



OFFICE OF THE  
**INTEGRITY  
COMMISSIONER**  
TORONTO

**Paul Muldoon**  
Integrity Commissioner  
375 University Ave., Suite 202  
Toronto, ON M5G 2J5  
416-397-7770 | [Paul.Muldoon@toronto.ca](mailto:Paul.Muldoon@toronto.ca)

December 16, 2024

Sent via Email (No Original to Follow)

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

**Re: EX 19.25 Updating the Code of Conduct for Public Members of City Council's Advisory Bodies and Ontario Bill 241**

Dear Members of Council,

The agenda for the December 16-18, 2024 Council meeting includes a motion from Executive Committee recommending that:

City Council direct the City Manager, in consultation with the City Clerk, the City Solicitor and the Integrity Commissioner, to develop a Code of Conduct for Public Members of Council Advisory Bodies that aligns with City Council's approved Codes of Conduct for Members of Council, Local Boards and Adjudicative Boards, as appropriate, and to report to City Council in the second quarter of 2025 with the recommended Code of Conduct for adoption.

My Office welcomes invitations to advise the City on policy matters relating to ethics oversight at the City of Toronto. I understand that establishing a Code of Conduct for advisory bodies could provide guidance on issues such as decorum, confidentiality, and the limitations of their mandate.

**Important Context: Ontario's Bill 241**

Although my office would be pleased to part of the consultation as noted above, it is relevant to note the possible implications of Bill 241. Last Thursday, the Province introduced [Bill 241: "An Act to amend the City of Toronto Act, 2006 and the Municipal Act, 2001 in relation to codes of conduct."](#) It has garnered attention as it would establish a mechanism to declare the seat of a member of Council vacant if the Commissioner investigates and finds egregious misconduct. However, Bill 241 has more widespread implications for Toronto.

Part of the proposed legislation would establish a uniform code of conduct for all municipalities in Ontario, regardless of their size or complexity. It would apply to City Council and City of Toronto local boards (restricted definition). While my Office will be reviewing the Bill and consulting with City partners before I advise of my position, it is important I flag this for you now.

In light of EX 19.25, aligning an advisory body code of conduct with the City's other Codes of Conduct may be time limited in its application as the model Codes of Conduct may be changed by the province

in the next two years. It may still be valuable to establish a Code of Conduct for advisory bodies generally, and my Office would be willing to help.

Primarily though, I write to alert Council to Bill 241 as Council will be called on to direct the City in its response. The deadline for feedback is February 10, 2024 and can be made [online](#).

Yours truly,

A handwritten signature in black ink, appearing to read 'Paul Muldoon', written in a cursive style.

Paul Muldoon  
Integrity Commissioner