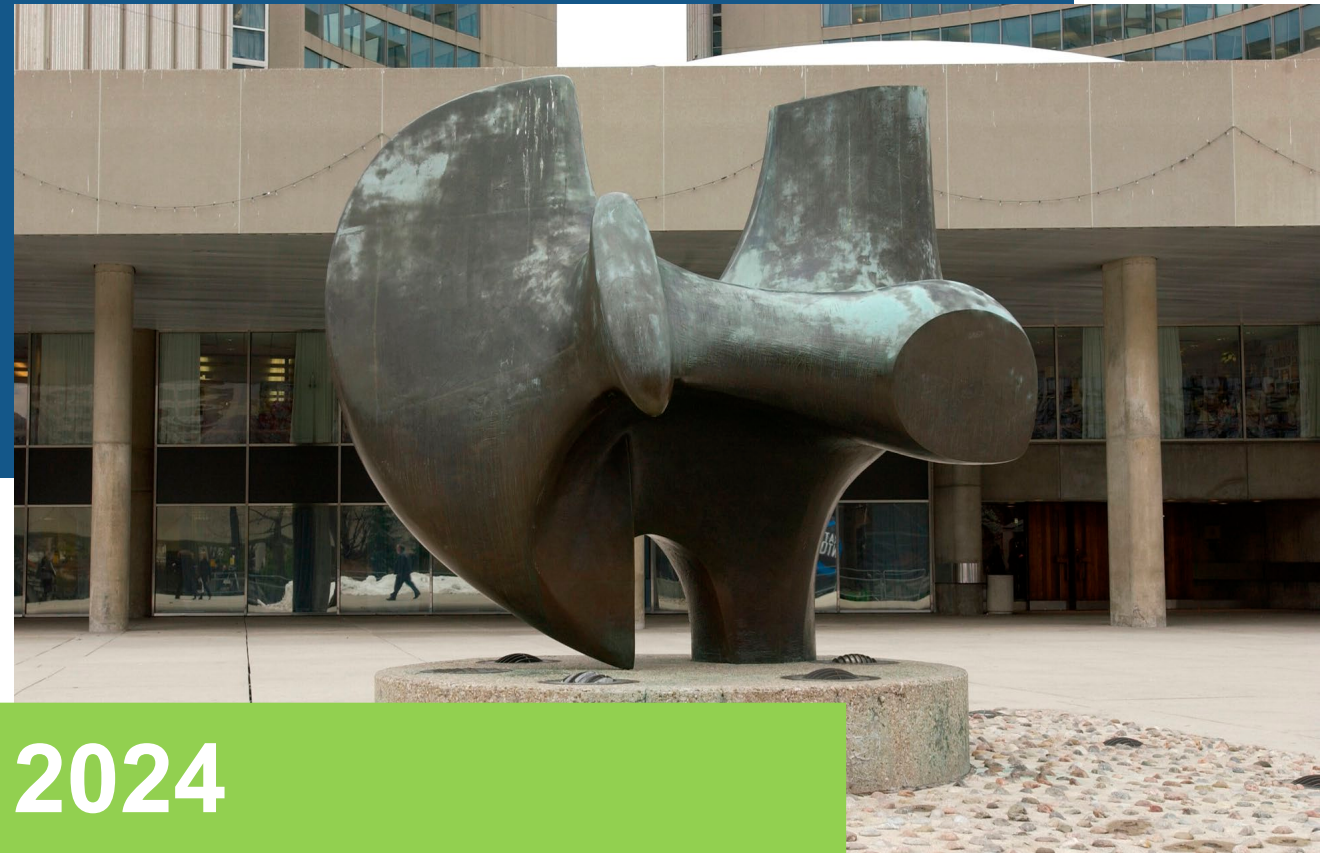




2024 Annual Report

Office of the Integrity Commissioner

Paul Muldoon
Integrity Commissioner

May 12, 2025

ICT

OFFICE OF THE
INTEGRITY
COMMISSIONER
TORONTO

Land Acknowledgement

I acknowledge that my Office is on the traditional territory of many nations, including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee, and the Wendat peoples, and that this land—covered by Treaty 13 and the Williams Treaties—is now home to many diverse First Nations, Inuit, and Métis peoples.

African Ancestral Acknowledgement

Though I am not a person of African descent, I am committed to continually acting in support of and in solidarity with Black communities seeking freedom and reparative justice in light of the history and ongoing legacy of slavery that continues to impact Black communities in Canada. As part of this commitment, I would also like to acknowledge that not all people came to these lands as migrants and settlers. Specifically, I wish to acknowledge those of us who came here involuntarily, particularly those brought to these lands as a result of the Trans-Atlantic Slave Trade and Slavery. In support of the City of Toronto's ongoing efforts to confront anti-Black racism, I pay tribute to those ancestors of African origin and descent.

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Commissioner's Message

Commissioner's Message

I am honoured to present my 2024 annual report for the Office of the Integrity Commissioner Toronto (ICT). Having officially started my appointment on December 1, 2024, I am pleased to present my first report to Council. This report will reflect on my transition into my new role as well as reflect on the last year of Commissioner Jonathan Batty's term.

Looking forward to my Role as Integrity Commissioner for the City of Toronto

For the first few months, I have focussed not only familiarizing myself with the ICT office, but the environment in which it operates. I have met with many people and without exception, each person has been welcoming and generous with their time; let me thank you for this welcome.

I have met with the vast majority of Members of Council, and look forward to meeting those I have not yet met. The elected officials were not only welcoming but provided valuable insights into the role of the Integrity Commissioner, ideas to further evolve the Office and the challenges they face as on a day-to-day basis. I committed myself to meeting each Councillor on a yearly basis to further such discussions and receive feedback for the ICT.

I would also like to thank the City Clerk, the City Manager, the City Solicitor and their staff for introductory meetings and briefings which have been invaluable. My accountability colleagues, the Auditor General, the Ombudsman and the Lobbyist Registrar have been superb in supporting me and for providing briefings on their roles in serving the residents of Toronto.

