policy framework as the election date draws near.

Please do not hesitate to contact me to obtain confidential advice about specific scenarios.

Sincerely,

[original signed by Valerie Jepson]

Valerie Jepson
Integrity Commissioner

Enclosure (1): August 1, 2018 Interpretation Bulletin – 2018 Election-Related Activities (9 pages)

cc: Ulli Watkiss, City Clerk
Giuliana Carbone, Interim City Manager
Wendy Walberg, City Solicitor

August 17, 2018

Sent via Email

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

Members of Council:

Re: Duties of Members of Council and their Staff Regarding Confidential Information

Various media outlets are reporting that reporters have been able to access confidential information included in the agenda for the August 20 City Council meeting. I trust that neither members of Council nor their staff were the reason for this disclosure. Out of an abundance of caution, however, I write to remind members of Council and their staff of their obligations to protect confidential information.

Members of Council

Article V of the *Code of Conduct for Members of Council* prohibits disclosure of confidential information for any purpose. Article V states (emphasis added):

V. CONFIDENTIAL INFORMATION

Confidential information includes information in the possession of, or received in confidence by the City that the City is either prohibited from disclosing, or is required to refuse to disclose, under the Municipal Freedom of Information and Protection of Privacy Act (often referred to as “MFIPPA”), or other legislation. Generally, the Municipal Freedom of Information and Protection of Privacy Act restricts or prohibits disclosure of information received in confidence from third parties of a corporate, commercial, scientific or technical nature, information that is personal, and information that is subject to solicitor-client privilege.

The City of Toronto Act, 2006 allows information that concerns personnel, labour relations, litigation, property acquisitions, the security of the property of the City or a local board, and matters authorized in other legislation, to remain confidential. For the purposes of the Code of Conduct, “confidential information” also includes this type of information.

No member shall disclose or release by any means to any member of the public, any confidential information acquired by virtue of their office, in either oral or written form, except when required by law or authorized by Council to do so.

Nor shall members use confidential information for personal or private gain, or for the gain of relatives or any person or corporation. As one example, no member should directly or indirectly benefit, or aid others to benefit, from knowledge respecting bidding on the sale of City property or assets.

Under the Procedures By-law (passed under section 189 of the City of Toronto Act, 2006), a matter that has been discussed at an in-camera (closed) meeting remains confidential. No member shall disclose the content of any such matter, or the substance of deliberations, of the in-camera meeting until the Council or committee discusses the information at a meeting that is open to the public or releases the information to the public.

The following are examples of the types of information that a member of Council must keep confidential:

- items under litigation, negotiation, or personnel matters;
- information that infringes on the rights of others (e.g., sources of complaints where the identity of a complainant is given in confidence);
- price schedules in contract tender or Request For Proposal submissions if so specified;
- information deemed to be “personal information” under the Municipal Freedom of Information and Protection of Privacy Act, and
- statistical data required by law not to be released (e.g. certain census or assessment data).
- Members of Council should not access or attempt to gain access to confidential information in the custody of the City unless it is necessary for the performance of their duties and not prohibited by Council policy.

Staff of Members of Council

Your staff also have a duty to maintain confidential information, which is described in the Human Resources and Ethical Framework for Members' Staff, which states (emphasis added):

e. Use or disclosure of confidential information

Members' staff may not, during the term of his or her employment or any time thereafter, directly or indirectly use or disclose any confidential information obtained during their employment with the Member, unless they are required by law or authorized by the Member in writing and in advance. The obligation to maintain confidentiality continues after the ceasing of employment.

Confidential information includes, but is not limited to, privileged information, draft by-laws or staff reports, third party information, personal information, technical, financial or scientific information and any other information collected, obtained or derived for or from any records that a Members' staff may come into contact with while employed in the office of the Member.

I encourage you to review your obligations as set out in the *Code of Conduct for Members of Council* and to remind your staff of their obligations. I am available to answer any questions.

