

# **Annual Report**Toronto Lobbyist Registrar for the Year 2020

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, 2020. This is the TLR's 13th Annual Report to Toronto City Council (Council). The purpose of this report is to highlight actions and key accomplishments in 2020.

### Mandate of the Lobbyist Registrar

### Role of the 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 requirements through the Registry ensure that 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 standards that lobbyists must adhere to.

### Role of Lobbying in Local Democracy

"...lobbyists help organizations to navigate the complexities of government and take important messages to the right ears. Lobbying can be a legitimate way for diverse interests to bring their views before the people who will shape and make decisions."

The Honourable Madam Justice Denise E. Bellamy, Commissioner Report of the Toronto Computer Leasing Inquiry and the Toronto External Contracts Inquiry Vol. 2: Good Government

Ethical and transparent lobbying is a central component to a responsive City government which encourages civic engagement and open democratic processes. Lobbying is a legitimate activity, when disclosed publicly and when conducted according to the ethical standards outlined in the By-law. The By-law does not impede access to government, but instead guarantees a window of transparency for lobbying communications.

The By-law recognizes that access to City government is vital to local democracy and reflects that lobbying is not restricted, but is instead regulated. Lobbying provides POH with different viewpoints, opinions and specialized knowledge which can be useful to POH in decision-making. The online Registry provides the public with a window into government decision-making. The Code of Conduct guarantees that lobbyists are bound by standards of conduct, and compliance requirements through the By-law's oversight mechanisms. By ensuring that lobbyists adhere to their transparency requirements and the Code of Conduct provisions, the By-law fulfills an important role in the City's governance model.

### **Building Public Trust**

"Lobbying can best contribute productively to the democratic dialogue when everyone can see and understand what is going on.... That may be achieved through a code of conduct for lobbyists. Another key is transparency in lobbying, through a lobbyist registry."

The Honourable Madam Justice Denise E. Bellamy, Commissioner Report of the Toronto Computer Leasing Inquiry and the Toronto External Contracts Inquiry Vol. 2: Good Government

Regulating lobbying activities is the cornerstone to building public trust in City government decision-making processes. The Registry and the Code of Conduct build the public's confidence in City government. The public's confidence in its City government's decision-making processes inspires the commitment of stakeholders, which, in turn, supports the outcomes intended by City government decisions. By providing public disclosure of who spoke to whom and about what, the Registry can further the exchange of diverse views on issues before City government. This brings about more informed policy considerations and generates better policy development. As a civic engagement tool, the Registry affords participation in public policy decisions to all stakeholders, including the private sector, media, constituents, POH, and the public. Because the Registry provides information about who has engaged in lobbying activities, the resulting transparency helps to minimize the risk of undue influence by private interest groups. Therefore, trust in City government is enhanced by the disclosure of lobbying activities provided through the Registry.

The public interest is also served by the guarantee that lobbyists are required to abide by the standards of conduct as set out in the Code of Conduct. Hence, while the Registry attests to the integrity of Council decisions, the Code of Conduct also entrenches the City's standards for ethical lobbying. It mandates that those who lobbied POH must act within the standards for responsible conduct set into law by the City. With the By-law guaranteeing both the disclosure requirements and the ethical standards for lobbyists, trustworthiness in City government decisions is enhanced.

### **Lobbying Transparency During the COVID-19 Emergency**

"Public integrity is key to a resilient response to the COVID-19 crisis, ensuring that government action benefits those in need.... It is therefore imperative that fundamental safeguards of public integrity are not weakened or disregarded in both the immediate response as well as the longer-term recovery from COVID-19."

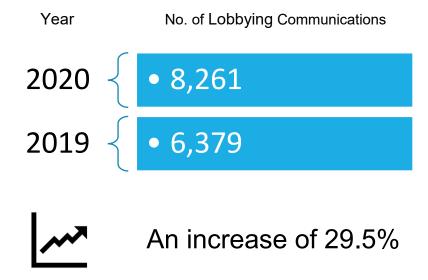
Public Integrity for an effective COVID-19 Response and Recovery OECD Policy Responses to COVID-19



The principles of accountability and transparency, which are codified in the City's governance model, provide the public with the assurance of integrity in the government's decision-making processes. This is especially important in times of crisis. On March 17, 2020, the City entered into a State of Emergency in response to the COVID-19 pandemic. The City was thrust into one of the most challenging crises in its history. Recognizing the importance of maintaining accountability while addressing pandemic concerns, City stakeholders continued to abide by the By-law's requirements for lobbying transparency.

The City stakeholder community, throughout the COVID-19 emergency, supported the TLR's mandate for transparency in lobbying communications. Lobbyists continued robust reporting of lobbying communications throughout 2020, demonstrating a willingness to comply with the By-law at this vital juncture. 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 the Registry's successes in delivering transparency and accountability notwithstanding the challenges of the pandemic. City Council, POH, lobbyists, members of the public and the media have all been instrumental in enabling the TLR to continue to provide transparency in City government decision-making processes throughout the pandemic. Thanks to these efforts, City government pandemic responses are supported by a transparent index of lobbying activities disclosed via the Registry. As of December 31, 2020, there were 8,261 lobbying communications reported with all POH. This represents an increase of 29.5% in the number of lobbying communications reported with all POH compared with 2019.

# Lobbying Communications Reported with all Public Office Holders in 2020 compared to 2019



#### **New Subject Matter Category Created for COVID-19 Emergency**



In 2020, TLR staff worked in collaboration with the City Clerk's Office, Business & Technology Planning Unit (Clerk's IT), to expand the mechanism of reporting subject matter information, in order to provide additional categories which include lobbying activities that are related to COVID-19 emergency. This enhancement will enable lobbyists to disclose in a more comprehensive manner the nature of their communications with POH. And it will allow the public to more easily search registered lobbying communications that pertain to pandemic related subject matters.



