

2022 Annual Report

Office of the Integrity Commissioner

Jonathan Batty
Integrity Commissioner

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ICT

OFFICE OF THE
**INTEGRITY
COMMISSIONER**
TORONTO

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Commissioner's Message

Introduction

This year was marked by three milestones, the updating of the City's Codes of Conduct, the 2022 municipal election and the completion of this Office's first inquiry under the *Municipal Conflict of Interest Act* (MCIA).

Before discussing our work on these matters, a word needs to be said about how these things were all made possible.

Office Operations

In addition to me, the Office of the Integrity Commissioner has two staff. For such a small office to reach these milestones, in addition to our steady workload, is a testament to the professionalism of the people I work with. I am very grateful for the wise counsel of Kate Zavitz, the Legal Counsel for the Office of the Integrity Commissioner, and the dedication of Lisa Di Felice, the Coordinator, Administration and Operations for the Office. Their efforts have been invaluable.

Most things at the City of Toronto are accomplished with the collaboration of people across the City's government. This was the case with my team's work on updating the City's Codes of Conduct. We greatly benefitted from the review and input from City Manager's Office, the City Clerk's Office and the City Solicitor's Office. In particular, I would like to thank the City Manager's Office for the advice and assistance they provided for the online consultation process. I am also grateful for the advice that former integrity commissioners gave me. Finally, I would like to thank the members of Council and their staff who met with me, for their insightful comments.

As I describe below, my Office's work would also not be possible without the funding we receive from the City.

Operating Budget

The 2022 approved net operating budget for the Office was \$661,587.20. The expenditures for the Office are set out in Appendix 2.

In addition to our in-house team, the Office of the Integrity Commissioner requires the flexibility to retain external legal and investigative resources.

Sometimes we need expert and forensic help in our investigations. For example, we may need additional resources in complex and concurrent investigations. To address these requirements, Council has approved a reserve fund to cover these contingencies. In 2022, \$38,049.58 was drawn from that reserve fund to cover external legal and investigative expenses and \$90,000 was contributed to it. This is a cost-effective and consistent way of

supporting our work. Council's continued support in 2022 recognized the value and contribution of the Office in serving the public.

Updating the City's Codes of Conduct

In 2021, upon my recommendation, Council requested me to consult with Members of Council individually, City staff, the public and other stakeholders with potential changes to the Code of Conduct for Members of Council, the Code of Conduct for Members of Local Boards and the Code of Conduct for Members of Adjudicative Boards.

The City's Codes of Conduct had served Toronto well and, when first adopted, set a precedent in Ontario. However, since they were first adopted 2008, Council had not comprehensively reviewed and updated them.

In June 2022, I reported back to Council and recommended both housekeeping and substantive amendments. I specifically recommended the conflict of interest rule and the discreditable conduct rule in all three Codes of Conduct needed to be strengthened and that a new rule be adopted to define how Members of Council can support charitable fundraising activities. Additionally, I recommended changes to make the Codes of Conduct more accessible and inclusive, for example, using gender neutral and plainer language and clearer formatting.

In addition to my meetings with Members of Council, City staff, the "town hall" with members from local and adjudicative boards and other input I received, my recommendations were helpfully informed by an online public survey. I believe that survey is a first to ever be conducted by an integrity commissioner. The survey asked for anonymous input on recommended amendments to the Codes of Conduct as well as any other recommendations for change. The survey, which received a good response rate, was promoted through email, social media, our website, some Member's newsletters, City Strategic Communications for City staff, and direct invitations to ethics practitioners. The survey found:

- 87% of participants agreed or strongly agreed with the recommendation to broaden the conflicts of interest rule to include apparent conflicts of interest;
- 86% of participants agreed or strongly agreed the recommendation to expand the discreditable conduct rule by adding a prohibition on derogatory conduct; and,
- 76% of participants agreed or strongly agreed with the recommendation to add a fundraising rule for members of Council, with 69% feeling the proposed wording did a good job of prohibiting inappropriate fundraising.

The input received through all these consultations helped refine the updated Codes of Conduct my Office drafted, which Council reviewed and adopted in June 2022.

The 2022 Municipal Election

A regular municipal election requires my Office to provide election-related guidance, observe specific legal requirements governing inquiries, and help with the transition to a new term of Council.

Early in 2022, my Office issued an interpretation bulletin explaining the City policies and rules that Members of Council and their staff are required to observe in a regular municipal election year. Specifically, Members were advised about, the restrictions placed on:

- Their use of City resources.
- Organizing community events.
- Communicating with the public using their office resources.
- The political activity of their staff in the workplace.
- Working with City staff.
- Using city-funded social media and webpages.
- Interacting with lobbyists.

My Office also issued an interpretation bulletin explaining the political activity rights of Members of Local Boards.

Finally, my Office also issued guidance about the use of social media by both Members of Council and Members of Local Boards.

As required by the *City of Toronto Act, 2006* for the 2022 regular municipal election between August 19 and October 24, 2022 (Voting Day), my Office could not receive new Code of Conduct complaints or MCIA Applications although these requirements still apply to members. For that reason, my Office continued to provide confidential advice throughout this period.

All inquiries also had to be terminated on August 19, 2022. However, after Voting Day, the Integrity Commissioner can resume inquiries that were terminated and receive and investigate Code of Conduct complaints and MCIA Applications about a member's activity during this period. In 2022, my Office terminated six inquiries on August 19, 2022. Following Voting Day, all six inquiries were resumed by my Office at the request of the people who submitted them.

At the beginning of the new Council term, I also participated in the orientation of new Members of Council hosted by the Clerk's Office and met with the Members who were newly-elected to brief them and answer questions about the requirements of the Code of Conduct for Members of Council and the MCIA.

Inquiry under the MCIA

Municipal integrity commissioners have only had jurisdiction to conduct inquiries under the MCIA since 2019. Normally, an integrity commissioner is provided up to 180 days to complete such an inquiry. The first inquiry my Office ever conducted began with an application submitted on July 22, 2022 regarding a vote by Mayor John Tory at Council in June 2022.

As noted above, due to the upcoming election, the City of Toronto Act, 2006 required that all inquiries be terminated on August 19, 2022. Effectively, my Office had only 19 business days to complete this inquiry before that date. It was impossible to conduct an inquiry and report out on this matter by that deadline.

While an inquiry can be resumed after an election (as this one was on October 28, 2022), this may pose a challenge as well. The recall of witnesses fades with time. Resuming an inquiry after it has been halted 66 days because of an election is difficult for gathering evidence.

For that reason, before August 19, 2022, my Office adopted an aggressive interview schedule to ensure we obtained evidence from people while their memories were fresh and we could easily access documents. When we resumed the inquiry as requested, we completed the inquiry and issued our report on December 20, 2022. Excluding the 70-day period from August 19, 2022 to October 28, 2022 when it was terminated, we completed the inquiry within 81 days.

Conclusion

My Office looks forward to serving Members of Council in the new Council term and the renewed and newly members of the City's local and adjudicative boards. With the end of the regular municipal election cycle, in addition to the continuing services my Office provides, we will be focussing in the upcoming year on the completion of inquiries delayed by, or arising from, the last election.

Respectfully submitted,

Jonathan Batty
Integrity Commissioner

Legislative Change: Strong Mayor Powers

Introduction

In 2022, the *City of Toronto Act, 2006* and *Municipal Conflict of Interest Act* were amended.

A new suite of powers and responsibilities were entrusted the Mayor under Part VI.1 of the *City of Toronto Act, 2006*. Additionally, the *Municipal Conflict of Interest Act* was amended to include accountability provisions that apply to the Mayor.

Strong Mayor “Powers and Duties”

There has been an enduring public policy discussion about the role of the Mayor at the City of Toronto at least since the amalgamation of the City of Toronto over twenty years ago. In the Bellamy report, which laid the foundation for Toronto’s current accountability framework, Justice Bellamy noted the following¹:

Toronto needs visionary policy on urban renewal, infrastructure, the environment, housing, public safety, fiscal planning, immigration, education, intergovernmental relations, and a host of other social and political issues of great breadth and depth. The City needs to empower leadership that can define and execute visionary policy in these areas while remaining accountable to the voters. The Mayor is elected city-wide and represents the City to the media; these facts lead the public to expect that he or she will provide visionary leadership. But the Mayor has only one vote in Council and cannot implement an agenda with the same efficiency as can leaders of the federal and provincial governments.