I would like to personally thank former Commissioner Batty, Kate Zavitz, legal counsel, and Lisa Di Felice, Coordinator, Administration and Operations for the ICT, for their incredible efforts to support my orientation and making the transition as seamless as possible.

In last year's ICT's Annual Report, Commissioner Batty provided reflections on his term. In so doing, he provided an eloquent and detailed mandate and the history of the Office, including as how it has evolved in the past twenty years. His words were echoed and reinforced when the ICT held a twenty year anniversary for the ICT at the end of November, 2024, called "IntegriTEA" where the past four commissioners were present and the first commissioner David Mullan, provided comments virtually.

As I continue into my first year, I do not take my role lightly. In my brief tenure, I have come to recognize the demands and challenges faced by elected officials, board members and adjudicators. When speaking to the Councillors, I committed to support them to my best abilities with practical and timely advice and with fair and transparent processes. As a general goal, I want to further the evolution of this Office, as past commissioners have done so incredibly well. In this context, I want to develop a three-year strategic plan for the Office that consider the increasing demands and desire for fair, timely and thoughtful responses.

I also want to accelerate and expand the educational mandate of my Office. Although the Codes of Conduct that govern elected officials, local boards and adjudicators are readily available, I have a role to play to ensure that everyone understands how those norms are to be applied and interpreted, and the role of my Office in responding to inquiries, complaints and advice requests.

There is also a new role for my Office, as I have become the Ethics Executive for Members of Council's staff. I am in the process of developing a framework for this new role.

I would also like to note that, in December 2024, the provincial government introduced Bill 241, a bill that would impose a new Code of Conduct on all 444 municipalities. Although the bill died on the order paper with the call of the recent provincial election, I will be closely monitoring whether it is revived as it will have significant implications for this Office, elected officials and board members in Toronto.

Again, I would like to thank all of those who have welcomed me and provided guidance. I look forward to working together.

Respectfully submitted,

Paul Muldoon
Integrity Commissioner



Photo: November 27th, 2024 IntegriTea: 20th Anniversary of the Office of the Integrity Commissioner Toronto. From left to right, past Commissioners Justice Lorne Sossin, Justice Janet Leiper, Valerie Jepson, Jonathan Batty and present Commissioner Paul Muldoon.

Report on Activities

Overview

In 2024 we received a record number of complaints, 60% more than the previous year. Some were submitted in connection with group campaigns directing people to our Office on the same matter. As a result, my Office had to develop methods to assess and respond to similar but not identical complaints. Despite the increased workload, the Office managed to close 91% of complaints in the same year we received them. Commissioner Batty reported to City Council with four investigation reports and a policy report. Our Office also dismissed four complaints about local board members after investigation, that did not require reports to those boards.

Twenty-four of the twenty-six members of Council came to our Office for advice, which we provided in two days or less, 82% of the time. This Office reviews sponsored travel and donations to community events, to ensure they fit within exceptions to the prohibition on receiving gifts. In 2024 this took more time than ever before with a notable 26 donations to member-organized community events. In such a busy time, and with a small office, our outreach and education efforts were stretched thin, but still included five presentations to local boards, one to new City of Toronto executives, and working as a community partner for two University of Toronto students researching public ethics.

Section 1: Operating Budget

The 2024 approved net operating budget for the Office was \$730,730. 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 2024, our Office drew down \$13,362 from the reserve fund. This is a cost-effective and consistent way of supporting our work to cover external legal and investigative expenses.

Section 2: Inquiries, Complaints and Applications

Inquiries

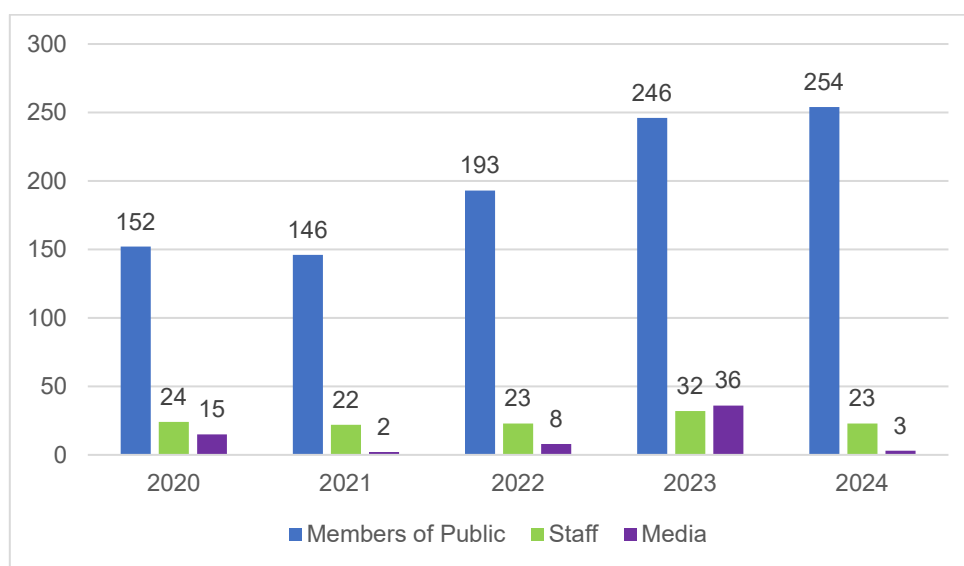
When the public, City staff and the media contact my Office it is often about complaints: specifically, how to make a complaint, whether their issue is within our jurisdiction or asking if we have received a complaint about someone. In answering those inquiries, we explain that we only have jurisdiction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

In 2024 this Office received 280 jurisdictional inquiries which required personalized responses and 1,189 non-jurisdictional inquiries.

The increase in non-jurisdictional inquiries is a strain on resources, as each email needs to be reviewed for jurisdictional content and provide referrals when warranted. The sender will at minimum receive information on the mandate of our Office.

We continue to receive more mass email campaigns and petitions. As we experience times where our email is “flooded” with cut-and-paste emails on a single topic, we may need to publicly emphasize that the Commissioner is not more likely to investigate with more requests: instead, the decision to investigate is based on whether the issues raised are jurisdictional and raise sufficient grounds.

