

# **2025 Annual Report of the Integrity Commissioner**

Karen E. Shepherd  
Integrity Commissioner

November 2025

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# Message from the Commissioner

I am pleased to present my sixth annual report to Council. This report details activities of my Office across the most recent reporting cycle (October 2024 through September 2025). However, events on the horizon are also very much on my mind. As I write, third reading is expected soon on Bill 9 (the *Municipal Accountability Act, 2025*), the stated purpose of which is to strengthen local governance and accountability in Ontario. We are also on the cusp of a municipal election year. Accordingly, my remarks this year are reflecting not only on activities of the past 12 months, but on my role in the context of potential new legislation and an impending election.



I continue to believe that education is the key to ensuring a culture of ethical responsibility. For this reason I continue to develop tools such as “IntegriTalk” bulletins to remind Members of their responsibilities in particular areas. This past year I was pleased by the number of Members who requested advice before taking action. I also believe that my public reports — from annual reports such as this one, to reports detailing the outcome of investigations — serve an educational purpose. Namely, they help demonstrate the requirements of the By-laws and codes within my mandate and provide guidance to fulfill them.

I continued my annual check-ins with Members. These are a chance to talk one-on-one about questions and/or ethical issues they are facing, as well as the priorities of my Office. Members once again came prepared to discuss issues of importance to them, demonstrating their commitment to operating at the highest ethical standards.

One topic on which both Members of Council and the public have been keenly engaged this past year is conflict of interest. I am pleased to provide Members with advice to assist them in complying with both the *Municipal Conflict of Interest Act (MCIA)* and/or the Code of Conduct for Members of Council. To paraphrase Justice Denise E. Bellamy in a landmark report, a conflict is not inherently a problem. What is important is how a Member manages it.

It is clear that a Member with a pecuniary (financial) interest in a matter, as defined in the MCIA, should declare it and abstain from discussion and voting. However, the proper course may be different for an “apparent conflict” under the Code (i.e., there is a reasonable perception that a Member’s private interest could affect their ability to

perform official duties). It may sometimes be reasonable for the Member to declare an interest but still participate in debate and voting.

I continue to encourage Members to seek advice whenever they see a potential conflict and are in doubt about how to proceed.

Council has acknowledged that those employed in Members' offices may also benefit from ethical guidance to navigate challenging situations. In January 2025, Council approved the Ethical Framework for Members' Staff, a code of conduct that recognizes the unique nature of this work. My Office recently surveyed both staff and Members to better

understand their questions and concerns about the Framework. The priority for the coming year will be to develop educational materials before it takes effect with the next term of council. My Office will consult with the Office of the City Clerk in this effort.

Another major activity for my Office this past year was work to develop a new lobbyist registry application. While lobbying is a legitimate activity, it must be done transparently and in an ethical manner. I expect the new system will support these aims when it is released in the spring or summer of 2026. The application, developed with the City's Information Technology Services, will make it easier to update information. The search function is also being improved. Both upgrades will support efforts to comply with the Lobbyist Registry By-law. In the months ahead, I expect to do a great deal of outreach to lobbyists, Members of Council and City staff to ensure a successful transition to the new system.

In addition to the daily work of overseeing Ottawa's ethics regime, I am engaged in the broader conversation about accountability frameworks across the province. This past summer, the province provided opportunities to comment on Bill 9, with the option to do so in writing or in-person in any of several municipalities. Given the strong accountability regime that the City of Ottawa has put in place, I decided to provide a written submission. My remarks, like those of several others, focused on provisions concerning serious code of conduct violations — namely, the mechanism to remove elected officials from office.

To remove an elected official from Office should not be taken lightly. Bill 9 sets out a specific process. After a local integrity commissioner investigates and determines a Member's contravention was of a serious nature, the commissioner makes a

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*“Having a conflict of interest is not in itself a sign of dishonesty. Honest people can and do find themselves in conflicts of interest ... The individual's actions when faced with a conflict of interest are what matters.”*

- Justice Denise E. Bellamy, Toronto Computer Leasing Inquiry / Toronto External Contracts Inquiry Report (2005)

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recommendation to the Integrity Commissioner of Ontario (OIC), who may make a recommendation to the local council that the Member's seat be declared vacant.

However, there are concerns about the steps that follow. First, removing the Member requires a unanimous vote by the rest of their colleagues on the local council. That may be impractical, even in the most serious of cases, due to the potential difficulty of achieving unanimity.

A second concern is that the Bill does not allow the municipality to impose another penalty if Council does not vote unanimously to support the recommendation from the OIC to declare the Member's seat vacant. Thus there is a risk that a Member in serious breach of a code of conduct, as confirmed through investigations by both a municipal commissioner and the OIC, receives no sanction at all.

Another key element of Bill 9 relates to the contents of codes of conduct. As drafted, the Bill provides that a code for members of council and local boards may be prescribed by regulations. It is unclear at this point whether municipalities will retain the ability to build on core elements that are prescribed, in order to tailor codes to meet local needs, or if they will be expected to adopt a new uniform code as written.

I will continue to watch the progress of Bill 9 closely, through the legislative process and the development of regulations which will follow. With many details and clarifications still to come, I expect to prepare recommendations for Council's consideration as part of a future governance review report.

As I noted at the outset, 2026 is an election year. I expect to work closely with the City Clerk to develop guidance for Members seeking re-election, to remind them of the requirements of the *Municipal Elections Act* and the Code of Conduct. Additionally, the City's Community, Fundraising and Special Events Policy, which I oversee, prohibits Members from seeking donations and sponsorships for most community events staged in an election year. There are exemptions, including those for recurring events. I encourage Members to provide me with as much detail as possible, as soon as possible, if they feel their event should be exempted.

For all their work to support these priorities and more to come, I would like to acknowledge and thank the dedicated staff from the Office of the City Clerk. Their efforts contribute greatly to the work I am able to accomplish across my roles as Integrity Commissioner, Lobbyist Registrar and Meetings Investigator.

Respectfully submitted,



Karen E. Shepherd  
Integrity Commissioner, City of Ottawa

# Year in review

**1**

**Investigation**

**19**

**Complaints**

Informal and formal

**654**

**Lobbying Activities**

**181**

**New Lobbyists**

**10**

**Outreach**

Presentations and publications

**336**

**Enquiries**

Questions and requests for guidance

# Mandate

As the City’s “three-in-one” Commissioner, my mandate includes:

## Integrity Commissioner

- Providing advice to Members of Council and members of local boards on their respective codes of conduct and their obligations under the *Municipal Conflict of Interest Act (MCIA)*
- Resolving complaints related to a potential breach of a code of conduct or the MCIA, either through informal resolution or formal investigation
- Offering education and training to Members of Council, members of local boards, the City administration and the public about matters within my jurisdiction

## Lobbyist Registrar

- Administering the Lobbyist Registry
- Ensuring compliance with the Lobbyist Registry By-law and Lobbyists' Code of Conduct, investigating complaints and imposing sanctions as necessary
- Offering education and training to lobbyists, City staff, and Members of Council on their obligations under the Lobbyist Registry By-law

## Meetings Investigator

- Receiving requests for investigation of closed meetings to the public of City Council, a local board or committee and investigating as required

# Integrity Commissioner

As Integrity Commissioner for the City of Ottawa, I oversee three codes of conduct:

- [Code of Conduct for Members of Council](#);
- [Code of Conduct for Members of Local Boards](#); and
- [Code of Conduct for Public Members of the Built Heritage Committee](#).

I am also responsible for the application of the *Municipal Conflict of Interest Act* (MCIA).

In all areas within my authority, I have a responsibility to provide guidance to members of Council and local boards. I also provide education to Members of City Council, members of local boards, City staff and the public.

## 2025 IN BRIEF

### Advice

A vital part of my mandate is providing advice to Members of Council and members of local boards respecting their obligations under their respective codes of conduct, the *Municipal Conflict of Interest Act* and related policies such as the Community, Fundraising and Special Events Policy.

Given the importance of education to ensure compliance, I have provided highlights in this section to assist Members of Council, members of local boards and public members of the Built Heritage Committee in abiding by their respective Codes of Conduct. With that said, every situation is unique, and for this reason, I encourage individuals to seek guidance as situations arise, even if it is for a simple “gut check.”