#### **Delivery of TLR's Mandate**

The TLR sustained the delivery of its mandate during the COVID-19 emergency notwithstanding the challenges of the pandemic. From the onset of the COVID-19 emergency and throughout, the TLR pivoted its operational strategies, using technology to accelerate the business transformation required to modernize the operations of both its Lobbyist Registry and Inquiries & Investigations Units. Led by innovation, the Lobbyist Registry Unit (Registry Unit) leveraged the implementation of the new Registry, which included both the streamlining of registration processes, and the augmentation of the auditing of its data to ensure clean, current and accurate Registry information. Similarly, the Inquiries & Investigations Unit (Investigations Unit) also swiftly adapted new strategies to ensure sustainment of its investigative and enforcement functions. Although the COVID-19 emergency initially foreclosed certain conventional investigation activities, for example, in-person interviews and meetings, the Investigations Unit quickly adopted procedures and technology to perform remotely the tasks required to continue its work. This was in no small measure aided by the City's rapid deployment of remote access capabilities to employees and the global pivot to increased electronic communications that allows for the remote preservation, collection and review of evidence. The Investigations Unit also implemented a new case management system, and undertook the necessary operational improvements to ensure timely and effective case file advancement.

#### **Lobbying Communications Reported During the COVID-19 Emergency**

33% of the lobbying communications reported between March 1 and December 31, 2020 were related to the COVID-19 emergency. During this period, there were 6,653 lobbying communications reported with all POH. Of these communications, 2,165 were related to the COVID-19 emergency.

### No. of Lobbying Communications Reported from March 1 to December 31, 2020



### The Most Frequently Registered Subject Matters in 2020 That were Related to the COVID-19 Emergency



Toronto Parking Authority

#### The Role of Public Office Holders (POH) in Supporting the TLR Mandate

The City's POH have supported the By-law's transparency requirements by directing third parties who communicated with them, to our office, for advice about registration requirements that may apply. Consistent with their efforts prior to the pandemic emergency, POH continued to contribute to the City's model for transparency and accountability for communications by third parties. In addition to referring lobbyists to our office for direct advice about their registration requirements, POH also sought advice from the TLR regarding best practices in dealings with lobbyists.

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

#### TLR Staff Team's Responsiveness to the COVID-19 Emergency

A review of the TLR's 2020 accomplishments would not be complete without acknowledging the commitment of the TLR's professional staff team to the effective regulation of lobbying activities. Throughout the COVID-19 emergency, with inventiveness, resiliency, and a dedication to serving the public interest, the TLR staff remained steadfast in facilitating City government transparency through upholding the By-law. They delivered the accountability intended by the By-law through:

- implementation of new technologies;
- transformation of operations with improved business practices;
- maintenance of the Registry, including enhancing emphasis on data integrity;
- provision of advice and information to stakeholders; education and outreach activities; and
- investigations and compliance measures.

Faced with the unprecedented challenges of the pandemic crisis, which included a heightened interest in transparency in government decision-making processes and fast-paced advances in technology, TLR staff enabled the TLR's mandate to continue. I would like to thank the TLR staff for their professionalism and commitment during these challenging times. I look forward to continuing to work with this dedicated team of experienced staff.

### **Collaboration Between the Four Accountability Offices**

Reinforcing the importance of sustaining the efficacy of the City's governance model during the unprecedented challenges of 2020, the Offices of the Auditor General, the Integrity Commissioner, the Ombudsman and the Toronto Lobbyist Registrar continued to work collaboratively in the public interest throughout the pandemic. While remaining dutiful to the separate mandates and statutory duties for each of the Accountability Officers, and while executing their respective mandates independently of one another, our offices worked cooperatively in the public interest. Our offices met regularly in 2020 to discuss issues in common on City matters of public interest. Under the umbrella of the Memorandum of Understanding (MoU), which is the charter document supporting co-ordination and co-operation between the four Accountability Offices in advancing City matters of public interest and importance, the four offices shared information, best practices and supported each other, where appropriate, while maintaining independent carriage of their individual mandates under COTA (*City of Toronto Act, 2006*).

### 2020 Launch of the New Lobbyist Registry



On January 27, 2020, the TLR launched the new Registry. The Registry provides all of the information required of lobbyists by the By-law. Its search capabilities enable the public to explore its data fields in order to learn who is lobbying whom, and about what. Recognizing the need to update and improve the online Registry and its search mechanisms, in March 2015, Council approved a State of Good Repair Project (SOGR) to upgrade the existing

technology that drives the Registry. Now deployed, the new Registry has delivered a revitalized, modern Registry, able to function, comply with statutory obligations, meet requirements of users, and conform to current City and industry technological standards. With the Registry's updated search capacity, the public can access the information in the Registry more effectively. Along with other improvements, a mobile interface has been added to the existing system. Through the new Registry, a more fluid registration experience and an accurate, easily searchable Registry is now available.

The delivery of the new Registry in January 2020 with its improved online Registry and search mechanisms proved to be timely, as it enabled the TLR to be best equipped to manage the shift to remote work during the pandemic. The upgrade was essential to the TLR being able to sustain the mandate through the COVID-19 crisis. TLR staff

worked in collaboration and in consultation with Clerk's IT to ensure the launch of the Registry was successful.

In late January, throughout February and early March 2020, stakeholder education sessions were hosted via webinar and in person to obtain input from POH and lobbyists, and to introduce the new Registry to its users and City stakeholders. The TLR supported stakeholders through the transition to the new system, and invited feedback for future improvements to further enhance the user experience. This feedback was reviewed to ensure the new upgrade accomplished what it was designed to do, and to identify opportunities to keep the new Registry current with changing technology.

These improvements to the new Registry are fundamental to the TLR mandate because they ensure the Registry meets the demands of ever-changing new technologies and high standards for data integrity. The new Registry will also help to prevent undue delays in registration and reporting. The completion of the upgrade ensures that the Registry can continue to deliver the transparency and accuracy required by the By-law.

As part of the implementation process for the new Registry, Registry Unit staff dedicated resources to the audit of the Registry data. This ensured that the new Registry contained current and easily searchable data. They also contributed to ongoing development towards simplifying the registration process which will assist lobbyists in meeting their compliance requirements.

I wish to thank all staff and contributors from the TLR and Clerk's IT for their dedication and commitment to the SOGR.

### Stakeholder Engagement

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. City Council, POH, 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.

