



OFFICE OF THE
INTEGRITY COMMISSIONER'S

TERM REPORT

2022 – 2026



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MESSAGE FROM THE INTEGRITY COMMISSIONER



Suzanne Craig, Integrity Commissioner and
Lobbyist Registrar

I am pleased to present this Term Report of the Office of the Integrity Commissioner and Lobbyist Registrar for the City of Vaughan, covering the period from the swearing-in of Council in November 2022 to September 2026.

This report covers the Office's activities, achievements, significant investigations, decisions and workflow modernization. Having had the benefit of reviewing how the enhanced powers of the Integrity Commissioner with respect to allegations of conflicts under the Municipal Conflict of Interest Act (the "MCIA") have operated, I believe that the enhanced jurisdiction of the Integrity Commissioner has facilitated access to accountability mechanisms for the public and serves to enhance and promote a culture of responsible decision-making by Members of Council and Local Boards over this reporting period. This Office has investigated one complaint under the MCIA; however, no applications to court have been made to have a judge decide if a Member breached the conflict of interest rules. After the published reasons explaining why I decided not to refer the matter to the court, the complainant still had the opportunity, within six weeks of the decision, to make an application to the court. Throughout this reporting period, my Office received several significant Code complaints that required thoughtful consideration of the application of the rules of the Code of Ethical Conduct for Members of Council and Local Boards (the "Code") to conduct that was perceived as simply carrying out the representative role of an elected official. Several judicial review decisions of various integrity commissioner findings have created a body of jurisprudence that remains unresolved regarding the boundaries of a Member of Council's political speech abutting against the rules of the Code of Conduct.

In addition to the receipt of formal and informal complaints under the Code, this Office receives informal inquiries that relate to areas that go beyond the mandate of the Office. In such situations, I advised individuals that my jurisdiction does not extend to matters relating to Council decisions

regarding City-wide issues or complaints about operations, enforcement or the administration of the City, given the statutory limitations imposed on the Integrity Commissioner by the Municipal Act.

A number of inquiries received about the Code regime and investigation process, as well as the jurisdiction of this Office, suggests that there still remains a lack of understanding of what the Integrity Commissioner does, or that the Office has been viewed as a last resort when seeking to address issues. Matters brought to this Office regarding City policies, except where incorporated under the Code, as well as performance of staff and decisions of Council, generally are not within the jurisdiction of the Integrity Commissioner. I have received several formal complaints which I have determined were not within my jurisdiction. Upon review of the information provided to me, I have made a preliminary classification decision that the complaints related to matters respecting the alleged actions, decisions, or omissions of administration relating to a matter properly investigated by staff. In addition, I determined that some matters were more appropriately pursued through City human resources or other policies or by initiating a proceeding before the courts.

As I have stated in previous periodic reports, municipal accountability officers function as arm's-length independent statutory officers who do not have jurisdiction over staff concerns. Notwithstanding this Office operating at arm's length from City staff and operations, it has been the case that during the course of conducting the business of this Office, I have had to interact with staff to obtain information, seek clarification about policies or speak about matters subject of a Code or MCIA complaint. At these times, it has been my experience that City staff have respected my statutory independence and I am profoundly grateful to those who have assisted me in the fulfillment of this important mandate. Once again, I acknowledge the senior leadership within the City, whose professional expertise and collaboration has been instrumental in

assisting me in ensuring that the evolving interpretation of the Code rules is reflected in and aligned with City policy rules.

It remains my responsibility to fulfil the duties of my mandate with fairness, clarity and independence. This Office remains committed to receiving and addressing not only complaints under the Code and MCIA but also concerns from the public and staff about the processes under the Code and the Lobbying By-law, so that accountability is brought to life through clarity and understanding.

During the 2022–2026 term, this Office received 9 formal complaints and 15 informal complaints under the Code. Two of the formal complaints requested a review of allegations under the MCIA. Only one of these continued to investigation and concluded in a decision not to make an application to the court to determine that the Member had contravened the MCIA. As required under the MCIA, the reasons for that decision were published on the Office webpage. I responded to 42 requests for advice from Members of Council and Local Boards, as well as 203 general ethics-related inquiries from the public and staff.

My thanks go to City staff who have cooperated with this Office, with special recognition to the staff of the Office of Transformation and Strategy who assisted in the Workflow Process Mapping and Review Project and the Project Management Team headed by Luigi Franzoi and Andrew Colacci who assisted with the Lobbyist Registry Updating Project. A warm thank you to Ms. Cathy Passafiume, who has provided this Office with professional support as Executive Assistant to the Integrity Commissioner and Lobbyist Registrar.