### Codes of Conduct

#### Seeking donations/ sponsorships for community events in an election year

This year, in anticipation of the 2026 municipal election, I received several questions from Members of Council about hosting community events in 2026.

The [Community, Fundraising and Special Events Policy](#) (CFSEP) provides guidance to Members on soliciting and accepting and donations and sponsorships for Member-organized community events and supporting benevolent events. Under the CFSEP, in an election year, a Member of Council must not seek donations and sponsorships for any community event that has not been staged in the previous two years, or accept donations or stage any new community event supported by donations and sponsorships after they have filed nomination papers.

A community event is considered to have been staged in the previous two years if it meets the following criteria:

- Has a very similar, if not the same, event name/title
- Takes place at approximately the same time
- Has the same general purpose

The prohibition on soliciting or accepting donations from lobbyists with active files in the Lobbyist Registry continues to apply.

These policy provisions are reinforced in the [Election-Related Resources Policy](#) and [Code of Conduct for Members of Council](#). Exemptions to the CFSEP election-related provisions may be granted on a case-by-case basis with the approval of the Integrity Commissioner. I encourage Members to carefully consider these policy restrictions and seek guidance on any events planned for 2026 at their earliest convenience.

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**A Member reached out to my Office and to the Office of the City Clerk about potentially hosting or co-hosting an event in 2026 with a local interest group about a specific matter impacting that group. The Member sought advice on election-related restrictions and considerations.**

The Clerk provided fulsome guidance to the Member respecting applicable provisions of the [Election-Related Resources Policy](#) and [Election-Related Blackout Period Procedures](#).

In addition to the Clerk's guidance, I advised of the above-noted CFSEP restrictions related to donations and sponsorships for community events in an election year.

Typically, the CFSEP applies to events Members hold in their community for the benefit of residents, such as BBQs, festivals, fun days, etc. The information available about the proposed event; however, indicated it could be more along the lines of an information session.

I set out key questions and considerations, the responses to which would determine if and how CFSEP restrictions would apply. For example, if the interest group co-hosted with the Member, and if the Member refrained from accepting an in-kind donation of event space, it is possible the CFSEP would not apply. I invited the Member to reach out to discuss the matter further.

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## **Disrespectful communications and/or unreasonable requests**

A trend that continues from my 2024 Annual Report is Members seeking guidance when faced with disrespectful and/or unreasonable communications from constituents.

Members of Council have a representative role under the *Municipal Act, 2001* and obligations to uphold under the Code of Conduct, including that Members shall “at all times serve and be seen to serve the interests of their constituents and the City in a conscientious and diligent manner”.<sup>1</sup> That said, Members of Council and their staff should not be subjected to aggressive and/or hostile behaviour from residents, and are entitled to a safe and respectful work environment. Furthermore, the Code of Conduct does not set any specific service standard respecting Members’ and/or their staff’s responses to constituents. The day-to-day management of their offices, including how and to what extent they engage with constituents on policy matters, is at Members’ discretion.

The [Public Conduct Policy](#) provides Members of Council with the means to initiate a course of action in cases of unreasonable behaviour and/or frivolous and vexatious action. Under the Policy, Members consult with the City Clerk and Integrity Commissioner regarding cases of such behaviour/action that the Member wishes to address. The Integrity Commissioner provides advice to the Member about any action under the policy as it relates to the Member’s obligations under the Code of Conduct.

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### **A Member of Council sought guidance to manage a pattern of disrespectful written communications from residents.**

The messages included abusive and offensive language, demanding the Member take specific actions opposed to the Member’s stated policy positions. The Member indicated the requests were taking an unreasonable amount of time, as well as an emotional toll on staff.

I supported the Member’s aim to create templated responses to manage various types of communications. I suggested they consider adding a disclaimer to automatic messages, or at the bottom of templated responses, noting:

- (1) That the office maintains a policy of zero tolerance towards harassment and may not respond to emails containing hostile, abusive, or offensive language; and
- (2) If the office has previously addressed the resident’s concerns or provided the requested information, they may not continue to respond to repeated inquiries on the same matter.

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<sup>1</sup> Code of Conduct for Members of Council, Section 4 (General Integrity).

## **Declining or returning gifts**

As set out in Section 13 (Gifts, Benefits and Hospitality) of the Code of Conduct, Members of Council are expected to represent the public and interests of the municipality with impartiality and objectivity. The acceptance of a gift has the potential to imply favouritism, bias or influence on the part of the Member.

To mitigate this risk, the Code of Conduct prohibits Members from accepting gifts that would, to a reasonable member of the public, appear to be in gratitude for influence, induce influence, or otherwise go beyond the necessary/appropriate public functions involved.

To enhance transparency and accountability with respect to gifts, the Code of Conduct requires Members of Council to disclose in the Gifts Registry all gifts, benefits, hospitality and sponsored travel received which individually exceed \$100 from one source in a calendar year. The Code of Conduct lists exceptions that do not require disclosure, including for items that normally accompany the responsibilities of office and are received as part of social protocol.

In some instances, a Member might be offered a gift they do not wish to accept, or receive a gift they do not wish to keep. In those instances, Members are free to respectfully decline the offer, or return the gift.

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### **A Member's Office inquired about returning a gift that had been delivered to the Member by mail.**

I acknowledged the Member's intention to return the gift to the sender by mail. I recommended including a brief letter along with the item, and/or sending a follow-up email to the sender, to explain why the Member was returning the gift. I suggested the letter state that Members of Council are subject to the Code of Conduct for Members of Council, which includes requirements respecting Gifts, Benefits and Hospitality; therefore, the Member was returning the gift in consideration of those duties.

I further recommended the letter be specific, leaving no question of which item was being returned. The letter should include a date, and a description of the specific item being returned.

A letter along these lines offers a brief explanation to the sender and documents the action the Member took with respect to the gift. I recommended that a copy of the letter/email should be kept on file in the Member's records.

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## **A Member of Council having a “closed mind”**

Section 4 of the Code of Conduct for Members of Council (General Integrity) sets out core ethical requirements and values for Members of Council, including that members are committed to performing their functions with integrity, accountability and transparency. Subsection 4 requires Members to “serve and be seen to serve the interests of their constituents and the City in a conscientious and diligent manner” and to “approach decision making with an open mind.”

In past years, I received complaints alleging a Member of Council’s actions/behaviour indicated they were of a “closed mind” with respect to a matter that came before them at Committee or Council. This year, I received a complaint-like enquiry along those same lines.

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### **A resident expressed concerns about statements a Member of Council made at a Committee meeting. In the resident’s view, the Member’s comments indicated they had decided how they were going to vote on a matter before hearing from delegations at Committee.**

The Member’s statements in question indicated that, coming into the Committee meeting, they held a position on a matter. The Member described what factors influenced that position, and commented on their thinking in relation to what they heard from delegates at the Committee meeting.

First, it is not unusual or inappropriate for Members of Council to discuss reports and/or motions coming to Committee or Council in advance, provided they do not do so as a gathering of a quorum of Members and in a manner that materially advances the business of the Committee or Council, as to do so could contravene the open meetings rules of the *Municipal Act, 2001*.

Second, there is a high bar for establishing that a Member of Council was of a “closed mind” when making a decision. Is stating an intention to vote a certain way enough to prove a closed mind, and a breach of the Code? In my view it is not. Further information would be needed to show that a Member’s position was so fixed that any effort to persuade otherwise would be futile; in other words, to show that they were really immovable.

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## **Local boards: Hiring a board member's company**

The Code of Conduct for Members of Local Boards, like the Code of Conduct for Members of Council, requires members to avoid conflicts of interest, both apparent and real.

A board member has a financial interest in a matter if a board decision may have an impact on the financial interest of the member, the member's business or employer, or certain family members (e.g., spouse, children and parents).

The *Municipal Conflict of Interest Act* (MCIA) requires members of local boards to take certain actions if they have a financial interest in a matter that is coming before them for a vote. In that scenario, the member is required to:

- Disclose the interest and its general nature before the matter is considered at a meeting;
- **Not** participate in the discussion or vote on any question in respect of the matter;
- **Not** attempt, in any way, to influence the voting on the matter before, during or after the meeting; and
- File a written statement of the interest with the board secretary.

