

# **Annual Report**Toronto Lobbyist Registrar for the Year 2019

Cristina De Caprio Lobbyist Registrar

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## Message from the Lobbyist Registrar

I am pleased to provide the Annual Report for the Toronto Lobbyist Registrar (TLR) for the period of January 1 to December 31, 2019. This is the TLR's 12th Annual Report to Toronto City Council (Council). The purpose of this report is to highlight actions and key accomplishments in 2019.

## Mandate of the Toronto Lobbyist Registrar

#### **Role of the Toronto Lobbyist Registrar**

The Lobbyist Registrar (Registrar) is an Independent Officer, who reports directly to Council about its legislative responsibilities. According to the values codified in the Lobbying By-law (By-law) by Council, the Registrar regulates lobbying activities in the public interest. The By-law establishes authority for the TLR to deliver transparency, requiring public disclosure of lobbying activities on the Lobbyist Registry (Registry) and adherence to the Lobbyists' Code of Conduct (Code of Conduct). The Registrar's duties are to administer and uphold the By-law in the public interest to ensure transparency and integrity in City government decision-making.

The Registry and Code of Conduct are the tools in the By-law which deliver transparency. The By-law's disclosure requirement through the Registry ensures that the lobbying of Public Office Holders (POH) is transparent. POH include: public service employees; and, City elected and appointed officials. The Code of Conduct sets out the high ethical standards that must be adhered to in lobbying activities at the City.

#### **Legislative Framework**

The City's regulatory model for lobbying activities is mandated by law. The *City of Toronto Act, 2006* (COTA), Toronto Municipal Code Chapter 140, Lobbying, and Toronto Municipal Code Chapter 3, Accountability Officers, outline the legislation, which

gives the TLR its authority, and which provides the obligations that lobbyists must adhere to.

The By-law does not impede access to government, but instead guarantees a window of transparency for lobbying communications. Lobbying is a legitimate activity, when disclosed publicly and when conducted according to the ethical standards outlined in the By-law.

#### **Good Governance**

The By-law's requirements for transparency and integrity in lobbying are an integral part of the City's policy and regulatory framework, contributing to the City's mandate for good public governance. The By-law supports civic engagement, open government, transparency, and access to democracy. The City's regulatory and policy framework for good governance supports a culture of transparency and integrity in lobbying. The broader City governance framework includes various mechanisms for good governance such as: accountability for regulatory and supervisory authorities; codes of conduct for public officials; stakeholder engagement initiatives through public consultation and participation; freedom of information legislation; and, rules on political activities and election campaign contributions. POH and lobbyists are each bound by their own respective standards of conduct, and each have their own accountability requirements through oversight mechanisms. By ensuring that lobbyists, through their Code of Conduct, adhere to the City's requirements for responsible business practices, the By-law fulfills an important role in the City's governance model.

#### The City's Ethical Standards



#### **Build Public Trust**

"Lobbying can be a legitimate way for diverse interests to bring their voices before the people who will shape and make decisions."

The Honourable Madam Justice Denise E. Bellamy, Commissioner

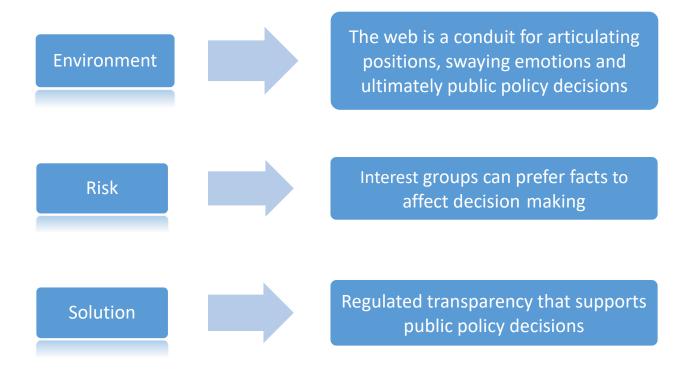
Toronto Computer Leasing Inquiry Report

Vol. 2: Good Government

Ethical and transparent lobbying is foundational to a responsive City government that advances civic engagement and open democratic processes. The Registry and the Code of Conduct are important tools which contribute to the public's confidence in City processes and to the public's trust in government. Building trust through these tools increases the public's confidence in government and the public's support for City government's decisions. The Registry's online search tool enables civic engagement. It delivers information about who spoke to whom and about what. By facilitating this transparency, the Registry contributes to the exchange of multiple perspectives on issues before City government. This enhanced engagement leads to more informed policy debates and the development of better policies. As a multi-stakeholder platform, the Registry affords all stakeholders, from the private sector, media, residents, POH, and the public, opportunities to contribute to the development of public policies. The Registry serves the public interest because the lens of transparency it provides counterbalances the risk of undue influence by private interest groups. Because the Registry provides information about who has engaged in lobbying activities, the Registry builds the public's trust in City government decisions.

The public's perception of its City government being trustworthy is important in order to attain the outcomes intended by City government decisions. Public confidence in the processes which lead to City government decisions is essential. The Registry provides a window of transparency which evidences that City government is trustworthy. Where the Registry substantiates the decisions of Council, the Code of Conduct further entrenches the City's standards for ethical lobbying, by requiring that those who lobbied POH have acted within the standards for responsible business practices that have been set into law by the City.

## **Transparency Supports Public Policy Decisions**



#### Transparency in the Age of Digital Technology

As digital technology mediums are increasingly becoming the main modes of communication, especially with the proliferation of social media platforms into daily life, the need for transparency in lobbying has never been more important. Expansions in digital communication platforms create the danger that interest groups may use these platforms for the wrong purpose by culling facts to influence City government decisions. If interest groups distort information through social media, the resulting conjecture and speculation may affect emotion, and ultimately impact City government decision-making. The Registry, in contrast, provides information about the sources from which City government collects, verifies and applies facts. Therefore, the Registry's information about who is lobbying whom, and about what, provides the window on City government decision-making processes, necessary to minimize the public's concerns about non-compliant persuasion of public policy.

# Technology Presents Unique Challenges to Government Transparency

66% of online survey respondents indicated – "I worry technology will make it impossible to know if what people are seeing or hearing is real."

From the 2020 Edelman Trust Barometer: Canada

# Advancements in Technology

- Big Data
- Artificial Intelligence (AI)
- Machine Learning
- Blockchain Technology
- Social Media

# Public's Expectation from Government

- More Rights for Citizens
- Enhanced Accountability
- Stronger Enforcement
- Protection of Existing Rights

#### **Grass-roots Lobbying Regulation**

The By-law's requirements for public disclosure of lobbying activities on the Registry extend to indirect lobbying. Communicating with government officials by indirect lobbying is known as "grass-roots" lobbying. Both direct and indirect lobbying communications require disclosure. The By-law mandates that the public should know who communicates with POH, whose interests are being advanced, and in what regard. Even if there is no direct lobbying, the By-law may still require registration of grass-roots communications.

Under the By-law, a grass-roots lobbying campaign is a form of indirect communication between a lobbyist and a POH through communications made by those who respond to the lobbyist's call to action. The call to action is through a mass appeal, which seeks to persuade the public or members of a community, to communicate directly with a POH about an issue or opinion advocated by the lobbyist.

These appeals by a lobbyist to the public, or members of an organization or special interest group are called grass-roots lobbying campaigns.

A lobbyist must obtain the approval of the Registrar for the grass-roots lobbying campaign before launching the appeal. Prior to granting such approval, the Registrar may require additional information on the proposed grass-roots communication to provide the required transparency.

The Registry contains disclosure of the identity of the lobbyists, as well as those individuals or groups on whose behalf the lobbyist is acting, and the reasons for the grass-roots lobbying campaign.