ABOUT THIS OFFICE

The Office of the Integrity Commissioner and Lobbyist Registrar (“OICLR”) is an independent office that reports directly to Council. The Office has two divisions, the Office of the Integrity Commissioner and the Office of the Lobbyist Registrar, both of which are supported by one Executive Assistant.

OFFICE OF THE INTEGRITY COMMISSIONER

Subsection 223.6(1) of the Municipal Act, 2001 states: “[i]f the Commissioner provides a periodic report to the municipality on his or her activities, the Commissioner may summarize advice he or she has given but shall not disclose confidential information that could identify a person concerned.”

Consistent with that section, this Report has summarized advice provided by the Integrity Commissioner during this term of Council, but does not disclose confidential information that could identify any person concerned. Examples of advice and issues of note are summarized in a generalized and anonymized manner.

The Integrity Commissioner is responsible for providing policy advice, complaint resolution and education to Members of Council and Local Boards on issues of ethics and integrity under the Code, and for the application of the MCIA in respect of the conduct of Members, including receiving complaints alleging contraventions of sections 5, 5.1 and 5.2 of the MCIA and, where appropriate, applying to a judge for a determination.

OFFICE OF THE LOBBYIST REGISTRAR

The Vaughan Lobbyist Registrar (VLR) oversees the City’s mandatory Lobbyist Registry, in force since January 2018, which allows the public to see who is communicating with public office holders about governmental decisions, and administers and enforces the Lobbying By-law (By-law 165-2017, as amended) and the Lobbyist Code of Conduct.

As an independent officer of the City of Vaughan, the VLR reports directly to City Council. Its legislative mandate includes ensuring public disclosure of lobbying activities and enforcing adherence to the Lobbyists’ Code of Conduct. This disclosure requirement guarantees transparency in lobbying activities within the City. The Lobbyist Code of Conduct establishes high ethical standards for lobbyists in their communications with Vaughan Public Office Holders.

ACTIVITIES OF THE OFFICE OF THE INTEGRITY COMMISSIONER & LOBBYIST REGISTRAR

2022–2026

9

Formal Complaints

15

Informal Complaints

3

Other Matters

2 formal complaints were made under the MCIA; 1 proceeded to investigation — decision not to apply to the court; reasons published. 3 investigation reports to Council (2024), sustained. Judicial review (March 2026): Divisional Court upheld the Office's process, findings and impartiality.

ADVICE & INQUIRIES

42

Requests for advice from Members

203

General ethics inquiries from public & staff

Members' advice: 17 Code · 25 MCIA

Public 106 · Staff 41 · Redirected (non-jurisdictional) 56

During the 2022–2026 term, this Office received 9 formal complaints and 15 informal complaints under the Code. Two of the formal complaints were made under the MCIA, with one complaint going to investigation. This investigation concluded in a decision not to make an application to the court to determine that the Member had contravened the MCIA. As required under the MCIA, the reasons for that decision were published on the Office webpage. This Office responded to 42 requests for advice from Members of Council and Local Boards, as well as 203 general ethics-related inquiries from the public and staff.

Methodology note: complaints “received” are counted by the date the matter was opened; complaints “disposed of” are counted by the date the matter was closed; one matter may therefore appear as received in one year and disposed of in another year.

COMPLAINTS RECEIVED BY YEAR

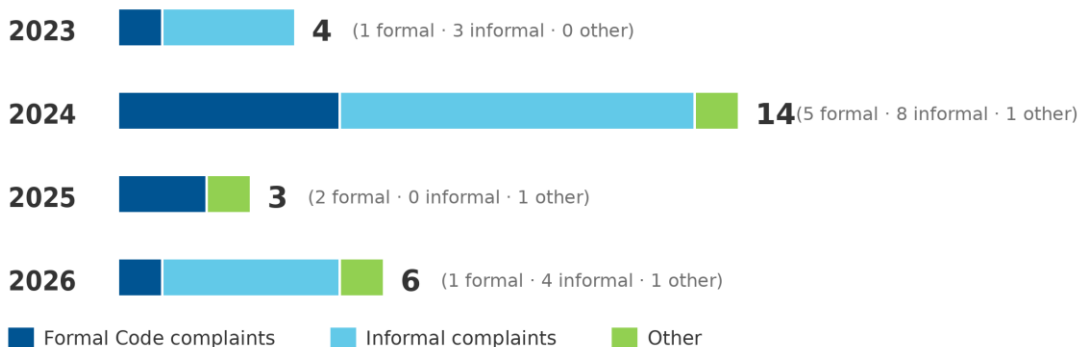


TABLE A — COMPLAINTS RECEIVED, BY YEAR

	2023	2024	2025	2026 (to date)	Total
Formal Code complaints	1	5	2 ¹	1	9
Informal complaints	3	8	0	4	15
Other	—	1	1	1	3
Total	4	14	3	6	27

¹ MCIA complaints.