In the current structure, theoretically, every vote poses a new and time-consuming challenge for the Mayor: to cobble together a supportive coalition. Thus, every initiative risks being diluted to attract the requisite support on Council. The process of passing even slightly controversial initiatives and sometimes even the most straightforward proposals can be unwieldy and long.

Justice Bellamy noted that striking the right balance to strengthen the Mayor’s powers is essentially a political question. She concluded as follows²:

The net effect of this diffuse form of leadership, with the Mayor drifting in and out of prominence from issue to issue, is to set the scene for a lack of consistent vision ... [T]he power relationship needs to be brought into the open and regularized, so that

¹ Justice Bellamy, Report on the Toronto Computer Leasing Inquiry & Toronto External Contracts Inquiry, Volume 2: Good Government, 2005, page 14.

² *ibid.* p. 15.

the public knows who is really in charge. That means formally according to the office of the Mayor the power that he or she may now exercise quietly and informally.

I have quoted this text because, even in acknowledging the Mayor's powers are primarily a political question, Justice Bellamy noted good government requires that the exercise of executive power needs to be transparent, counter-balanced and properly documented.

Before 2023, the Mayor of Toronto's oversight of the budget process had been "quiet and informal" as Justice Bellamy described. The City Manager had been the official charged with presenting the City's capital and operating budget to Council for approval.

The new requirement in Part VI.1 that the Mayor prepare and present the budget is more transparent. In conjunction with this new budgetary power, there are explicit statutory requirements that govern the exercise of the Mayor's new duties and powers.

The new powers the Mayor has in the *City of Toronto Act, 2006* are built on top of the existing powers the holder of the office exercises as the head of council. In the exercise of some powers, it is now the "head of council" that is entrusted the power to make decisions and issue directions rather than the "city."

In particular, the Mayor now has explicit and broad reaching authority to direct City staff to (s. 226.1):

- a) undertake research and provide advice to the head of council and city council on policies and programs of the City or of the head of council as they relate to the powers and duties under this Part; and
- b) carry out duties related to the exercise of the power or performance of the duty, including implementing any decisions made by the head of council under this Part.

Corresponding with the exercise of these specific powers to direct staff, the Mayor is also required "by the next business day, [to] provide a written record of the direction to the clerk and chief administrative officer, if one is appointed."

The Mayor is similarly required in s. 226.2, in the general exercise of the Office's new powers and duties under section 226.2 (1), to do so in writing and provide the written record "to each member of city council and to the clerk" and the public, subject to the requirements of the *Municipal Freedom of Information and Protection of Privacy Act*. The requirements in s. 226.2, however, are subject to the further caveat that this does not apply if the regulations under Part VI.1 apply otherwise.

The presentation of the budget does not appear to fall with the ambit of s. 226.2 as s. 226.14(2) appears to provide separate direction on this matter. Section 226.14(2) instead states: "[t]he head of council shall, in accordance with the regulations, prepare a proposed budget for the City and provide the proposed budget to city council for city council's consideration."

Sections 6, 7 and 8 of O. Reg. 529/22 provide detailed direction with respect to the budget process.

Accountability Requirements

The exercise of the Mayor’s Special Powers and Duties in Part VI.1 are also subject to new accountability requirements built on the existing accountability requirements that apply to the Mayor as a member of Council.

Some of these accountability requirements are found in Part VI.1 and its regulations which “formalize” how the Mayor may exercise the new powers and duties. The MCIA also contains new accountability requirements.

This intent to build on, rather than oust or amend, existing accountability requirements is clear from the legislative debate before the enactment of the Mayor’s new “powers and duties.” As both the parliamentary assistant to the Minister of Municipal Affairs and Housing, and the Associate Minister of Housing noted, all members of Council, including the head of council, are already subject to legislated accountability and transparency rules, and the government’s amendments were intended to supplement the existing requirements³.

The Associate Minister of Housing also went on to say⁴:

The *Better Municipal Governance Act* would, if passed, have the same contingencies in place as the first strong-mayors bill did. We have accounted for the possibility of an abuse of power, and we’ve maintained the existing municipal accountability framework, including rules about conflict of interest. On top of that, heads of council would also be required to provide their rationale when using the proposed new bylaw power. This is all because we have built a strong system of checks and balances into the *Strong Mayors, Building Homes* legislation. And remember that council members are already, and are still, subject to legislated accountability and transparency rules—and that includes the mayor.

A government member of the Legislative Assembly elaborated on this when she said in debate⁵:

Strong, efficient decision-making must be balanced with appropriate accountability and oversight. Already, mayors in all municipalities are subject to their local codes of conduct, and persons can make complaints to the local integrity commissioner, who has the power to investigate and report findings to council. In addition, mayors are subject to the *Municipal Conflict of Interest Act*, which was recently amended to prevent mayors from using their new powers if they have a financial interest in the matter.

³ Hansard, September 6, 2022 and November 17, 2022.

⁴ Hansard, December 6, 2022.

⁵ Hansard, December 7, 2022.

All members of Council are required by the MClA to declare in writing when they have a pecuniary interest in a matter at Council, disclose the nature of that pecuniary interest, remove themselves from such votes and refrain from influencing the vote on such matters. In addition to these requirements, the Mayor is now also required to make a declaration for “any matter of the municipality and [where the head of council] has a power or duty” in Part VI.1. This is a very expansive requirement and appears to be modelled on the language in s. 5(1), which the Court of Appeal has found should be interpreted in a broad and purposive manner to enhance transparency and accountability⁶.

It is also significant to note that the exceptions to declaring interests in s. 4 are the only counter-balance to the expansive requirement to declare an interest in s. 5.3. The Legislature has not added any new exceptions to the obligation to declare an interest. The Legislature has also not provided the Mayor the right to apply to a judge for an exemption from the requirements of s. 5.3, as other members may do when a quorum to decide a matter may be lost. This speaks to a legislative intent that the Mayor not be engaged in budgetary matters, either in its formulation or presentation, that affect their pecuniary interests.

This intent was expressed by the Minister of Municipal Affairs who noted in debate about Part VI.1⁷:

The proposed changes would also affect the *Municipal Conflict of Interest Act* by requiring the mayor to declare any financial interests related to the use of the new powers. They would be prevented from using these new powers where any financial conflict exists.

Budget Preparation

The prohibition on the Mayor being involved in the formulation and presentation of elements of the budget in which they have a pecuniary interest is also reflected in s. 7 of O. Reg. 529/22 which provides as follows:

If, under section 5.3 of the *Municipal Conflict of Interest Act*, the head of council is prohibited from using the power and exercising the duty under subsection 226.14 (2) of the Act to prepare the proposed budget for the City with respect to a matter,

- a) city council may pass a resolution to amend the proposed budget with respect to the matter; and
- b) the head of council may not veto the resolution.

How then is a budget matter in which the Mayor has a pecuniary interest prepared and presented? This answer is not explicitly provided in the legislation. At the same time, legislation must be read as a whole and is presumed to be logically consistent and able to fulfill its stated purpose until there is a judicial determination otherwise.

⁶ *Ferri v Ontario (Ministry of Attorney General)*, 2015 ONCA 683, at para 10.

⁷ Hansard, August 11, 2022.

Using Part VI.1, the Mayor ordered that⁸:

The Budget Committee is responsible for:

- (1) Hearing public presentations and providing advice to the Mayor on the operating and capital budgets; and
- (2) Making recommendations to Council on any operating or capital budgets in which the Mayor has a pecuniary interest.

The assignment of this function to the Budget Committee should, perhaps, have been broader. As the City's full accountability framework applies to the exercise of the new powers and duties of the Mayor, the Budget Committee could have been given responsibility for making recommendations to Council on any operating or capital budget matters in which the Mayor has a conflict of interest, in recognition of the fact that pecuniary interests as defined by the MCIA are just one form of conflict of interest that may warrant recusal from participation in decision-making.