Yours truly,

[original signed by Valerie Jepson]

Valerie Jepson
Integrity Commissioner

November 8, 2018

Sent via Email (No Original to Follow)

PRIVATE AND CONFIDENTIAL

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

Dear Members of Council:

Re: Post-Employment Obligations — Former Members of Council

This letter is being sent to all members of Council whose terms are ending on November 30, 2018. As part of the education and outreach mandate of this Office, I am pleased to attach an interpretation bulletin developed to provide general guidance to outgoing members during this transition period.

I would also like to take this opportunity to give you my best wishes as you begin a new chapter in your life. As you know, my over-arching philosophy is that it is essential for society that well-intentioned and qualified people run and serve for elected office. Thank you for your contributions and commitment to public life through elected office, and I wish you well in the future.

Please feel free to contact me for specific advice should you have any questions about the guidance in the bulletin or other Code of Conduct matters.

Yours truly,

[original signed by Valerie Jepson]

Valerie Jepson
Integrity Commissioner

Enclosure (1): November 2018 Interpretation Bulletin: Post-Employment
Obligations — Former Members of Council

cc. Ulli Watkiss, City Clerk
Chris Murray, City Manager
Cristina De Caprio, Lobbyist Registrar

Valerie Jepson
Integrity Commissioner
375 University Ave., Suite 202
Toronto, ON M5G 2J5
416-397-7770 | Valerie.Jepson@toronto.ca

Cristina De Caprio
Lobbyist Registrar
375 University Ave., Suite 201
Toronto, ON M5G 2J5
416-338-5858 | Cristina.DeCaprio@toronto.ca

December 10, 2018

Dear Members of Council and Staff:

Re: Holiday Gift-giving and Events

During the holiday season, members of Council sometimes receive gifts and invitations to events. Please be reminded that:

- Under the [Lobbying By-law](#), lobbyists are not permitted to offer or provide gifts, entertainment, meals or favours of any kind.
- Under the [Code of Conduct for Members of Council](#), members have a companion obligation not to receive such gifts or benefits of any value from lobbyists.
- Further, members are reminded that they are not permitted to receive a gift or benefit from any other source unless one of the exceptions set out in the Code applies. See Article IV of the Code of Conduct.

If offered a gift or an invitation to an event, members of Council and their staff should be aware of the Lobbying By-law and their own Code of Conduct obligations. This may mean politely declining gifts or invitations. Members of Council can contact the Integrity Commissioner at Valerie.Jepson@toronto.ca or 416-397-7770 for specific advice.

Please contact the Lobbyist Registrar, Cristina De Caprio at Cristina.DeCaprio@toronto.ca or 416-338-5865 for advice on the provisions of the Lobbying By-law relating to gifts and invitations; to ask if someone is a lobbyist or the client of a lobbyist; or to report that a lobbyist has offered or provided a gift, meal, entertainment or favour in breach of the Lobbying By-law.

Yours truly,



Valerie Jepson
Integrity Commissioner



Cristina De Caprio
Lobbyist Registrar

c.c. Chris Murray, City Manager



November 29, 2018

Members of Council
City of Toronto
Toronto City Hall
100 Queen St. W.
Toronto, ON M5H 2N2

Dear Members of Council:

Re: Welcome to the 2018-2022 term of Toronto City Council

Congratulations and welcome to the 2018-2022 term of Toronto City Council. I wish you every success in your new or continuing role.

As the Integrity Commissioner, I am responsible for providing advice about the *Code of Conduct for Members of Council* (the "Code of Conduct") and the *Municipal Conflict of Interest Act* (the "MCIA"). I am available to you and your staff to provide confidential advice and guidance on issues, conflicts and complaints that may arise during the course of your work.

This is an exciting time for you. In these early days, you will be busy establishing your offices, setting policies and procedures for your constituency office, selecting your staff, and—for some of you—familiarizing yourself with City Hall.

I encourage you to spend time thinking and planning about how you will ensure that you and your staff act in accordance with the high standards of conduct expected of you by the Code of Conduct. My Office is a key resource for you.

I look forward to meeting with you in person to discuss my role more fully.