I encourage any local board member to seek guidance if they have questions about their responsibilities respecting conflict-of-interest: [integrity@ottawa.ca](mailto:integrity@ottawa.ca)

Anyone who believes a member of a local board has contravened the conflict-of-interest rules in the MCIA may apply to the Integrity Commissioner to request an investigation.

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**A representative of a board of directors of a local board sought guidance on whether a board member's company could submit a proposal for a project through the board's RFP process.**

As the RFP process would result in paid work, certain measures were required to ensure the Member upheld their requirements under the MCIA, as well as the Code of Conduct for Members of Local Boards.

I recommended the board put a firewall in place to ensure the member in question was not involved in the RFP process, and had the same access as any other bidder. Recommended steps included:

- (a) requiring the member inform all other board members of their intention to submit a proposal, and request their fellow members do not include them in discussions about the RFP;
- (b) requiring other board members to take care not to share information, including in informal conversation, about the RFP process with the board member in question; and
- (c) ensuring the member did not have access to any information about the RFP that was not available to any other bidder.

I recommended the board document the steps taken to ensure these measures were in place.

If any matter regarding the RFP came to the board for a vote, I noted the MCIA requirements listed above (e.g., declaring an interest in the matter, not participating in discussion or vote on the matter, not attempting to influence the vote on the matter, and filing a written statement of interest).

I noted the member, in preparing their proposal, should not use any information they gained or could access in their position as board member that was not available to other, non-board members who submitted proposals.

Finally, as a best practice, I recommended the board carefully document all decisions, scoring and rationale for selecting the winning proposal.

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## ***Municipal Conflict of Interest Act***

In Q1 2023, Members of Council began filing proactive disclosures of their own private interests, as well as the private interests of their parent(s), spouse, or child(ren).<sup>2</sup> Members confirm annually whether any updates are required. In the 2025 reporting year, eleven Members updated their disclosure statements.<sup>3</sup>

Regular review of Members' disclosure statements contributes to thoughtful and productive discussions during my annual check-ins with Members. Those discussions continue during the year as Members reach out to my Office for guidance when potential conflicts arise.

In the 2025 reporting cycle, Members' requests for advice on MCIA matters raised various potential conflict-of-interest scenarios, including upcoming decisions of Council that had the potential to impact the Member's private interest(s). For several such requests, it needed to be determined if the interest was one the Member had in common with electors generally. If that was the case, the following exception to the MCIA requirement to disclose the interest and not take part in vote or discussion of the matter, etc., might apply:

*(j) by reason of the member having a pecuniary interest which is an interest in common with electors generally;*<sup>4</sup>

Due to the complexity and unique elements of these requests, I consulted with external counsel to assist with the determination of whether an exemption applied. Counsel's advice included an analysis of case law related to each scenario, as well as a determination on whether the Member had a pecuniary interest in the matter and if exception 4(j) applied.

According to case law, clause 4(j) applies to instances where a Member's interest in a matter is no greater than that of all other electors affected by the decision. For example, if a Member had a pecuniary interest because their property would be affected by an area's infrastructure renewal project, consideration may be given to whether the Member's interest is any more unique than other electors living in the area affected by the project.

Where exception 4(j) applies, counsel's advice confirmed that despite having a pecuniary interest, the Member was permitted to participate in the matter.

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<sup>2</sup> As part of the 2022-2026 Council Governance Review, Council amended Section 4 (General Integrity) of the Code of Conduct to require Members to file a disclosure statement with the Integrity Commissioner within 60 days of being elected and annually thereafter.

<sup>3</sup> Members' disclosure forms remain confidential and are kept on file with my Office.

<sup>4</sup> *Municipal Conflict of Interest Act* Section 4(j).

Upon receipt of external legal counsel's advice on such MCIA matters, it is my practice to comment, as appropriate, about apparent conflict of interest or other Code of Conduct considerations. I then forward the advice to the Member.

## **Complaints**

As Integrity Commissioner, I am responsible for receiving requests from City Council, a Member of Council, or a member of the public about whether a Member of Council or a member of a local board has failed to observe or uphold the obligations set out in their respective code of conduct.

Each code includes a Complaint Protocol which sets out the process for receiving, investigating, and reporting on complaints. The Complaint Protocol includes two complaint processes: informal and formal.

### **Informal complaints**

Informal complaints are generally managed through a complainant-led process. The process typically begins with the complainant addressing the behaviour that they believe contravenes the Code of Conduct directly with the Member. If appropriate, I may mediate/facilitate a discussion between the two parties. The outcome of the informal complaint process depends entirely on the willingness of both parties to participate in an informal discussion. Not all complaints are suitable for the informal process and not every informal complaint leads to a resolution that is acceptable to both parties.

This year, one informal complaint was addressed through a mediated session.

### **Formal complaints**

As required by the Complaint Protocol, formal complaints must be submitted on the appropriate form, with a signed affidavit, and include information to support the allegation(s) made against a member including dates, locations, other persons present and all other relevant information.

The formal process is not intended to be onerous, but it does involve more than simply sending an email. My Office is available to accommodate individuals who require assistance with any part of the process.

Upon receiving a formal complaint, I conduct a thorough intake analysis to determine if the matter is, on its face, a complaint with respect to non-compliance with the relevant code of conduct, whether the complaint is within my jurisdiction to investigate, and if there are sufficient grounds for an investigation. After careful consideration of these matters, I determine if further investigation is warranted.

During the 2025 reporting cycle, I managed a total of 18 formal complaints, two of which remained under review at the end of the previous reporting cycle (2024). Seven complaints were dismissed at the intake stage because they were either outside my

jurisdiction or did not establish sufficient grounds for an investigation. Three were dismissed after I received a substantive response from the Member and determined there were no grounds for further investigation.

**Appendix 1** summarizes the formal complaints that were dismissed and my reasons for dismissing them. When I dismiss a formal complaint, I provide the complainant with a comprehensive letter clearly setting out the results of my intake analysis, and/or the results of the inquiry process and the rationale for not proceeding with an investigation.

I conducted one investigation into four complaints during the 2025 reporting period. City Council received my report concerning the conduct of Councillor Plante at its meeting of August 27, 2025. Council received the report and issued a reprimand to the Councillor.

Four formal complaints remain in progress at the end of the 2025 reporting cycle.

## **Education and Outreach**

A core element of my mandate is education: for Members of Council, for City staff and for the public.

This year I engaged in periodic discussions with Integrity Commissioner colleagues to share broad observations on best practices, lessons learned, and observations/emerging issues regarding Bill 9, (*Municipal Accountability Act, 2025*).

I also had the opportunity to make presentations to the following stakeholders:

- BIA Board of Management Directors, Executive Directors and staff (December 2024)
- Carleton University Law and Ethics Class (April 3, 2025)
- Advisory Committees (June 2025)
- New Council Member orientation (June 2025)

### **IntegriTalk**

IntegriTalk is a short bulletin for Members of Council that focuses on a particular aspect of the Accountability Framework, reinforces Members' applicable responsibilities and offers practical guidance for upholding their obligations. During the 2025 reporting period I issued bulletins on the following subjects:

- Gifts and Hospitality (December 2024)
- Managing conflict of interest – External Boards (May 2025)
- Representative role at events (August 2025)

## 2025 IN NUMBERS

### Trends

The total number of complaints filed with my Office in the 2025 reporting year jumped to 17 from 12 in the 2024 reporting year. This year's total more closely aligns with 2022 and 2023 totals, in which 17 and 18 complaints were filed, respectively.

This year, the Office also managed a high number (32) of complaint-like enquiries that requested my intervention to address an issue or grievance. Complaint-like enquiries are distinct from complaints in that they are not filed in accordance with the requirements of the Complaint Protocol (e.g., the complainant has not sworn an affidavit, has not clearly set out which sections of the Code of Conduct they allege the Member breached, or has not provided particulars to support allegations). As in the past two reporting years, a common subject of such complaint-like communications continues to be service-related matters involving a Member's office.

In response to complaint-like enquiries, my Office provides information on the two complaint procedures available, and describes the requirements and process for filing a complaint. I cannot act on any alleged breach of the Code of Conduct without (a) receiving a formal complaint; or (b) a complainant indicating their interest in initiating the informal complaint procedure. Not all complaint-like enquiries result in an official complaint.