The assignment of this function to the Budget Committee in 2023 was formally documented and issued pursuant to s. 226.2. In future years, it may be of assistance if the Mayor and City administration could clarify whether, in their opinion, the Mayor needs to issue written directions under s. 226.1 to City staff about how to prepare and submit budget items in which the Mayor has a pecuniary interest.

With this overview in place, I make some general recommendations relating to these new legislative requirements in the budget process.

Recommendations

1. In the budget process, a Mayor needs to make the declaration(s) required by s. 5.3 of the MCIA as soon as a pecuniary interest is identified, which may be long before the budget is considered in committee or at Council, and may need to periodically update and renew them.
2. Prior to a "Budget Launch":
 - a. it should be announced/documentated what direction a Mayor has given City staff to prepare the draft budget and what they are being asked to present;
 - b. a Mayor should submit a declaration to the Clerk disclosing what pecuniary interests, if any, require them not to present any matters found in the draft budget. Additionally, a Mayor should identify if they have any conflicts of interest.

⁸ Mayoral Decision 1-2022, p.4.

3. It should be announced/documentated if matters in the draft budget for which a Mayor has a pecuniary interest under the MClA, or a conflict of interest under the Code of Conduct, are being presented by City staff (and how that differs from the presentation by City staff of the other matters in the draft budget).
4. It should be announced/documentated how the Budget Committee is being advised what the Mayor's pecuniary and conflicts of interests are, if any, before they receive the draft budget and consider amending it.
5. It should be announced/documentated how matters in which a Mayor has a pecuniary or conflict of interest, if any, are being presented differently from the other matters in the draft budget.
6. Even if a Mayor has made a declaration under MClA s. 5.3 prior to Council, a separate declaration under s. 5.1 is required because a Mayor will need to withdraw from voting on matters where there is a pecuniary interest, which should be clearly documented in the Council minutes.

Report on Activities

Section 1: Advice and Gift Declarations

Advice for Members of Council and Members of Local Boards

Providing confidential advice to help members of Council comply with the *Municipal Conflict of Interest Act* (MCIA) and the *Code of Conduct for Members of Council* is a key responsibility of the Integrity Commissioner. The Integrity Commissioner is also assigned responsibility for advising, receiving and publicly reporting on gifts received by members of Council. I request meetings with members of Council each year to review all these matters and update them about the activities of my Office. This year, I met with 26 members of Council, including members from the 2018-2022 Council, the new 2022-2024 Council and some members who held interim positions as members of Council.

Similarly, I provide advice to members of the City's boards and adjudicative tribunals about their obligations under the *Code of Conduct for Members of Local Boards (Restricted Definition)* and the *Code of Conduct for Members of Adjudicative Boards*. As there are approximately 1000 members of these boards and adjudicative tribunals, it is not possible to meet with everyone individually and my Office's outreach activities are important to provide updates to these members and to let them know who to contact if they have questions.

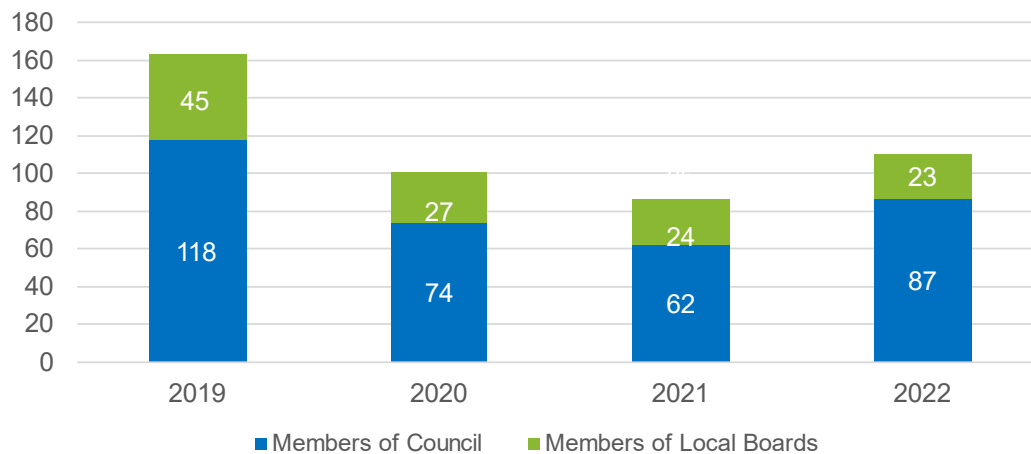
The advice I provide needs to be thorough, practical and timely. I often receive urgent requests for advice at the last minute or outside regular working hours. The fact that the vast majority of advice I provide, supported by my team, is given within 24 hours or less speaks to the emphasis we place on this.

To advise someone, I may need to refer to past advice, reports, legal precedents, Council decisions and City policies. The City's three Codes of Conduct are similar, but not identical, so that is always considered. Requests may engage the MCIA and one or more provision in a Code of Conduct. In addition to applying the correct standards and interpretive principles, the full context of a situation is important to understand. Precise advice requires precise background information so most advice requests require follow-up to obtain more information. When I provide written advice, members typically contact me to discuss and confirm their understanding of the advice or if they have follow-up questions when circumstances change.

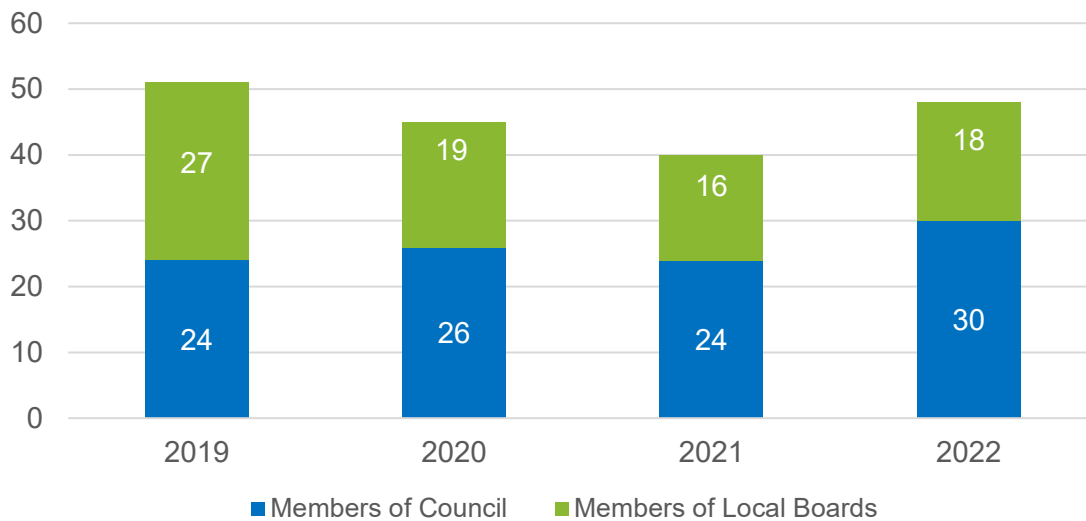
My Office provided advice in two days or less to members of Council 83 percent of the time and to members of local boards 52 percent of the time.

I was contacted for advice 110 times during this reporting period, an increase from the previous two years. The following charts summarize how many requests we received, who was asking for advice and what they wanted advice about.

Number of Advice Requests



Number of Members who asked for Advice



Subject of Advice Requests

Subject	Number of Requests	Percentage of Requests
Conflict of interest/Use of influence under the Code of Conduct	46	41%
Election related	35	31%
Understanding pecuniary interests under the MCIA	9	8%
Receiving gifts and benefits	5	5%
Support for activities and fundraising	4	4%
Dealing with staff	3	3%
Observing post-employment obligations	3	3%
Providing letters of reference	2	2%
Best practices for dealing with constituents/the public	2	2%
Complaining about another member	1	1%

Gifts and Benefits declared by Members of Council

Under Article IV (Gifts and Benefits) of the Code of Conduct, members of Council are not permitted to receive any gifts or benefits directly or indirectly connected with their official duties unless they fall within the following categories:

- 1) Legally authorized compensation (e.g. a salary from the City for being a member)
- 2) Official gifts (e.g. received as part of protocol)
- 3) Political contributions
- 4) Volunteer services in their offices
- 5) Gifts from an event honouring a member
- 6) Sponsored travel and related expenses
- 7) Food and beverages at events
- 8) Complimentary media in their offices
- 9) Donations for Member-Organized Community Events

Members must report to my Office if they have received anything that is worth more than \$300 and falls within category 2, 5, 6, 7, 8 or 9 noted above. These reports are posted on the [Office of the Integrity Commissioner's website](#).