### Looking Towards the Future

The TLR looks forward to continuing to deliver its mandate with success by committing to the following: 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 objectives for the TLR in 2021:

#### 1. Modernization

Building on the progress made in 2020, the TLR will continue with the business transformation required to modernize the operations of both its Registry and Investigations Units throughout 2021. The Registry Unit will continue to support the implementation of the new Registry, which will include improving the audit of its data to ensure clean, current and accurate Registry information, and will continue streamlining the registration processes. The Investigations Unit will continue to utilize technology, including the ongoing implementation of the new Case Management System, and the modification of conventional investigation procedures to ensure timely and effective case file advancement. The TLR will continue its commitment to innovation and responsiveness, and to maximizing technology in order to support its mandate with modernized operations.

### 2. Continuous Improvements to the Registry

Given the rapid pace of technological advancement, the TLR remains committed to ensuring the new Registry does not become obsolete. The TLR will expand on the modernization of the Registry. 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. In 2021, the TLR will work in collaboration with Clerk's IT to identify and implement new ways to improve the Registry to further expedite registration and reporting.

### 3. Expansion of the 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

In 2020 and 2021, the TLR continued its development of the policy and operational requirements for adding these administrative monetary sanctions into the range of penalties available. 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. The TLR is working in collaboration with the City Manager and City Solicitor towards the implementation of this regime. The proposed new sanctions 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. 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.

### 4. Preparation for the 2022 Municipal Election

In advance of the 2022 Municipal Election, the TLR will be undertaking a review of the issues regarding lobbying and political activities for lobbyists. The goal will be to determine appropriate education and outreach activities that will provide guidance to help lobbyists to comply with their obligations. The TLR will identify resources and opportunities to provide lobbyists with information to encourage best practices and pre-empt incidences of non-compliance.

#### 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 City 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.

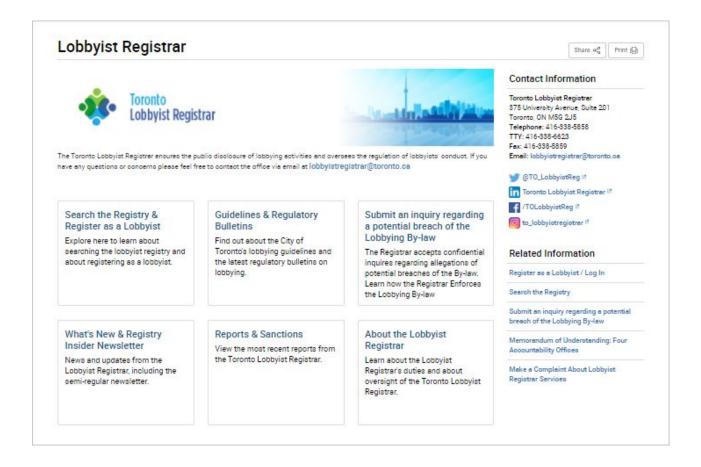
### Report on Activities in 2020

#### Website

In 2020, there were 20,780 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

### Follow us on Linked in







The TLR maintains several social media platforms: Twitter, LinkedIn, Facebook and Instagram. In 2020, 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 Interpretation and Advisory Bulletins on the TLR public website.

### **Educational Online Tools Available**

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

# 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 2,365 online users of this tool in 2020.

Alternatively, a copy of the <u>flow chart</u> is available for printing on the <u>Register as a Lobbyist</u> webpage for records.

#### 2. Video Tutorials

There are <u>tutorial videos</u> available on the <u>Register as a Lobbyist</u> webpage to assist lobbyists to use the Registry.

### **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.

### **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.

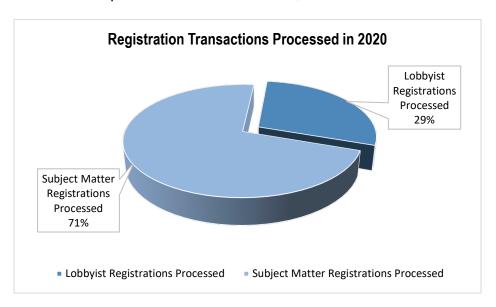
The Registry delivers information necessary to enable robust searches of lobbying activities by all stakeholders. Because the TLR enforces the By-law's provisions that require timely reporting of lobbying activities, the Registry successfully provides timely access to such information. Therefore, the 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.

The Lobbyist Registry & Stakeholder Outreach Advisors (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 as well as providing advice to lobbyists and the public about their obligations under the By-law. In 2020, 29,542 outgoing email messages were sent to lobbyists by our Advisors through the new Registry, in order to facilitate the completion of the registration transactions.

### **Registration Statistics**

Since 2010, over 104,000 transactions have been processed through the Registry and over 58,000 lobbying communications have been recorded. The total number of registration transactions processed in 2020 was 16,424.

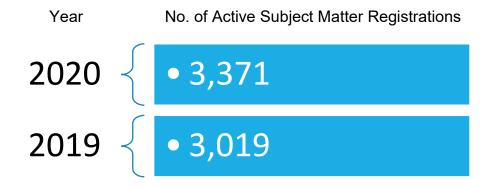


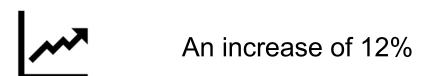
In 2020, 4,708 lobbyist registration transactions were processed, and 11,716 subject matter registration transactions were processed. The total number of active lobbyist registrations at year-end was 1,214; and the total number of active subject matter registrations at year-end was 3,371.





## Active Subject Matter Registrations as of December 31, 2020 compared to December 31, 2019





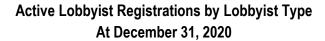
As of December 31, 2020, there were 3,371 active subject matter registrations. This represents an increase of 12% from 2019, where the number of active subject matter registrations as of December 31, 2019 was 3,019.

