

2025 Annual Report

Office of the Integrity Commissioner

Paul Muldoon
Integrity Commissioner

July 15, 2026



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

This Annual Report is my second; however, it is the first in which I have served as Integrity Commissioner for the full reporting period. I would like to provide observations on the Office's evolving workload, process improvements, and key developments over the past year.

Year in Review

2025 was an exceptionally active year for the Office, representing the highest level of activity in its history. The Office responded to approximately 91 formal requests for advice from Members of Council and Local Board Members, an increase from 74 in 2024. It is important to note that adherence to advice provided by the Office affords protection against subsequent complaints. Accordingly, the Office places significant emphasis on delivering clear, expert, and timely guidance.

The volume of complaints also increased substantially. The Office received 105 formal complaints and applications in 2025, up from 75 in 2024, and 47 in 2023. This means the number of complaints in a year has more than doubled over a period of two years. Each complaint is carefully reviewed to determine whether it meets the threshold for a formal investigation. Applications under the *Municipal Conflict of Interest Act* (MCIA)¹ increased to 12 in 2025, compared to 2 in 2024 and none in 2023. Informal complaints also rose, with 13 received in 2025, compared to 2 in 2024 and 6 in 2023.

I conducted investigations and presented investigation reports to two Business Improvement Areas (BIAs): one addressing alleged breaches of an applicable Code of Conduct, and another concerning the MCIA. I also submitted an investigation report to the Toronto Transit Commission Board regarding the unauthorized disclosure of confidential information. A summary of each investigation is provided later in this Annual Report.

The Office also experienced a significant increase in general inquiries. While total inquiries exceeded 11,600, a substantial portion related to a single issue. Excluding those inquiries, the Office still received a notable increase compared to prior years.

Procedural Changes

The increasing volume and complexity of the Office's work in 2025 highlighted the need to review our complaint and application procedures. As noted above, the Office experienced a significant rise in complaints and inquiries, placing growing demands on our small office of three people. This increase highlighted pressures on administrative capacity and the need to ensure all matters are addressed in a fair and timely manner.

Within a fixed budget, the Office continually assesses its processes to identify opportunities to improve efficiency and streamline operations without compromising procedural fairness or the quality of its work. In light of these pressures, the Office began examining potential updates to its Complaint and Application Procedures to ensure they remain responsive to

¹ The MCIA requires elected officials and Local Board appointees to declare any pecuniary interests in a matter and refrain from participating in debate and voting in matters where they have such interests.

current demands and aligned with best practices in administrative fairness and effective case management. My Office will continue to review procedures, with the objective of maintaining a high standard of service while adapting to the evolving workload of the Office.

In addition to providing advice and conducting investigations, the Office continues to fulfill its educational mandate by supporting those under its jurisdiction in understanding their ethical obligations as public officials. Apart from my mandates to give advice and investigate complaints, I also have the mandate to educate those under my jurisdiction about their applicable Code of Conduct and the MCIA. This report will show I have spent considerable time working with City BIA boards in particular, in my first year.

Organizational Change

Throughout 2025, the Office continued to pursue operational efficiencies to manage increased demand. As part of this effort, Kate Zavitz assumed additional responsibilities as Deputy Integrity Commissioner, alongside her existing role as legal counsel to the Office.

Bill 9 update

In December 2025, Bill 9, the *Municipal Accountability Act, 2025*, completed committee review and was ordered for Third Reading before the provincial legislature. The Office provided written submissions to the legislative committee and appeared before the Standing Committee on Heritage, Infrastructure and Cultural Policy.

[The Municipal Accountability Act, 2026 was passed into law on May 26, 2026 and received Royal Assent on June 2, 2026. The Act will be operational immediately after the 2026 municipal election.]

Key elements of this initiative include the introduction of a framework for the removal of a municipal councillor in cases of serious misconduct, as well as the establishment of a standardized provincial Code of Conduct applicable to all municipalities in Ontario, including the City of Toronto.

The Office provided submissions and appeared before committee regarding this initiative, recognizing the need to strengthen municipal accountability frameworks while emphasizing that reforms should build on, rather than replace, established and effective systems. The Office also raised concerns about the practicality of the proposed mechanism to remove a Member of Council and identified areas where further legislative clarity and consultation would be beneficial. You can read our [written submissions](#) on our Announcements page. The Office has not been consulted on the proposed provincial Code of Conduct or other operational aspects of the legislation, including responsibility for Member education and training. The Office will be providing guidance to affected Members and developing an implementation plan.

Within the Office's increasing workload, the ICT staff deserves a sincere thanks for their hard work and dedication in light of the demands on the Office.

Respectfully submitted,
Paul Muldoon, Integrity Commissioner

Report on Activities

Overview

In 2025, the Office of the Integrity Commissioner for Toronto (ICT) received 105 complaints and applications, a record which was 44% more than the previous year, which had itself, been a record. There was a continued trend towards multiple complaints on the same issue, including petition-style complaints and coordinated campaigns. As a result, our Office began to develop a new protocol for such complaints, which would be launched in 2026. Despite the increase in complaint volume, the Office managed to close 64% of complaints in the same year we received them. Our Office reported out on three investigation reports involving City of Toronto Local Boards.

Twenty-one of the twenty-six Members of Council came to our Office for advice, which we provided in two days or less, 78% of the time. Our Office is also required to review Members of Council's sponsored travel and donations to community events, to ensure they fit within exceptions to the prohibition on receiving gifts, and doing so takes detailed discussion and review. In 2025 there were a remarkable 17 declarations for sponsored travel. Our Office continued outreach with presentations to local boards, City staff and the legal community.