Communications that are part of the grass-roots lobbying campaign should state:

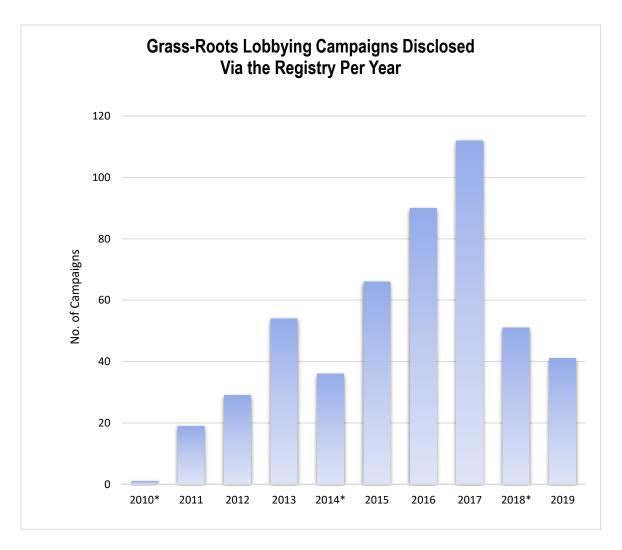
- 1. Who prepared the communication;
- 2. On whose behalf the communication is being sent;
- 3. That the communication is being sent as part of an approved grass-roots lobbying campaign and the dates for which the Registrar provided approval;
- 4. The subject matter and lobbyist registrations for which the grass-roots lobbying campaign is approved; and
- 5. The purpose of the grass-roots lobbying campaign.

This ensures that when POH receive the grass-roots communication, they are assured legitimacy of the grass-roots lobbying campaign, the lobbyists' disclosure of identity of those on whose behalf they are acting, and the purpose of the campaign.

Since Council adopted the By-law, these requirements for regulation of grass-roots lobbying campaigns have supported transparency in City democracy. The following are indicators of how the Registry has contributed to increased transparency:

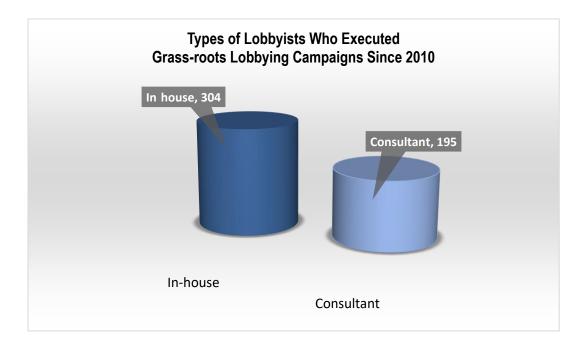
1. The Total Number of Grass-roots Lobbying Campaigns Since 2010

Since 2010, there have been 499 grass-roots lobbying campaigns registered. An average of 72 campaigns have been launched annually for the last five years, i.e. from 2015 to 2019.



<sup>\*</sup> Election year

- 2. The Number of Stakeholder Groups Engaged in Grass-roots Lobbying Campaigns Since 2010
  - a. The Number of Grass-roots Lobbying Campaigns
     Since 2010, 499 grass-roots lobbying campaigns were launched as lobbying activities.
  - Types of Lobbyists Who Executed Grass-roots Lobbying Campaigns
     Grass-roots lobbying campaigns have been executed by 304 in-house lobbyists and 195 consultant lobbyists, since 2010.



#### c. Who Was Reached?

Of these 499 grass-roots lobbying campaigns, 69 were aimed at communities of interest, 93 were designed to reach the public, and 337 were attempted to reach a combination of both the public and communities of interest.

#### d. Which POH were Targeted?

To date, 449 grass-roots lobbying campaigns targeted councillors, 13 grass-roots lobbying campaigns targeted staff, and 36 grass-roots lobbying campaigns targeted a combination of councillors and staff. One grass-roots lobbying campaign in 2018 targeted a registered candidate for election.

## The Number of Grass-roots Lobbying Campaigns Since 2010 Sorted by Communities and Targets Reached

Total No. of Grass-roots Lobbying Campaigns: 499

Launched by:

304 In-house Lobbyists; and

195 Consultant Lobbyists Communities Reached

Communities of Interest (69)

Public (93)

Communities of Interest + Public (337)



Councillors (449)

**Staff (13)** 

Councillors + Staff (36)

Registered Candidate for 2018 Election (1)

### **Looking Towards the Future**

In order to continue delivering the TLR mandate with success, our office will adhere to the following objectives while always preserving our independence: improving the services that we deliver to our stakeholders; identifying and implementing ways in which the Registry and the regulatory scheme can be improved; and adapting and modernizing to meet ever-changing regulatory challenges.

Below are the key commitments for the TLR in 2020:

# 1. Improvement to the Online Registry through the State of Good Repair Project (SOGR)

The TLR completed its third year of working with the City Clerk's Office Business & Technology Planning Unit (Clerk's IT) on the State of Good Repair Project (SOGR) to upgrade the technology that drives the Registry. The SOGR was approved by Council in 2015. On January 24, 2020, the SOGR deployed the improved Registry. Its improvements enable the Registry to comply with statutory obligations, meet requirements of users, and conform to City and industry standards. A new mobile interface enhances the user experience and improves accessibility. Undue delays in registration and reporting will now be pre-empted with the new system because it ensures data integrity and compatibility with new technology in the marketplace. These upgrades are integral to ensuring the Registry meets the demands of ever-changing new technologies and high standards of data integrity. The Registry's information will be more easily accessed with its upcoming improved search capabilities, and mobile interface. The completion of the SOGR for the Registry is pivotal to the delivery of transparency and accuracy required by the By-law.

Thank you to all staff and contributors from the TLR and City Clerk's IT for their dedication and commitment to the SOGR.

#### 2. Continuous Improvements to the Registry

The Registry is the publicly available, online, multi-stakeholder platform that provides disclosure of lobbying activities. All of the information lobbyists are obligated to report is contained in the Registry. Searchable online data fields can be explored in order to learn who is lobbying whom, and about what.

Although the Registry has recently undergone a major re-development and upgrade to its technology platform, the TLR remains committed to ensuring the Registry upgrades do not become obsolete, given the rapid pace of technological advancement in the marketplace. Now that the upgrade is complete, and the new platform has been deployed, the TLR will use this advancement to expand on the modernization of the Registry, choosing not to remain complacent with the conformity achieved with City and industry technological standards. The TLR recognizes that continuous upgrades will be required to guarantee that the Registry will continue to meet the demands of rapidly changing new technologies and heightened standards of data integrity. The new upgrades allow the Registry's information to be more easily accessed because of improved search capabilities and mobile interface. In 2020, the TLR will look forward to receiving feedback from our stakeholders for ways to improve the platform to further prevent undue delays in registration and reporting.

Therefore, the TLR in 2020 will be supporting stakeholders through the transition to the new system, and inviting feedback for future improvements to further assist their work routine and the user experience. The goal is to ensure the system accomplishes what it was designed to do, and can evolve fluidly to keep current with changing technology standards.

Feedback will be sought in 2020 for identifying new opportunities for business improvement and transformation. The following goals for improvement needs have been identified:

- A. Enhancing opportunities for the Registry to be used as a compliance tool.
- B. Leveraging the new technology platform to create more efficient processes, such as fully transitioning the account creation and registration processes to digital. Maximizing this technology upgrade would allow earlier access to information and also improve the timeliness of the completion of lobbyists registrations.
- C. Enabling the collection of more comprehensive subject matter information to provide additional details about lobbying activities, and therefore enhance transparency. Capturing additional data will enhance disclosure and assist with better understanding of lobbying activities.

- D. Reviewing and expanding the key performance indicators will assist the TLR to quantify the value added to the user experience by the improvements made to the Registry.
- E. Expanding the use of predictive text should be implemented to reduce spelling variations. This will improve the quality of data and therefore enhance search capability.

#### 3. Using Data to Create Understanding

The TLR will also continue its effort to disseminate Registry information and statistics in multiple formats beyond the Registry's public site. The ongoing expansion of information provided in the TLR's Annual Reports is another example of our office's commitment to sharing information available in the Registry in ways that create greater understanding of lobbying activities in City government. The following are examples of new data shared by the TLR: the number of grass-roots lobbying campaigns undertaken, number and methods of lobbying communication, review of lobbying activities, listings of the recipients of lobbying activities, and a global perspective on compliance. Assembling and publishing this data is important in making the TLR's mandate successful.

#### 4. Expansion of Lobbying By-law Provisions

#### A. Improvements to the Regulatory Framework

Improvements to the legislation are important to ensure the efficacy of the TLR's legislative mandate. The office will continue to conduct periodic reviews of the By-law and propose amendments as necessary.

Evaluating and responding to requests for advice are important to facilitate compliance with the By-law. The TLR will continue its commitment to supporting its stakeholders, by performing environmental scans to anticipate future contraventions and conduct judicious interventions where possible to prevent such harm.