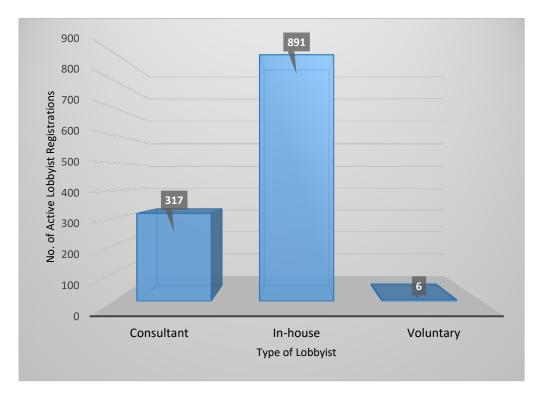
### **Lobbyist Registrations and Lobbying Communications Reported in 2020**

Registration Transactions Processed	January 1 to December 31, 2020
Lobbyist Registration Transactions	
New Lobbyists Submitted	545
Lobbyist Updates Submitted	2,949
Lobbyist Registrations Closed	1,214
Lobbyist Registration Transactions Processed	4,708
Subject Matter Registration Transactions	
New Subject Matters Submitted	1,244
Subject Matter Updates Submitted (reports of lobbying activities)	9,165
Subject Matters Withdrawn	248
Subject Matters Closed	1,059
Subject Matter Registration Transactions Processed	11,716
TOTAL Registration Transactions Processed	16,424

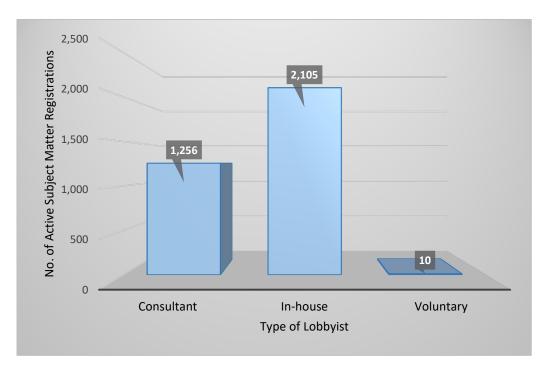
### Active Lobbyist and Subject Matter Registrations at December 31, 2020

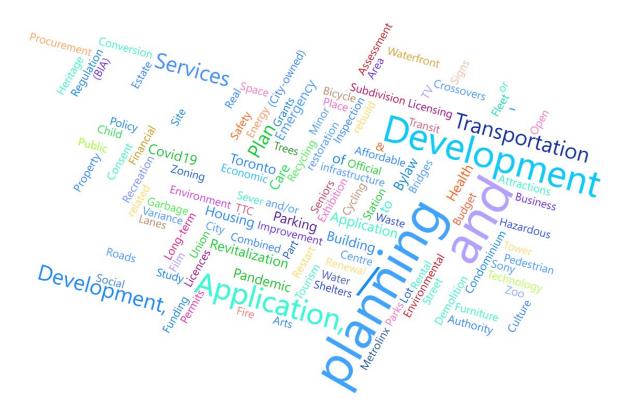
Active Lobbyist Registrations	1,214
- Consultant Lobbyists	317
- In-house Lobbyists	891
- Voluntary Lobbyists	6
Active Subject Matter Registrations	3,371
- Consultant Lobbyists	1,256
- In-house Lobbyists	2,105
- Voluntary Lobbyists	10
TOTAL No. of Lobbying Communications Reported in 2020	8,261





Active Subject Matter Registrations by Lobbyist Type
At December 31, 2020





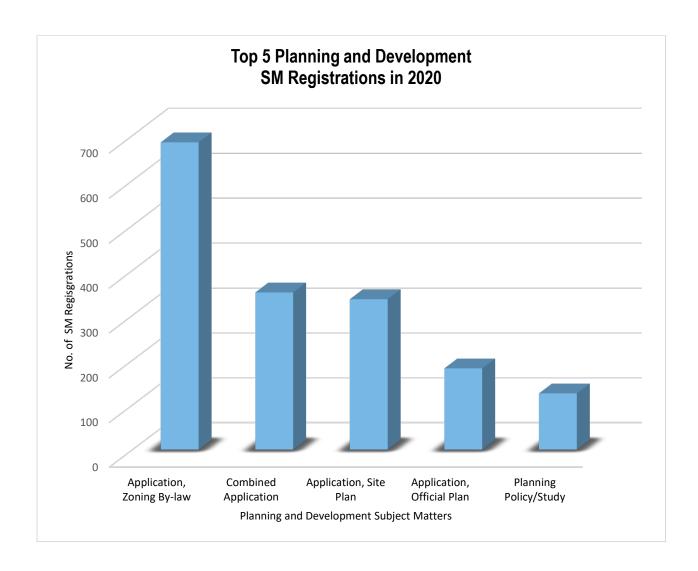
Top 10 Registered Subject Matters (SM) in 2020

This table lists the 10 most frequently registered subject matters as of December 31, 2020:

Rank	Subject Matter Category	No. of Active Registrations
1	Planning and Development	2,250
2	Technology	273
3	Economic Development	242
4	Procurement	136
5	Transportation – Roads/Bridges	121
6	Environment	115
7	Transit/TTC	111
8	Building Permits	96
9	Water	86
10	<ul><li>Affordable Housing</li><li>Real Estate / Property (City-owned)</li></ul>	81 81

### **Top 5 Planning and Development SM Registrations in 2020**

This chart lists the five most frequently registered planning and development subject matters as of December 31, 2020:

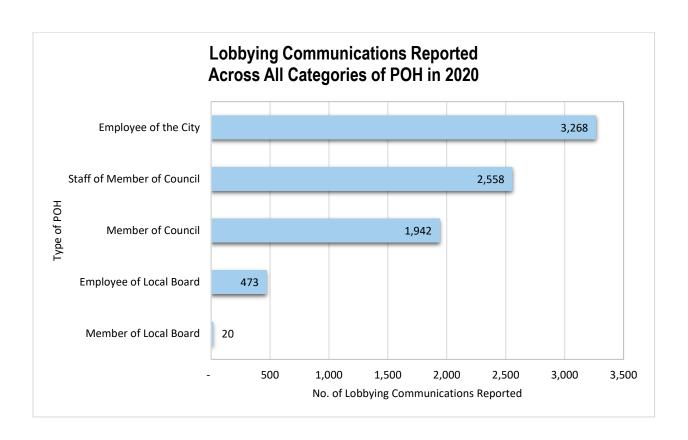




### **Public Disclosure of Lobbying Activities**

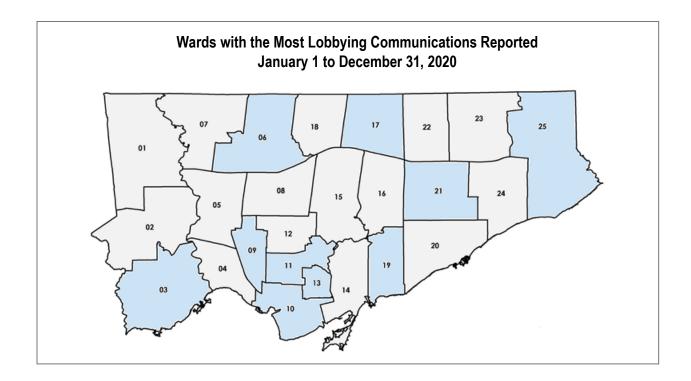
### **Lobbying Communications Reported Across All Categories of Public** Office Holders (POH) in 2020

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. The total number of lobbying communications reported in 2020 with all POH is 8,261.