Separate forms are used to report Donations for Member-Organized Community Events (category 9) and Sponsored Travel and related Expenses (category 6) as there are additional policies and processes that apply to receiving and reporting these gifts and benefits: the [Council Member-Organized Community Events Policy](#) and the [Sponsored Travel Procedures and Form Guidelines](#). Anything else is reported on a form under the [Gifts and Benefits Procedure](#).

The table below shows the reported donations for member-organized community events, sponsored travel and related expenses.

Number of Declaration Forms Received

Category	2019	2020	2021	2022
Community Events	39	8	8	1
Sponsored Travel	8	5	0	3
Gifts and Benefits	0	0	0	0

Section 2: Inquiries, Complaints and Applications

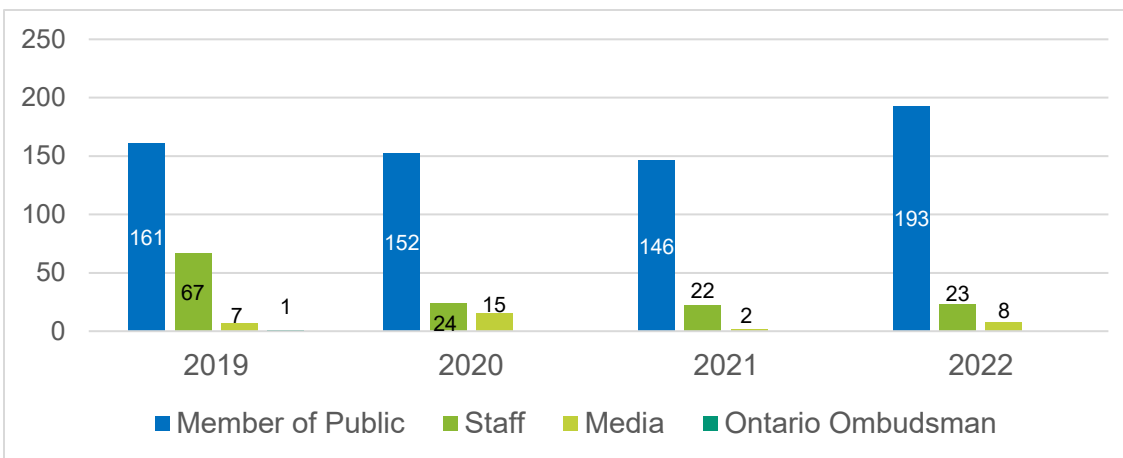
Inquiries

When the public, City staff and the media contact my Office it is invariably about complaints: specifically, how to make a complaint, whether their issue is within our jurisdiction or asking if we have received a complaint about someone. In answering those inquiries, we explain that we only have jurisdiction over members of Council and members of local boards. Many inquiries result in a referral to another City office or external agency.

Most complaints that I receive begin with an inquiry. We received more inquiries in 2022, which may be do to the fact that it was an election year, a pattern observed in 2018.

The following table shows how many inquiries we received over the last four years and who we received them from.

Number of Inquiries

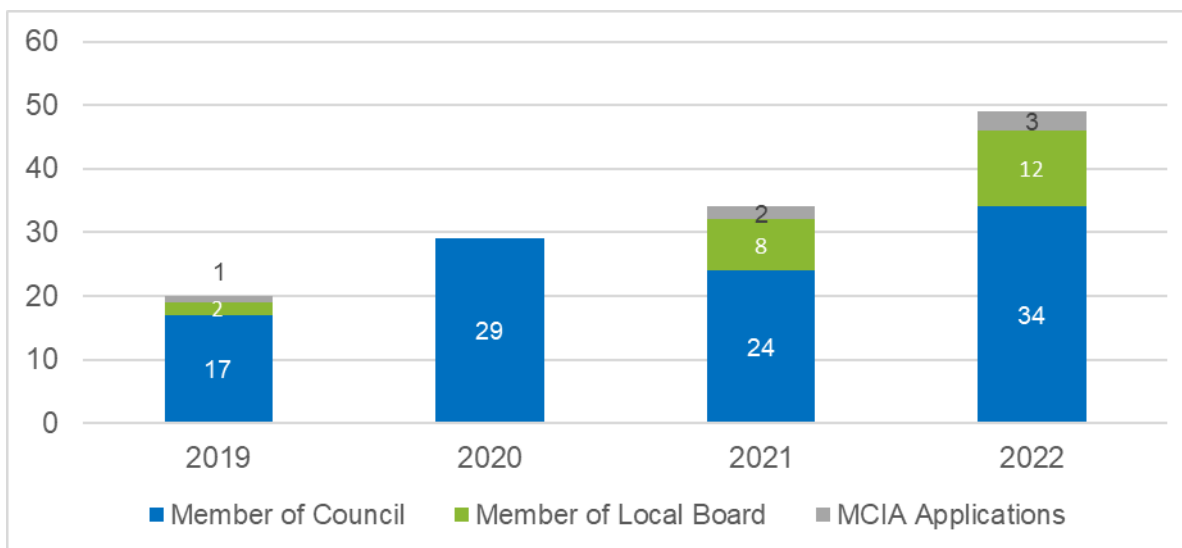


Informal Complaints, Formal Complaints and Applications

Under the *City of Toronto Act, 2006*, I may only investigate someone’s conduct if I receive a Code of Conduct complaint or an MCI/A Application. I follow the process set out in the [Complaint and Application Procedures](#) for assessing, investigating and reporting on matters. The procedures include a process for dealing with complaints either informally or formally. There is no informal process for resolving MCI/A Applications.

In 2022, the combined number of informal complaints, formal complaints and MCI/A Applications I received increased by 44% percent from the previous year. The table below shows how many complaints and Applications we have received over the last four years.

Number of Complaints and Applications received 2019 to 2022



Informal Complaints

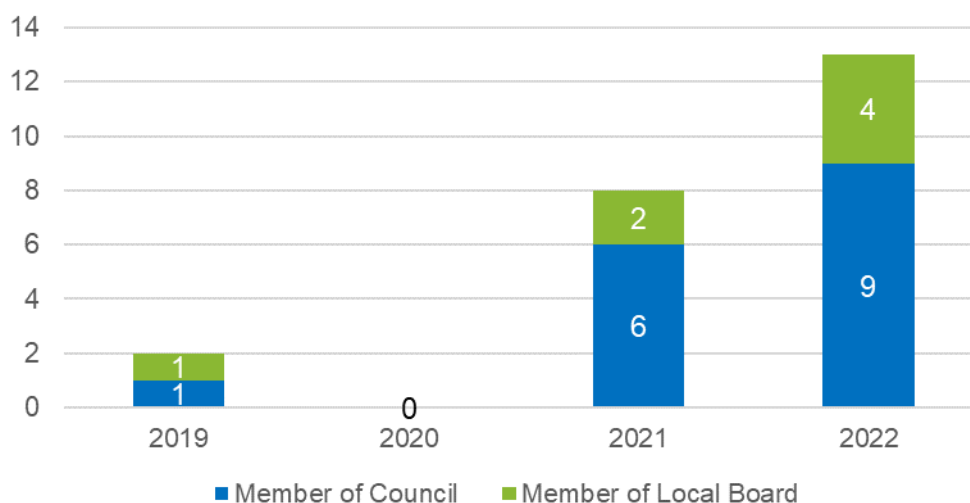
The informal complaint process is a form of alternative dispute resolution where I assist the parties arrive at a mutually acceptable resolution to a complaint. They do not require a formal investigation.

Often, these complaints involve an isolated “customer service” issue where a corrective action, or an apology, is sufficient. I approve this manner of resolving complaints where a person who makes a complaint can obtain an appropriate remedy and a member is able to correct the mistake and does so in good faith. If someone makes an informal complaint, and a member is not willing to resolve it voluntarily, this process cannot be used but that person may file a formal complaint.