TABLE B — DISPOSITION OF COMPLAINTS, BY YEAR

	2023	2024	2025	2026 (to date)
Preliminary review / dismissed	1	1	0	6
Resolved informally / mediated	3	9	0	0
Withdrawn / terminated	0	0	0	0
Investigation completed — sustained	0	3	0	0
Investigation completed — not sustained	0	0	2 ²	0
MCIA — no application to court	0	1	1	0
Total	4	14	3	6

² 1 complaint; 1 other matter as services as assigned.

TABLE C — ADVICE AND INQUIRIES, BY YEAR

	2023	2024	2025	2026 (to date)	Total
Requests for advice from Members (Code)	3	5	4	5	17
Requests for advice from Members (MCIA)	7	8	5	5	25
Inquiries from staff	20	8	10	3	41
Inquiries from the public	53	27	8	18	106
Non-jurisdictional matters redirected	20	10	21	5	56
Total	103	58	48	36	245

TYPE OF CODE-RELATED INQUIRIES

58 Charitable / Community support by Members

32 Use of Social Media

27 Preferential Treatment / Undue Influence

35 Conflicts of Interest

31 Gifts and Benefits

20 Role of Councillor



SIGNIFICANT ISSUES OF THE TERM

COMPLAINTS OF NOTE

In 2024, this Office tabled a report to Council which set out the findings of two Complaints. The first Complaint alleged that the Respondent breached the Code by:

- making derogatory comments about a matter that was subject of litigation before the OLT, knowing that the Respondent would be unable to respond;
- commenting himself on the matter before the OLT, denigrating Council's decision-making; and
- making disparaging comments about a majority of Members of Council.

The second Complaint alleged that the Respondent did not conduct himself with appropriate decorum, in contravention of Rule 15 of the Code, when they removed the Complainant Member of Council from an email thread initiated by a resident, and made disparaging comments about the Complainant (and Council) without her knowledge, ascribing a negative motive to the Complainant's lack of action.

The Report found that the intentional removal of another Member of Council from the email thread is inappropriate and does not evidence the Respondent behaving in an exemplary manner. By removing the Complainant from the thread and criticizing the lack of response from others on Council (which includes the Complainant), the Respondent ensured that the Complainant could not respond.

The Report found that removing a fellow Council Member from an email thread is not an act of efficacy. A Member of Council may decide to remove staff or individuals or organizations external to the City of Vaughan. The Code does not preclude a Member from limiting whom they will include in a response. However, when the email "to" line includes two Members of Vaughan Council and one Member (the Respondent in this case) removes the email

address of the other from the email thread, and includes all others on the original email, this action is deliberate and not a function of email management efficacy, and had the result of causing the Councillor not to view the ongoing comments and questions of a resident of Vaughan and not to provide her comments, whether through email response or by inviting the resident to a meeting or a discussion by phone.

The Report concluding this investigation set out that the rules of the Code do not require a Member of Council to express public support for a Council decision with which the Member disagrees. In this way, the Code does not interfere with the Member's right of dissent. However, a Member is prohibited from making disparaging comments in stating that they did not support the decision or voted against it.

The Report further stated that in a 2023 Memorandum to Council, this Office set out, with reference to Rule 16 – Conduct Respecting Staff, that the Commentary to this rule underscores that City staff provide a high quality of advice and work to the City based on political neutrality and objectivity, irrespective of party politics, the loyalties of persons in power or their personal opinions.

These rules, read together, highlight the requirement that each Member of Council must avoid comments that denigrate the decisions of the City or that cast aspersions on the integrity of Members of Council or City staff. Healthy and respectful debate and disagreement is part of the democratic foundation of a municipal Council. However, it is a violation of the Code of Conduct to make comments that do not enhance respect for City decisions or to make utterances that impugn the reputation of staff and suggest illegal activity of staff.