As noted in the "Advice" section above, a trend that continues from last reporting cycle is Members seeking guidance when faced with disrespectful and/or unreasonable communications from constituents. Under the Public Conduct Policy, I am responsible for providing advice to Members of Council about any action under the Public Conduct Policy as it relates to Members' Code of Conduct responsibilities. As noted in Table 4 – Enquiries by type, my Office received 10 Public Conduct Policy-related enquiries this year. In most of those enquiries, Members are reaching out for advice on steps they could take to mitigate the impacts of disrespectful and/or unreasonable communications before having to invoke restrictions on communication.

The total number of enquiries increased by approximately 17% over the 2024 total, with the most significant category of growth in enquiries from members of the public. This year, enquiries from members of the public comprised approximately 43% of total enquiries received by my Office. As I have mentioned in previous Annual Reports, this demonstrates the public is aware of the Office, and is engaged with matters of ethics and integrity.

## Integrity Commissioner statistics

Table 1 - Total complaints within the Integrity Commissioner's jurisdiction respecting the Code of Conduct

Complaints	
Outstanding from 2024	2
New complaints	17
Formal complaints	16
Informal complaints	1

Table 2 - Outcome of formal complaints managed in 2025

Outcome of formal complaints	
Dismissed at intake	7
Dismissed after preliminary inquiry steps	3
Sustained after investigation	4
Ongoing/under review	4

Table 3: Total enquiries by source (October 1, 2024 to September 30, 2025)

Enquiries by source	
Elected officials	97
City staff	12
Local board members	9
Lobbyists	1
Members of the public	90
Other Integrity Commissioners' offices	1

Table 4: Total enquiries by type (October 1, 2024 to September 30, 2025)

Enquiries by type	
Basic request for information	16
Questions	
Code of Conduct (e.g. gifts/tickets; general Code enquiries) <sup>5</sup>	67
Lobbying	6
Sponsorships and benevolent activities	8
Conflict of interest	13
Public Conduct Policy-related	10
Complaint-like communications	32
Closed meetings	2
Out of jurisdiction	56

<sup>5</sup> In previous reporting years, subtotals for enquiries on “gifts and tickets” and “representing constituent/ward interests” were reported as separate line items in this table. In the 2025 reporting year, my Office captured data on those enquiries as part of the total of Code of Conduct-related enquiries. This change in data collection was made in acknowledgement that gifts/tickets and representing constituent/ward interests are enquiries respecting the Code of Conduct and are not covered by any other Council policy, by-law, or legislation.

# Lobbyist Registrar

## 2025 IN BRIEF

### Interpretations

An important function of my mandate as Lobbyist Registrar is to provide interpretations of the Lobbyist Registry By-law (“the By-law”). I strive to uphold transparency and accountability in lobbying activities by offering clarity on definitions, registration requirements, and compliance obligations. In doing so, lobbyists and public office holders receive reliable guidance on the application and scope of the By-law.

#### Advocacy

A local not-for-profit organization reached out about their activities in relation to a public policy matter to determine whether registration was required.

The activities included a peaceful demonstration outside City Hall and a delegation to a Committee of Council. My Office advised that the By-law did not apply to these activities under Section 4 as follows:

#### **Section 4 (Restriction of Application for Certain Activities)**

This by-law does not apply to the following activity:

(1) communication that is a matter of the public record or occurs during a meeting of Council, a Committee of Council or the Transit Commission.

...

(3) advocacy communication for or against a policy or program that state a position where the primary focus is a broad community benefit or detriment, whether city-wide or local, and where that position would have no direct, indirect or perceived benefit to the business or for-profit organization on whose behalf the communication is undertaken.

#### Not-for-Profits

A City staff member was consulting with a not-for-profit and asked for clarification regarding which communications from the not-for-profit would be captured by the Lobbyist Registry By-law.

My Office explained that if the not-for-profit’s communications were aimed at providing their views to advocate for a general community benefit, those communications would not need to be registered (Section 4(3) of the By-law). However, if the not-for-profit as a

whole or any of its individual members approached City staff to seek funding, then that communication would require registration.

### **Public Engagement Process**

A for-profit corporation asked whether they were required to register comments they had submitted as part of a public engagement process through Engage Ottawa.

I confirmed that comments submitted through Engage Ottawa are considered public records. Accordingly, I advised that the comments were exempt from registration under Section 4 of the Lobbyist Registry By-law as follows:

#### **Section 4 (Restriction of Application for Certain Activities)**

This by-law does not apply to the following activities:

- (1) communication that is a matter of the public record or occurs during a meeting of Council, a Committee of Council or the Transit Commission.
- (2) communication that occurs during a public process such as a public meeting, hearing, consultation, open house or media event held or sponsored by the City or a public office holder or related to an application.
- ...
- (10) communications directly related to those City-initiated consultative meetings and processes where an individual is participating as a stakeholder.

That said, I cautioned the representatives of the company that these exemptions apply strictly to comments submitted through Engage Ottawa. Any communications outside of this process, such as following up with the project manager or a Member of Council regarding the company's position, could constitute lobbying and require registration.

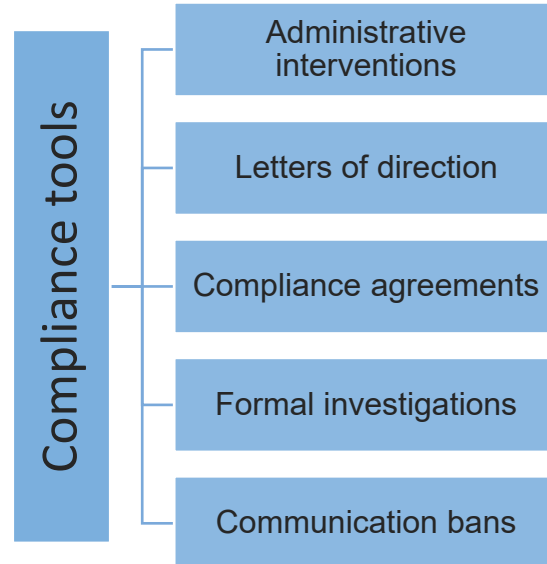
### **Compliance**

The Office of the Lobbyist Registrar operates on the principle that lobbying is legitimate activity that plays an important role in democratic society. Like any other process involving public office holders, lobbying must be done transparently and performed with the highest ethical standards.

To support these principles, the Lobbyist Registry By-law includes an escalating compliance scheme, beginning at one end with education and awareness and escalating to formal investigations and communication bans where necessary.

The Lobbyist Registry By-law Complaint Protocol (Appendix B to the By-law) sets out the investigative process for inquiries into non-compliance with the By-law or the Lobbyists' Code of Conduct.

Anyone wishing to report incidents of non-compliance with the By-law may do so through an automated form on Ottawa.ca.



In the 2024-2025 reporting period, a member of the public contacted my Office to report suspected non-compliance under the Lobbyist Registry By-law. I reviewed the information supplied and determined further investigation was required. At the time of writing this report, the inquiry is complete and work to implement compliance measures is underway and expected to be complete by the end of this calendar year.

## Education and Outreach

As I have noted with respect to other parts of my mandate, education and outreach are key to my role as Lobbyist Registrar. I continually look for opportunities to engage with colleagues and maintain an open dialogue with stakeholders.

### Council on Governmental Ethics Laws (COGEL)

The 2024 Annual COGEL conference was held from December 8-11, 2024, and provided an excellent chance to connect with colleagues both in Canada and internationally. I had the opportunity to learn about best practices and emerging approaches and reflect on their potential application to the City's Accountability Framework.

The conference covered many interesting and important topics. Of particular interest was a focus on lobbying at the local (municipal) level.

In addition to attending several informative sessions, I participated in a panel discussion alongside national and international colleagues including the Federal Commissioner of Lobbying, the Associate Vice-President and Chief Compliance Officer for the University of Connecticut, and the Executive Director, Minnesota Campaign Finance and Public Disclosure Board. The panel discussed education and outreach tools, using limited resources effectively and measuring the effectiveness of an education strategy.

As ethics administrators, creating relationships with the communities we regulate is often integral to the execution of our mandates. To that end, I hosted a morning session on establishing and managing relationships within the regulated community to build trust and meaningful engagement while maintaining objectivity and impartiality.