This alternative dispute resolution process is used at my discretion. I will not use this where I do not have jurisdiction over the issue, the allegations are without merit or a party is not acting in good faith. I will not use it for allegations of serious misconduct or a pattern of misconduct. In such cases, it is not in the public interest to resolve them informally. Where appropriate, I may also suggest to the parties that a formal complaint be resolved informally.

I received 13 informal complaints during 2022, more than in the previous three years combined.

Number of Informal Complaints received 2019 to 2022



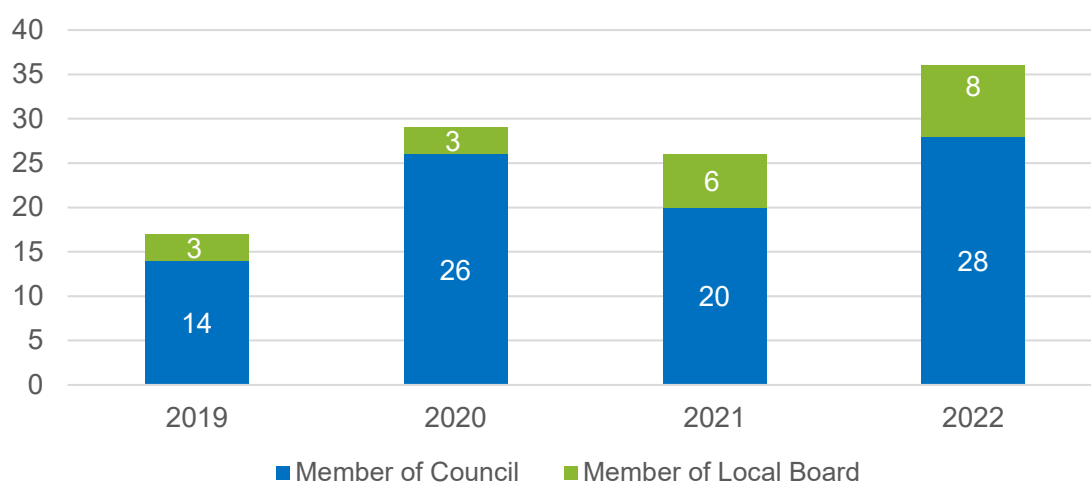
I was able to settle 23% of the informal complaints submitted to my Office; the rest were dismissed. Some complaints filed either do not allege a potential Code of Conduct violation

or are otherwise unsuitable for settlement or resolution without an inquiry. In addition, sometimes I am unable to have the parties able to settle the matter. This does not prevent the complainant from filing a formal complaint that I will review and may investigate.

Formal Complaints and MCIA Applications

As shown below, in 2022 I received 36 formal complaints and Applications, more than in each of the previous three years.

Number of Formal Complaints and MCIA Applications received 2019 to 2022



Members of the public filed 30 complaints and staff filed six. For all complaints, 83 percent (30 complaints) were completed by the end of 2022.

Formal Complaints/Applications Closed in the Year Received

Formal Complaints and Applications	2019	2020	2021	2022
Number received	18	29	26	36
Number closed in the same calendar year as they were received	16	22	23	30
Percentage closed in the same calendar year as they were received	89%	76%	88%	83%

Intake Review

I conduct an initial review of a complaint under a Code of Conduct, or an Application under the MCI, to determine if it is within my jurisdiction and includes sufficient grounds to investigate. If there are not, or I determine there is no purpose to investigate, I dismiss the complaint or Application.

In 2022, I dismissed a combined total of 27 formal complaints and MCI Applications at the intake review stage.

Outcome after an Investigation begins

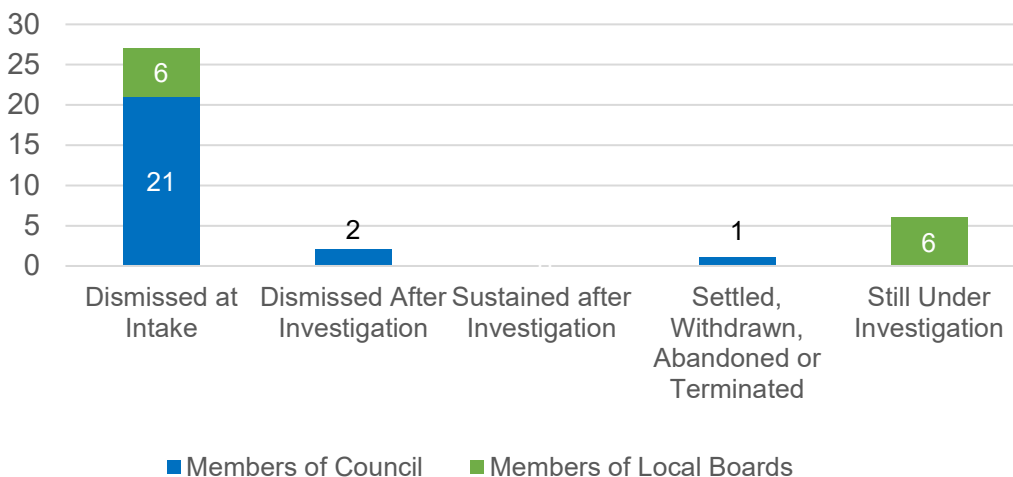
When I investigate a complaint or Application, the member is notified and asked to submit a response. In my investigations, relevant people are asked to answer questions, sometimes under oath or affirmation. I ask, or order, documents and other materials to be produced. I review the evidence and sometimes retain external forensic, investigative and legal assistance.

There are three possible outcomes:

- 1) A complaint or Application can be wholly dismissed after an investigation. In such cases, the Integrity Commissioner may report to Council or the local board; or, where an Application is involved, advise the parties the investigation is terminated.
- 2) A complaint or Application can be sustained, in whole or in part, after an investigation. In such cases: where a complaint is involved, the Integrity Commissioner must report to Council or the local board; or, where an Application is involved, make an Application to a judge.
- 3) A complaint or Application can be withdrawn or abandoned if someone decides they no longer wish to pursue a matter or fail to respond to the Integrity Commissioner about it.

The outcome as of December 31, 2022 of complaints and Applications received in 2022 is shown in the following graph:

Outcome and Status of Formal Complaints/Applications received in 2022



Investigation Reports

In 2022, I reported out with two investigation reports about the conduct of members:

1. [Report on Councillor Mark Grimes' actions relating to Adamson Barbecue \(January 26, 2022\)](#)

I reported to Council about my investigation into a complaint that former Councillor Mark Grimes interfered with the City's response to a local restaurant operating contrary to public health guidelines to manage the COVID-19 pandemic. The complainant cited Councillor Grimes' statements to the media, which raised a concern that he had directed enforcement activities at the restaurant.

Ultimately, I found Councillor Grimes did not violate the Code of Conduct, that he had acted appropriately with respect to staff, and had not acted discredibly. My report highlighted the importance of members of Council properly escalating concerns to City administration in an emergency and that in this case, the Councillor had done so.

2. [Report on Mayor John Tory, the Toronto Blue Jays and ActiveTO \(December 20, 2022\)](#)

This report was the first Municipal Conflict of Interest Act (MCIA) investigation of this Office. In contrast to Code of Conduct investigations, I do not report out to City Council on MCIA investigations, but instead am required to publicly post reasons for my decision.

The Application alleged Mayor John Tory violated the MCIA during City Council's consideration of an item at Council on June 15, 2022. The Mayor voted on and spoke to an

item dealing with ActiveTO road closures on Lake Shore Boulevard West. Before the meeting, the President and CEO of the Toronto Blue Jays had written to City Council, urging the Mayor to vote against the continued ActiveTO road closures, citing adverse effects on attendance at Blue Jays games. Also prior to the Council meeting, the Mayor publicly defended the Blue Jays' President, which added to public concerns about an apparent conflict of interest.

The Application alleged the Mayor should have declared an interest in the ActiveTO item and removed himself from any discussion of the decision, because the applicant said the Mayor had a pecuniary interest due to his ongoing role in Rogers Communications Incorporated (RCI) and the Rogers Control Trust (RCT), who owned the Toronto Blue Jays.

My investigation considered four key issues. In doing so, I found ActiveTO was the subject matter before Council, the Mayor had an indirect pecuniary interest in the matter, and that an exception in the MCIA applied in this case. Specifically, I found that the nature of his interest was "remote or insignificant" under section 4(k) of the MCIA. My investigation found ActiveTO road closures had minimal impact on Blue Jays' games' attendance. I found it would not be warranted to apply to court, but noted the Applicant could pursue this if desired.