Section 1: Operating Budget

The 2025 approved adjusted net operating budget for the Office was \$744,631. Appendix A provides a summary comparison of budget and actual spending by expense category.

Our three-person Office tries to meet its mandate internally but requires the flexibility to retain external legal and investigative support when needed. This includes accessing forensic or expert analysis in complex investigations or periods of higher volume. Council's approval of a reserve fund provides a cost-effective mechanism to address these demands.

While our Office did not draw on the reserve fund in 2025, it became clear as the year proceeded that demand for our services was exceeding our capacity. Our Office continued to rely on our in-house team, but increasing complaint volumes, concurrent investigations and anticipated Bill 9 changes place growing pressure on our available resources. These factors make it clear that our Office will require additional ongoing staffing resources and/or will need to rely more regularly on the reserve fund in the future.

Section 2: Advice and Gift Declarations

Advice to 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 ICT is also assigned responsibility for advising, receiving and publicly reporting on gifts received by Members of Council. The Commissioner requests meetings with Members of Council each year to review all these matters and update them about the activities of the Office. In 2025, the Commissioner met in person with 16 Members of Council, in addition to providing advice to 21 Members of Council.

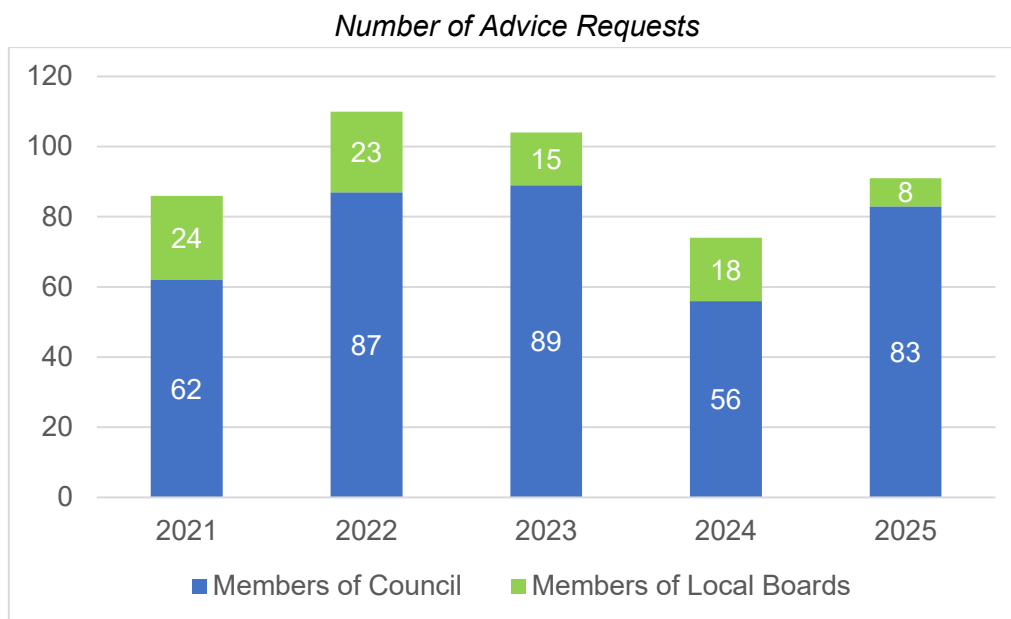
Similarly, our Office provides advice to Members of the City's boards and adjudicative tribunals about their obligations under the Code of Conduct for Members of Local Boards (Restricted Definition) and the Code of Conduct for Members of Adjudicative Boards. As there are approximately 1000 Members of these boards and adjudicative tribunals, it is not possible to meet with everyone individually. The Office's outreach activities provide updates to these Members and let them know about the resources and advice the ICT provides.

The advice the ICT provides must be thorough, practical and timely. Our Office often receives urgent requests for advice at the last minute or outside regular working hours. The fact that the vast majority of advice is given within 24 hours speaks to the emphasis we place on this.

To advise someone, the ICT 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 our Office provides written advice, Members often contact the Office to discuss and confirm their understanding of the advice or if they have follow-up questions when circumstances change.

Our Office provided advice in two days or less to Members of Council 78 percent of the time and to Members of local boards 87 percent of the time.

The ICT was contacted for advice 91 times during this reporting period.



Subject of Advice Requests

Subject	Number of Requests	Percentage of Requests
Best practices for dealing with constituents/members of the public	5	6%
Complaining about another Member	1	1%
Conflict of interest/ Use of influence under the Code of Conduct	51	56%
Dealing with Lobbyists	0	0%
Dealing with staff	0	0%
Election Related	1	1%
Observing post-employment obligations	0	0%
Other	1	1%
Providing letters of reference	1	1%
Receiving gifts and benefits	13	14%
Support for Activities and Fundraising	7	8%
Understanding pecuniary interests under the MCIA	10	11%
Using City resources and/or Members' office budget	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 our Office if they have received an eligible gift worth more than \$300 that 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	2021	2022	2023	2024	2025
Community Events	8	1	3	26	10
Sponsored Travel	0	3	8	6	17
Gifts and Benefits	0	0	0	0	0