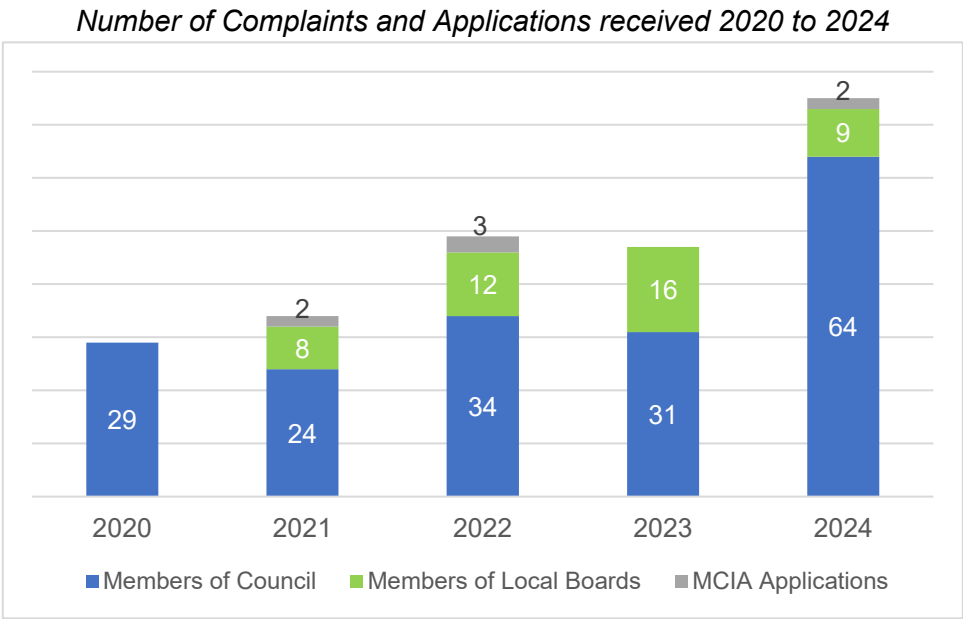
Number of Inquiries



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 a *Municipal Conflict of Interest Act* (MCIA) 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 MCIA applications as the MCIA and the Toronto Municipal Code do not provide for this.

The table below shows how many complaints and applications we have received over the last five years. In 2024 my Office received two MCIA applications.



*This year, we had two instances where we received multiple complaints. In some situations, one complaint form named several members. Our final count reflects the number of complaint forms received, not the number of members named.

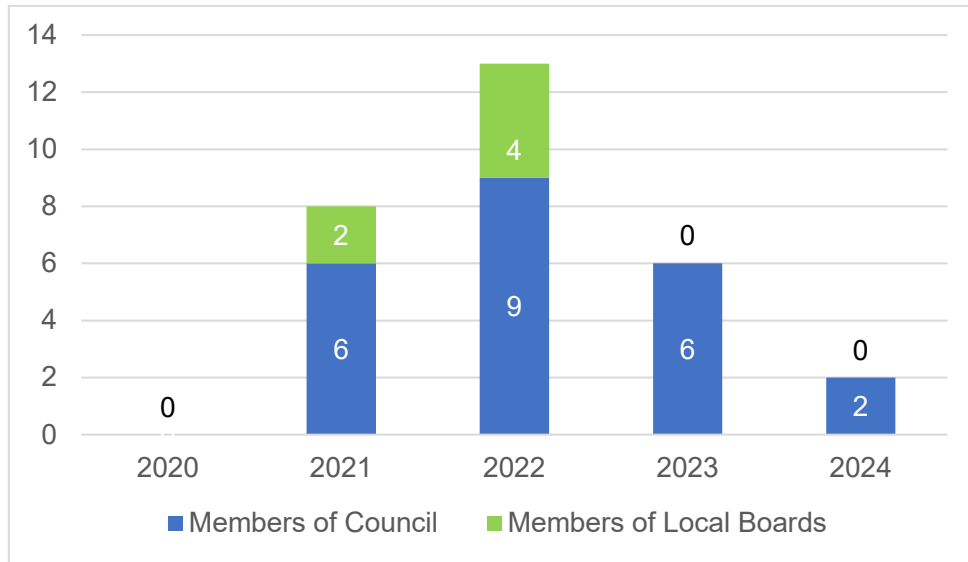
Informal Complaints

The informal complaint process is a form of alternative dispute resolution where I assist the parties to arrive at a mutually acceptable resolution to a complaint. This means there is no formal investigation required.

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.

Number of Informal Complaints Received about Members 2020 to 2024

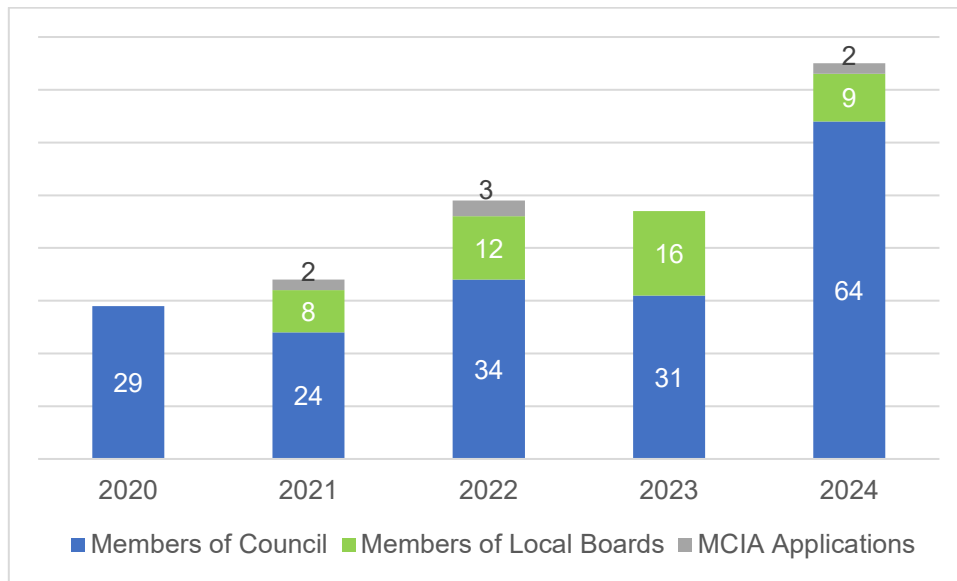


Some informal complaints either do not allege a potential Code of Conduct violation or are otherwise unsuitable for settlement or resolution without an inquiry. In addition, sometimes I am unable to settle the matter. If informal resolution is not possible, or is unsuccessful, the complainant has the right to file a formal complaint that I will review and may investigate. In 2024, I received two informal complaints. I dismissed one and the other was withdrawn.