Yours truly,

Valerie Jepson
Integrity Commissioner

Enclosure (1): 2018-2022 New Council Orientation Package (5 pages)

March 15, 2018

Sent via E-Mail (No Original to Follow)

Attention: Chairs
City of Toronto Adjudicative Boards
Toronto, Ontario

Dear Chair:

Re: Changes to the Code of Conduct

I write to bring your attention to recent changes to the Code of Conduct for Members of Adjudicative Boards. The updated Code of Conduct is attached. I would appreciate it if you could provide this letter and the new Code of Conduct to all members of the board that you chair and that this item be included on your upcoming board meeting agenda for consideration.

There are three main changes that all board members should be aware of:

- **Doing Business with the Board.** Article XI of the Code of Conduct has been amended to prohibit board members from personally or directly providing goods or services to the board for payment. This is a significant change, and I acknowledge some time will be required to allow members who are currently providing the board with goods or services to transition into compliance with the new obligation. I have issued an interpretation bulletin to assist with the transition, which is also attached.
- **Outside Activities.** New Article XII.1 of the Code of Conduct stipulates that members of the adjudicative board cannot hold a senior position (director or executive) with an organization whose objectives or mandate are in conflict with the adjudicative board.
- **Confidential Information.** Article V of the Code of Conduct has been amended to clarify the meaning of "confidential information", and to provide greater clarity about board members' obligations to avoid disclosing or using such information. These changes to Article V are clarifying in nature and should not impact any board operations.

There were additionally a number of housekeeping amendments to the Code of Conduct that in my opinion should not significantly impact board members' activities.

I remain available to you and all board members to provide education and advice.

Yours truly,

[original signed by Valerie Jepson]

Valerie Jepson
Integrity Commissioner

Enclosures (2): Code of Conduct for Members of Adjudicative Boards (12 pages)
 Interpretation Bulletin: Article XI of the Code of Conduct (Business
 Relations) (2 pages)

cc. Ulli Watkiss, City Clerk
 Marilyn Toft, Manager, Council Secretariat Support
 Aretha Phillip, Manager, Community Councils & Committees
 Peter Wallace, City Manager
 Meg Shields, Director, Corporate Policy

March 15, 2018

Sent via E-Mail (No Original to Follow)

Attention: Chairs

City of Toronto Business Improvement Area Board of Management
Toronto, Ontario

Dear Chair:

Re: Changes to the Code of Conduct

I write to bring your attention to recent changes to the Code of Conduct for members of BIA boards of management. The updated Code of Conduct, which is called the "Code of Conduct for Members of Local Boards (Restricted Definition)", is attached. I would appreciate it if you could provide this letter and the new Code of Conduct to all members of the board that you chair and that this item be included on your upcoming board meeting agenda for consideration.

There are three main changes that all board members should be aware of:

- **Doing Business with the Board.** Article IX of the Code of Conduct has been amended to prohibit *board members* from personally or directly providing goods or services to the board for payment. This is a significant change, and I acknowledge some time will be required to allow members who are currently providing the board with goods or services to transition into compliance with the new obligation. I have issued an interpretation bulletin to assist with the transition, which is also attached.
- **Outside Activities.** New Article X.1 of the Code of Conduct stipulates that a member of the BIA Board of Management cannot hold a senior position (director or executive) with an organization whose objectives or mandate are in conflict with the BIA.
- **Confidential Information.** Article V of the Code of Conduct has been amended to clarify the meaning of "confidential information", and to provide greater clarity about board members' obligations to avoid disclosing or using such information. These changes to Article V are clarifying in nature and should not impact any board operations.

There were additionally a number of housekeeping amendments to the Code of Conduct that in my opinion should not significantly impact board members' activities.

I remain available to you and all board members to provide education and advice.