### **Lobbyist Registrars and Commissioners Network (LRCN)**

The LRCN represents a group of Canadian regulators responsible for enforcing lobbying laws, regulations and policies. The group meets twice annually, providing an opportunity to share best practices on emerging issues regarding lobbying regulation.

A virtual mid-year meeting was hosted by the Office of the Integrity Commissioner of Ontario on February 27, 2025. Members of the group provided updates from their respective jurisdiction, and the group discussed a few topics including lobbying during elections and post-employment provisions.

The annual in-person meeting of the LRCN, hosted by the Office of the Integrity Commissioner of New Brunswick, took place from September 29 – October 1, 2025. Throughout the meeting, lobbying regulators shared updates from their respective jurisdictions and discussed commonalities and lessons learned.

The following topics were discussed:

- Reaching lobbyists who may not currently be aware of their obligations under their respective Acts;
- Cooling-off periods for public officials;
- Recent legal findings; and
- An in-depth exploration of registration thresholds.

Lobbyisme Québec also presented their work exploring the possibilities offered by artificial intelligence to support the organization in achieving its mission and operations.

The LRCN is committed to increasing collaboration on a continuous basis with ongoing work between meetings to develop discussion papers on topics that have impacts across jurisdictions in Canada.

### **Stakeholder briefing session**

A local consulting firm requested a briefing session for its employees who regularly communicate with public office holders on behalf of clients. The session provided staff with an overview of the Lobbyist Registry By-law and their obligations as consultant lobbyists.

Topics covered in the session included: what is and is not lobbying, responsibilities of lobbyists and public office holders under the By-law, what a compliant return looks like, and a review of specific scenarios to assess whether registration would be required.

Targeted briefings provide an opportunity to review how the By-law is applied to real-life scenarios or answer questions that arise while doing business with City Hall. I am pleased to provide education and outreach to all stakeholders upon request.

## **The Year Ahead**

I expect my Lobbyist Registrar mandate to be busier than usual in the coming year. In addition to the anticipated release of a new Lobbyist Registry application, I will focus on education and outreach to lobbyists and Members of Council regarding the Lobbyist Registry By-law as it applies to election-related matters.

### **Rollout of a new Lobbyist Registry application**

The current Lobbyist Registry system was built in 2011. There have been no substantial upgrades to the system in the past ten years. To address issues with the system's functionality and ensure the application meets required web standards, a new Lobbyist Registry application is in development. The project is on track for its anticipated release in the spring/summer (Q2/Q3) of 2026.

Planning for the rollout is already underway. I will communicate early and often with all stakeholders to ensure a successful transition to the new application.

### **Political Activities**

2026 is a municipal election year and lobbyists, like other members of the public, may engage in political activities to support a candidate's campaign.

However, as discussed in the interpretation bulletin respecting [Political Activities and Conflicts of Interest](#), a lobbyist's engagement in such activities has the potential to create a sense of obligation on the part of a candidate towards the lobbyist.

The risk of creating a sense of obligation increases with the strategic importance of the political activities, as well as proximity between the lobbyist and candidate.

Some political activities that carry a higher risk of creating such a sense of obligation to include:

- Serving as campaign chair, treasurer or fundraising manager for a campaign
- Organizing political fundraising events or soliciting donations for a campaign
- Acting as a designated spokesperson for a candidate

Activities that carry a lower risk of creating a sense of obligation include:

- Volunteering, canvassing or scrutineering without significant interaction with a candidate
- Donating to a political campaign

- Placing a candidate’s sign on one’s lawn

Anyone with questions about their election-related activities is encouraged to reach out for specific guidance at [lobbyist@ottawa.ca](mailto:lobbyist@ottawa.ca).

### Post-employment restrictions

Next year will be the first time the Lobbyist Registry By-law’s post-employment restrictions will be in place at the end of a term of Council. As named public office holders under the By-law, departing Members of Council are prohibited from lobbying the City for a period of one year. This rule also applies to any Member’s staff who leave employment with the City.

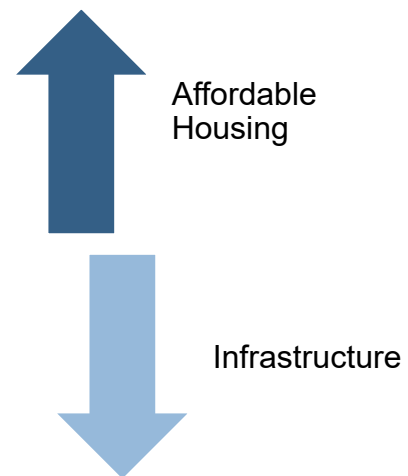
The post-employment restrictions aim to mitigate the risk of conflicts of interest between former colleagues. The restrictions do not prohibit former named public office holders from seeking employment including with businesses and organizations that do business with the City and/or lobby other levels of government. It only prohibits them, for one year, from lobbying City officials.

## 2025 IN NUMBERS

### Trends

This past year, there was a decline in new lobbyists (decrease of 16%) as well as lobbying files (decrease of 6%) and lobbying activities (decrease of 13%). That said, this year’s statistics are in line with year-to-year fluctuations I have observed over the past five years (aside from a slight dip in 2022 likely due to the municipal election).

In my 2024 Annual Report, I noted a dramatic shift in the top three most popular subject matters which switched from affordable housing, planning/development and water the previous year to transportation, garbage/recycling and infrastructure. This year, the top three subject matters have shifted back with affordable housing, planning/development and water rising back to the top of the list. In fact, affordable housing lobbying files more than doubled over last year. This reversal aligns with the City’s ongoing work this past year towards accelerating development and increasing available affordable housing.



Infrastructure remained on the list of the top 10 subject matters, but the number of lobbying files dropped by almost half this past year. While Construction and Information Technology both dropped off the top 10 list, they only did so by less than a handful of lobbying files.

The number of enquiries to the Office this past year increased. The majority of enquiries involved resolving technical issues or making changes to profiles. It has been over a decade since the Lobbyist Registry application was first created and the system's functionality has begun to decline. I believe that the new application will serve all stakeholders better.

## Lobbyist Registry statistics

Table 5: Total number of enquiries

Enquiries	
Technical support	47
Questions and advice	28
Interventions	51

Table 6: Total number of new lobbyists

New lobbyists	
Total new lobbyists	181
In-house	95
Consultant	82
Voluntary	4

Figure 1: Total lobbying activity by month, 2024-2025

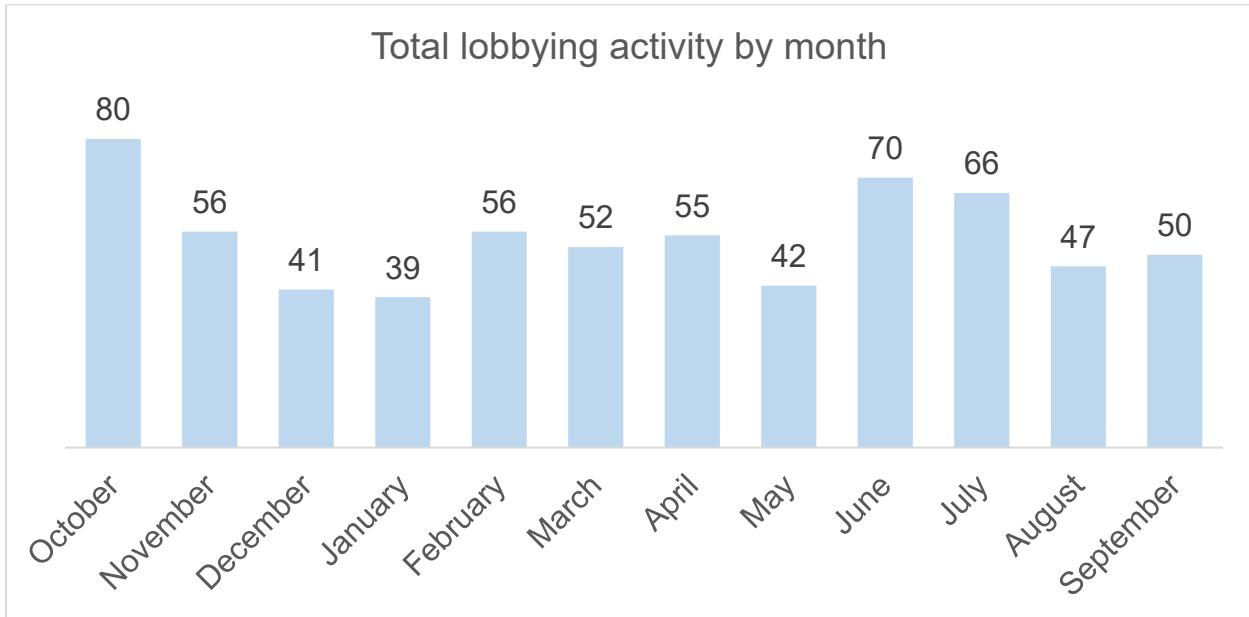


Table 7 - Top ten registered subject matters

Top ten registered subject matters	Files
1. Planning and development	31
2. Affordable housing	23
3. Water and sewer	18
4. Transportation	16
5. Environment	12
6. Infrastructure	12
7. Garbage and recycling	11
8. Health and safety	11
9. Procurement	9
10. Economic development	9

# Meetings Investigator

## 2025 IN BRIEF

### Compliance

The *Municipal Act, 2001* requires that all meetings of City Council, its committees and local boards be open to the public, except as permitted by specific discretionary and mandatory exceptions.