Formal Complaints and MCIA Applications

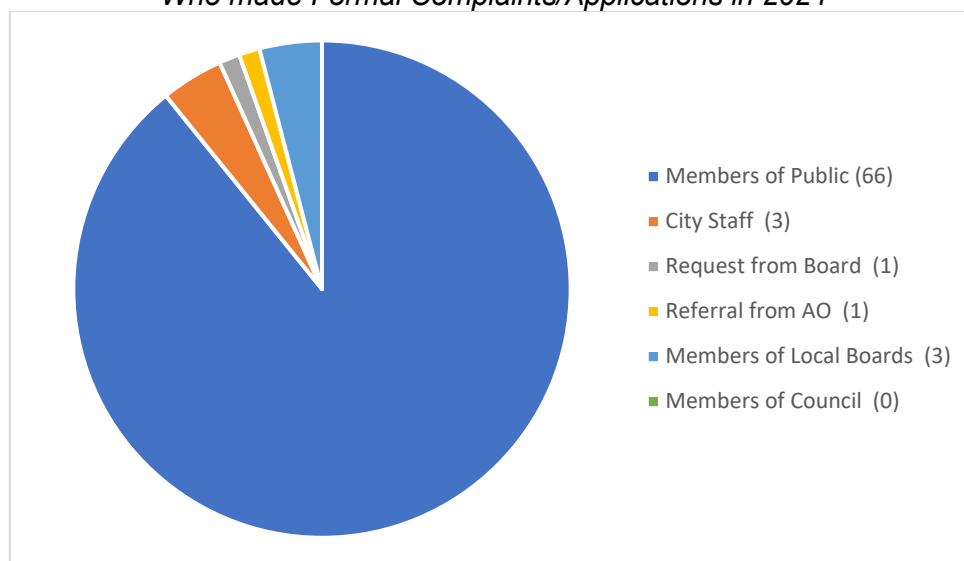
As shown below, in 2024 I received 75 formal complaints and applications, a 60% increase from the previous year. This included three MCIA applications.

Number of Formal Complaints and Applications Received about Members 2020 to 2024



Most complaints come from members of the public, but staff and board or Council members also complain. In other cases, we can have a matter referred to us from another Accountability Office (AO) and boards or Council can request an investigation by resolution.

Who made Formal Complaints/Applications in 2024



Formal Complaints/Applications Closed in the Year Received

Formal Complaints and Applications	2020	2021	2022	2023	2024
Number received	29	26	36	41	75
Number closed in the same calendar year as they were received	22	23	30	30	68
Percentage closed in the same calendar year as they were received	76%	88%	83%	73%	91%

Intake Review

I conduct an initial review of a complaint under a Code of Conduct, or an application under the MCIA, 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 2024, I dismissed a combined total of 68 formal complaints at the intake review stage.

Investigation Outcomes

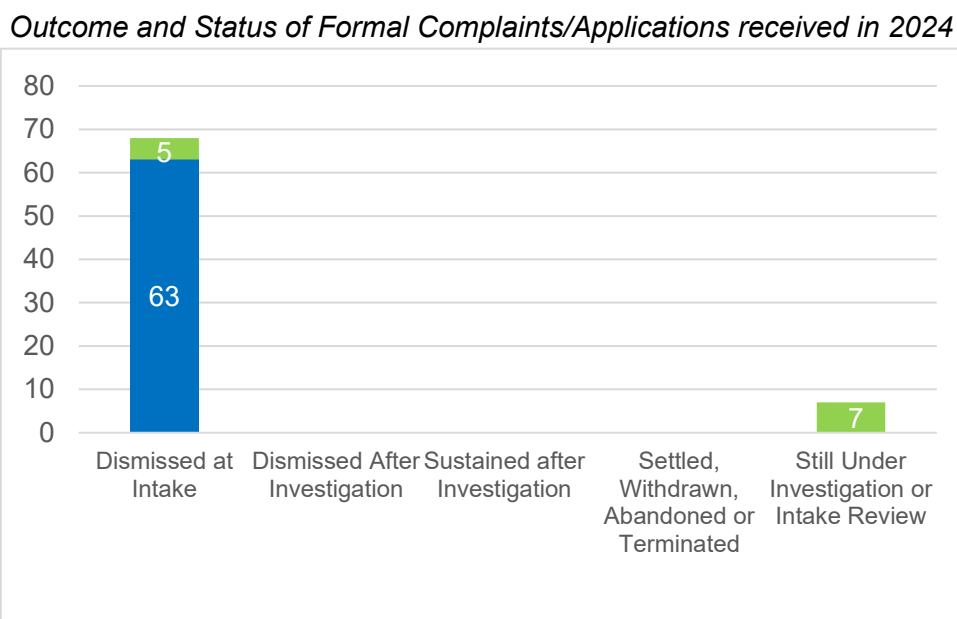
When I investigate a complaint or application, the member is notified and asked to submit a response. In my investigations, relevant people are asked to answer questions, sometimes under oath or affirmation. I ask, or order, documents and other materials to be produced. I review the evidence and sometimes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

Before an investigation is completed, a complaint or application can be withdrawn or considered abandoned if someone decides they no longer wish to pursue a matter or fail to respond to my Office about it.