Section 3: Inquiries, Complaints and Applications

Inquiries

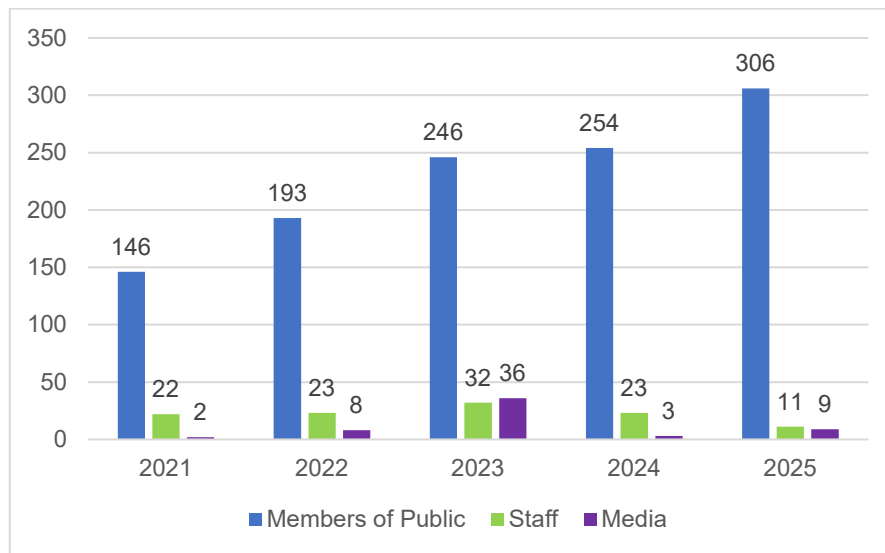
When the public, City staff and the media contact my Office it is often about complaints: specifically, how to make a complaint, whether their issue is within our jurisdiction or asking if the ICT has received a complaint about someone. In answering those inquiries, the ICT explains our Office only has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

In 2025 the ICT received 306 jurisdictional inquiries which required personalized responses and 11,322 inquiries that did not require a personal response, and are not recorded in the table below.

The increase in 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.

The ICT continues to receive more mass email campaigns and petitions; in fact, the 11,322 number is largely a result of an online campaign. In those cases, we will review the first properly-filed complaint and only engage with subsequent complaints if they differ in a material way or the complainants are personally and directly involved. The ICT is not more likely to investigate with a higher volume of requests: instead, the decision to investigate is based on whether there are sufficient jurisdictional grounds raised.

Number of Jurisdictional Inquiries Responded to

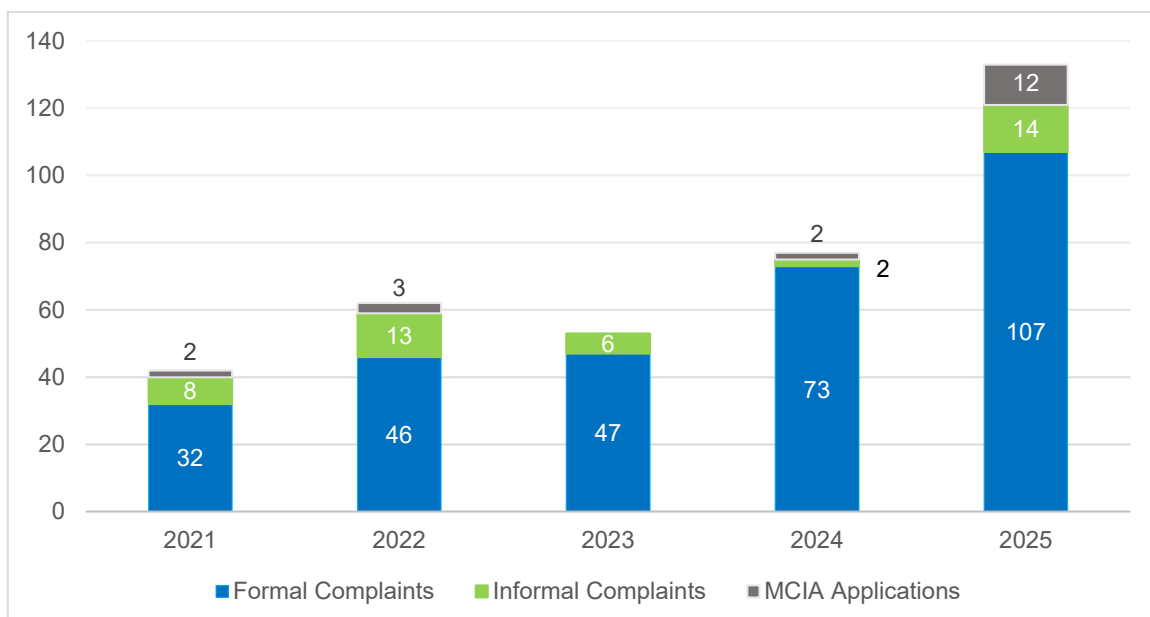


Informal Complaints, Formal Complaints and Applications

Under the *City of Toronto Act, 2006*, our Office may only investigate a Member's conduct if we receive a Code of Conduct complaint or an MCIA application. Our Office follows 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 informally or formally.

The table below shows how many complaints and applications the ICT has received over the last five years. In 2025 my Office received a record twelve MCIA applications.

All types of Complaints (Five-Year Overview)



*This year, we had two instances where we received multiple complaints on the same subject matter. 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.

