

Post-Employment Obligations – Former Members of Council

Purpose of the Bulletin

1. The purpose of this Interpretation Bulletin is to outline key obligations that remain incumbent upon former members of Council.

Lobbying Prohibitions

2. Section 140-9 of the [Lobbying By-Law](#) prohibits former members of Council from lobbying any public office holder during the 12 months after the date that the member of Council ceases to hold office. The definitions of "lobbying" and "public office holder" are broad. For example, please remember that arranging a meeting between a public office holder and any other person constitutes lobbying. Accordingly, if former members intend to pursue any role that interacts with City of Toronto officials, they should consult directly with the [Office of the Lobbyist Registrar](#) to ensure a clear understanding of the Bylaw.

Ineligibility for Appointments to City Adjudicative Boards

3. Section 2.3 of the [Public Appointments Policy](#) stipulates that former members of Council in the immediately preceding term are ineligible for appointment to any of the City's quasi-judicial or [adjudicative boards](#) or positions (e.g. the Committee of Adjustment, the Sign Variance Committee, etc.).

Code of Conduct Obligations and Future Activities

4. Certain obligations of members of Council under the Code of Conduct for Members of Council (the "Code of Conduct") can impact the future activities of former members of Council. For example:

Confidential Information (Article V)

Article V of the Code of Conduct prohibits members of Council from disclosing or using the City's confidential information. Accordingly, former members of Council should be cautious and seek specific advice about any interactions with individuals or entities that could benefit from confidential information that former members obtained in their role as a member of Council and/or other City committee or board member.

Prospective Employment (Article X)

Article X stipulates that members of Council shall not allow the prospect of their future employment by any person or entity to detrimentally affect the performance of their duties to the City. Accordingly, members of Council should be cautious, and seek specific advice, about opportunities with organizations or entities with which they had significant dealings. The Code of Conduct continues to apply to former members of Council in relation to circumstances that took place while they were members of Council, and significant prior involvement with a new employer could give rise to reasonable concerns about the circumstances that led to the new position.

Use of City Resources (Article VI)

Article VI prohibits members of Council from using City resources for activities other than City business. Accordingly, members of Council should refrain from using City resources to research or pursue any future employment or appointment activities.

General Principles

5. Outgoing or former members of Council should consider acting cautiously with respect to opportunities at entities that are City stakeholders, or those with which they had significant dealings as a councillor or board member. However, all cases are fact-specific. Members of Council are encouraged to contact the Integrity Commissioner for more specific advice as opportunities unfold.

Further Information

This interpretation bulletin is intended to provide general information. To rely on the Integrity Commissioner's advice about a specific situation, members of Council must seek written advice in the manner contemplated by Article XVII of the Code of Conduct.

If you have any questions, please contact:

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