# **Lobbying Communications Reported with Offices of Elected Officials in 2020**

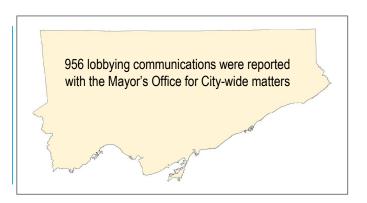
The offices of elected officials with the most frequent lobbying communications reported throughout 2020 has been represented below geographically, by ward office. In the map below, the wards with the most lobbying communications reported during 2020 are highlighted in light blue.



Ward/Office	No. of Lobbying Communications Reported
Ward 6 York Centre	322
Ward 9 Davenport	245
Ward 21 Scarborough Centre	238
Ward 25 Scarborough-Rouge Park	223
Ward 11 University-Rosedale	207
Ward 19 Beaches-East York	196
Ward 10 Spadina-Fort York	192
Ward 17 Don Valley North	177
Ward 13 Toronto Centre	155
Ward 3 Etobicoke-Lakeshore	149

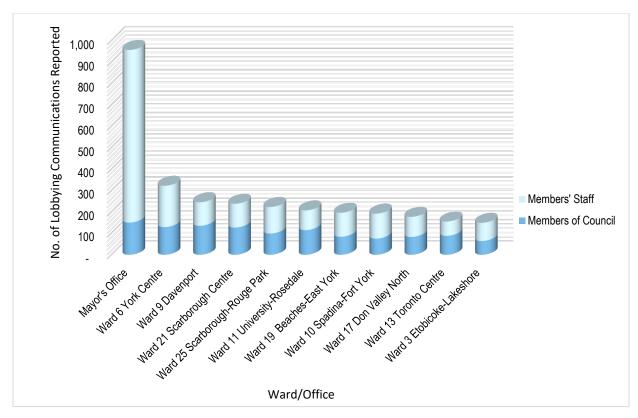
# No. of Lobbying Communications Reported with the Mayor's Office January 1 to December 31, 2020

The total number of lobbying communications reported with the Mayor's Office for City-wide matters is 956 between January 1 and December 31, 2020.



The following chart indicates the number 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, 2020.

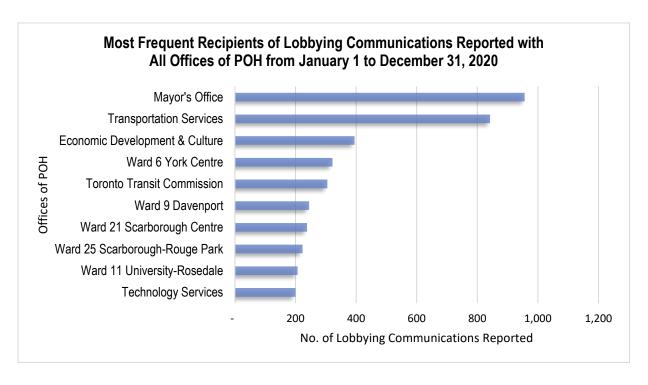
# Members of Council and Member's Staff for the Offices of Elected Officials with the Most Lobbying Communications Reported January 1 to December 31, 2020



# Most Frequent Recipients of Lobbying Communications Reported with the City's Divisions in 2020

Rank	Division	No. of Lobbying Communications Reported
1	Transportation Services	842
2	Economic Development and Culture	395
3	Technology Services	200
4	Municipal Licensing and Standards	168
5	City Manager's Office	141
6	Legal Services	130
7	City Planning	114
8	Corporate Real Estate Management	104
9	Waterfront Secretariat	97
10	Transformation Office	81

# Most Frequent Recipients of Lobbying Communications Reported with All Offices of Public Office Holders (POH) in 2020

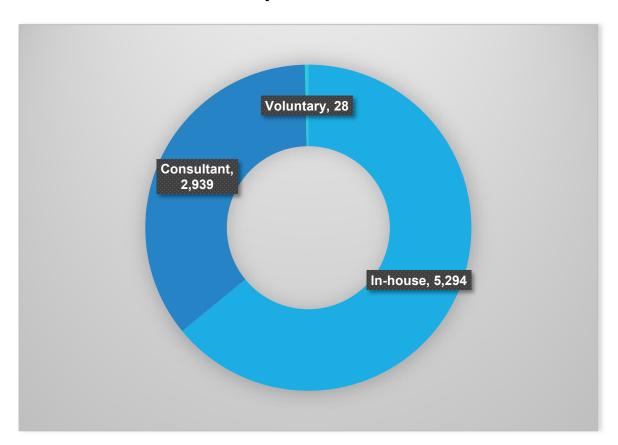


### **Total Number of Lobbying Communications Reported in 2020**

The total number of lobbying communications reported in 2020 with all POH is 8,261.

### Lobbying Communications Reported in 2020 by Type of Lobbyist

# All Lobbyists Who Reported Lobbying Communications with POH from January 1 to December 31, 2020



### Methods of Lobbying Communications Reported in 2020

The most frequent methods of lobbying communications were communications through emails, meetings (both in person and virtual) and telephone.



51%

**Emails** 



26%

Meetings, including in person and virtual



16%

Telephone



7%

Combination of the above methods, plus written, social media and text messages

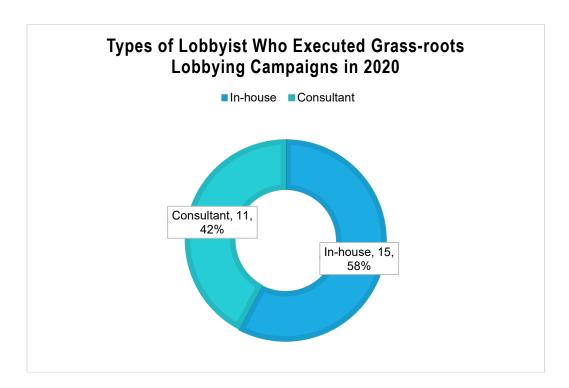
# The Number of Stakeholder Groups Engaged in Indirect Lobbying by Grass-roots Lobbying Campaigns in 2020

#### A. The Number of Grass-roots Lobbying Campaigns

26 grass-roots lobbying campaigns were launched as lobbying activity in 2020.