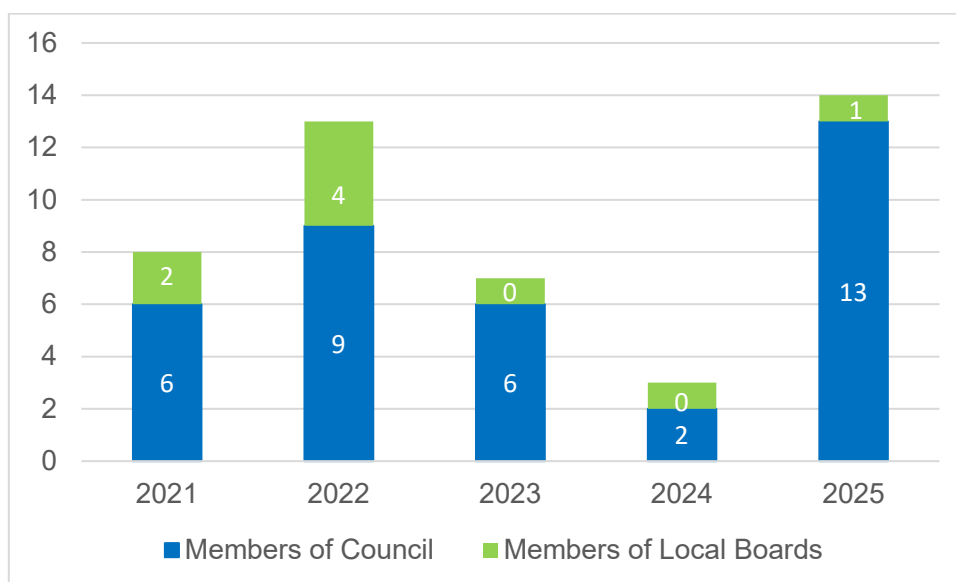
Informal Complaints

The informal complaint process is a form of alternative dispute resolution where ICT assists 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 interpersonal or “customer service” issue where a corrective action, or an apology, is sufficient. Our Office acts as mediator for such 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 the Commissioner’s discretion. It must be for jurisdictional complaints raising a real issue under the Code of Conduct, with parties acting in good faith. The ICT will not use it for allegations of serious misconduct. In such cases, it is not in the public interest to resolve them informally. Where appropriate, our Office may suggest to parties that a formal complaint be resolved informally.

Number of Informal Complaints Received about Members 2021 to 2025

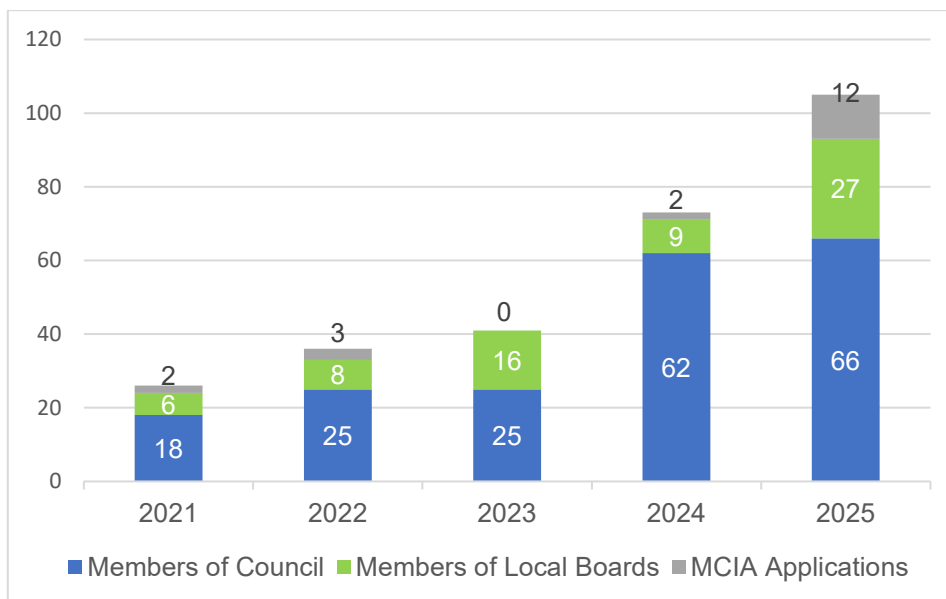


Some informal complaints either do not allege a potential Code of Conduct violation or are otherwise unsuitable for settlement or resolution without an inquiry. In addition, sometimes our Office is unable to settle the matter. If informal resolution is not possible, or is unsuccessful, the Complainant has the right to file a formal complaint that the ICT will review and may investigate. In 2025, our Office received 14 informal complaints.