The exceptions permit closed meetings of City Council, a local board or committee of either, to discuss a number of matters including, but not limited to: labour relations or employee negotiations, litigation or potential litigation affecting the municipality or local board, advice that is subject to solicitor-client privilege, and personal matters about an identifiable individual.

Anyone who feels that a meeting or part of a meeting of City Council, a local board, or a committee of either was closed to the public for the wrong reason, or that other rules for closed meetings were not upheld, may submit a request for investigation to my Office. There is no fee for submitting a request.

In my capacity as Meetings Investigator, I receive such requests and investigate as required. At the end of an investigation, I submit my findings and recommendations in a public report to City Council or the local board.

When a violation of the open meeting rules has been reported, City Council (or the local board) is required to pass a resolution stating how it intends to address the report.

During the 2025 reporting cycle, my Office received no formal requests to investigate closed meetings. However, I would like to note one enquiry from a resident that I think helps to highlight common misunderstandings around the open meeting requirements of the *Municipal Act*.

The resident in question was concerned by news of an exchange between Members. It was their understanding, based on public comments, that one Member had committed to another in private to vote a certain way on an issue. They expressed concern about important public business happening out of public view.

In my response, I noted that it is not unusual or inappropriate for Members of Council to have advance discussions of reports and/or motions coming to committee or Council, provided they do not do so as a gathering of a quorum of Members *and* in a manner that materially advances the business of the committee or Council. It is only if both of these conditions are met (and none of the *Municipal Act's* open meeting exceptions apply), that the scenario would be considered an improperly closed meeting.

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*“While a culture of silence outside of council chambers is unrealistic of democratic governance in municipalities, the desire to proactively engage outside of council chambers with important municipal projects does not negate the public’s expectation of open governance.”*

-Paul Dubé, Ombudsman of Ontario

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The risk of an inadvertent closed meeting is especially high in informal settings such as coffee or lunch meetings, as principles of open and transparent government may not be as top of mind. If the conversation veers into work topics, Members risk materially advancing business in settings where it is not permitted. In some cases — for example, training sessions — Members may consider mitigating the closed meeting risk by opening the event proactively. They can do this by publishing notice and inviting the media to attend.

All that said, where there is no quorum, Members are permitted to discuss business in private — including voting intentions — without running afoul of the *Municipal Act*.

### **Advance notice of *in-camera* items**

During the Integrity Commissioner’s 2014-2015 reporting cycle, the Office of the City Clerk initiated a practice of notifying the Meetings Investigator in advance of the public notice of any Council or committee meeting where it was expected that matters would be considered *in camera*. The practice provided the Meetings Investigator with the opportunity to review the appropriateness of the planned closed session before the Clerk’s Office issued public notice as part of the meeting agenda.

In December 2020, as part of the 2018-2022 Mid-term Governance Review, City Council endorsed the informal practice as a formal protocol of the Office of the City Clerk through an amendment to the Council Procedure By-law. Since that time, staff of the Office of the City Clerk and the Meetings Investigator have upheld this protocol.

This past year, I received notice of 31 items to be discussed *in camera*. However, three of these were ultimately handled in open forum, with Council moving directly to a vote in each case. The first was to approve a sustainable energy project. In the other two

cases, Council voted to approve appointments of a Medical Officer of Health and Associate Medical Officer of Health, and to transmit recommendations for the approval of those appointments to the Minister of Health and Long-Term Care. I note that in voting openly, Council was exercising its discretion, as the *Municipal Act* does permit closed votes on matters covered under its open meeting exceptions.

I appreciate Council's ongoing commitment to transparency whenever possible. Even though the *Municipal Act* lists 14 exceptions to the rule of open meetings, this does not mean going *in camera* is *required* in every case. Discretion is permitted in all but two of those 14 instances (those two being requests under the *Municipal Freedom of Information and Protection of Privacy Act*, and ongoing investigations by the Ontario Ombudsman or the municipality's closed meeting investigator or local ombudsman). In [Open Meetings – Guide for Municipalities](#), the Ontario Ombudsman advises that “whenever possible, municipalities should opt to discuss these subjects in public, in the interest of transparency.”

Ottawa's Council Procedure By-law is infused with that same spirit of openness. In fact, I encourage local boards to adopt requirements similar to those in the By-law, as these boards are also bound by the open meeting requirements of the *Municipal Act*. Updates to procedures could include:

- making reference to the specific issue to be considered *in camera* in the resolution to close a meeting;
- practicing “rise and report” after closed sessions, where the Chair states all matters that were considered, and confirms that no motions were carried *in camera* other than procedural motions;
- making reports considered in closed session accessible to the public upon the passing of a certain reporting out date (or if not making the report accessible, providing the legal basis for that decision).

## 2025 IN NUMBERS

### Closed Meeting statistics

From October 1, 2024 to September 30, 2025, Council and its Committees went into closed session 18 times to consider 28 matters. This is up from 12 matters discussed *in camera* in the previous reporting cycle.

10 of the 28 *in camera* matters were related to light rail (primarily legal updates) while five pertained to cybersecurity (update, audit or investigation). More than half of the rest were issues involving labour relations or employee negotiations.

Appendix 2 provides details of the body holding the closed meeting, date, reason for resolving *in camera* and open meeting exception(s) cited.

Table 8: Closed sessions of Council and Committees

<b>Closed sessions of Council and Committees</b>	
Council	14
Standing Committee	
Audit Committee	1
Finance and Corporate Services Committee	3

# Conclusion

Over the past year, the Office maintained a consistent workload, continuing to manage a high volume of enquiries and complaints. Notable progress was also made in advancing the development of a new Lobbyist Registry application.

Looking ahead, I intend to place a strong emphasis on education and training. I will seek opportunities to further support Members of Council, members of local boards, and lobbyists in fulfilling their ethical responsibilities, particularly in the context of the upcoming 2026 municipal election. Additionally, my Office will dedicate significant effort to the implementation and rollout of the new Lobbyist Registry application.

# Financial Statement

The Integrity Commissioner’s Office is funded through the Office of the City Clerk. As of September 1, 2021, the Integrity Commissioner’s remuneration consists of a \$25,000 annual retainer and a per diem of \$250 per hour to a daily maximum of \$1,250.

As outlined in this report, I fulfill three statutory roles: Integrity Commissioner, Lobbyist Registrar and Meetings Investigator. My annual report provides insight on the application of the codes of conduct, the *Municipal Conflict of Interest Act*, the Lobbyist Registry By-law and the open meeting rules. It also serves as a detailed overview of the activities and work performed by the Office of the Integrity Commissioner.

The following is a breakdown for the period of October 1, 2024 to September 30, 2025.