## B. Planning for the Implementation of Administrative Sanctions

The Registrar's enforcement powers were expanded through the Modernizing Ontario's Municipal Legislation Act, 2017, with the added authority to impose administrative sanctions, including administrative monetary penalties. These will expand the range of corrective actions from minor for less grievous infractions, to more punitive measures for more egregious breaches of the By-law. In 2019, the TLR continued its development of the policy and operational requirements for incorporating these administrative monetary penalties into the range of penalties available, in collaboration with the City Manager and City Solicitor. The implementation of this regime is scheduled for 2020. Once in place, the range of enforcement measures will be expanded to include: terms and conditions imposed by the Registrar, bans, provincial prosecutions, and administrative monetary penalties. Various approaches are used to enforce compliance with the By-law, including advice and training, reports to Council and prosecutions under the *Provincial Offences Act*. These new enforcement tools will be added to the spectrum of corrective actions imposed in the public interest, on an escalating scale, depending on the facts of the case and the seriousness of the breach.

#### 5. Continued Collaboration with Stakeholders

The TLR will continue its important role in the City's accountability framework through ongoing collaboration with the City Manager, the City Clerk, the City Solicitor, other Accountability Officers and Council. Finally, the TLR will continue to work with lobbyists, POH, the public, and other governments to ensure that City government continues to provide effective lobbyist regulation.

Lobbyists have demonstrated a willingness to comply with the By-law. Their adherence to the obligations under the By-law, together with the ongoing support of the TLR's many stakeholders, have underscored the By-law and Registry's successes in delivering transparency and accountability. Together with our office, the broad stakeholder community has embraced the TLR's mandate for transparency in lobbying communications. The City Clerk's Office has provided ongoing administrative, financial and information technology services. The

Offices of the City Manager and City Solicitor have worked with the TLR to expand the By-law with new provisions. Working in collaboration, the City Manager, the City Clerk, the City Solicitor and the Accountability Officers have all supported the TLR's achievements within the City's accountability framework. POH, Council, lobbyists, members of the public and the media have all been instrumental in enabling the TLR to promote and enhance transparency in City government decision-making processes.

## 6. The Role of Public Office Holders (POH) in Nurturing an Ethical Culture

The City's POH have underscored the By-law and Registry's success by reinforcing to third-parties who communicate with them the requirement to comply with the By-law. As POH have made transparency and accountability a pre-requisite for communications by third parties, POH either seek advice from the TLR regarding dealings with lobbyists or refer lobbyists to our office for direct advice about their obligations.

The TLR looks forward to continuing this important collaboration between it and POH in support of lobbying regulation at the City.

## Report on Activities in 2019

#### Website

In 2019, there were 18,310 visits to the TLR public website.

In addition to hosting the Registry, the TLR website provides important compliance information, including legislation, interpretation and advisory bulletins, tutorials, interactive tools, FAQs and links to other sites.

The TLR maintains and administers the Registry online via <a href="www.toronto.ca/lobbying">www.toronto.ca/lobbying</a>. The Registry meets the requirements of s. 165 of COTA, that the City maintains a Registry of persons who lobby POH, and that this Registry be available for public inspection.

#### Social Media





Linked in





The TLR maintains several social media platforms: Twitter, LinkedIn, Facebook and Instagram. In 2019, the TLR continued its use of social media as an outlet for news and information through these platforms, where information is posted about the By-law, Interpretation and Advisory Bulletins, Reports to Council, upcoming training sessions, and best practices in government ethics and lobbying regulation.

### Interpretation Bulletins and Advice

Through s. 169 of the *City of Toronto Act, 2006* (COTA), and Chapter 140 of the Toronto Municipal Code, Lobbying, the Registrar may provide interpretations pertaining to the administration, application and enforcement of the By-law.

The TLR also provided POH, lobbyists and members of the public with advice and interpretation of the By-law in the following ways: in-person, by telephone, by mail and by email. TLR staff provided information about:

- Registrations;
- Searching the Registry;
- Requirements for registration;
- Lobbyists' Code of Conduct;
- Status of unions, broader public sector and not-for-profit organizations;
- Conduct of lobbyists at charitable and civic events;
- Lobbying by former senior POH;
- Grass-roots communications;
- Avoiding the placing of POH in a conflict of interest;
- Gifts and favours;
- Lobbying by former municipal election campaign team members; and
- Procurements.

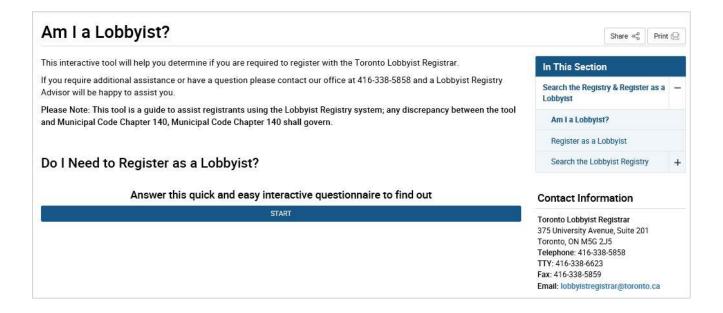
Information about the application of the By-law with respect to many of these subjects is available in <u>Interpretation and Advisory Bulletins</u> on the <u>TLR public website</u>.

#### **Use of Educational Tools**

The TLR has educational materials and interactive online tools available to provide information. Some examples include the following online questionnaire:

# 1. Online Interactive Questionnaire "<u>Do I Need to Register as a Lobbyist?</u>"

For registrants using the Registry, this interactive tool is a guide which helps determine if registration with the TLR is required. There were 2,112 online users of this tool in 2019.



#### 2. Online Interactive Questionnaire "Am I being lobbied?"

In early 2019, an online interactive survey was made available to all POH on the City's intranet website. It helps POH determine whether third parties to the City intending to communicate with them are required to register the TLR.



#### **Open Data**

The Registry is available in Open Data. Data from the Registry is available in machine-readable format on the City's Open Data Portal at <a href="https://open.toronto.ca/">https://open.toronto.ca/</a>.

Transparency is enhanced when data is made open to the public through Open Data. The availability of the Registry in Open Data contributes to the City's strategic initiatives that support civic engagement and open government. The TLR has been utilizing the Registry information found in Open Data to perform audits of the data on the Registry. This practice ensures that the Registry data is as clean and accurate as possible. In addition, the TLR has been using Open Data to extract the information it provides to stakeholders with respect to who is lobbying whom, and about which subject matters.

# Lobbyist Registry Open Data Featured in Open Data Toronto's Knowledge Centre

In 2019, Open Data Toronto published a guide, in its Knowledge Centre, pertaining to the analysis of the Toronto Lobbyist Registry's Open Data. The guide is entitled "Analyzing Lobbyist Data". It provides information about how to prepare and explore the Lobbyist Registry data. The TLR worked in partnership with Open Data Toronto on its development. Thank you to Open Data Toronto for providing this opportunity.

## **Registry Services**

The By-law requires public disclosure of lobbying activities, providing access to information about how POH were lobbied as part of City government decision-making. The Registry information is easily available and accessible to the public on the TLR website in accordance with the By-law's requirements. The TLR's mandate ensures that the Registry is publicly available as a multi-stakeholder, online web-based platform.

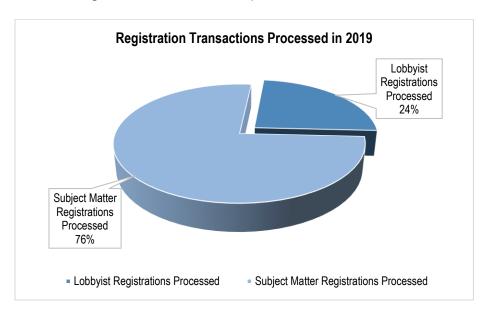
The Registry delivers information necessary to enable robust searches of lobbying activities by all stakeholders. Because the TLR enforces the By-law's provisions that require timely reporting of lobbying activities, the Registry successfully provides timely access to such information. Therefore, the Registry ensures the diverse views of society and business are engaged, providing opportunity for input from multiple stakeholders into City government decision-making.

The online Registry is the mechanism for the disclosure of lobbying activities. The Registry provides all of the information required of lobbyists by the By-law. Its search capabilities enable all stakeholders to explore its data fields in order to learn who is lobbying whom and about what.