After an investigation is completed, I can:

- 1) Dismiss the complaint or application. For complaints, I may report to Council or the local board. Where an application is involved, I advise the parties and publish written reasons for the decision.
- 2) Uphold the complaint or application, in whole or in part. Where a complaint is involved, I must report to Council or the local board. Where an application is involved, I must publish written reasons for the decision and may apply to a judge to determine if a member has contravened the MCIA.

The outcome as of December 31, 2024 for complaints received in 2024 is shown in the following graph:



Investigation Reports

In 2024, we reported to Council with four investigation reports about members' conduct:

[Report on Councillor Perruzza's Use of Resources in an Election](#)

Commissioner Batty investigated a complaint filed about Councillor Perruzza, about subject matter he had also self-reported to the Commissioner. The matter concerned a flyer Councillor Perruzza's office had printed and distributed, advertising events before Voting Day in the 2022 election, after the distribution ban imposed by Council policy.

Commissioner Batty found that, while there was a violation of the Code of Conduct, the fact the Councillor had promptly realized and self-disclosed the error and reimbursed the City, meant no penalty should be imposed. Council adopted the report and the recommendation.

[Report on Councillor Nunziata's Use of Constituent Contact Information](#)

The complaint alleged Councillor Nunziata used constituent contact information from her office for election purposes in the 2022 municipal election, without the constituent's consent.

Commissioner Batty found that Councillor Nunziata's office violated Articles 5 (Confidential Information) and 7 (Election Campaign Work) of the Code of Conduct when a member of her staff transferred contact information of persons without their consent. The investigation found the Councillor did not direct staff to take these actions, and that she was not aware of the actions of her staff. Nonetheless, members are responsible under the Code of Conduct, for the actions of their staff. The Councillor took responsibility and apologized. Commissioner Batty recommended a reprimand, which Council adopted.

[Report on Councillor Bradford's Use of Constituent Contact Information](#)

The complaints alleged Councillor Bradford used constituent contact information from his office for election purposes in the 2023 mayoral by-election, without the constituents' consent.

Commissioner Batty found that Councillor Bradford's office violated Articles 5 (Confidential Information) and 7 (Election Campaign Work) of the Code of Conduct. Former staff of the Councillor had uploaded constituent information to his election campaign. The evidence showed the Councillor did not direct staff to take these actions, and that he was not aware of it. Nonetheless, members are responsible under the Code of Conduct, for the actions of their staff. Commissioner Batty recommended a reprimand, which Council adopted.

[Report on an Alleged Conflict of Interest in Mayor Chow's Office](#)

The complaint claimed Mayor Chow failed to manage an alleged conflict of interest in the Mayor's Office.

Commissioner Batty investigated the alleged conflict of interest with respect to a former Mayor's Office staff who had previously been a registered lobbyist at the City of Toronto. He concluded that the Mayor's conduct did not violate Article 8 (Conflicts of Interest & Use of Influence) of the Code of Conduct as the Mayor's office placed appropriate safeguards and the staff person was not in a conflict of interest. Council adopted this report.

Investigations resulting in complaint dismissal without a report

Our Office also conducted investigations into four complaints that the Commissioner ultimately dismissed without a report to the local board. In such cases, we advise both the respondent and the complainant of the outcome with detailed reasons for the Commissioner's decision.

To summarize those investigations:

- The Commissioner investigated two separate complaints about the conduct of a local board member, alleging violation of the city of Toronto's Human Rights and Anti-Harassment/Discrimination Policy and injuring the professional reputation of staff. After reviewing documents and interviewing witnesses, the Commissioner found there was not clear and convincing evidence that the board member had violated the Code of Conduct for Members of Local Boards.
- The Commissioner investigated a complaint that an adjudicative board member had failed to follow the policies and procedures of the adjudicative board. After the board member left their position on the board, the Commissioner found there was no purpose served in proceeding further with his inquiry.
- The Commissioner investigated a complaint about an adjudicative board member's conduct in a matter outside their tribunal. At issue was the personal conduct of the member in a legal proceeding outside the City of Toronto framework, and whether they had brought their role as a City of Toronto adjudicator into issue in that external proceeding. The Commissioner found that while the member may not have conducted themselves in an appropriate manner, the conduct did not occur in the context of any City of Toronto official duty, so it was not a Code of Conduct violation.

Section 3: 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 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. In 2024, I met in person with ten members of Council, in addition to providing advice to 24 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. My Office's outreach activities provide updates to these members and let them know about the resources and advice my Office provides.

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.

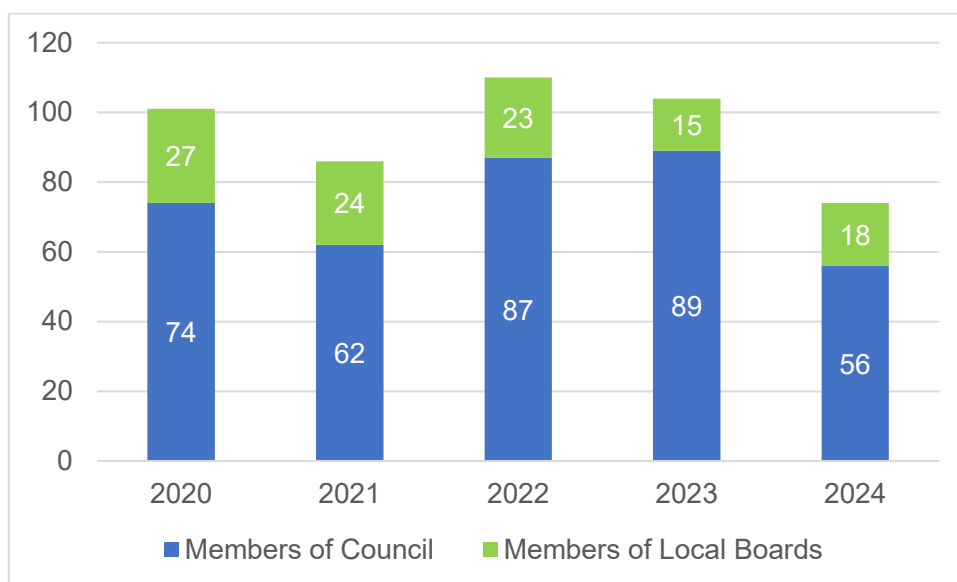
To advise someone, I may need to refer to past advice, reports, legal precedents, Council decisions and City policies. The City's three Codes of Conduct are similar, but not identical. Requests may engage the MCIA and one or more Articles in a Code of Conduct. In addition to applying the correct standards 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 often contact me to discuss and confirm their understanding of the advice or if they have follow-up questions when circumstances change.