Section 3: Engagement with Stakeholders

Information for Members of Council

In addition to meeting with members of Council, I write to them over the course of the year with information and important reminders. Where available, I have provided web links, the others are attached as Appendix 1 in this annual report.

In 2022 I wrote to members on the following topics:

[June 2, 2022 Provincial General Election - February 4, 2022](#)

I wrote to the members to remind them and their staff not to use city resources for election campaigns. Member's work as City of Toronto elected officials must be kept separate from their activities in election campaigns, so as not to provide an unfair advantage to those they support. The letter also provided guidance on the use of social media during the election.

[Environment Days – March 31, 2022 \(Appendix 1\)](#)

This is an annual letter that outlines for members how they may be involved in Environment Days that are organized by Solid Waste Management Services (SWMS). The main reminder is that members should follow SWMS guidelines and be mindful of who is invited to participate, as this gives a unique platform to those businesses and groups. I raised some additional considerations because 2022 was a municipal election year. This meant members

of Council could not partner with SWMS after August 1, 2022 and members were not permitted to engage in campaign activities at Environment Days.

Annual Meeting with Integrity Commissioner & Code of Conduct Review – April 14, 2022 (Appendix 1)

Each year, I invite members of Council to meet with me to discuss any ethical issues they may have questions about in relation to their role as an elected official. This year, I also offered to speak to members about the interpretation bulletins I sent in March about election-related rules under the Code of Conduct and the use of social media.

I took this opportunity to individually consult members about my proposed revisions to the Code of Conduct.

[Public Consultation on the City of Toronto's Codes of Conduct -Survey Announcement \(web & email to members\) – May 24, 2022 \(link\)](#)

On May 24, 2022 I announced my Office's online public consultation on changes to the City's Codes of Conduct. This letter explained the Codes of Conduct established in 2008 were due to be updated for clarity and inclusivity, and in need of some substantive changes I proposed to recommend. This included adding a rule against apparent conflicts of interest, strengthening the discreditable conduct rule, and introducing a new Fundraising Article setting out Council members can publicly support charities and humanitarian causes. The letter encouraged the public to give input through an online survey.

[MM47.39 and Council's Election Year Policies July 18, 2022 \(Link\)](#)

I submitted a letter to Council about the City's municipal election year policies in response to a member's motion which proposed to make some changes to those. I explained it was important to make changes to election-related rules well before nominations opened to maintain public trust. Changing rules during an ongoing election could create challenges and impact the democratic process. If there was a desire to amend policies at this time, I recommended doing so narrowly and with a time-limited focus or considering a comprehensive review after the election.

Updated Code of Conduct– August 5, 2022 (Appendix 1)

I wrote to thank members for the feedback they provided in the consultations to update the City's Codes of Conduct and reminded them that as Council adopted its update on June 15, 2022 it came into effect on August 1, 2022.

I clarified that the new Codes of Conduct apply from August 1, 2022 onwards but do not have retroactive application. This means that if my Office receives a complaint about a member's

conduct pertaining to events before August 1, 2022, the rules in the former Code of Conduct apply to that situation.

Election Period Advice FAQs – September 7, 2022 (Appendix 1)

I wrote to members of Council reminding them of the interpretation bulletins I had issued explaining how City policies and the Code of Conduct apply in the election period to all members, regardless of whether they were seeking re-election.

I provided a document listing questions I was receiving frequently in the election period, to share my advice with all of Council on:

- Services members provide to ward residents in their official capacity
- Communications from members' offices
- Organizing and attending events in their community
- Giving interviews and writing articles

New Term of Toronto City Council - November 3, 2022 (Appendix 1)

I wrote to the Members of the 2022-2026 Council at the outset of their term to introduce my Office to new Members and remind returning Members of the services we provide to their offices.

Gifts in the 2022/2023 Holiday Season – December 2, 2022 (Appendix 1)

In conjunction with the Lobbyist Registrar, I write each year to members to remind them that under members must not receive any gifts or benefits of any value from lobbyists. They may only receive gifts from other sources if it falls under one of the exceptions set out in Article IV (Gifts and Benefits) of the Code of Conduct.

Education: Interpretation Bulletins

In 2022 I issued five interpretation bulletins related to the general municipal election. They are a key resource for members, City staff and the public, in explaining how the Codes of Conduct, Municipal Conflict of Interest Act and City policies apply to members during an election period.

For Members of Council

[Rules before Leaving Office and Post-Service Obligations - April 2022 \(Link\)](#)

I published this Interpretation Bulletin to remind members of Council contemplating leaving office, of the rules that apply before and after they depart. Members are not to use City

resources for personal benefit, and cannot allow the prospect of future employment to affect the performance of their duties. They are also subject to some post-service restrictions including maintaining the confidential information they obtained while on Council and to refrain from lobbying the City for a year after their departure.

[2022 Municipal Election Requirements - March 2022 \(Link\)](#)

This bulletin provided guidance to members on how to separate their Council work from their political activities in the 2022 municipal election. It pulled together the various City policies applying to members in the election period, and explained the application of the Code of Conduct to their activities in this period. This included guidance on using City resources, communicating with the public, working with City staff, using social media and interacting with lobbyists.

[Use of Social Media by Members of Council - March 2022 \(Link\)](#)

This Interpretation Bulletin updated and clarified how the Code of Conduct applies to a member's use of social media. This included general information on social media use needing to comply Ontario's Human Rights Code and City policies. It also set out specific rules applying to an election period, such as the need for separate election campaign accounts from a member's official account used for City business and how to convert an official social media account.

For Members of Local Boards and Adjudicative Boards

While many of the same considerations and rules apply to members of local boards and adjudicative boards, their context is somewhat different from members of Council, particularly in an election period and with respect to having social media accounts related to their official City business. It was for that reason I published separate guidance on these topics for local board members.

[Political Activity Rules for Members of Local Boards and Members of Adjudicative Boards - April 2022 \(Link\)](#)

[Use of Social Media and Websites for Members of Local Boards and Members of Adjudicative Boards - April 2022 \(Link\)](#)

Public Engagement

I participated in a meeting of the Municipal Integrity Commissioners of Ontario (MICO) and the Office posted 17 investigation reports from MICO to the CanLII database to promote transparency and awareness of ethics oversight in municipalities across Ontario.

My Office continued to partner with the Community Research Partnerships in Ethics (CRPE) program at the University of Toronto. The Office is working with a student for the 2022/23 academic year.

In 2022 I spoke at these events:

1. Online seminar hosted by the Society of Ontario Adjudicators and Regulators (SOAR), in conjunction with the provincial Integrity Commissioner, about election-year requirements for public servants (April 5)
2. Accountability Officers' Information Session for new City staff (April 20)
3. Clerk's 2022 Elections' Visitors Program: The Role of the Integrity Commissioner in the Election (October 24)
4. Ethics and Integrity at City Hall: The MCIA and the Code of Conduct (Onboarding for new members of Council) (November 1)

Section 4: Policy Advice

Under the *City of Toronto Act, 2006*, I advise Council about policy matters relating to ethics oversight at the City of Toronto. This part of my mandate was a major focus in 2022 as my Office brought proposed Code of Conduct revisions to Council and the public for consultation. After receiving feedback, I [presented my recommended changes to Council](#), who [adopted them](#) in June 2022.

Appendices

Appendix 1: Letters to Members of Council

Appendix 2: 2022 Expense Budget

Appendix 1: Letters to Members of Council

March 31, 2022

Sent via Email (No Original to Follow)

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

Dear Members of Council:

Re: Environment Days 2022

At this time of year, many members of Council are working with Solid Waste Management Services ("SWMS") to host Community Environment Days. This letter includes some reminders about common issues that arise in relation to Environment Days.

Working with SWMS

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

- Members need to follow SWMS' internal guidelines (attached). The internal guidelines also reflect procedures relating to COVID-19.
- Before inviting any group to participate in an Environment Day, members should first consult with SWMS staff about possible invitees to ensure that each invitee is suitable and consistent with the program objectives. If, following this consultation with SWMS, members decide to offer additional services at the event, they must do so in accordance with the [Constituency Services and Office Budget Policy](#).