Formal Complaints and MCIA Applications

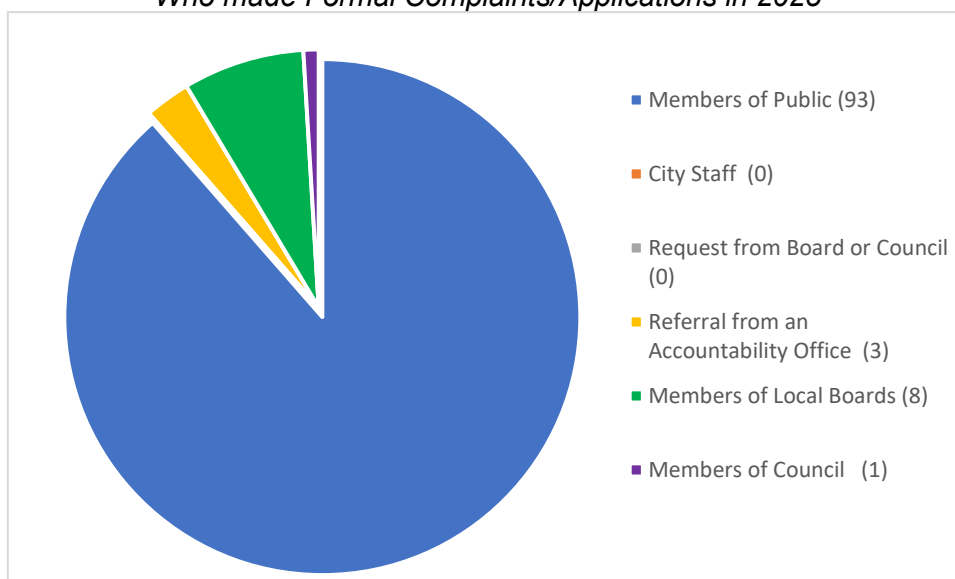
As shown below, in 2025 our Office received 105 formal complaints and applications, a 44% increase from the previous year. This included twelve MCIA applications.

Number of Formal Complaints and Applications Received about Members 2021 to 2025



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 2025



Formal Complaints/Applications Closed in the Year Received

Formal Complaints and Applications	2021	2022	2023	2024	2025
Number received	26	36	41	75	105
Number closed in the same calendar year as they were received	23	30	30	68	67
Percentage closed in the same calendar year as they were received	88%	83%	73%	91%	64%

Intake Review

The ICT conducts an initial review of a complaint under a Code of Conduct, or an application under the MCIA, to determine if it is within jurisdiction and includes sufficient grounds to investigate. If there are not, or the Office determines there is no purpose to investigate, the ICT can dismiss the complaint or application.

In 2025, our Office dismissed a total of 56 formal complaints at the intake review stage.

Investigation Outcomes

When our Office investigates a complaint or application, the Member is notified and asked to submit a response. In investigations, relevant people are asked to answer questions, sometimes under oath or affirmation. Our Office asks, or orders, documents and other materials to be produced. The evidence is then reviewed and sometimes the Office will retain external forensic, investigative and legal assistance.

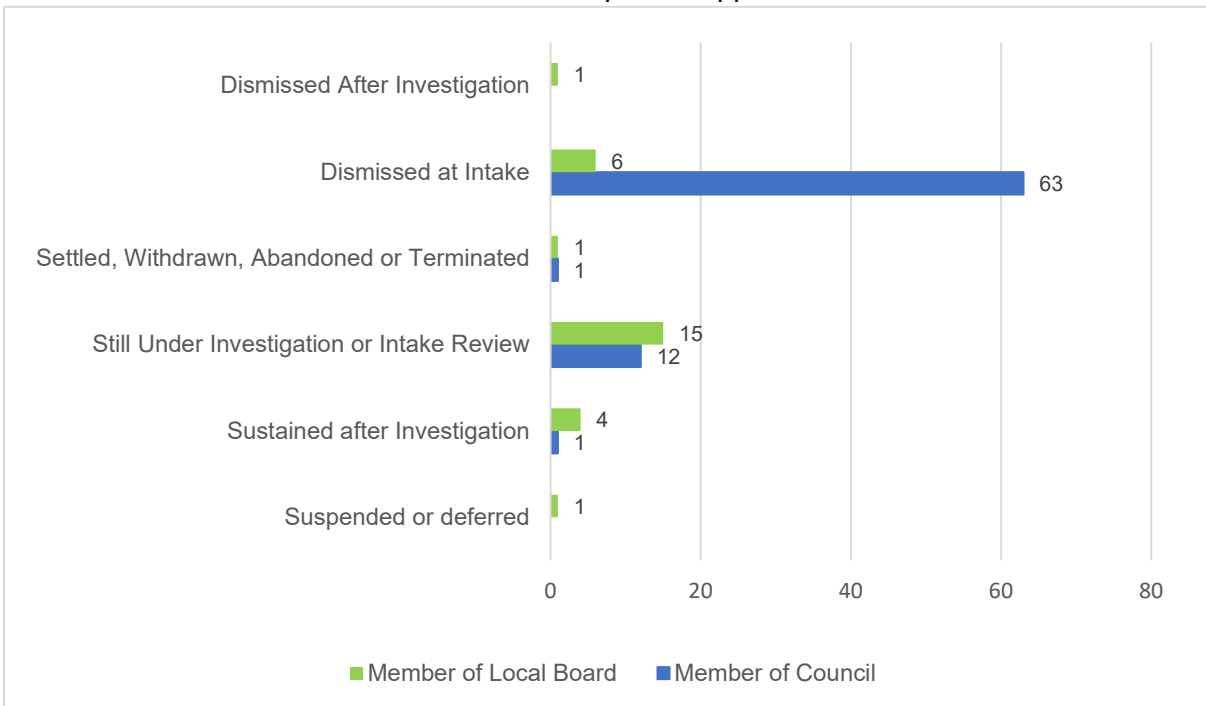
Before an investigation is completed, a complaint or application can be withdrawn or considered abandoned if someone decides they no longer wish to pursue a matter or fail to respond to our Office about it.

After an investigation is completed, the Commissioner can:

- 1) Dismiss the complaint or application. For complaints, the Commissioner may report to Council or the local board. Where an application is involved, the Commissioner advises the parties and publishes written reasons for the decision.
- 2) Uphold the complaint or application, in whole or in part. Where a complaint is involved, the Commissioner must report to Council or the local board. For an MCIA application, the Commissioner must publish written reasons for the decision and may apply to a judge for a further determination of an MCIA violation, and who may impose significant penalties up to removal from office.