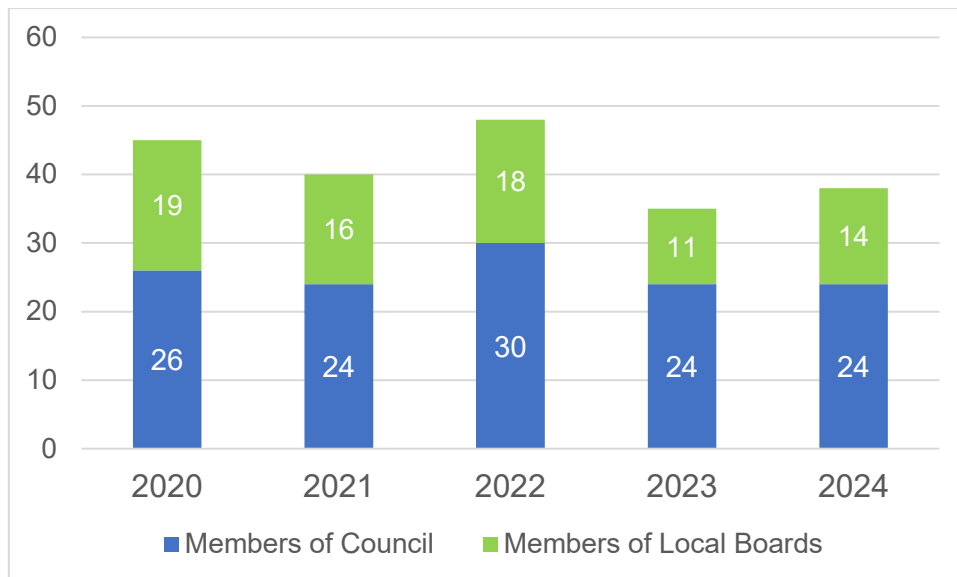
My Office provided advice in two days or less to members of Council 82 percent of the time and to members of local boards 55 percent of the time.

I was contacted for advice 74 times during this reporting period. 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 and/or use of influence under the Code of Conduct	29	39%
Understanding pecuniary interests under the MCIA	15	20%
Support for activities and fundraising	13	18%
Receiving gifts and benefits	8	11%
Providing letters of reference	4	5%
Complaining about another member	2	3%
Using City resources and/or members' office budget	1	1%
Observing post-employment obligations	1	1%
Best practices for dealing with constituents	1	1%

Gifts and Benefits declared by Members of Council

Under Article 4 (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 at community events
- 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. Members should refer to the [Council Member-Organized Community Events Policy](#) and, for sponsored travel, the [Travel Declaration Forms: 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 Gift Declaration Forms Received

Category	2020	2021	2022	2023	2024
Community Events	8	8	1	3	26
Sponsored Travel	5	0	3	8	6
Gifts and Benefits	0	0	0	0	0

Section 4: Engagement with Stakeholders

Information for Members of Council

I write to members of Council over the course of the year with information and important reminders. These are attached as Appendix 1 in this annual report.

In 2024 I wrote to members on the following topics:

- Environment Days 2024 (May 31 - See Appendix 1)
- Four Investigation Reports submitted to Council (July 19 - See Appendix 1)
- EX 19.25 Updating the Code of Conduct for Public Members of City Council's Advisory Bodies and Ontario Bill 241 (December 16 - see Appendix 1)
- Holiday Gifts and Events (December 4 joint letter with the Lobbyist Registrar's Office - See Appendix 1)

Education and Public Engagement

My Office posted six investigation reports from the Municipal Integrity Commissioners of Ontario (MICO) to the CanLII database to promote transparency and awareness of ethics oversight in municipalities across Ontario.

My Office partnered with the Community Research Partnerships in Ethics (CRPE) program at the University of Toronto, working with two students in the 2023/24 academic year.

In 2024 our Office participated in these events:

- University of Toronto CRPE Presentation (Jan 10)
- City of Toronto Executive Onboarding Session (October 18)

Boards to which the Integrity Commissioner presented

- Dangerous Dogs Review Tribunal (January 16)
- Sign Variance Committee (Feb 2)
- Toronto Transit Commission Board (April 2)
- Administrative Penalty Tribunal (April 22)
- Multi-Tenant House Licensing Tribunal (May 21)

Section 5: Policy Advice

Under the *City of Toronto Act, 2006*, I advise Council about policy matters relating to ethics oversight at the City of Toronto.

Updates on Workplace Harassment and Discrimination (November 13-14 2024)

In 2023, Council asked our Office to consult with the City Solicitor, City Manager and City Clerk on ways to address workplace harassment and discrimination by members of Council, and members of the City's Local Boards, and report back in 2024.

Commissioner Batty reported back in November, 2024, having completed his review and consultation. He recommended the City of Toronto not yet adopt new measures, as the Province was poised to introduce new legislation on the topic. Independent of the expected provincial legislation, he recommended Council designate the Integrity Commissioner as the ethics executive for Council members' staff, so they could consult directly and confidentially about their own personal conflicts of interest, rather than requiring them to ask their member of Council. Council adopted this report and its recommendations.

Appendices

Appendix 1: Letters to Members of Council

Appendix 2: 2024 Expense Budget



OFFICE OF THE
**INTEGRITY
COMMISSIONER**
TORONTO

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

May 31, 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

Dear Members of Council:

Re: Environment Days 2024

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).
- 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 [Members of Council Operations 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.