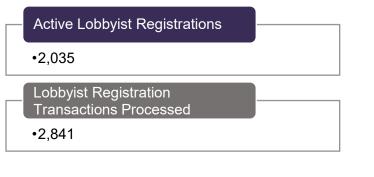
Since 2010, over 87,000 transactions have been processed through the Registry and over 50,000 lobbying communications have been recorded. The Lobbyist Registry & Stakeholder Outreach Advisors support the Registry's maintenance. They review, check accuracy, and accept registrations and any necessary updates. They supervise abidance with registration and reporting requirements.

#### **Registration Statistics**

The total number of registration transactions processed in 2019 was 11,782.



In 2019, 2,841 lobbyist registration transactions were processed and 8,941 subject matter registration transactions were processed. The total number of active lobbyist registrations at year-end was 2,035; and the total number of active subject matter registrations at year-end was 3,019.



Active Subject Matter Registrations

•3,019

Subject Matter Registration
Transactions Processed

•8,941

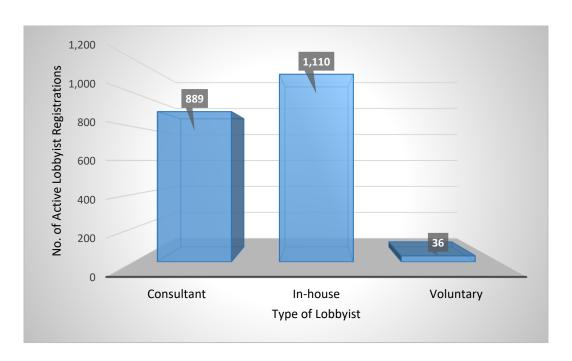
#### Lobbyist Registrations and Lobbying Communications Reported in 2019

| Registration Transactions Processed                               | January 1 to<br>December 31, 2019 |
|---|-----------------------------------|
| Lobbyist Registration Transactions                                |                                   |
| New Lobbyists Submitted   | 770                               |
| Lobbyist Updates Submitted  | 1,742                             |
| Lobbyist Registrations Closed                                     | 329                               |
| Lobbyist Registration Transactions Processed                      | 2,841                             |
| Subject Matter Registration Transactions                          |                                   |
| New Subject Matters Submitted                                     | 1,338                             |
| Subject Matter Updates Submitted (reports of lobbying activities) | 6,685                             |
| Subject Matters Withdrawn   | 186                               |
| Subject Matters Closed  | 732                               |
| Subject Matter Registration Transactions Processed                | 8,941                             |
| TOTAL Registration Transactions Processed                         | 11,782                            |

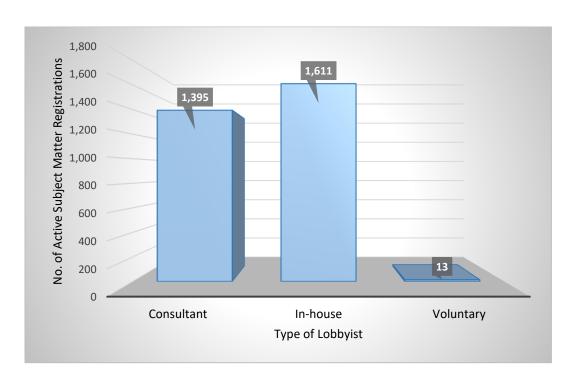
#### Active Lobbyist and Subject Matter Registrations at December 31, 2019

| Active Lobbyist Registrations                         | 2,035 |
|---|-------|
| - Consultant Lobbyists                                | 889   |
| - In-house Lobbyists                                  | 1,110 |
| - Voluntary Lobbyists                                 | 36    |
| Active Subject Matter Registrations                   | 3,019 |
| - Consultant Lobbyists                                | 1,395 |
| - In-house Lobbyists                                  | 1,611 |
| - Voluntary Lobbyists                                 | 13    |
| TOTAL No. of Lobbying Communications Reported in 2019 | 6,379 |

Active Lobbyist Registrations by Lobbyist Type
At December 31, 2019



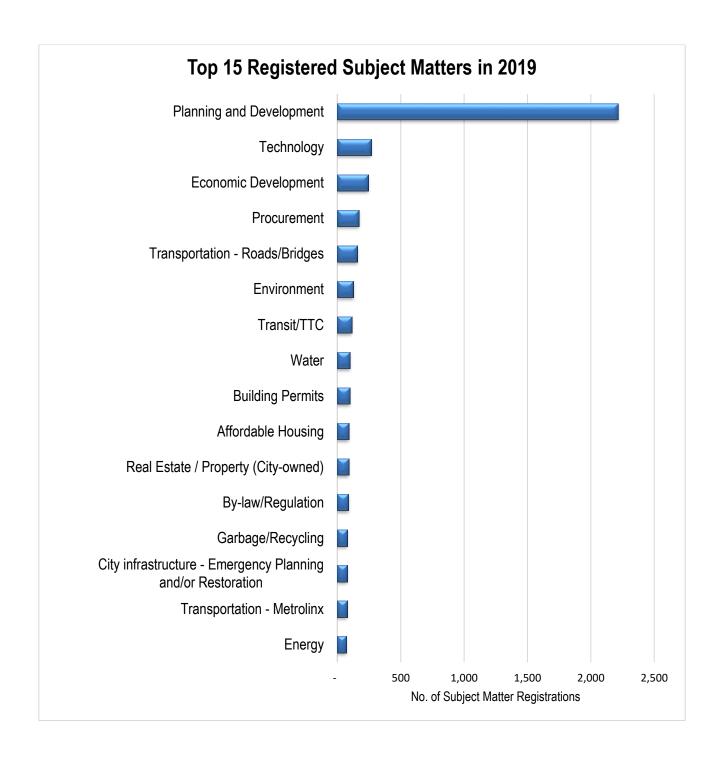
Active Subject Matter Registrations by Lobbyist Type
At December 31, 2019



## **Top 15 Registered Subject Matters (SM) in 2019**

This table lists 15 most frequently registered subject matters as of December 31, 2019:

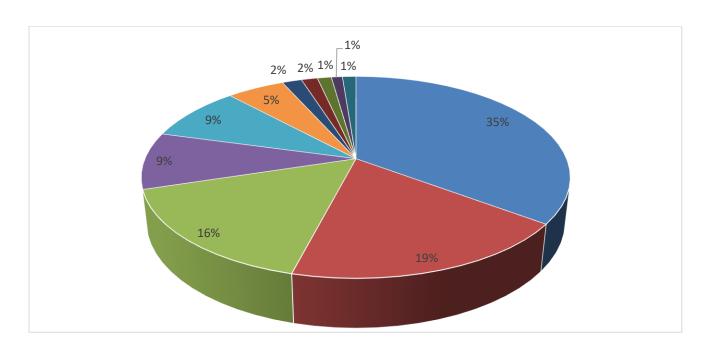
| Rank | Subject Matter Category                                     | No. of Active<br>Registrations |
|------|---|--------------------------------|
| 1    | Planning and Development                                    | 2,216                          |
| 2    | Technology  | 268                            |
| 3    | Economic Development  | 245                            |
| 4    | Procurement   | 171                            |
| 5    | Transportation – Roads/Bridges                              | 160                            |
| 6    | Environment   | 128                            |
| 7    | Transit/TTC   | 115                            |
| 8    | Water   | 101                            |
| 9    | Building Permits  | 99                             |
| 10   | Affordable Housing Real Estate / Property (City-owned)      | 90<br>90                       |
| 11   | By-law/Regulation   | 89                             |
| 12   | Garbage/Recycling   | 80                             |
| 13   | City infrastructure – Emergency Planning and/or Restoration | 79                             |
| 14   | Transportation – Metrolinx                                  | 78                             |
| 15   | Energy  | 71                             |



## **Top 10 Planning and Development SM Registrations, 2019**

This table lists 10 most frequently registered planning and development subject matters as of December 31, 2019:

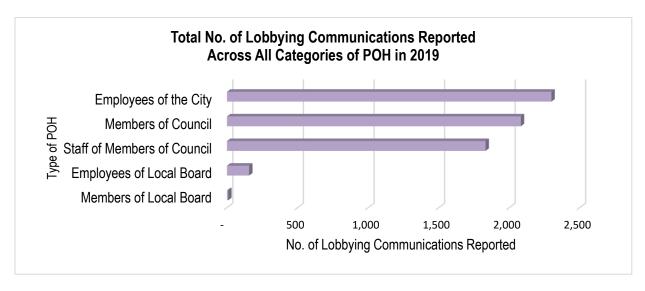
| Rank | Planning and Development Subject Matter Registrations   | No. of Active<br>Registrations |
|------|---|--------------------------------|
| 1    | Application, Zoning By-law  | 780                            |
| 2    | Combined Application  | 417                            |
| 3    | Application, Site Plan  | 358                            |
| 4    | Application, Official Plan  | 202                            |
| 5    | Planning Policy/Study   | 196                            |
| 6    | Application, Minor Variance   | 115                            |
| 7    | Application, Plan of Condominium  | 39                             |
| 8    | Application, Plan of Subdivision  | 32                             |
| 9    | Heritage  | 28                             |
| 10   | Rental Housing Demolition or Conversion   | 22                             |
|      | Other: Environmental Assessment, Application  – Consent to Sever and Part Lot, Policies and Applications, Zoning By-law Amendment | 27                             |

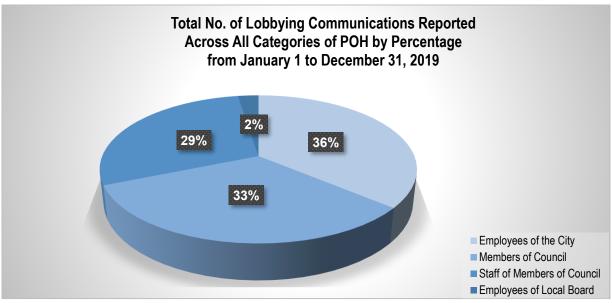


## **Public Disclosure of Lobbying Activities**

# Lobbying Communications Reported Across All Categories of Public Office Holder (POH) in 2019

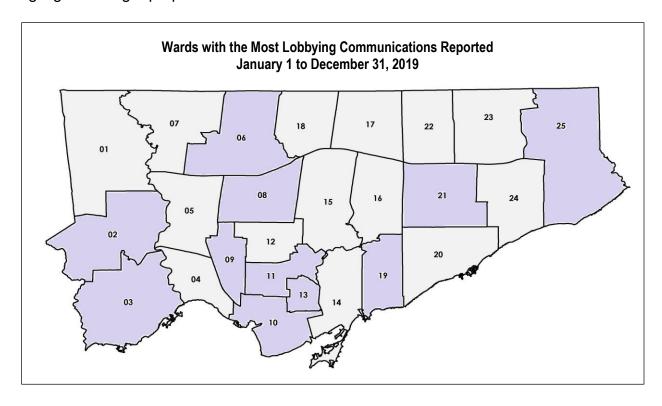
In accordance with the requirements of the By-law, lobbying communications were reported across all categories of POH. The public, therefore, is being provided with the transparency intended by the By-law. This affords the public a window into the decision-making processes undertaken by City government.





# **Lobbying Communications Reported with Offices of Elected Officials in 2019**

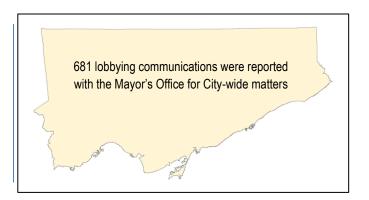
The offices of elected officials with the most frequent lobbying communications reported throughout 2019 has been represented below geographically, by ward office. In the map below, the wards with the most lobbying communications reported during 2019 are highlighted in light purple.



| Ward/Office                    | No. of Lobbying Communications<br>Reported |
|--------------------------------|--|
| Ward 11 University-Rosedale    | 247  |
| Ward 10 Spadina-Fort York      | 223  |
| Ward 8 Eglinton-Lawrence       | 191  |
| Ward 9 Davenport               | 188  |
| Ward 19 Beaches-East York      | 171  |
| Ward 2 Etobicoke Centre        | 159  |
| Ward 3 Etobicoke-Lakeshore     | 152  |
| Ward 25 Scarborough-Rouge Park | 149  |
| Ward 13 Toronto Centre         | 146  |
| Ward 6 York Centre             | 146  |
| Ward 21 Scarborough Centre     | 145  |

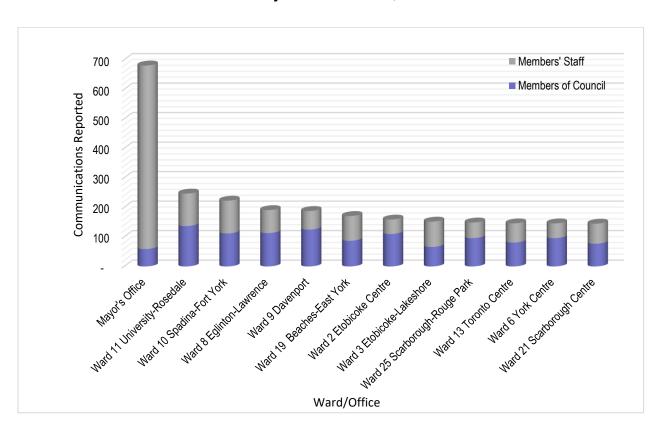
#### No. of Lobbying Communications Reported with the Mayor's Office January 1 to December 31, 2019

The total number of lobbying communications reported with the Mayor's Office for City-wide matters is 681 between January 1 and December 31, 2019.



The following chart indicates the no. of communications reported, sorted by members of Council and members' staff for the offices of the elected officials, with the most lobbying communications reported from January 1 to December 31, 2019.

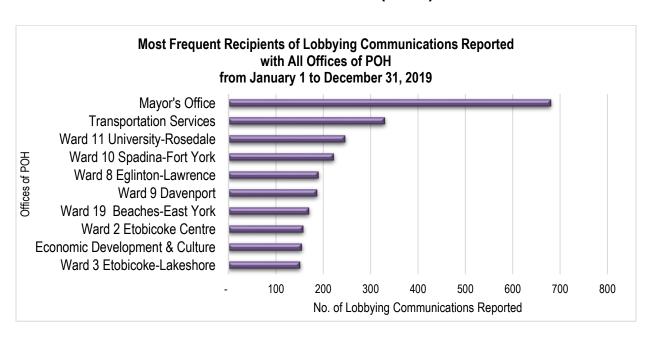
# Members of Council and Member's Staff for the Offices of Elected Officials with the Most Lobbying Communications Reported January 1 to December 31, 2019



# Most Frequent Recipients of Lobbying Communications Reported with the City's Offices/Divisions in 2019

| Rank | Office/Division                       | No. of Lobbying<br>Communications Reported |
|------|---------------------------------------|--|
| 1    | Transportation Services               | 331  |
| 2    | Economic Development and Culture      | 156  |
| 3    | City Clerk's Office                   | 123  |
| 4    | Information and Technology            | 116  |
| 5    | Planning                              | 107  |
| 6    | Toronto Water                         | 101  |
| 7    | Waterfront Secretariat                | 98   |
| 8    | Children's Services                   | 85   |
| 9    | Engineering and Construction Services | 82   |
| 10   | Solid Waste Management Services       | 75   |

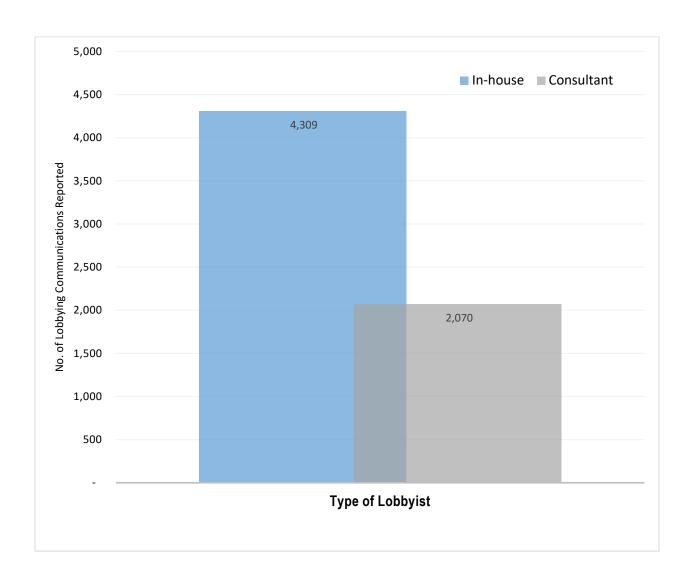
# Most Frequent Recipients of Lobbying Communications Reported with All Offices of Public Office Holder (POH) in 2019



## **Total Number of Lobbying Communications Reported in 2019**

The total number of lobbying communications reported in 2019 with all POH is 6,379.