The outcome as of December 31, 2025 for complaints received in 2025 is shown in the following graph:

Outcome and Status of Formal Complaints/Applications received in 2025



Investigation Reports

In 2025, our Office publicly reported out on three investigation reports about Members' conduct:

[Report on the Unauthorized Release of Confidential Information from a 2023 Closed Toronto Transit Commission Board Meeting \(July 7, 2025\)](#)

Our Office investigated the unauthorized disclosure of confidential information arising from a closed session of the Toronto Transit Commission Board in 2023, following a formal request from the Board. The investigation examined the obligations of Members to maintain confidentiality of deliberations in closed meetings and in confidential documents, in the circumstance of disclosure to the media by several unnamed sources.

Our Office was unable to determine, on a balance of probabilities, which individual was responsible for the disclosure to the media. The Report also examined the conduct of the Chair in sharing confidential information outside of his office, with staff for another Member of Council. The Commissioner found that this disclosure occurred in good faith; however, it nonetheless constituted a breach of the Code of Conduct confidentiality obligations. He recommended no penalty. The Board adopted the report and recommendations.

Although our Office could not pinpoint the source of the disclosure to the media, it was clear that the confidentiality requirements were not respected. The Report includes recommendations to strengthen compliance with these requirements, emphasized the importance of protecting confidential information from closed sessions, and proposed our Office develop an interpretation bulletin to clarify whether, and in what circumstances, Members may share confidential information with their own staff, as some currently do.

[Report on a Business Improvement Area \(BIA\) Board Member Acting in Dual Roles](#)

The Commissioner investigated three related conflict of interest complaints concerning a Member of the Parkdale Village BIA Board. The Report found that the Respondent acted in conflicts of interest in each case: by engaging the same individual to work for both the BIA and her private business, by authorizing honorarium payments to relatives and by retaining a paralegal for the BIA Board who also worked for her business.

It was noted in the Report that, with respect to hiring an individual for both her private business and at the BIA Board, the Respondent had sought advice from the Office and chose not to follow it. In this case, the failure to follow the Commissioner's advice was an aggravating factor considered in his recommendations as to penalty.

While the Respondent indicated she believed she was acting in the best interests of the BIA, the Commissioner emphasized that Members must avoid conflicts between their public duties and private interests and follow established ethical standards.

[Report on an alleged Municipal Conflict of Interest Act violation by a Member of a Local Board](#)

The Commissioner conducted an investigation under the *Municipal Conflict of Interest Act* (MCIA) into a Member of the Weston Village Business Improvement Area (WVBIA) Board, following an application from a fellow Board Member. The application alleged the Respondent failed to declare a pecuniary interest and refrain from voting on a matter related to a development proposal that included the potential conveyance of land to the City for a performing arts facility. The Respondent's charitable foundation advocated for the conveyance and planned to provide startup financial support to whatever arts agency would be selected to run the facility.

In assessing the matter, the report examined the development proposal and the Respondent's role in a foundation that may later provide funding to the operator who would occupy the proposed arts facility. The investigation focused on whether this involvement gave rise to a direct or indirect pecuniary interest in the vote before the Board. After reviewing the evidence, the report found that any potential financial interest was too remote and not sufficiently connected to the decision to meet the statutory threshold under the MCIA.

The report concluded that the Respondent did not contravene the MCIA and as a result the Commissioner declined to commence a court application. It was emphasized in the report that the Act requires a narrow interpretation of pecuniary interest, meaning the interest must be real and not speculative. The report highlights the importance of distinguishing between concrete financial interests and those that are indirect or uncertain when applying the MCIA.

Section 4: Engagement with Stakeholders

Information for Members of Council

Our Office writes 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 2025 we wrote to Members on the following topics:

- Election Activity Rules (January 29 - See Appendix 1)
- Environment Days 2025 (March 17 - See Appendix 1)
- Election Activity Rules (March 24 - see Appendix 1)
- Reminder to Complete Accessibility for Ontario with Disabilities Act (AODA) Training (October 17 - see Appendix 1)
- Holiday Gifts and Events (December 1 - see Appendix 1)

Our Office posted twelve 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.

In 2025 the ICT presented at the following events:

- Toronto City Clerk Member Services & Program Support ICT presentation (April 28)
- City of Toronto Leader Orientation (October 30, November 27)
- Administrative Law Primer, SOAR (April 30)
- University of Toronto ICT Presentation (September 9)
- York University Panel on Bill 9 (November 6)
- Ethics Keynote panel: SOAR's 37th Annual Conference (November 14)

Boards to which the Integrity Commissioner presented

- Regal Heights BIA (May 13)
- Weston BIA (May 14)
- Danforth Mosaic BIA (May 26)
- Toronto Association of Business Improvement Areas (TABIA) (May 27)
- Kingsway BIA (August 11)
- Midtown Yonge BIA (October 20)
- Emery Village BIA (October 29)
- Property Standards Committee (November 28)

Section 5: Policy Advice

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

[Submissions with respect to Bill 241, Municipal Accountability Act, 2024](#)

The ICT's submission to the Ministry of Municipal Affairs and Housing explained that while our Office supports efforts to strengthen municipal accountability across Ontario and the opportunity to remove a Member in cases of extreme misconduct, the province should take care not to undermine well-established accountability frameworks. Drawing on Toronto's

experience, the ICT emphasized that Toronto's integrity framework had evolved over more than two decades into a sophisticated model. The Office submitted that provincial reforms should focus on improving weaker regimes and raising baseline standards, rather than imposing uniformity that would dilute more advanced systems.