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: Stephen Littlejohn, Lobbyist Registrar
Mike Pacholok, Deputy City Clerk, Member Services & Programs
Andrew Dungate, Supervisor Collection Operations, SWMS
Matt Keliher, General Manager, SWMS
Lisa Duncan, Director Collections & Litter Operations, SWMS
Emily LeBlanc, Associate Director, SWMS
John Alcott, Manager Collection Operations, SWMS

City of Toronto Environment Day Program Internal Guidelines

As a reminder, Community Environment Days are organized and operated by Solid Waste Management Services. As such, event policies are consistent with City of Toronto and Solid Waste Management Services' policies.

All Community Environment Day participants are to abide by these policies and procedures:

1. Office of the Integrity Commissioner
 - All City staff and Council staff shall be compliant to the high standards of conduct set out by The Office of the Integrity Commissioner
 - For more information, please visit: <https://www.toronto.ca/city-government/accountability-operations-customer-service/accountability-officers/integrity-commissioner/>
2. Guidelines for community groups
 - Community Environment Days is a program designed to promote and educate the public on various waste diversion initiatives as well as raising awareness about ongoing environmental issues
 - We ask that when groups invited to attend events are related to the theme of the Community Environment Day program as stated above
 - Please ensure all groups adhere to and sign the "Community Group Participation" Release and Waiver form prior to their arrival. Failure to do so can result in a refusal of their attendance
 - All participants should report to the event Supervisor upon arrival. No unauthorized person may climb into event trailers or bins. The on-site Supervisor has the authority to ask a person to refrain from any activities deemed unsafe.
3. Purchasing Materials Management Division (PMMD) procedures
 - As per PMMD procedures, the procurement of goods must be made in a fair and competitive process through proper request for proposals (RFPs) and request for quotes (RFQs)
 - City and Council staff must refrain from permitting groups from selling/offering goods and services for monetary gain;
 - For more information please visit <http://insideto.toronto.ca/purchasing/index.htm>
4. Anti-scavenging policy
 - SWMS does not allow the scavenging of waste
 - Scavenging is also not permitted under Environmental Protection Act R.R.O 1990, Regulation 347;
 - For more information, please visit <http://insideto.toronto.ca/solidwaste/pnp/memo-anti-scavenging-policy.pdf> or <https://www.ontario.ca/laws/regulation/900347>
5. Permit rules, regulations and conditions
 - All City and Council staff shall abide by the rules, regulations and conditions stipulated by the permit for the issued Environment Day location.
6. City Clerk's Office protocols
 - All City and Council staff shall refrain from endorsing any politician or political activity
 - For more information, please visit <http://insideto.toronto.ca/clerks/>
7. Office of Lobbyist Registrars policy
 - Lobbying By-Laws must be adhered to at all times
 - For more information, please visit <http://insideto.toronto.ca/lobbyist-registry/index.htm>

We ask that all staff members abide by these policies and procedures. If there are questions or concerns, please contact Andrew Dungate, Environment Day Supervisor at Andrew.Dungate@toronto.ca.

Thank you for taking part in the City of Toronto Community Environment Day program.



OFFICE OF THE
**INTEGRITY
COMMISSIONER**
TORONTO

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

July 19, 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

Dear Members of Council,

Re: Integrity Commissioner reports submitted to the July 2024 Council Meeting

Dear Members of Council,

You will note reviewing the agenda items posted for the July 24 and 25, 2024 Council meeting that I have submitted four investigation reports concerning the Code of Conduct for Members of Council (the “Code of Conduct”).

As this is only the second time in the history of my Office that so many reports have been submitted to one meeting, I want to explain to you why this was necessary.

As my 2023 Annual Report noted, having a mayoral by-election so soon after the 2022 municipal election posed unforeseen challenges. In the two months leading up to a regular election, the *City of Toronto Act, 2006* prohibits my Office from receiving, investigating and reporting to Council on Code of Conduct complaints. While these requirements do not formally apply to by-elections, it became clear in 2023 that the rules governing by-elections were not designed for a mayoral by-election in the City of Toronto. For that reason, it was fair for my Office to follow the same practices for investigating and reporting on election-related complaints during the 2023 mayoral by-election as were in place for the 2022 regular election. I advised members of Council and the public about this in my Office’s 2023 Mayoral By-election Interpretation Bulletin.

As it was important to have election-related investigation reports considered by Council at the same time, this has required election-related matters from 2022 and 2023 to be reported together.

Three reports deal with election-related matters:

- One concerns a member of Council’s flyer that advertised events before Voting Day in the October 2022 election and was sent out after the distribution ban imposed by Council policy.

- Two concern the use of constituent contact information for election purposes without constituents' consent. This occurred in the 2022 election and the 2023 mayoral by-election.

I received complaints from constituents about all these matters. However, because of the confidentiality requirements in the *City of Toronto Act, 2006*, I could not advise and update the complainants or members of Council that other election-related investigations were underway.

I especially thank the complainants and the members of Council whose matters date from 2022, for their patience. The investigation in connection with the 2023 mayoral by-election was completed last month so I am now able to report on all election-related matters.

In the first report, in addition to receiving a complaint, the member of Council also self-reported the matter and fully mitigated the issue. For that reason, while finding the rules in the Code of Conduct were not followed, I am not recommending Council impose any penalty.

In the second and third reports, the members of Council have acknowledged that some constituent contact information from their offices was used for election purposes, without the consent of those constituents. This is a breach of the Code of Conduct. I am recommending Council reprimand these two members.

When people share their personal information with their member of Council, they have the right to expect it will be used only for the purpose it was provided. If due care is not exercised in protecting this information, it erodes public trust. The unauthorized use or disclosure of personal information by governments, businesses or other organizations is a serious public concern. It is important to investigate and report to Council on such matters, as I have done. I encourage all members of Council to review the policies and guidance governing the protection of constituent contact information.

My fourth report dealt with a complaint made a few months after the mayoral by-election. It alleged someone hired in the new Mayor's Office had a conflict of interest. The complaint alleged that the staff person continued to work for an organization, which was lobbying the Mayor's Office, that they had been involved with before being hired. I investigated the matter and have dismissed the complaint. Appropriate measures to protect against conflicts of interest were in place and respected. While the policy preferences of that organization may have aligned with those of the new Mayor, there was no evidence the staff person continued to work for it.