Dealing with Unsolicited Offers and Requests

Members are sometimes contacted by groups that wish to offer or showcase products, initiatives or services at Environment Days. Members should exercise caution when responding to these unsolicited offers. To gain visibility, a vendor may offer a service to a member at a discounted rate—which would constitute a benefit or donation to the member. Such vendors may also be lobbyists within the meaning of the *Lobbying Bylaw*, who are thereby barred from offering any benefit or donation to members of Council. For this reason, members should confirm that vendors who solicit goods or services are referred to the Toronto Lobbyist Registrar to seek advice about its registry and the *Lobbyists' Code of Conduct* and ensure that any goods and services are purchased at market value. Members can determine market value informally, such as by obtaining quotes for similar services.

Similar concerns also arise when not-for-profit entities ask to participate at Environment Days.

Environment Days are sometimes seen as opportunities for businesses and other groups to raise awareness of their business or cause. Members of Council – who represent all interests – may be asked why a particular business or group has been provided the Environment Days platform.

Therefore, if you wish to accommodate any such requests, you must be prepared to answer questions from the public about why you selected the group to appear. My advice is that you plan ahead, recognize that you are accountable for the complement of groups that appear, and make choices that appear equitable and can be easily explained. I am available to provide advice on this.

Donations

Members are reminded that any requests for donations (such as food, beverages, prizes etc.) must be made in accordance with the [Council Member-Organized Community Events Policy](#), and, therefore, donations from lobbyists cannot be accepted. Importantly, members should not ask third parties or SWMS to seek such donations.

Election-related Considerations for Environment Days

We are in a municipal election year, which means the following rules in City policies need to be followed:

- Members of Council cannot partner with SWMS for an Environment Day after August 1, 2022.
- Members of Council may not use any City resources for any campaign purpose. Accordingly, members running for re-election should ensure to establish a clear separation between campaign activities and Environment Days activities. This means that:
 - Members running for re-election should not organize campaign activities to coordinate with an Environment Day.
 - If a resident requests campaign information at an Environment Day, they should be informed that the event is unrelated to the campaign, and that no campaigning can occur at the event.
 - Members and staff should not hand out any campaign literature at an Environment Day.

Guidance about the rules that apply to members and their activities are found in the [2022 Municipal Election Requirements](#) Interpretation Bulletin.

When in Doubt, Seek Advice

As noted, I am available to you to provide case-specific confidential advice. You can reach me at Jonathan.Batty@toronto.ca or 416-397-7770.

Best wishes for a successful Environment Day season!

Yours truly,

Jonathan Batty
Integrity Commissioner

Attached: City of Toronto Environment Day Program Internal Guidelines (2 pages)

Cc: Cristina De Caprio, Lobbyist Registrar
Grace Young, Deputy City Clerk, Strategic Integration & Prog
Derek Tung, Supervisor Collection Operations, Solid Waste Management
Services
Matt Keliher, General Manager, Solid Waste Management Services
Lisa Duncan, Director Collections & Litter Operations, Solid Waste
Management Services
Emily LeBlanc, Manager Collection Operations, Solid Waste Management
Services

April 14, 2022

Sent via email

Dear Members of Council,

Re: Annual Meeting with Integrity Commissioner

I hope you are well. As I do each year, I am writing to ask to meet with you.

As this is an election year, this will provide the opportunity to discuss, if you wish, the interpretation bulletins I sent members in March about election-related rules under the *Code of Conduct for Members of Council* (the “Code of Conduct”) and also about the use of social media.

I would also like to consult you about my proposed revisions to the *Code of Conduct for Members of Council* (the “Code of Conduct”). Council asked me to review and consult with members individually before reporting back, which I intend to do in June.

The Code of Conduct is an integral part of the City of Toronto’s accountability framework. It needs to inspire public confidence in the standards to which Council holds itself. Its principles, rules and guidance need to be clear and easily understood by the public, City staff and members.

The current Code of Conduct was adopted by Council in 2008. At the time, it was precedent-setting and served as a model for other municipalities. Notably, since it was adopted, judicial inquiries have recommended that Codes need to include conflict of interest provisions. Other municipalities have already done so.

The Need for Plain Language

The City of Toronto tries to use plain and inclusive language in its public documents to reach a broad audience. The Code of Conduct needs to be revised to:

- Be gender neutral.
- Comply with the current writing and style guide for the City of Toronto.
- Help people easily navigate and understand its requirements.
- Differentiate between what is a “rule” and what is “commentary.”

I have drafted a **Plain Language Version of the Code of Conduct** [see attached Review Materials, pages 4 to 16] for your review. It does not contain any substantive changes to the Code of Conduct apart from editing the long Authority and Preamble into a shorter Preamble. The attached **Comparative Example** [see attached Review Materials, page 3] also shows the benefit of a plain language revision of the Code of Conduct.

Substantive Revisions

In addition to a plain language revision, I propose the Code of Conduct be substantively amended to include:

1. A specific rule against engaging in activity that is a real or apparent conflict of interest.
2. A strengthened discreditable conduct rule to clarify it has a broad application and that derogatory conduct and remarks are contrary to the Code of Conduct.
3. A rule acknowledging members can publicly support and help with fundraising for registered charities and humanitarian causes.

These proposals are found in the attached [see attached Review Materials, pages 17 to 20]. I also recommend the *Code of Conduct for Members of Local Boards* and the *Code of Conduct for Members of Adjudicative Boards*, in addition to receiving a similar plain language revision, also be updated to include the first two substantive revisions noted above.

Regular Review of the Code of Conduct

I also recommend, in order to keep the City's Codes of Conduct up to date, that the Toronto Municipal Code§ 3-4.3 be amended to permit the Integrity Commissioner to report directly to Council with recommended changes when necessary.

Conclusion

I welcome your input on these revisions. I will also be consulting about these changes in a public online survey.

I look forward to meeting with you.

Yours truly,

Jonathan Batty
Integrity Commissioner

Attached: Review Materials: Code of Conduct for Members of Council

August 5, 2022

Sent via Email (No Original to Follow)

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

Dear Members of Council:

Re: Code of Conduct for Members of Council

I am writing to thank you for the feedback you provided in the consultations to update the [Code of Conduct for Members of Council](#) (the “Code of Conduct”). Council adopted its updated Code of Conduct on June 15, 2022 and it came into effect, earlier this week, on August 1, 2022.

In addition to a plain language revision and housekeeping amendments, the Code of Conduct has been substantively amended to include:

4. A specific rule against engaging in activity that is a real or apparent conflict of interest (Article 8).
5. A strengthened discreditable conduct rule to clarify it has a broad application and that derogatory conduct and remarks are contrary to the Code of Conduct (Article 14).
6. A new rule acknowledging members can publicly support and help with fundraising for registered charities and humanitarian causes (Article 16).

These new standards apply from August 1, 2022 onwards. They do not have retroactive application. This means that if my Office receives a complaint about a member’s conduct pertaining to events before August 1, 2022, the rules in the former Code of Conduct apply to that situation.

Council’s adoption of a new Code of Conduct, for itself and the City’s local boards and adjudicative boards, demonstrates its commitment to maintaining the highest ethical standards in government.

I would like to thank you again for your consideration of these matters.

Yours truly,

Jonathan Batty
Integrity Commissioner

Sent via email

October 25, 2022
Members of Council
Toronto City Hall
100 Queen St. W.
Toronto, ON M5H 2N2

Dear Members of Council:

Re: New Term of Toronto City Council

At the outset of the 2022-2026 Council term, I would like to congratulate you on being elected. I am looking to working with you. Some of you will be familiar with my Office and what it does. For some, this will be new.

My role is to give Council advice about issues of ethics and integrity.

I give Members of Council individual advice on the ethical standards that apply to your office. These standards are set out in the *Code of Conduct for Members of Council* (the Code of Conduct) and the *Municipal Conflict of Interest Act* (the MCIA). If you have previously served on Council, it is important to remember that the Code of Conduct was updated on August 1, 2022. When I give you individual advice, its confidentiality is protected by the *City of Toronto Act, 2006*.