Yours truly,

[original signed by Valerie Jepson]

Valerie Jepson
Integrity Commissioner

Enclosures (2): Code of Conduct for Members of Local Boards (Restricted
Definition) (10 pages)
Interpretation Bulletin: Article IX of the Code of Conduct (Business
Relations) (2 pages)

cc: Ulli Watkiss, City Clerk
Aretha Phillip, Manager, Community Councils & Committees
Marilyn Toft, Manager, Council Secretariat Support
Peter Wallace, City Manager
Meg Shields, Director, Corporate Policy
Mike Major, Manager, Business Improvement Area Office

March 15, 2018

Sent via E-Mail (No Original to Follow)

Attention: Chairs
City of Toronto Local Boards
See Schedule A for list of Recipients
Toronto, Ontario

Dear Chair:

Re: Changes to the Code of Conduct

I write to bring your attention to recent changes to the Code of Conduct for members of Toronto boards. The updated Code, which is called the "Code of Conduct for Members of Local Boards (Restricted Definition)", is attached. I would appreciate it if you could provide this letter and the new Code of Conduct to all members of the board that you chair and that this item be included on your upcoming board meeting agenda for consideration.

There are three main changes that all board members should be aware of:

- **Doing Business with the Board.** Article IX of the Code of Conduct has been amended to prohibit board members from personally or directly providing goods or services to the board for payment. This is a significant change, and I acknowledge some time will be required to allow members who are currently providing the board with goods or services to transition into compliance with the new obligation. I have issued an interpretation bulletin to assist with the transition, which is also attached.
- **Outside Activities.** New Article X.1 of the Code of Conduct stipulates that a member of the Board of Management cannot hold a senior position (director or executive) with an organization whose objectives or mandate are in conflict with the board.
- **Confidential Information.** Article V of the Code of Conduct has been amended to clarify the meaning of "confidential information", and to provide greater clarity about board members' obligations to avoid disclosing or using such information. These changes to Article V are clarifying in nature and should not impact any board operations.

There were additionally a number of housekeeping amendments to the Code of Conduct that in my opinion should not significantly impact board members' activities.

I remain available to you and all board members to provide education and advice.

Yours truly,

[original signed by Valerie Jepson]

Valerie Jepson
Integrity Commissioner

Enclosures (2): Code of Conduct for Members of Local Boards (Restricted
Definition) (10 pages)
Interpretation Bulletin: Article IX of the Code of Conduct (Business
Relations) (2 pages)

cc: Ulli Watkiss, City Clerk
 Marilyn Toft, Manager, Council Secretariat Support
 Aretha Phillip, Manager, Community Councils & Committees
 Peter Wallace, City Manager
 Meg Shields, Director, Corporate Policy