Our Office submitted that introducing a single, standardized Code of Conduct and investigation procedures would not accommodate the diversity of needs and realities from the 444 Ontario municipalities without allowing some flexibility. Our Office proposed the province adopt a model setting a "floor" of baseline requirements while allowing municipalities to enhance their own codes and investigative processes.

The submission addressed the proposed mechanism for removing elected officials in cases of extreme misconduct. While supporting the objective in principle, the ICT identified significant practical concerns, including the requirement for a unanimous council vote, which is practically unachievable, and the absence of alternative penalties if Council does not unanimously approve removal. The ICT requested meaningful consultation and that reforms be informed by the experience of established municipal integrity offices.



Our Team: From left to right, Lisa Di Felice, Paul Muldoon, and Kate Zavitz.

Appendices

Appendix 1: Letters to Members of Council

Appendix 2: 2025 Expense Budget



OFFICE OF THE
**INTEGRITY
COMMISSIONER**
TORONTO

Appendix 1

Paul Muldoon

Integrity Commissioner

375 University Ave., Suite 202

Toronto, ON M5G 2J5

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

January 29, 2025

Sent via Email (No Original to Follow)

Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Members of Council:

Re: Election Activity Rules regarding the February 27, 2025 Provincial General Election

Under Ontario's *Election Act*, writs for the Provincial General Election were issued on January 29, 2025. Election Day will be February 27, 2025.

I am writing to remind you of the requirements governing election-related activities in the [Code of Conduct for Members of Council](#) ("Code of Conduct") that you and your staff will need to observe.

Article 7 (Election Campaign Work) of the Code of Conduct and the City's [Use of City Resources during an Election Period Policy](#) prohibit use of City resources for any municipal, provincial or federal campaign purpose. City resources include City employees (e.g., members' staff), City events, City facilities, City funds, City information and City infrastructure.

While members of Council and their staff can be involved in election campaigns, they must separate their work as elected officials and members' staff from their activities as campaign volunteers or supporters. The public must have confidence that the City's resources are not being used to support one political party or candidate over another. This separation of activities complies with the principle in the Code of Conduct that "members should serve the public interest by upholding both the letter and the spirit of federal and provincial laws and the bylaws and policies adopted by City Council."

Members' staff are reminded of their obligations under the [Human Resources Management and Ethical Framework](#). The Framework establishes that City employees are eligible to be a candidate in a Provincial election so long as the employee takes an unpaid leave of absence and provides written notice to request an unpaid leave to the Member of Council to whom they report, and the City Clerk's Office. If elected, the employee shall be deemed to have resigned.

Social Media Use

Members should also review the Integrity Commissioner's [guidance about use of social media](#) and not post content that promotes any candidate or political party in the provincial election on any social media account that:

- uses any toronto.ca email address as a point of contact for registration purposes;
- identifies the member as a current member of Toronto City Council in the handle name, the username or the profile description;
- is publicized on the member's constituency website or the City of Toronto's contact page for members of Council;
- is publicized on business cards, newsletters or other publications eligible to be paid for out of the Constituency Services and Office Budget for the duration of the currency of the publication;
- uses the logo or any other proprietary mark of the City of Toronto;
- contains contact information for the member at City Hall, a ward constituency office, or any other official contact information;
- is managed using City of Toronto resources including computers, smart phones, or tablets; or,
- is managed or maintained by City staff, the member's staff or academic placement interns, or using services eligible to be paid for out of the Constituency Services and Office Budget or the Mayor's Office Annual Operating Budget.

I hope these reminders are of assistance. If you have any questions about these requirements, please contact my office.

Yours truly,



Paul Muldoon
Integrity Commissioner

c.c. Paul Johnson, City Manager
John Elvidge, City Clerk
Wendy Walberg, City Solicitor



OFFICE OF THE
**INTEGRITY
COMMISSIONER**
TORONTO

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Integrity Commissioner
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March 17, 2025

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 2025

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

Best wishes for a successful Environment Day season!

Yours truly,



Paul Muldoon
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, Senior Manager Strategic Planning & Unit, Infrastructure & Development Services 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

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

March 24, 2025

Sent via Email (No Original to Follow)

Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Members of Council:

Re: Election Activity Rules regarding the April 28, 2025 Federal General Election

As writs have now been issued for a Federal General Election on April 28, 2025, I am writing to remind you of the requirements governing election-related activities in the [Code of Conduct for Members of Council](#) (“Code of Conduct”) that you and your staff will need to observe.

Article 7 (Election Campaign Work) of the Code of Conduct and the City's [Use of City Resources during an Election Period Policy](#) prohibit use of City resources for any municipal, provincial or federal campaign purpose. City resources include City employees (e.g., members' staff), City events, City facilities, City funds, City information and City infrastructure.

While members of Council and their staff can be involved in election campaigns, they must separate their work as elected officials and members' staff from their activities as campaign volunteers or supporters. The public must have confidence that the City's resources are not being used to support one political party or candidate over another. This separation of activities complies with the principle in the Code of Conduct that “members should serve the public interest by upholding both the letter and the spirit of federal and provincial laws and the bylaws and policies adopted by City Council.”