I also investigate complaints and applications about Members of Council under the Code of Conduct and the MCIA. If I believe there has been a contravention, I report Code of Conduct violations to Council or take MCIA violations to court. This underscores the benefit of consulting my Office for advice if you have questions about ethical issues.

In briefing your staff at the start of the new Council term, I recommend you remind them of the high ethical standards that your offices must follow when serving the people of Toronto.

My Office can be a helpful resource for you. I look forward to meeting with you to discuss these things in more detail. Please contact me directly at 416-397-7770 or Jonathan.Batty@toronto.ca whenever you have a question.

Yours truly,

Jonathan Batty
Integrity Commissioner

Sent via email

December 2, 2022

Dear Members of Council and Staff,

Re: Holiday Gifts and Events

As the holiday season approaches, our Offices always provide a reminder about the rules that apply to receiving gifts and attending events. Members of Council who were reelected in October have likely been offered fewer gifts and invitations in the last two years due to the pandemic. For new members of Council, these rules may be new to you. This letter provides you information about the rules you need to follow.

If members of Council or their staff are sent gifts or offered invitations to functions at which complimentary food and/or drink will be provided, please remember that:

- Under the [Lobbying By-law](#), 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.
- Under Article 4 of the [Code of Conduct for Members of Council](#) (the “Code of Conduct”), which sets out the rules for accepting gifts and invitations, members must not accept gifts or benefits of any value from lobbyists.
- Even if the gift or invitation is not from a lobbyist, they may only be accepted if they fall within the exceptions listed in Article 4 of the Code of Conduct. Members should seek the advice of the Integrity Commissioner before accepting them to ensure one of these exceptions applies. Please review the [Gifts and Benefits Procedure at-a-Glance](#) for more information.
- In some cases, gifts and benefits valued at over \$500 are prohibited. Some gifts and benefits valued at over \$300 must be reported in the [Gifts and Benefits Disclosure Statement](#) for review and approval by the Integrity Commissioner, who is then required to publicly post these statements.

If offered a gift, a benefit of any value or an invitation to an event, members of Council and their staff should be aware of the Lobbying By-law and their own Code of Conduct obligations. This may mean politely declining gifts, benefits or invitations.

Members also must not accept donations to their own community events from lobbyists or anyone with an application before the City. Members planning to hold a community event, or partner with an organization running an event, should seek the Integrity Commissioner's advice before soliciting donations for the event (including donations from City agencies). Before a member accepts a donation for a community event, it must be reported in a [Donor Declaration Form](#) for review and approval by the Integrity Commissioner. These forms are also publicly posted.

For more information about the requirements under the Code of Conduct, contact the Integrity Commissioner at Jonathan.Batty@toronto.ca or 416-397-7770.

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

We wish you all a happy holiday season at the start of this new Council term.

Yours truly,

Jonathan Batty
De Caprio Integrity Commissioner
Registrar

Cristina
Lobbyist

c.c. Paul Johnson, City
Manager

John Elvidge, City Clerk

Appendix 2: 2022 Expense Budget

City of Toronto														
Integrity Commissioner Office Expense Budget														
Actuals January - December 2022														
Charged to Cost Centre IG0001														
OFFICE OF THE INTEGRITY COMMISSIONER														
Cost Element	January '22	February '22	March '22	April '22	May '22	June '22	July '22	August '22	September '22	October '22	November '22	December '22	January - December '22	Totals
Cost Element Name	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Totals
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
1015 Full Time Regular Pay	11,280.76	32,230.79	48,346.21	34,410.83	33,581.58	32,958.80	32,958.80	32,958.80	49,438.20	32,958.80	32,958.80	54,382.03	428,464.40	
1050 Permanent - Vacation Pay										431.96			431.96	
1060 Permanent - Performance Bonus					5,296.20								5,296.20	
1711 Comprehensive Medical	357.87	1,022.46	1,533.69	1,022.46	1,022.46	1,022.46	1,022.46	1,022.46	1,533.69	1,022.46	1,022.46	1,682.19	13,287.12	
1712 Dental Plan	193.83	553.80	830.70	553.80	553.80	553.80	553.80	553.80	830.70	553.80	553.80	911.13	7,196.76	
1720 Long Term Disability	244.02	640.76	961.14	684.98	667.89	655.24	655.24	655.24	982.86	655.24	655.24	1,077.32	8,535.17	
1730 Group Life Insurance	87.38	249.66	374.49	265.95	261.08	255.32	255.32	255.32	382.98	255.32	255.32	419.77	3,317.91	
1740 Employment Insurance	618.36	597.74	896.61	406.64	308.66	143.29	110.76	110.76	166.14	11.66			3,370.62	
1745 EI Rebate	13.90	48.38	72.57	32.79	24.99	11.60	8.96	8.96	13.44	0.94		50.61	287.14	
1750 Ontario Health Tax	221.95	634.30	951.45	676.61	763.58	647.91	647.86	647.86	971.79	656.13	647.68	1,069.64	8,536.76	
1760 Canada Pension Plan	1,807.62	1,808.12	2,712.18	1,319.82	926.76	550.29	328.24	328.24	492.36	225.77			10,499.40	
1770 Pension Plan (OMERS)	1,366.19	3,903.42	5,855.13	4,222.04	4,874.64	4,010.52	4,010.52	4,010.52	6,015.78	4,010.52	4,010.52	6,610.93	52,900.73	
Total Salaries and Benefits	16,191.88	41,689.43	62,534.17	43,595.92	48,281.64	40,809.23	40,551.96	40,551.96	60,827.94	40,782.60	40,103.82	66,203.62	542,124.17	
2010 Stationery													-	
2020 Books & Magazines													-	
2040 Paper & Print Supplies													-	
2082 Health & Safety Supplies													-	
2570 Janitorial Supplies													-	
2610 Kitchen Supplies													-	
2999 Miscellaneous Materials													-	
3410 Computers - Hardware													-	
3420 Computers - Software	159.56												159.56	
4010 Professional Services - Legal									193.34	27,295.59		27,774.37	55,263.30	
4086 Translation & Interpreters													-	
4122 Transcripts			3,771.21					219.12				1,415.85	5,406.18	
4132 Conduct Money													-	
4144 Investigative Expense													-	
4199 Professional & Technical Services	61.06	7.63	259.49	30.53	15.26			298.20				564.71	1,236.88	
4256 Conference/Seminar - Registration Fee											198.43		198.43	
4310 Training & Development - External									152.64	152.64		103.10	408.38	
4340 Tuition Fees													-	
4416 Transfer, Haulage & Storage													-	
4473 Managed Print Charges												33.40	33.40	
4474 Computer Software Maintenance		337.84								212.13			549.97	
4760 Membership Fees		2,427.48											2,427.48	
4804 Wireless Devices													-	
4805 Postage													-	
4811 Cellular Phones	58.77	58.18	58.91		58.16	116.89		106.96	58.16	241.48		189.59	947.10	
4827 Online Services Fees												881.93	881.93	
4995 Other Expenses													-	
6030 Contribution to Reserve Funds												90,000.00	90,000.00	
6031 Contribution - Insurance Reserve Fund													-	
Total Office Expenditures	\$ 279.39	\$ 2,831.13	\$ 4,089.61	\$ 30.53	\$ 73.42	\$ 116.89	\$ -	\$ 624.28	\$ 616.27	\$ 27,689.71	\$ 198.43	\$ 120,962.95	\$ 157,512.61	
Total Monthly Expenditures	\$ 16,471.27	\$ 44,520.56	\$ 66,623.78	\$ 43,626.45	\$ 48,355.06	\$ 40,926.12	\$ 40,551.96	\$ 41,176.24	\$ 61,444.21	\$ 68,472.31	\$ 40,302.25	\$ 187,166.57	\$ 699,636.78	
9260 Contribution from Reserve Fund												(38,049.58)	(38,049.58)	
Other Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (38,049.58)	\$ (38,049.58)
Net Expenditures	\$ 16,471.27	\$ 44,520.56	\$ 66,623.78	\$ 43,626.45	\$ 48,355.06	\$ 40,926.12	\$ 40,551.96	\$ 41,176.24	\$ 61,444.21	\$ 68,472.31	\$ 40,302.25	\$ 149,116.99	\$ 661,587.20	