Appendix 2

City of Toronto														
Integrity Commissioner Office Expense Budget														
Actuals January - December 2018														
Charged to Cost Centre IG0001														
OFFICE OF THE INTEGRITY COMMISSIONER														
Cost Element	Cost Element Name	January '18	February '18	March '18	April '18	May '18	June '18	July '18	August '18	September '18	October '18	November '18	December '18	January - December '18
		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Totals
		\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
1015	Full Time Regular Pay	17,657.97	29,429.94	29,429.94	25,326.11	27,207.03	40,810.63	29,364.14	30,997.10	29,173.43	29,565.74	29,565.74	57,653.26	376,180.93
1050	Permanent - Vacation Pay				5,490.97	129.48	129.48							5,749.93
1711	Comprehensive Medical	419.52	699.92	699.92	699.92	581.96	1,332.43	793.59	699.92	699.92	699.92	699.92	1,364.84	9,282.25
1712	Dental Plan	215.93	353.28	353.28	301.58	297.00	621.99	388.41	353.28	353.28	353.28	353.28	688.90	4,634.09
1720	Long Term Disability	360.94	601.56	601.56	497.95	489.98	766.47	600.22	633.48	604.34	604.34	604.34	1,178.46	7,543.64
1730	Group Life Insurance	131.95	219.92	219.92	182.06	179.14	280.27	219.62	231.09	221.04	221.04	221.04	431.02	2,758.11
1740	Employment Insurance	606.48	606.48	606.48	383.69	218.30	341.23	119.05	106.01	105.98	105.98	77.62		3,277.30
1745	El Rebate	19.53	32.56	32.56	14.04	17.76		9.14	8.14	8.14	8.14	6.00	20.03	193.80
1750	Ontario Health Tax	347.28	578.80	578.80	604.76	536.92	804.16	577.06	608.87	573.35	581.00	580.96	1,133.03	7,504.99
1760	Canada Pension Plan	1,429.30	1,429.30	1,429.30	921.77	532.07	790.59	391.34	256.02	256.02	256.02	256.92	96.77	8,044.42
1770	Pension Plan (OMERS)	3,606.46	2,163.88	3,606.46	3,093.75	3,044.36	4,801.27	3,596.82	3,835.49	3,569.19	3,626.46	3,626.46	7,062.88	45,633.48
1903	Separation - Benefit													-
	Total Salaries and Benefits	24,795.36	36,115.64	37,558.22	37,407.07	33,234.60	50,696.18	36,059.39	37,729.40	36,504.69	36,021.92	35,991.28	69,629.19	470,802.94
2010	Stationery				18.09		23.49				71.21			112.79
2020	Books & Magazines													-
2040	Paper & Print Supplies	81.39		69.49						57.78				208.66
2099	Miscellaneous Office Supplies													-
2790	Presentation Items									13.41				13.41
2999	Miscellaneous Materials												(0.02)	(0.02)
3020	M & E - Communications													-
3310	Furnishings						468.10							468.10
3410	Computers - Hardware													-
3420	Computers - Software													-
4010	Professional Services - Legal		749.46		1,658.69	2,956.13	3,983.39	203.52	3,953.88	5,327.88			2,473.53	21,306.48
4066	Translation & Interpreters									11.11				11.11
4122	Transcripts			3,458.21		1,542.92						(999.18)	945.47	4,947.42
4130	Process Sener Fees					351.07								351.07
4132	Conduct Money				508.38								483.80	992.18
4144	Investigative Expense							1,017.60						1,017.60
4199	Other Professional & Technical Services													-
4225	Business Travel - Public Transit						822.33					(822.33)		-
4252	Conference/Seminar - Accommodation													-
4253	Conference/Seminar - Air/Rail/Bus Travel													-
4254	Conference/Seminar - Ground Transportation													-
4256	Conference/Seminar - Registration Fee						125.00							125.00
4310	Train/Development - External													-
4410	Contracted Services - Electrical													-
4414	Advertising & Promotion													-
4452	Transportation - Taxis													-
4472	Computer Hardware Maintenance - RSA Token													-
4473	Managed Print Charges						83.83					122.84	199.65	406.32
4590	Rental - Other				508.80									508.80
4760	Membership Fees													-
4770	Parking													-
4775	Kilometrage													-
4805	Postage													-
4810	Telephone													-
4811	Cellular Phones	55.31	55.31	55.31		110.62	55.31	55.31		110.62		55.31	179.80	732.90
4815	Courier Services													-
4820	Business Meetings					711.86								711.86
4822	Receptions & Public Relations													-
4825	Printing & Reproduction - External													-
4827	Online Services Fees													-
4865	Cash Over/Under				0.02									0.02
4895	Other Expenses			12.00	12.00								12.00	36.00
6031	Contribution - Insurance Reserve Fund						4,464.53							4,464.53
6570	Bank Service Charges													-
7025	IDC - Postage & Courier													-
7030	IDC - Printing					5.71								5.71
7035	IDC - Photocopying													-
7130	IDC - User Hardware & Operational Syst Support													-
9451	Trade A/P Discounts Received													-
	Total Office Expenditures	\$ 136.70	\$ 804.77	\$ 3,596.01	\$ 2,705.98	\$ 5,678.31	\$ 10,025.96	\$ 1,276.43	\$ 3,963.88	\$ 5,520.80	\$ 71.21	\$ (1,643.36)	\$ 4,294.23	\$ 36,419.94
	Total Monthly Expenditures	\$ 24,932.06	\$ 36,920.41	\$ 41,153.23	\$ 40,113.05	\$ 38,912.91	\$ 60,722.16	\$ 37,335.82	\$ 41,683.28	\$ 41,085.49	\$ 36,093.13	\$ 34,347.92	\$ 73,923.42	\$ 507,222.88