Members' staff are reminded of their obligations under the [Human Resources Management and Ethical Framework](#). The Framework establishes that City employees are eligible to be a candidate in a federal election so long as the employee takes an unpaid leave of absence and provides written notice to request an unpaid leave to the Member of Council to whom they report, and the City Clerk's Office. If elected, the employee shall be deemed to have resigned.

Social Media Use

Members should also review the Integrity Commissioner's [guidance about use of social media](#) and not post content that promotes any candidate or political party in the federal election on any social media account that:

- uses any toronto.ca email address as a point of contact for registration purposes;
- identifies the member as a current member of Toronto City Council in the handle name, the username or the profile description;
- is publicized on the member's constituency website or the City of Toronto's contact page for members of Council;
- is publicized on business cards, newsletters or other publications eligible to be paid for out of the Constituency Services and Office Budget for the duration of the currency of the publication;
- uses the logo or any other proprietary mark of the City of Toronto;
- contains contact information for the member at City Hall, a ward constituency office, or any other official contact information;
- is managed using City of Toronto resources including computers, smart phones, or tablets; or,
- is managed or maintained by City staff, the member's staff or academic placement interns, or using services eligible to be paid for out of the Constituency Services and Office Budget or the Mayor's Office Annual Operating Budget.

I hope these reminders are of assistance. If you have any questions about these requirements, please contact my office.

Yours truly,



Paul Muldoon
Integrity Commissioner

c.c. Paul Johnson, City Manager
John Elvidge, City Clerk
Wendy Walberg, City Solicitor



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

October 17, 2025

Sent via Email (No Original to Follow)

Members of Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Dear Members of Council:

Re: Reminder to Complete AODA Training

I am writing today to urge you and your staff to complete the required accessibility training that is available to you through the City's [ELI portal](#), in compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA).

One of the key requirements of the AODA is that staff are adequately trained. My Office frequently receives complaints that allege a failure to accommodate and lack of political staff awareness of the AODA and their obligations under it.

This year is the 20th anniversary of the Ontario government passing the AODA. The AODA recognizes the history of discrimination against people with disabilities and sets out a process for developing, implementing and enforcing accessibility standards to make Ontario more accessible and inclusive. There remains a long road ahead for the law to be fully implemented and for its goal of an accessible province to be reached. It is important that Members of Council and their staff comply with the requirements of the AODA.

Background

While the benefits of AODA are universal, it is particularly important in advancing equity and dignity for the 477,900+ senior Torontonians, a population that is expected to increase by over 50% by 2041 and the 570,000+ Torontonians with disabilities, an average of 1 in 4 people.

The City of Toronto has committed to creating an accessible and inclusive city where all individuals can use City services, programs and facilities in a way that respects their dignity and independence. To meet the AODA requirements, the City has developed a:

- [Statement of Commitment to Accessibility](#),

- [Corporate Accessibility Policy](#), and the
- [2025-2029 Disability Inclusion Action Plan](#) (DIAP) which was [adopted by City Council](#) on July 23, 2025.

The DIAP is the City's new accessibility plan. It replaced the former 2020-2024 Multi-Year Accessibility Plan. The DIAP outlines how the City will find, remove, and prevent barriers to accessibility. It aims to help people better understand accessibility rules and integrate disability inclusion into all City work. The plan supports the City's commitment to follow the requirements of the AODA including the *Integrated Accessibility Standards Regulation* (IASR). This regulation requires everyone providing services on behalf of the City to complete training on accessibility standards, customer service, and the Ontario *Human Rights Code* as it relates to persons with disabilities. The AODA defines disability broadly, encompassing physical, developmental, learning, mental health, and other types of disabilities.

Reminder to complete the necessary training

I kindly ask that you introduce or re-introduce your staff to the various training resources available on the AODA including [Accessibility 101](#) and [Human Rights 101](#), which can be accessed through ELI. The City Clerk's Office has also listed other mandatory and recommended training in the [Council Member Knowledgebase](#). If you require information on which political staff have taken these courses, please contact Mike Pacholok, Deputy City Clerk who can assist.

I would truly appreciate your attention to this matter. I thank the Chief People Officer and her team for their leadership, and for supporting my Office in this correspondence. If you have any questions, please contact my office.

Yours truly,



Paul Muldoon
Integrity Commissioner

C.c. Paul Johnson, City Manager
John Elvidge, City Clerk
Wendy Walberg, City Solicitor
Mary Madigan-Lee, Chief People Officer



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 1, 2025

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,



Stephen Littlejohn

Paul Muldoon
Integrity Commissioner

Stephen Littlejohn
Lobbyist Registrar

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

Appendix 2

Office of the Integrity Commissioner 2025 Financial Summary

Category (In \$000s)	2025 Budget	2025 Actual	Spending %
	\$	\$	
Salaries & Benefits	594.0	554.5	93.3%
Materials and Supplies	1.0	0.2	15.6%
Equipment	1.0	5.0	499.1%
Services and Rent	148.6	46.3	31.2%
Contribution To Reserves/Reserve Funds*	100.0	15.6	15.6%
Total Gross Expenditures	844.6	621.5	73.6%
Contribution From Reserves/Reserve Funds	100.0		0.0%
Total Revenues	100.0		
Net Expenditures	744.6	621.5	83.5%

*In line with Council Direction under Item - 2020.EX19.7 adopted at its meeting on December 16-18, 2020, the Office of the Integrity Commissioner, Legal and Investigative Expense Reserve Fund balance is capped at \$400k. As this cap has been reached, no further reserve fund contribution was made in 2025.