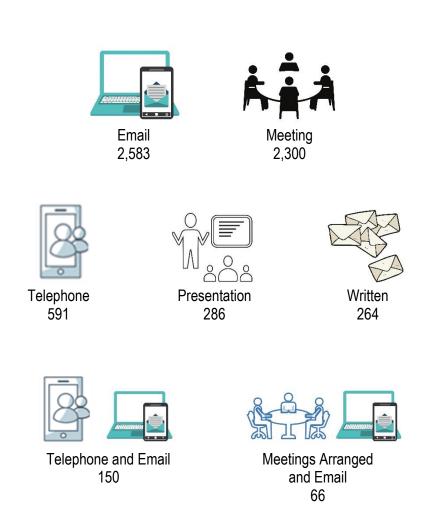
## **Lobbying Communications Reported in 2019 by Type of Lobbyist**



#### Methods of Lobbying Communications Reported in 2019

The following diagram shows the total number of lobbying communications reported in 2019, classified by methods of communication. The most frequent methods of lobbying communications were communications through meetings, emails and telephone.

#### No. of Lobbying Communications Reported in 2019 Classified by Method

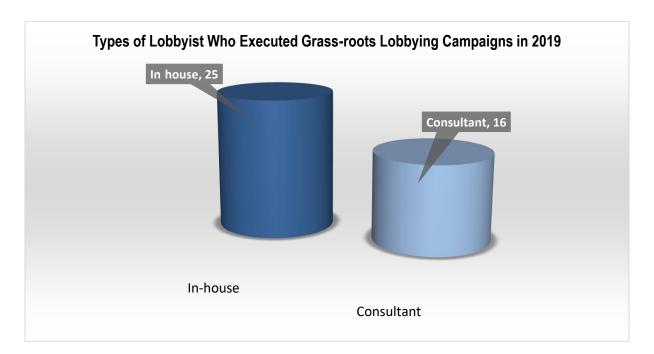


Other Communication Methods (Include: text, facsimile, LinkedIn messaging, event and screen share demonstration) 139

# The Number of Stakeholder Groups Engaged Indirect Lobbying by Grass-roots Lobbying Campaigns in 2019

- A. The Number of Grass-roots Lobbying Campaigns
  - 41 grass-roots lobbying campaigns were launched as lobbying activity.
- B. Types of Lobbyists Who Executed Grass-roots Lobbying Campaigns

Grass-roots lobbying campaigns have been executed by 25 in-house lobbyists and 16 consultant lobbyists.



#### C. Who Was Reached?

Of these 41 grass-roots lobbying campaigns, 21 were aimed at communities of interest, 14 were designed to reach the public, and 6 were attempted to reach a combination of both the public and communities of interest.

#### D. Which POH were Targeted?

Of these 41 grass-roots lobbying campaigns, 30 grass-roots lobbying campaigns targeted councillors, 1 grass-roots lobbying campaign targeted staff, and 10 grass-roots lobbying campaigns targeted a combination of councillors and staff.

## The Number of Grass-roots Lobbying Campaigns in 2019 Sorted by Communities and Targets Reached

Total No. of Grass-roots Lobbying Campaigns:

Launched by:

25 In-house Lobbyists; and

16 Consultant Lobbyists

Communities Reached

Communities of Interest (21)

Public (14)

Communities of Interest + Public (6)



Councillors (30) Staff (1)

Councillors + Staff (10)

#### **Global Compliance 2019**

Compliance is being achieved at an international level. Registered lobbyists, whose communications with Toronto POH appear in the Registry throughout 2019, originate from around the world. Places of origin include: Australia, Austria, Belgium, Brazil, Canada, France, Hong Kong and United States of America.

#### Places of Origin of Registered Lobbyists January 1 to December 31, 2019



# Advice, Investigations, Inquiries and Breach Prevention

The process of creating a new Case Management System (CMS) for the Inquiries & Investigations Unit (the Unit) was commenced in late 2018. It accelerated in 2019. The effort to automate the management of the Unit's work: intake, assessments, advice, referrals, investigations, early resolution and inquiries, and all the attendant correspondence and legal documentation, provided a unique window of opportunity for a comprehensive review. To that end, the Unit, working in conjunction with staff of the Clerk's IT and the successful vendor, spent a great deal of time mapping out the work of the Unit. This incredibly detailed exercise over the course of many months, while primarily serving to inform the creation of the CMS, also allowed the Unit to consolidate, revisit, and revise the standard operating procedures developed over the course of the last ten years.

The fruit of these endeavours is found in the following brief re-articulation of the work of the Unit. The legal and foundational touchstone for the Unit remains s. 169 of COTA and s. 140-33(5) of the By-law, which authorize the Registrar to conduct in private investigations or inquiries to determine whether contraventions of the By-law have occurred. The intake process may be triggered by a request for advice or a request to inquire into an alleged contravention received from Council, a member of Council or their staff, an Accountability Officer, a member of the public, a lobbyist or staff of the TLR.

Requests for advice are reviewed by the Inquiries & Investigations Counsel (Counsel) or the Lobbyist Compliance Investigator (the Investigator). Simpler requests may be addressed by phone or email, while more complex requests will receive a formal opinion as well as possibly one or more in-person meetings.

When the Unit receives a report of an alleged contravention of the By-law, Counsel or the Investigator will conduct an assessment. Matters may be assessed as: a request for advice, requiring referral to other authorities, or requiring investigation.

Matters referred for investigation will be the subject of a report to the Registrar. Upon review of the report, the Registrar may authorize that a matter be: determined in certain circumstances, by early resolution (for example, by permitting a late registration), referred to other authorities or, the subject of an inquiry by the Unit. Unit staff when conducting inquiries maintain the strictest confidence, in accordance with the requirements of COTA.

Under COTA, and the Toronto Municipal Code, Chapter 3, Accountability Officers, the Registrar may report to Council on an inquiry into whether the By-law has been contravened. The Registrar's reports on inquiries to Council are public. The Registrar may disclose such information as is necessary for the purposes of the report. Since 2011, the TLR has brought 26 inquiry reports to Council.

#### **Breach Prevention**

#### Update on 2018

As reported last year, the Unit embarked on a new exercise aimed at preventing contraventions of the By-law. Each year the Unit conducts an environmental scan to identify an issue, activity or event at the City, where one could reasonably anticipate potential future contraventions, and will then conduct judicious interventions where possible to prevent harm.

By way of reminder, the Unit's breach prevention initiative in 2018 focused on breaches related to the 2018 municipal election. At the time of the submission of the previous annual report, the Unit had not received any complaints in relation to the election-related subject matters on which advice was given. We are pleased to report that this metric stayed true through 2019; however, we would note the Unit continued to receive queries pertaining to the election throughout last year. These were addressed through consultations and the provision of advice.

#### 2019

As part of the 2018 initiative, the Unit provided advanced opinions regarding the post-term of office employment for ex-councillors and their former staff. To explain, s. 140-9A of the By-law prohibits a former "Senior Public Office Holder" from lobbying current POH for a period of one year from the last day of employment with the City. The By-law considers a member of City Council to be a "Senior Public Office Holder".

The need for opinions on this subject spilled over into 2019 and was the topic of several of the 15 full advanced opinions issued by the Unit. The provision of these opinions allowed the Unit to develop a structured framework to analyze post-employment restrictions for all former Senior Public Office Holders. This proved opportune as 2019 saw a significant number of Senior Public Office Holders who were not councillors or their staff leave the City, which in turn led to a spike in requests for advice and advanced opinions on this topic. Again, the Unit is pleased to note that no inquiry

reports to Council were issued in 2019 related to the post employment restrictions on former Senior Public Office Holders.

The Unit identified the issue of late registrations as the focal point for the 2019 breach prevention exercise. In a nutshell, persons that communicate with POH, on behalf of a client or on behalf of an organization that employs them, regarding any of the seven types of municipal decisions articulated in the By-law, are lobbying. Registration as a lobbyist is then required, unless the person, organization or communication is subject to an exemption under the By-law. The By-law requires lobbyists to register before lobbying a POH, as such the term late registration is probably more aptly entitled unregistered lobbying. In our experience, over the last ten years, in many instances it is a person's mistaken belief that an exemption applied to their communication that resulted in unregistered lobbying.