The Code requires Members of Council to accurately describe the decisions of Council; it does not require that Members endorse positions with which they disagree and does not prevent Council Members from explaining their reasons for disagreement. **There is a difference between expressing one's disagreement with the position of colleagues on Council in a respectful way and making statements that demean and disparage individual Members of Council and/or Council decisions. Comments directed at Members of Council, such as those made by the Respondent in this complaint,** do not express disagreement with a position of a Member of Council or the decision of Council, but rather disparage Council as a whole.

The second report was with respect to an allegation of a breach of the confidentiality provision of the Code. This report presented the findings of the investigation under the City's Code relating to the conduct of the Respondent in connection with the disclosure of confidential information alleged to be in contravention of Rule 3 of the Code.

In this Report, the Respondent's position was that the email subject of the Complaint was not disclosed to the public through posting on the public City of Vaughan website as part of the Council meeting agenda; that does

JUDICIAL REVIEW

On March 10, 2026, the Divisional Court dismissed two applications for judicial review brought by a Member of Council in respect of two investigations conducted by this Office and the resulting reports, in which I concluded that the Member had breached the Code by, among other things, making disparaging remarks about other Members of Council and sharing confidential material. The Court rejected the allegations that the investigative procedure was unfair, that the Integrity Commissioner was biased, and that the findings were unreasonable, holding that the investigative process was fair, the findings reasonable, and the Commissioner free of bias.

The Court also decided a novel question: whether Council's decision to impose sanctions was tainted by a reasonable apprehension of bias because the complainant, also a Member of Council, participated in the vote on sanctions. The Court held that the filing of a complaint does not, in and of itself, give rise to a reasonable apprehension of bias, and that a complainant Member may sit and vote on sanctions arising from their own complaint, absent particular facts such as the complaint itself advocating a specific sanction.

not make the Respondent's actions appropriate, even though these actions did not violate the letter of Rule 3.1. Often there is a significant amount of information included by a complainant in the Complaint Form Affidavit. The public, staff and other Members of Council must be assured that my Office will not disclose confidential information supplied by the Complainant. I made it abundantly clear to the Complainant and the Respondent in this case, as is the practice of this Office, to remind them that they are not to disclose the correspondence to and from my Office regarding the Complaint investigation to anyone.

It was clear from the Respondent's replies to the Complaint that they did not believe that their disclosure of confidential information was contrary to the obligations contained in Rule 3 of the Code. In fact, the Respondent submitted that their action in disclosing confidential information in the relevant email was to argue that they were not afforded procedural fairness. The Report concluded that the Respondent could have advanced this argument without inclusion of the document which the Integrity Commissioner had provided confidentially and which the Clerk had refused to post publicly.

THE ROLE OF THE INTEGRITY COMMISSIONER

Over the course of this reporting period, it became clear that some Members of Council and the public do not understand the role of the Integrity Commissioner.

As I have stated publicly with respect to other jurisdictions, and as is the case with the City of Vaughan, Council appoints the Integrity Commissioner through resolution and confirming by-law. Integrity Commissioners are not hired by staff. Integrity Commissioners do not “work for” Council but rather act independently and oversee elected officials and members of local boards. As set out by the Divisional Court in *Di Biase v. City of Vaughan*:

[12] The Integrity Commissioner is subject to a statutory scheme set out in the Municipal Act, 2001, S.O. 2001, c. 25 (“Municipal Act”), the Code of Conduct, the Complaint Protocol for Council Code of Conduct (the “Complaint Protocol”) and the applicable City [...] policies and procedures.

[13] The Integrity Commissioner is a statutory office created under the Municipal Act, which was amended effective January 1, 2007 to add a new Part V.1, entitled “Accountability and Transparency.” Part V.1 of the Municipal Act authorizes municipal councils to establish codes of conduct for members of councils (s. 223.2), and to appoint Integrity Commissioners (s. 223.3). The Integrity Commissioner is responsible for investigating and reporting on complaints regarding alleged breaches of the Code of Conduct by city councillors. The Integrity Commissioner reports to municipal councils (s. 223.6), and is responsible for “performing in an independent manner the functions assigned by the municipality” (s. 223.3) with respect to the application of codes of conduct for members of council.

In the Divisional Court decision *Robinson v. Pickering (City)*, 2025 ONSC 3233, the Court stated:

11 The City's Code of Conduct authorizes the Commissioner to determine, on a case-by-case basis, whether to undertake an investigation of a complaint. That Code of Conduct 18.03 permits the Commissioner to summarily dismiss a complaint if the Commissioner believes it constitutes an abuse of process or is frivolous or vexatious.

12 Where the Commissioner decides to undertake a formal investigation, a copy of the complaint is given to the councillor in question and a copy of any response from the councillor is given to the complainant. The Commissioner may interview anyone whom the Commissioner deems relevant to the investigation and resolution of a complaint.