#### B. Types of Lobbyists Who Executed Grass-roots Lobbying Campaigns

Grass-roots lobbying campaigns have been executed by 15 in-house lobbyists and 11 consultant lobbyists.



#### C. Who Was Reached?

Of these 26 grass-roots lobbying campaigns, 12 were designed to reach the public, 5 were aimed at communities of interest, and 9 were directed to a combination of both the public and communities of interest.

#### D. Which POH were Targeted?

Of these 26 grass-roots lobbying campaigns, 23 grass-roots lobbying campaigns targeted councillors and 3 grass-roots lobbying campaigns targeted a combination of councillors and staff.

# The Number of Grass-roots Lobbying Campaigns in 2020 Sorted by Communities and Targets Reached

Total No. of Grass-roots Lobbying Campaigns: 26

Launched by:

15 In-house Lobbyists; and

11 Consultant Lobbyists

Communities Reached

Public (12)

Communities of Interest (5)

Communities of Interest + Public (9)



Councillors (23)

Councillors + Staff (3)

### **Global Compliance 2020**

Compliance is being achieved at an international level. Registered lobbyists, whose communications with Toronto POH appear in the Registry throughout 2020, originate from around the world. Places of origin include: Canada, United States of America, Australia, Norway, Belgium, France, Israel and Netherlands.

### Places of Origin of Registered Lobbyists January 1 to December 31, 2020



# Advice, Investigations, Inquiries and Breach Prevention

The COVID-19 emergency compelled the City of Toronto to adapt to a new work reality. Work was now conducted remotely, meetings were virtual, electronic communications increased exponentially, and for the first time Council and committees met virtually. Lobbyists were impacted no differently. They quickly adjusted their approach and lobbying registrations grew again this year, with a significant portion of these communications having to do with COVID-19 itself.

Crises and the need for expedient responses to them present a significant challenge for ethics offices. There is often a call for the lessening of oversight, with a suggestion that it will unnecessarily impede nimble responses in a time of emergency. However, the opposite is true, ethics offices and the deterrent provided by their investigation and enforcement units are even more vital in these times. This is doubly so for offices that regulate lobbyists such as the office of the TLR. The public must be reassured that the significant decisions being made by local government are merited. This is accomplished by ensuring that those who seek to influence these decisions are transparent and acting ethically.

Considering this seismic shift, the Investigations Unit focused its breach prevention initiative on lobbying related to the COVID-19 emergency. By way of reminder, at the outset of the 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.

The COVID-19 crisis saw numerous organizations new to lobbying the City register with the TLR. Efforts were made by the Investigations Unit to ensure that these newcomers were fully apprised of the requirements of the By-law; as from previous experience many newcomers to lobbying at the City are not aware of how robust the system of lobbyist regulation is here. Within this subset there was also an increased number of not-for-profit organizations of various composition, as in pre-pandemic years these entities often require special assistance in navigating the By-law.

The COVID-19 crisis also prompted a flood of corporate goodwill. This was best expressed at the City by the numerous donations offered to assist the City with its response. These overtures well welcome, also required in numerous instances the expertise of the Investigations Unit. The Unit provided advice to both the donors and City staff to ensure that they did not run afoul of the By-law gift giving restrictions.

Interestingly the preceding year again saw a significant number of former senior POH leave the City of Toronto. In these circumstances the Investigations Unit is, wherever possible, advised by People & Equity (P&E) of the POH exit. Former senior POH are advised of s. 140-9A of the By-law. This section prohibits former senior POH from lobbying current POH for a period of one year from the last day they ceased to hold office.

In total, 12 advance opinions were given by the Investigations Unit in 2020, and over 285 consultations and/or pieces of advice were provided to stakeholders.

## **Selected Investigations and Advanced Opinions**

#### **Conflict of Interest**

A Board member (the member) of a relatively new local board of the City reported lobbying, on behalf of a company that he owned, an employee of the Board (the employee) on which he sat. It was alleged that the member's lobbying placed the employee in a conflict of interest contrary to s. 140-45 of the By-law. A conflict of interest in the context of impropriety and improper influence under s. 140-45 requires:

- 1. a public office holder;
- 2. a private capacity interest; and
- 3. an actual or apparent improper influence/conflict that could affect the performance of official duties.

The scenario raised the important question as to whether a member of a City local board was free to lobby the employees of the local board regarding a personal interest. However, the Registrar was not compelled to decide on this issue at this juncture. Preliminary enquiries revealed the employee was formerly employed by a City division that was subsumed by the new local board. The employee's job title with the local board was like his previous title and various City sources indicated he was an employee of the local board. The member registered lobbying him as he thought he was an employee of the local board. The Investigations Unit issued summonses for the employee's personnel files. Multiple files were eventually located, the last of which revealed that the employee was not transferred over to the new local board from the dissolved division, as were other employees, but in fact had retired and been retained as a consultant by the local board. Accordingly, the Registrar determined that the member was not in breach of s.140-45 of the By-law as the employee was not a POH as defined in the By-law and the City of Toronto Act. Nevertheless, the more difficult policy question of whether a member of a City local board is free to lobby the employees of the local board regarding a personal interest remains.