This exercise was launched at a joint training session held at Toronto City Hall, conducted in conjunction with our provincial colleagues from the Office of the Ontario Integrity Commissioner, aptly titled "It's About Time: Staying in Compliance with Deadlines & Details". At this session, the members of the lobbying and business community were reminded of the importance of the various timelines for submitting and updating their registrations. Additionally, they were invited to contact the Unit if they had any question or doubt as to whether a matter required registration and more specifically whether their communication was subject to an exemption. This message was reiterated in various formats throughout 2019.

These overtures resulted in numerous requests for advanced opinions on the issue of whether registration was required. For example, this included opinions on:

- The application of the not-for-profit exemption
- The application of the foreign government exemption
- The application the labour groups exemption
- The application of the public process/meeting exemption

In total, 15 advance opinions were given by the Unit in 2019, and over 261 consultations and/or pieces of advice were provided to stakeholders. Much of this work related to whether registration with the TLR was required.

Going forward, the Unit has identified the issue of communications related to the COVID-19 pandemic as the focal point for the 2020 breach prevention exercise.

#### Report to Council on an Inquiry for Prohibited Communications During a Procurement Process

Early in 2019, Council received a report on an inquiry into whether communications during the Blackout Period of a procurement were in breach of the By-law. The vendor was an in-house lobbyist, as defined by s. 140-20 of the By-law. During the Black-out Period, the vendor contravened s. 140-41A of the By-law by communicating with a POH who was not permitted by the Purchasing By-law and Tender document to receive communications about the Tender. Adherence to the Purchasing By-law and all relevant Tender documents is required to preserve the integrity of the City's procurement processes. Ensuring all lobbyists comply with s. 140-41A of the By-law guarantees lobbying transparency in the context of the City's procurement processes.

To read the Report on an Inquiry for Prohibited Communications during a Procurement Process.

#### **Technological Change**

The Unit worked throughout 2019 with Clerk's IT and the successful vendor on a new investigation Case Management System (CMS). The CMS is on track to be operational late summer 2020.

This CMS will manage all aspects of the work of the Unit: the conducting of investigations, inquiries and the provision of advice and training. It automates the Unit's workflow ensuring all steps are tracked, assigned due dates with reminders and ultimately completed. The CMS will act as a central repository for the collection and organization of inquiry evidence.

The CMS is designed to manage the enforcement options (corrective actions) available to the Registrar in the event of a breach of the By-law. This includes a built-in process to manage the imposition, appeal, and payment of administrative monetary penalties.

Finally, the CMS will allow for the creation of new reports based on the data collected that will be useful both for reporting out statistics to council and the public and for identifying trends and relationships.

Many thanks to the staff of Clerk's IT that worked on this project for their thoughtful and able assistance.

#### **Inquiries & Investigations Unit Statistics**

The table below shows the source of requests for the 6 new assessments and 6 new inquiries in 2019:

#### **Source of Information or Request for Inquiry**

| Source of Requests                | New<br>Assessments | New<br>Inquiries |
|-----------------------------------|--------------------|------------------|
| Members of Council or their staff | 0                  | 0                |
| City staff                        | 2                  | 2                |
| Toronto Lobbyist Registrar        | 1                  | 1                |
| Other Accountability Offices      | 1                  | 1                |
| Members of the Public             | 2                  | 2                |

The following table shows the investigations and inquiries in 2019:

#### **Investigations and Inquiries**

| Investigations and Inquiries | 2019 |
|------------------------------|------|
| Investigations (new)         | 6    |
| (completed)                  | 6    |
| Inquiries (new)              | 2    |
| (completed)                  | 4    |
| (carried over to 2020)       | 5    |

The table below shows the outcomes of the 6 investigations completed in 2019:

#### **Outcomes of Completed Investigations**

| Outcomes of the Investigations          | Completed<br>Investigations |
|---|-----------------------------|
| Inquiry Files Opened                    | 5                           |
| Referral to Other Accountability Office | 1                           |

The table below shows the outcomes of the 4 inquiries completed in 2019:

#### **Outcomes of Completed Inquiries**

| Outcomes of Inquiries Completed                 | Completed<br>Inquiries |
|---|------------------------|
| Breach of the Lobbying By-law substantiated     | 2                      |
| Breach of the Lobbying By-law not substantiated | 2                      |

The table below shows the resolutions for the 2 substantiated files in 2019:

#### **Resolutions for Substantiated Files**

| Corrective Action           | No. of Actions<br>Taken |
|-----------------------------|-------------------------|
| Advice Given                | 1                       |
| Mandatory Lobbyist Training | 1                       |
| Apology Provided            | 1                       |
| Commitment to Comply        | 2                       |
| Report to Council           | 1                       |

#### **Education and Outreach**

#### **Supporting Compliance**

A key function of the TLR is to provide education and outreach to POH, the public and lobbyists about the By-law and Registry. Promoting awareness of the By-law and the Registry is important for effective regulation. Engaging in educational activities about the By-law's application encourages best practices and helps to nurture a vibrant ethical culture. Outreach and education to provide information to all our stakeholders is key to providing enlightenment regarding the implications of their actions with respect to obligations and requirements under the By-law.

The TLR's continued emphasis on outreach has been essential to the success of the By-law. Widespread sharing of knowledge is a most effective tool to achieving transparency and compliance with the By-law.

#### **Supporting Stakeholders**

In 2019, the TLR staff provided information to all stakeholders about the By-law application to their circumstances. The TLR provided POH, lobbyists and members of the public with advice and interpretation of the By-law in the following ways:

- in-person meetings;
- telephone communication;
- written communication by mail;
- written communication by email;
- online interactive tools;
- tutorials and training sessions; and
- written resource materials available online, including interpretation bulletins, newsletters, and previous investigation reports.

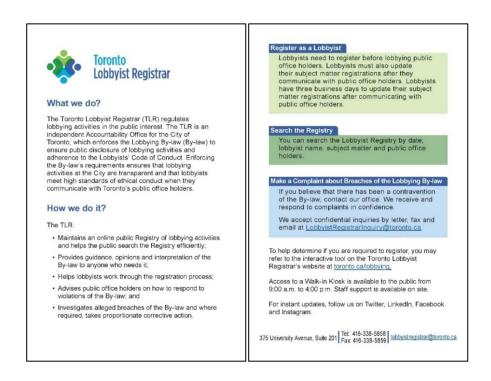
The TLR's education and outreach activities have contributed to the increase in Registry activities. Both the TLR's Inquiries & Investigations Unit and Lobbyist Registry Unit (Registry Unit) have been dedicated to undertaking the above activities which raise awareness of the By-law and its application, and which support access to the Registry, understanding of lobbyist's objectives and public awareness for our mandate in lobbying transparency. Enabling our stakeholders to participate in educational activities about

the By-law's application encourages best practices and helps to nurture a vibrant ethical culture. Moreover, welcoming a variety of stakeholders for in-person consultations through meetings, email and telephone communication, provides the customized advice and interpretation of the By-law which ensures that lobbyists are able to successfully comply.

#### **Supporting Public Office Holders (POH)**

The TLR continued to partner with POH to ensure that information about the By-law and its application is easily available and understood. The Registrar made 3 presentations to Senior Management Teams and hosted 50 one-on-one meetings with POH including members of Council and their staff, City staff, and board and agency members, where best practices and opportunities for collaboration were identified, and where access to online and print materials was reviewed.

In 2019, the following new information card was developed for POH to distribute to third party's wishing to communicate with them or their office staff, in order to ensure that members of the public and lobbyists had access to information about the By-law and how to contact our office. These new cards, along with other printed information materials, and online tools were promoted amongst POH to maximize opportunities where lobbyists can be reminded to register and report their communications with POH, and to contact the TLR.



In 2019, the TLR partnered with the Purchasing and Materials Management Division (PMMD) to attend, present and provide information at monthly orientation sessions. These sessions were (New) Vendor Days, where new potential vendors were introduced to the City's requirements for procurement. The TLR supported these sessions by providing information about lobbying regulations as they relate to purchasing. This knowledge for vendors, especially at the outset of their interactions with the City, exemplifies the value of collaborating with POH to ensure all of our stakeholders have the information they need to comply with the By-law. The TLR also supported City staff at the Social Procurement Program: Networking Event with Diverse Suppliers, by providing information and educational materials to potential vendors, and POH from various City divisions. Working with PMMD, TLR staff participated in 1 Information session with PMMD staff, 2 PMMD Vendor Information Sessions on Doing Business with the City, and 1 Networking with Diverse Suppliers Event.