Table 9 - Financial Statement October 1, 2024 to September 30, 2025

	Q4 2024	Q1 2025	Q2 2025	Q3 2025	TOTAL
<b>Retainer</b>				\$25,440	\$25,440
<b>Salary *</b>	\$40,068	\$37,651	\$29,510	\$31,291	\$138,520
<b>Ancillary Costs</b>	\$3,632	\$3,535	\$733	\$2,306	\$10,206
<b>External Services</b>	\$17,834	\$2,976	\$16,016	\$22,029	\$58,855
<b>Hours Logged</b>	157.5	148	116	123	544.5 <sup>6</sup>

\*includes tax less eligible municipal rebates

<sup>6</sup> During the preparation of this report, an error was discovered in the financial breakdown provided in my 2024 Annual Report. Specifically, the total hours logged in Q2 2024 should read 96 and not 126.5.

# Appendix 1

During the 2025 reporting cycle, a total of ten formal complaints were dismissed. Seven were dismissed at the intake stage and three after preliminary inquiry steps were taken. The following summaries detail my reasons for dismissing each formal complaint.

## Conflict of interest and improper use of influence

**A resident alleged that a Member of Council's comments during discussion of an item at a Committee meeting indicated the Member's personal connection to the item, and showed preferential treatment toward individuals involved with the item.**

The formal complaint alleged that the Member's relationship to the item, indicated by the Member's comments during debate on the matter, gave rise to a conflict of interest. After conducting a thorough intake analysis of the formal complaint, I determined there was no evidence to indicate that the Member had a financial interest in any aspect of the matter. Accordingly, there was an insufficient basis for an alleged breach of the *Municipal Conflict of Interest Act (MCIA)*.

With respect to non-financial, apparent conflict of interest, as active and engaged members of their communities, it is reasonable Members will have connections with matters that come before them for a vote. In some cases, Members rise on a point of personal privilege to describe the nature of a personal, but non-financial, relationship with an Agenda item. The aim of making such a public statement is to be transparent about their relationship with the matter. In the situation in question, I determined that by commenting in the public meeting about their connection to the item, the Member achieved that valuable transparency.

Finally, after a careful review of the information provided in the formal complaint and the publicly-accessible video of the Council meeting, I found the Member's comments on the matter to be in line with normal and appropriate commentary. There was no basis to proceed with an investigation into alleged improper use of influence or preferential treatment toward individuals involved with the matter.

## Conduct of members of an arm's length board

**A complainant alleged the actions of several members of the board, past and present, resulted in specific negative outcomes for user's of the board's services and eroded public trust.**

The complaint named former Members of Council; however, my jurisdiction only extends to sitting Members of Council and members of local boards. It is not within my jurisdiction to investigate allegations related to former Members.

I further determined the board in question was not a local board of the City. As the Code of Conduct for Members of Local Boards did not apply, the alleged conduct of its members was not within my area of oversight.

Finally, the complaint contained allegations regarding the conduct of sitting Members of Council who occupied positions on the board. After careful consideration, I determined there were insufficient grounds to proceed with a formal investigation into the alleged misconduct.

#### Conflict of interest and breach of trust

**A complaint set out several allegations, including a Member of Council's alleged:**

- (i) Conflict of interest under the "General Integrity" provisions of the Code of Conduct; and**
- (ii) Improper use of influence by not intervening in an associated enforcement matter in their capacity as Director on an external board.**

The complaint described that the Member retained professional services from an individual who was also retained by individuals involved with an item before Council for a vote. The complaint alleged that situation gave rise to a conflict of interest for the Member.

There was no evidence provided with the submission that the Member stood to sustain a negative or positive financial impact due to allegedly retaining the same individual to provide professional services. Further, there was insufficient information to indicate that, due to the alleged situation, the Member was unable to perform duties impartially. Therefore, there was no indication of a conflict of interest under the *Municipal Conflict of Interest Act* (MCIA), or of an apparent conflict of interest under the Code of Conduct.

With respect to the allegation of improper use of influence while serving on an external board, I conveyed my position that a Member's conduct and actions in their capacity as a member of an external board may be subject to the Code of Conduct for Members of Council, particularly where the Member is fulfilling a Council appointment. In this case, however, I determined there was no basis to pursue the allegation. As a Director on the external board, the Member had no responsibility to intervene in enforcement of the external board's administrative by-laws. In fact, it could be an improper use of the Member's position and influence if they had tried to intervene and influence the decisions/actions of the external board's staff.

### Lack of engagement with resident on policy matters

**A resident raised several concerns about their Member of Council, including that the Member refused to discuss the resident's concerns, and failed to declare a conflict of interest on a Council vote.**

In support of the allegation that the Member refused to engage with the complainant on specific concerns, the complainant provided copies of email communication with the Member. On a review of the documentation, I found that, while the Member's responses may not have been to the complainant's satisfaction, the Member was responsive in that they set out their position on the matter in response to the resident's concerns.

Members of Council have a broad duty to engage with their constituents, and a Member's failure to uphold that duty could constitute a breach of Section 4 (General Integrity) of the Code of Conduct. However, the Code does not govern the day-to-day management of Members' offices. It does not prescribe specific requirements for Member's engagement with constituents on policy matters, and it does not require Members to grant constituents' specific requests. Members are responsible for determining how to reasonably allocate their capacity to accommodate requests from constituents.

The complaint also alleged the Member failed to declare a conflict of interest resulting from their work on a board, and, during a Council vote, failed to abstain from voting on an item regarding that body.

In general, an indirect conflict of interest may arise as a result of a Member's commitment to an external board. There could be a conflict of interest between the Member's duty to do what is in the best interest of the board, and their duty to do what is in the best interest of their Ward/the City. In this case, however, Council had appointed the Member to serve on the board. As a result, the Member's position on the body does not inherently create a tension between official duties as a Member of Council and responsibilities to the body. Rather, membership on the body is part of that Member's duty as a Member of City Council. Accordingly, there was no basis for an allegation of conflict of interest.

### Improper influence of members of a quasi-judicial body

**A complainant alleged a Member of Council improperly influenced a quasi-judicial body through sustained activism and affiliation with an advocacy organization. While the Member was not physically present at any hearings of the quasi-judicial body, the Member's public statements on the broad matter allegedly created political pressure that influenced members of the quasi-judicial body to adopt similar positions to that of the Member.**

As noted in the [Ontario Municipal Councillor's Guide](#), the role of a Councillor includes three main functions: representative, policy-maker, and steward. As part of their policy-maker role, it is understood and expected that Councillors will hold positions on important policy matters.

Section 8 of the Code of Conduct requires that Members of Council do not improperly use the influence of their office to the advantage of themselves, their family, friends, or others. A stated position on a broad policy matter is not an improper use of a Member's position. Accordingly, there were no grounds to pursue the allegation further.

The complaint further alleged the Member received political benefit from the organization, including activist support and ideological alignment, which created a conflict of interest in policy matters on the broad subject.

Section 13 of the Code of Conduct prohibits the acceptance of a gift or benefit that would "appear to be in gratitude for influence, to induce influence or otherwise go beyond the necessary and appropriate public functions" of a Member. The alleged benefits described by the complainant are subjective and unquantifiable. It is not a breach of the Code for a Member to hold a position on a policy matter and have others support or advance that position. As there was no evidence the Member received an improper benefit, there were no grounds to pursue the allegation.

#### Conflict of interest/improper use of influence attributed to a professional or personal connection

**A complaint described that an individual who had worked on a Member's election campaign was now allegedly affiliated with an item before Council for a vote. The complaint alleged the situation created a conflict of interest for the Member.**

The complaint engaged several sections of the Code, including Section 5 (General Integrity) and Section 8 (Improper Use of Influence).

The *Municipal Conflict of Interest Act* (MCIA) applies to a pecuniary (financial) interest of the Member, the Member's spouse, children, or organizations/ corporations the Member is affiliated with (as a shareholder, employee, board member, etc.). The complaint did not indicate any particular connection between the Member and the individual that would engage the MCIA.

In general, as active and engaged members of their communities, it is reasonable to expect that Members of Council may have professional and/or personal connections to individuals and places affected by matters on which they are called to vote.

In order for the Member's actions to amount to a Code contravention, it would need to be established that the Member used the influence of their Office to benefit the individual out of a sense of personal obligation or a reward for support during the election campaign. The complaint did not provide any evidence that the Member took

any particular action in respect of the matter for the individual's benefit. The fact that the Member had a connection to the individual from election campaign work, and the individual was tangentially affiliated with a matter before Council did not provide sufficient grounds to warrant investigation.