### Twelve-Month Prohibition on Lobbying for Former Senior Public Office Holders

Former senior public office holders are advised by way of letter of this restriction and are invited to ask, within the twelve-month restriction period, for an advance opinion about whether a position or activity they are contemplating will place them in contravention of s. 140-9. Questions requiring opinions have included the following:

- Is a former senior public office holder in contravention of s. 140-9 if they
  communicate with employees of the City for the purposes of administering a
  grant that has already been awarded to a not-for-profit entity. The answer is
  the subject matter does not fit into the definition of lobbying as articulated in
  the Lobbying By-law and the former senior public office holder was free to
  engage in this endeavour.
- May a former senior public office holder communicate on behalf of a not-for-profit organization of which they are a member, regarding their tax arrears. The former senior public office holder was advised that they were free to communicate on behalf of the not-for-profit and that in so doing they were not required to register and consequently they were not in contravention of s. 140-9 of the Lobbying By-law. The communication was exempt as the former senior public office holder was not communicating for payment and as a result did not fit the definition of Lobbyist under the By-law. Further, while not necessary to make the finding in this opinion, members of a not-for-profit community services sector organization when acting in their official capacity are completely exempt from the application of the Lobbying By-law.
- If a former senior public office holder were to work with a client doing City business, such as a developer, or a company bidding on a contract, may they contact City staff for purposes of obtaining information about a bid or for providing clarity around application requirements. They were advised as follows:
  - o If you act on behalf of a business and communicate with the chief purchasing official or the employee specifically designated as the point of contact (emphasis added) in the solicitation document, and you do so between the time the solicitation is issued and the award and execution of final form of contract, then you are not lobbying.
  - If you act on behalf of a developer and communicate with the Mayor or a councillor and the subject of that communication is **general information** (emphasis added) regarding a planning application or an inquiry about the application review process, then you are not lobbying.

- If you act on behalf of a developer and communicate with City staff (emphasis added) who have a role in processing a planning application (planners, support staff and managers up to and including the Chief Planner), then you are not lobbying.
- Consequently, as you are not lobbying when engaging in these communications, you will not contravene the 12-month restriction on lobbying imposed on former senior public office holders by s. 140-9A of the Lobbying By-law.

#### **Conflict of Interest**

An individual who was the chair of a 2018 election campaign wished to know, given the elapse of time, whether they were now free to register and lobby the councillor whose campaign they chaired. They were advised as follows:

Section 140-45B of Chapter 140 of the Toronto Municipal Code (the Lobbying By-law) provides:

Lobbyists shall not place public office holders in a conflict of interest or in breach of the public office holders' codes of conduct or standards of behaviour.

The purpose of paragraph s. 140-45B is to enhance public confidence in the integrity of City government by preventing lobbyists from placing public office holders in a conflict of interest, whether real or apparent.<sup>1</sup>

The Lobbyist Registrar adopted the following definition of "conflict of interest" in the Interpretation Bulletin of the Lobbyist Registrar, Lobbying and Municipal Elections at the City of Toronto (January 10, 2014):

6. A conflict of interest is any interest, relationship, association or activity that may be incompatible with the duties of the public office holder, including the duty to act in the public interest, whether real or apparent.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> <u>Lobbyist Registrar for the City of Toronto, Report to Council on an Inquiry into Placing members of Council in an Apparent Conflict of Interest (March 23, 2015) at page 14.</u>

<sup>&</sup>lt;sup>2</sup> <u>Interpretation Bulletin of the Lobbyist Registrar, Lobbying and Municipal Elections at the City of Toronto</u> (January 14, 2014, updated March 21, 2018)

Madam Justice Bellamy wrote when considering conflict of interest in a municipal context that:

...a conflict of interest is essentially a conflict between public and private interests.

...The core concern in a conflict is the presumption that bias and a lack of impartial judgement will lead a decision-maker in public service to prefer his or her own personal interests over the public good...conflicts of interest extend to any interest, loyalty, concern, emotion, or other feature of a situation tending to make the individual's judgement less reliable than it would normally be.<sup>3</sup>

The individual was advised that based on their significant role in that election campaign, that any lobbying of the councillor or his staff during the remainder of the 2018 to 2022 term of Council, may place the councillor in a conflict of interest in breach of the Lobbying By-law, s. 140-45B.

### **Prohibition on Gifts from Lobbyists**

A corporation provided a donation of services to the City to be utilized by residents in need as a result of the COVID-19 crisis. The corporation is also registered as an in-house lobbying organization with the TLR. The Investigations Unit was asked whether this contravened s. 140-42 of the Lobbying By-law, which reads:

No lobbyist or client of a lobbyist, or any parent, subsidiary, affiliate, officer or employee of any lobbyist or client of a lobbyist shall directly or indirectly offer, provide or bestow entertainment, gifts, meals, trips or favours of any kind to a public office holder.

It was the opinion of the office that the donation was not a contravention of the Lobbying By-law as it was a donation to the City and not an individual public office holder and it was made in accordance with the *Donations To The City of Toronto for Community Benefits Policy*.

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<sup>&</sup>lt;sup>3</sup> Report of the Toronto Computer Leasing Inquiry and the Toronto External Contracts Inquiry (2005), Volume 2: Good Government at pages 38 and 39.

# **Technological Change**

The new investigation Case Management System (CMS) became operational in October of 2020. Due to the COVID-19 emergency, the Vendor had to modify the in-person training scheduled for staff, training was conducted virtually instead. The Investigations Unit is now utilizing this new tool to manage new investigations, inquiries and advance opinions. The Unit is now able to issue all correspondence necessary for an inquiry through this tool, ensuring that files are properly documented and timely. Unit staff are becoming more familiar and proficient with the capabilities of the tool with each new case.

The Investigations Unit also endeavoured to acquire both skills and tools that would assist in the ever-expanding realm of e-discovery. The City Clerk's Office was able to provide some early assistance with the provision of advice and some low-cost software options. Ultimately the Unit was apprised of an application currently utilized by the Auditor General's Office, and the Unit is now in the process of acquiring a licence for this product. Given the upsurge in electronic communications during the COVID-19 emergency, this tool will be a necessity for future inquiries.