TLR's 2019 outreach initiatives also included orientation sessions coordinated with staff in People and Equity (P&E) for new employees. Another new opportunity for TLR this year was the inclusion of the TLR in New Employee Orientation Sessions, where new POH were introduced to information and resources about what is considered "lobbying". Attendees were given effective tools for directing third-party's wishing to communicate with them to the TLR for strategies on avoiding lobbying non-compliance issues. The Registrar also attended 1 Executive Onboarding Session hosted by P&E, and 13 personal one-on-one orientation meetings with new City executives and senior management, where best practices were reviewed for situations in which the By-law may impact their meetings, discussions and decisions. Information was disseminated to equip senior staff with the tools necessary to alert them to the relevancy of the By-law in their day-to-day encounters. References and staff connections were provided to aid them when appropriate. The Registrar also met with 3 exiting POH to provide advice and support regarding post-term lobbying restrictions. With support from the TLR's Inquiries & Investigations Unit, exiting POH were provided with valuable information regarding the statutory requirements a former POH must consider when evaluating future opportunities relating to lobbying current POH.

With 2019, ushering in the new Council Term 2018-2022, the Registrar participated in an orientation session hosted by the City Clerk for newly elected councillors, and participated in 10 in-person orientation meetings for councillors and their staff which included education regarding the application of the By-law, distribution of TLR printed information materials, and an enhancement of available on-line resources for POH and the public.

## **Sharing Best Practices in Lobbying Regulation with Other Jurisdictions**

The TLR meets regularly with regulators of lobbying in other jurisdictions and participates in Canadian and international conferences and seminars to share strategies in lobbying regulation. The TLR shares expertise and advice with governments in many jurisdictions across Canada and internationally. In 2019, the TLR's collaborative exchanges were undertaken with the Ontario Ombudsman, and lobbying regulation authorities from other jurisdictions, including: Commissioner of Lobbying of Canada, Integrity Commissioner of Ontario, Lobbyist Registrar and General Counsel of Alberta, Office of the Information and Privacy Commissioner for British Columbia, Conflict of Interest Commissioner for Manitoba Legislative Assembly, Commissioner of Lobbyists for Newfoundland & Labrador, Executive Director of Registries for Nova Scotia, Registrar of Lobbyists for Saskatchewan, Commissaire au lobbyisme du Québec, Integrity Commissioner of Ottawa, Integrity Commissioner of Vaughan, Integrity Commissioner of Winnipeg and Integrity Commissioner of York Region. In addition, the TLR senior staff participated in the following conferences as instructors and contributors, sharing expertise with public service and government ethics executives:

## 1. The Society of Ontario Adjudicators and Regulators (SOAR) 31st Annual Conference 2019

SOAR held its 31st Annual Conference on November 7, 2019 in Toronto. The Registrar, was a panelist for the conference session entitled "Enhancing Regulators' Transparency: Open Data, Social Media and More", where she contributed to a discussion about how regulators can enhance transparency and public access to information through their public registries.

### 2. Lobbyist Registrars and Commissioners Network (LRCN) Conferences

From September 24th to September 26th, the Registrar and the Inquiries & Investigations Counsel attended the LRCN's annual conference, which was hosted by the Office of the Commissioner of Lobbying of Canada, in Ottawa. They joined various jurisdictions in sharing news and information regarding legislative developments in the oversight of lobbyist registrations, standards of conduct, and duties of investigation and enforcement. LRCN shares information and best practices regarding emerging trends in lobbying regulation across

Canada. Registrars and Commissioners of Lobbying from across Canada have been meeting and sharing information through this network since 2006.

#### 3. Municipal Integrity Commissioners of Ontario Conference (MICO)

On October 25, 2019, the Registrar attended the conference held by MICO at Kleinburg, Ontario. She gave a presentation entitled "Lobbying Regulation in Toronto: Bellamy and Beyond" where she reviewed key components of Toronto's model for lobbying regulation with our peers in municipal government public integrity. This meeting was a gathering of integrity commissioners from municipalities across the province. MICO is a growing, informal group of practitioners in the field of municipal ethics and integrity plays a key role in developing a core set of best practices for municipal integrity commissioners in Canada.

## 4. 41st Annual COGEL (Council On Governmental Ethics Laws) Conference

From December 15 to 18, 2019, Inquiries & Investigations Counsel attended the 41st Annual COGEL Conference in Chicago, and spoke about best practices in regulatory investigations. He joined experts from Canada, the U.S. and the world to provide educational sessions about the latest developments in lobbying regulation. TLR staff have participated in this conference with our international colleagues and peers in government ethics and accountability since 2008. This international organization brings together leaders in the fields of government ethics, freedom of information, elections, lobbying and campaign finance. COGEL members include governmental entities, educational institutions, and organizations (such as law firms and corporations).

#### 5. Canadian Bar Association (CBA)

Inquiries & Investigation Counsel for the TLR, Stephen Littlejohn, is a long-time member of the Canadian Bar Association's Administrative Law Section, Law of Lobbying and Ethics Committee and in 2019 was a Member-at-large of the National Executive Committee of the CBA Administrative Law Section.

Mr. Littlejohn has made numerous presentations about lobbying and ethics with an emphasis on the City's regime to the legal community; most recently he provided training for an Ontario Bar Association course – "Professionalism for Planning & Municipal Lawyers" and internally to City lawyers at a continuing professional development course – "Ethical Considerations for Lawyers Employed in Public Service".

#### Staff

The staff of the TLR is a team of eight.

In addition to the Registrar, the TLR is staffed by three Lobbyist Registry & Stakeholder Outreach Advisors, an Inquiries & Investigations Counsel, a Lobbyist Compliance Investigator, and two Administrative Assistants.

Lobbyist Registry & Stakeholder Outreach Advisors provide advice and interpretation; maintain the Registry; review, verify and approve registrations and updates; monitor compliance with registration and reporting requirements; develop and deliver information, training, and outreach programs and materials; and participate in the TLR's website projects.

Inquiries & Investigations Counsel provides advice on compliance issues; conducts assessments, inquiries and investigations on behalf of the Registrar; and develops policies and procedures to support TLR assessment, inquiry and investigation processes. The Lobbyist Compliance Investigator assists Inquiries & Investigations Counsel in these functions.

Two Administrative Assistants provide administrative support and assistance to the Registrar, Lobbyist Registry & Stakeholder Outreach Advisors, and Inquiries & Investigations staff.

The TLR staff team is dedicated to professional development and continuing education. In 2019, the TLR staff participated in conferences and seminars offered by the following institutions:

- Chartered Professional Accountants of Canada (CPA)
- Council of Government Ethics Law (COGEL)
- Council on Licensure, Enforcement and Regulation (CLEAR)
- Law Society of Ontario
- Lobbyist Registrars and Commissioners Network (LRCN)
- Municipal Integrity Commissioners of Ontario (MICO)
- Ontario Bar Association (OBA)
- Osgoode Hall Law School Professional Development
- Society of Ontario Adjudicators and Regulators (SOAR)
- Transparency International

### **Budget Summary**

In accordance with Chapter 3 of the Toronto Municipal Code, the Registrar submits the TLR Operating and Capital Budget requests directly to Budget Committee for consideration and recommendation to Council.

On March 7, 2019, Council approved the TLR Operating Budget request for the year 2019 of \$1,235.1 thousand net. Council also approved the Capital Budget for the TLR with 2019 cash flow of \$0.215 million; and Capital Budget and Plan totaling \$0.950 million in project estimates, composed of \$0.350 million for 2024, \$0.350 million for 2025, and \$0.250 million for 2026.

### **Financial Information**

TLR business, travel and PCard expenses are posted on the <u>Lobbyist Registrar's</u> <u>Expense Reports</u> page of the <u>TLR website</u>.

Each year, the TLR undergoes an external compliance audit as part of the City's annual attest audit. These audits are required under Chapter 3 of the Toronto Municipal Code to be conducted annually by independent auditors and are reported directly to Council. The external compliance audit report for the year 2018 was adopted by Council on November 26 and 27, 2019. The compliance audit for the year 2019 is not yet available.

Respectfully Submitted,

Cutin Delapric

Cristina De Caprio Lobbyist Registrar

City of Toronto