Members of Council have a responsibility to represent their constituents by engaging in debate and voting on matters. A Member should only refrain from performing this duty if they have a pecuniary interest under the MCI, or a non-pecuniary interest under the Code which would make it impossible for the Member to be unbiased. As the complaint did not provide evidence of either, there were insufficient grounds to proceed with further investigation into the alleged misconduct.

#### Involvement in alleged unsafe action

#### **A complaint described that Members of Council contravened the Code of Conduct by participating in an allegedly unsafe action.**

The complaint relied on a document in the public domain as evidence of the alleged action. Around the time the complaint was filed, one of the Members publicly provided additional explanation and context relevant to the alleged action.

I acknowledged the complainant's concerns with the Members' actions. However, I was satisfied that the Member's public statements about the matter mitigated those concerns and provided a reasonable explanation for the action. As such, there were insufficient grounds for proceeding with an investigation into the matter.

#### Benefit from an organization associated with active lobbying files

#### **A resident alleged a Member of Council:**

- (i) Had a conflict of interest in relation to specific organizations' involvement in producing material the Member used in outreach resources; and**
- (ii) Received a benefit from an organization associated with active lobbying files, and therefore contravened Section 12 (Conduct Respecting Lobbying) of the Code of Conduct.**

After careful review of all relevant materials, I determined there were insufficient grounds to proceed with an investigation into the allegation regarding conflict of interest. However, I determined the allegation regarding the alleged benefit required further examination. Pursuant to Section 9 (Investigation) of the Complaint Protocol, I supplied the respondent with the complaint and supporting material and provided the respondent the opportunity to respond to the allegations.

The respondent indicated the material was in the public domain. Accordingly, as the material was freely accessible for public consumption, I determined that the material did not constitute a benefit to the Member, and therefore the prohibition on accepting

benefits from lobbyists with active files did not apply. I terminated the inquiry and advised the parties of such.

#### Spreading false information and releasing confidential information

#### **A complainant alleged more than one Member of Council breached the Code of Conduct by spreading false information and releasing confidential details related to an anticipated City project.**

After a careful review of the evidence provided with the formal complaint, I determined there were sufficient grounds to initiate an inquiry respecting both allegations.

Accordingly, pursuant to Section 9 (Investigation) of the Complaint Protocol, I initiated an inquiry, and provided the complaint to the respondent Members of Council with the request that they respond to the allegations.

Upon receipt and review of the respondents' responses, I exercised my discretion under Section 9 of the Complaint Protocol to provide a copy of the responses to the complainant with a request for the complainant's written reply.

I conducted a comprehensive analysis of the complaint, publicly available information, the respondents' responses to the formal complaint, and the complainant's ultimate reply to those responses. Ultimately, I determined the information available to me did not support the allegation that the respondents spread false information, or that the information that the complainant alleged the respondents released had been identified as confidential. With insufficient grounds to proceed with an investigation, I terminated the inquiry into the members and the file was closed.

#### Inappropriate use of influence

#### **The formal complaint alleged a member of the Board of Directors of a local board breached the Code of Conduct for Members of Local Boards through attempts to use the influence of their position to act against a Council-endorsed decision, including by directing local board staff to act in opposition to that decision. The complaint further alleged the member was in possession of confidential information and failed to treat it with proper care.**

After undertaking a comprehensive intake analysis of the formal complaint and supporting documentation, I determined there were sufficient grounds to initiate an inquiry. Pursuant to Section 9 (Investigation) of the Complaint Protocol, I supplied the respondent with the complaint and supporting material and provided the respondent the opportunity to respond to the allegations.

The respondent's reply indicated they participated in discussions on the subject with key decision-makers, but did not lead and influence strategy discussions. The information further indicated the member did not attempt to influence the decisions of others to further their own personal interests. Further, the response made clear there was

insufficient evidence to support any allegation the member directed staff of the local board to undertake work in opposition to a Council-endorsed decision. With respect to the allegation the member possessed confidential information and failed to properly manage it, I determined that at the time period, the specific information appeared to be in the public domain. Accordingly, there was insufficient evidence to support the allegation.

After a comprehensive analysis of the formal complaint and the respondent's response, I determined there were insufficient grounds to proceed or that it served no useful purpose to continue with an investigation into the matter. I terminated the inquiry and closed the file.

# Appendix 2

From October 1, 2024 to September 30, 2025, Council and its Committees went into closed session 18 times to consider 28 matters. The body holding the closed meeting, date, reason for resolving *in camera* and open meeting exception(s) cited were as follows:

## **Audit Committee**

*September 12, 2025:*

Office of the Auditor General (OAG) – Follow-Up Report: Cybersecurity Investigation

Office of the Auditor General (OAG) – Follow-Up Report: Audit of Cybersecurity

- Security of the property of the City

## **Finance and Corporate Services Committee**

*November 6, 2024:* Cybersecurity Update Q4

*May 6, 2025:* Cybersecurity Update Q2

*September 2, 2025:* Cybersecurity Update Q3

- Security of the property of the City

## **City Council**

*October 16, 2024:*

Stage 1 Light Rail Transit (LRT) – Legal Update

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

Bilingualism Policy – Exception for a Position in the City of Ottawa’s Senior Leadership Team

- Personal matters about an identifiable individual, including staff
- Labour relations or employee negotiations

*December 11, 2024: Stage 1 Light Rail Transit (LRT) – Legal Update*

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

*February 12, 2025:*

Strategic Collective Bargaining/Mandate for Negotiations

- Labour relations and employee negotiations
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

Light Rail Transit (LRT) Legal Updates

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

Corporate Security Update

- Security of the property of the City

*March 26, 2025: Stage 1 Light Rail Transit (LRT) Legal Updates and Related Remedial Matters*

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

*April 2, 2025: Stage 1 Light Rail Transit (LRT) Legal Updates and Related Remedial Measures*

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

*April 16, 2025: Strategic Collective Bargaining – Ottawa Professional Fire Fighters Association (OPFFA) – Ratification of Tentative Agreement*

- Labour relations and employee negotiations
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

*April 30, 2025:*

Potential Property Acquisition – Negotiations

- A proposed or pending acquisition or disposition of land for the purposes of the City
- A position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality

Bilingualism Policy Exception for a Position in the City of Ottawa's Extended Senior Leadership Team

- Personal matters about an identifiable individual, including staff
- Labour relations or employee negotiations

*May 14, 2025:*

Stage 1 Light Rail Transit (LRT) Legal Updates

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

Legal Update – Ontario Land Tribunal – Planning Act and Municipal Act fees for Urban Settlement Areas Expansion

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

*June 11, 2025:*

Stage 1 Light Rail Transit (LRT) Legal Updates

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

Potential Property Acquisition – Negotiations – Update

- A proposed or pending acquisition or disposition of land for the purposes of the City;
- A position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality

*June 25, 2025: Stage 1 Light Rail Transit (LRT) Legal Updates*

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

*July 23, 2025:*

Light Rail Transit (LRT) Legal Updates and Related Remedial Matters

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

Collective Bargaining – Updates

- Labour relations and employee negotiations
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

Potential Property Acquisition – Negotiations – Update

- A proposed or pending acquisition or disposition of land for the purposes of the City
- A position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality

*August 27, 2025: Stage 1 Light Rail Transit (LRT) Legal Updates*

- Litigation or potential litigation affecting the City
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

*September 10, 2025: Potential Property Acquisition – Update*

- A proposed or pending acquisition or disposition of land for the purposes of the City
- A position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality

*September 24, 2025*

Strategic Collective Bargaining – The Ottawa-Carleton Public Employees’  
Union Local 503 – Aquatics and PTRC – Ratification of Tentative Agreements

Strategic Collective Bargaining – Amalgamated Transit Union 279 –  
Ratification of Tentative Agreement

- Labour relations and employee negotiations
- Receiving of advice that is subject to solicitor-client privilege, including communications necessary for that purpose

City Council and its Committees are not required to go *in camera* every time an exception applies. During the current reporting period, there were three instances where an *in-camera* item was listed on the agenda, but the item was approved without moving into closed session:

**City Council**

*January 29, 2025:* Wastewater Energy Transfer (WET) Pilot Project – 665 Albert Street

*July 23, 2025:* Appointment of a Medical Officer of Health

*September 24, 2025:* Appointment of Associate Medical Officer of Health