# **Inquiries & Investigations Unit Statistics**

The table below shows the source of requests for the 14 new investigations and 14 new inquiries in 2020:

## Source of Information or Request for Inquiry

Source of Requests	New Investigations	New Inquiries
Members of Council or their staff	0	0
City staff	10	10
Toronto Lobbyist Registrar	2	2
Other Accountability Offices	1	1
Members of the Public	1	1

The following table shows the investigations and inquiries in 2020:

# **Investigations and Inquiries**

Investigations and Inquiries	2020
Investigations (new)	14
(completed)	14
Inquiries (new)	14
(completed)	6
(carried over to 2021)	8

The table below shows the outcomes of the 14 investigations completed in 2020:

# **Outcomes of Completed Investigations**

Outcomes of the Investigations	Completed Investigations
Inquiry Files Opened	14
Referral to Other Accountability Office	1

The table below shows the outcomes of the 6 inquiries completed in 2020:

# **Outcomes of Completed Inquiries**

Outcomes of Inquiries Completed	Completed Inquiries
Breach of the Lobbying By-law substantiated	2
Breach of the Lobbying By-law not substantiated	4

The table below shows the resolutions for the 2 substantiated files in 2020:

## **Resolutions for Substantiated Files**

Corrective Action	No. of Actions Taken
Advice Given	1
Mandatory Lobbyist Training	1
Apology Provided	1
Commitment to Comply	2

# **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 the 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 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 order to support stakeholders with the transition to use the new Registry, the Advisors hosted 5 in-class training sessions and 5 virtual training sessions for lobbyists and POH. Participants were provided with an introduction to the new system which included a demonstration of the Registry and search functions. They also provided feedback to TLR staff about suggested improvements and future upgrades.

The TLR hosted one Lobbying By-law virtual training session in 2020 for lobbyists. Our office offers special virtual training sessions by request, where an overview of registration and compliance obligation under the By-law is provided. To request a special training session, please contact <a href="LobbyingBylawTraining@toronto.ca">LobbyingBylawTraining@toronto.ca</a>.

In 2020, the TLR staff provided information to all stakeholders about the application of the By-law 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 Investigations and Registry Units 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 lobbyists' 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 partnered with POH to ensure that information about the By-law and its application is easily available and understood. The Registrar hosted 43 one-on-one meetings with POH including members of Council and their staff, and City staff, where an overview of application of the By-law was provided, where opportunities for collaboration were identified, and where access to online and printed materials was reviewed.

The TLR also 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. Working with PMMD, TLR staff participated in 3 PMMD Vendor Information Sessions on Doing Business with the City.

Outreach initiatives also included an orientation session coordinated with staff in P&E attended by approximately 90 new employees. The Registrar presented at the New Employee Orientation Session, 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.

Another new opportunity for the TLR to contribute to orientation for POH was the inclusion of TLR in the Toronto Fire Senior Officers Virtual Onboarding Session. The Registrar presented to approximately 35 officers about the By-law and its application.

The Registrar also hosted 10 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 7 exiting POH to provide advice and support regarding post-term lobbying restrictions. With support from the TLR's Investigations Unit, exiting POH were provided with valuable information regarding the statutory requirements a former senior POH must consider when evaluating future opportunities relating to lobbying current senior POH.

The TLR also provided information and support to councillors and their staff. Two virtual orientation sessions were delivered to councillors' staff, including the Mayor's Office.

# **Sharing Best Practices in Lobbying Regulation**

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. Due to the unique challenges of the pandemic, the TLR pivoted to sharing expertise and advice with governments in other jurisdictions by virtual meetings.

The TLR shares expertise and advice with governments in many jurisdictions across Canada and internationally. In 2020, the TLR's collaborative exchanges were undertaken with the lobbying regulation authorities from other jurisdictions, including: Commissioner of Lobbying of Canada, Office of the Information and Privacy Commissioner for British Columbia, Lobbyist Registrar and General Counsel of Alberta, Registrar of Lobbyists for Saskatchewan, Conflict of Interest Commissioner for Manitoba Legislative Assembly, Integrity Commissioner of Ontario, Commissaire au lobbyisme du Québec, Integrity Commissioner of New Brunswick, Executive Director of Registries for Nova Scotia, Commissioner of Lobbyists for Newfoundland & Labrador, Integrity Commissioner of Ottawa, Integrity Commissioner of Peel Region, Integrity Commissioner of Vaughan, Integrity Commissioner of Winnipeg, and Accountability Officer of Town of Collingwood. In addition, the TLR senior staff participated in the following conferences virtually as instructors and contributors, sharing expertise with public service and government ethics executives:

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

Both the Lobbyist Registrar and Inquiries & Investigations Counsel participated in the LRCN Annual Conference, which was held virtually on September 17, 2020. The TLR has been meeting and sharing best practices with Registrars and Commissioners of Lobbying from across Canada through this network annually.

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.

# 2. Municipal Lobbyist Registrars of Ontario (MLRO)

Working in collaboration with the Integrity Commissioner of Vaughan, the Registrar engaged in planning and preparation for the 2021 inaugural meeting of the MLRO. The Registrar and the Commissioner look forward to establishing the MLRO as a networking forum where municipal commissioners and registrars of lobbying can meet to share best practices.

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

The Registrar attended the virtual conference on the Collingwood Judicial Inquiry held by MICO on November 12, 2020, and also contributed as a presenter. This meeting was a gathering of integrity commissioners from municipalities across the province. MICO is an 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. Public Affairs Association of Canada (PAAC)

On October 21, 2020, the Lobbyist Registrar joined the Commissioner of Lobbying of Canada and the Integrity Commissioner of Ontario for a panel discussion on "Compliance and Registration: An Update from the Federal, Ontario and City of Toronto Lobbying Commissioners", which was hosted by PAAC, via webinar. Special thank you to PAAC for inviting the Lobbyist Registrar to participate in this education and outreach event.

## 5. Canadian Bar Association (CBA)

Inquiries & Investigations 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 2020 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 spoke at the COGEL conference in Chicago where he sat on the *Enforcement Update Panel*, he also provided training on the Lobbying By-law to major Canadian law firms.

# 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, an Executive Assistant and an Administrative Assistant.

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.

The Executive/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 2020, the TLR staff participated in conferences and seminars offered by the following institutions:

- Council of Government Ethics Law (COGEL)
- Council on Licensure, Enforcement and Regulation (CLEAR)
- Institute of Public Administration of Canada (IPAC)
- 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
- Organisation for Economic Co-operation and Development (OECD)
- 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 February 19, 2020, Council approved the TLR's 2020 Operating Budget request of \$1,252.0 thousand gross and net. Council also approved the 2020 Capital Budget for the TLR with cash flows and future year commitments totaling \$0.1 million; and the 2021-2029 Capital Plan for the TLR totalling \$1.0 million in project estimates.

# **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 2019 was adopted by Council on March 10, 2021. The compliance audit for the year 2020 is not yet available.

Respectfully Submitted,

Cristina De Caprio Lobbyist Registrar City of Toronto

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