I hope this context is helpful as you review these investigation reports.

Yours truly,

Jonathan Batty
Integrity Commissioner



OFFICE OF THE
INTEGRITY
COMMISSIONER
TORONTO



Toronto
Lobbyist Registrar

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

Stephen Littlejohn
Lobbyist Registrar
375 University Ave., Suite 201
Toronto, ON M5G 2J5
416-338-6620 | Stephen.Littlejohn@toronto.ca

December 4, 2024

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. 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 Paul.Muldoon@toronto.ca or 416-397-7770.

Please contact the Lobbyist Registrar, Stephen Littlejohn at Stephen.Littlejohn@toronto.ca or 416-338-6620 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.

Yours truly,

Paul Muldoon
Integrity Commissioner

Stephen Littlejohn
Lobbyist Registrar

c.c. Paul Johnson, City Manager
John Elvidge, City Clerk



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

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,

Paul Muldoon
Integrity Commissioner



Appendix 2
City of Toronto
Integrity Commissioner Office Expense Budget
Actuals January - December 2024
Charged to Cost Centre IG0001

OFFICE OF THE INTEGRITY COMMISSIONER

		January '24	February '24	March '24	April '24	May '24	June '24	July '24	August '24	September '24	October '24	November '24	December '24	January - December '24
Cost Element	Cost Element Name	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Totals
		\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
1015	Full Time Regular Pay	12,406.15	35,446.17	54,937.23	36,066.50	36,066.50	36,066.49	40,894.57	36,771.32	55,156.99	36,771.33	36,771.34	66,073.49	483,428.08
1050	Permanent - Vacation Pay												48,981.70	48,981.70
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	1,380.87	12,985.80
1712	Dental Plan	202.02	623.88	935.82	623.88	623.88	623.88	623.88	623.88	935.82	623.88	623.88	842.58	7,907.28
1720	Long Term Disability	188.45	471.44	730.80	479.68	479.68	479.68	544.08	489.06	733.59	489.06	489.06	585.50	6,160.08
1723	Employee Family Program			29.46	10.44	10.44	10.44	10.44	10.44	15.66	10.44	10.44	18.62	136.82
1730	Group Life Insurance	96.01	234.30	363.23	238.40	238.40	238.40	271.42	243.20	364.80	243.20	243.20	291.19	3,065.75
1740	Employment Insurance	692.46	692.46	1,073.24	419.00	267.65	123.78	144.49	126.80	158.22			214.53	3,912.63
1745	EI Rebate	19.31	55.18	85.44	33.38	21.32	9.86	11.55	10.10	12.60			22.74	281.48
1750	Ontario Health Tax	244.16	696.84	1,079.84	708.60	708.37	708.14	802.36	721.98	1,082.92	721.78	721.78	2,250.57	10,447.34
1760	Canada Pension Plan	2,080.60	2,078.22	3,222.79	1,580.05	968.08	543.59	427.67	373.38	559.92	276.32	55.88	533.21	12,699.71
1770	Pension Plan (OMERS)	1,391.87	4,324.14	6,744.63	4,415.32	4,415.32	4,415.32	5,120.92	4,518.92	6,778.38	4,518.92	4,518.92	5,334.68	56,497.34
Total Salaries and Benefits		17,678.90	45,645.09	70,736.17	45,597.71	44,822.10	44,242.04	49,873.84	44,911.54	67,332.59	44,677.39	44,456.96	126,529.68	646,504.01
2010	Stationery						68.44							68.44
2020	Books & Magazines													-
2040	Paper & Print Supplies													-
2082	Health & Safety Supplies													-
2570	Janitorial Supplies													-
2610	Kitchen Supplies													-
2999	Miscellaneous Materials							85.81			45.16			130.97
3410	Computers - Hardware													-
3420	Computers - Software													-
4010	Professional Services - Legal													-
4086	Translation & Interpreters													-
4122	Transcripts													-
4132	Conduct Money								53.00					53.00
4144	Investigative Expense													-
4199	Professional & Technical Services						484.02							484.02
4256	Conference/Seminar - Registration Fee										503.71			503.71
4310	Training & Development - External							1,485.88						1,485.88
4340	Tuition Fees													-
4416	Transfer, Haulage & Storage													-
4473	Managed Print Charges												14.62	14.62
4474	Computer Software Maintenance	742.64								165.87				908.51
4760	Membership Fees		1,990.43											1,990.43
4804	Wireless Devices												936.02	936.02
4805	Postage													-
4811	Cellular Phones			116.87	279.16		116.80		118.05		210.80	58.16	173.49	1,073.33
4815	Courier Services													-
4827	Online Services Fees													-
4995	Other Expenses													-
6030	Contribution to Reserve Funds					90,000.00								90,000.00
6031	Contribution - Insurance Reserve Fund													-
Total Office Expenditures		\$ 742.64	\$ 1,990.43	\$ 116.87	\$ 279.16	\$ 90,000.00	\$ 669.26	\$ 1,571.69	\$ 171.05	\$ 165.87	\$ 759.67	\$ 58.16	\$ 1,124.13	\$ 97,648.93
Total Monthly Expenditures		\$ 18,421.54	\$ 47,635.52	\$ 70,853.04	\$ 45,876.87	\$ 134,822.10	\$ 44,911.30	\$ 51,445.53	\$ 45,082.59	\$ 67,498.46	\$ 45,437.06	\$ 44,515.12	\$ 127,653.81	\$ 744,152.94
9260	Contribution from Reserve Fund												(13,362.32)	(13,362.32)
Other Revenues		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (13,362.32)	\$ (13,362.32)
Net Expenditures		\$ 18,421.54	\$ 47,635.52	\$ 70,853.04	\$ 45,876.87	\$ 134,822.10	\$ 44,911.30	\$ 51,445.53	\$ 45,082.59	\$ 67,498.46	\$ 45,437.06	\$ 44,515.12	\$ 114,291.49	\$ 730,790.62