13 Upon completing an investigation, the Commissioner issues a report to Council. The report may contain “findings” made by the Commissioner and the Commissioner's opinion as to whether the councillor has contravened the Code of Conduct. The report may also contain the Commissioner's

recommendations as to sanction or remedy, which recommendations are not binding on Council.

14 In this regard, s. 223.4(5) of the Municipal Act, 2001 provides that: The municipality may impose either of the following penalties on a member of council or of a local board if the Commissioner reports to the municipality that, in his or her opinion, the member has contravened the code of conduct: 1. A reprimand. 2. Suspension of the remuneration paid to the member in respect of his or her services as a member of council or of the local board, as the case may be, for a period of up to 90 days.

15 The Commissioner has a statutory duty of confidentiality with respect to investigations. Subsection 223.5(1) of the Act requires that the Commissioner “shall preserve secrecy with respect to all matters that come to his or her knowledge in the course of his or her duties under this Part.” However, s. 223.6(2) permits the Commissioner to disclose in a report to Council about whether a member has contravened the Code of Conduct “such matters as in the Commissioner's opinion are necessary for the purposes of the report.”

I. THE CODE OF CONDUCT COMPLAINT INVESTIGATION PROCESS

The Code process is set by Council. Every investigation is different, as each allegation is different. In the event that allegations of a complaint are set out in email and/or recorded exchanges, the Integrity Commissioner may review the written or oral record of the conduct, in addition to speaking with witnesses. Respondents may provide names of potential witnesses to the Integrity Commissioner. The Integrity Commissioner has discretion

to determine whether such interviews are necessary to reach a fair determination.

When this Office receives a Code complaint, if after a preliminary classification it is determined that there are sufficient grounds to investigate, one will be commenced. **Typically**, a single complaint can give rise to multiple “breaches” and multiple allegations in a complaint by a

complainant can give rise to one or two issues as formulated by the Integrity Commissioner.

In *Di Biase v. Vaughan*, the Court wrote:

[42] In exercising the powers conferred upon her, the Integrity Commissioner must be able to interpret and reformulate complaints submitted by members of the public who may lack specific knowledge of the Code of Conduct and the Complaints Protocol and who may, therefore, not be familiar with how to identify and formulate alleged breaches.

[43] By interpreting and applying the Code of Conduct and the Complaint Protocol when reformulating a complaint, the Integrity Commissioner essentially applies what can be

considered her “home statute”. See Eagle’s Nest Youth Ranch v. Corman Park No. 344 (Rural Municipality), 2016 SKCA 20 at para. 49, 395 DLR (4th) 24. Such decisions are reviewed on the standard of reasonableness, unless they involve a broad question of decision maker’s authority.

Generally, this Office does not interpret each separate allegation of a Code violation as necessarily representing a separate “breach” but rather focuses on the wrongful conduct being alleged, such that if one factual “wrong” breaches several Code provisions, it is still considered one “breach” for the purpose of determining if the Member is in violation of the Code and a recommended sanction.

II. A MEMBER'S OPPORTUNITY TO RESPOND TO ALLEGATIONS MADE IN A CODE COMPLAINT

Under the Code, a Member who is named as a respondent in a complaint has the opportunity to respond in writing to the allegations of the Complaint. The Integrity Commissioner conducts an investigation and makes findings.

If the Integrity Commissioner reports to Council, the Member is permitted to attempt to influence the decision or recommendation about the report and sanction but may not vote. Under subsection 5.2(2) of the Municipal Conflict of Interest Act, if a municipality delegates a power to suspend the remuneration paid to a member under subsection 223.4(5) of the Municipal Act, 2001 to a person or body, and the person or body is considering exercising that power with respect to a member, subsection (1) of this section does not prevent the member from attempting to influence any decision or recommendation of the person or body that results from consideration of the matter. The legislation is silent on how the Member may attempt to influence any decision or recommendation of the person or body that results from consideration of the matter. Typically, the Member may make a deputation or participate in a debate in accordance with the municipality's procedural by-law, including time limits.

In the majority decision of the Divisional Court in *Villeneuve v. North Stormont*, at paragraphs 34–37, the Court analyzed the issue and found that “The Code of Conduct requires that Members respect the roles of staff, and not intimidate, threaten, coerce, command, or influence any staff with the intent of interfering with staff duties.” The Court agreed that it was reasonable for the Integrity Commissioner to characterize an email exchange as “not appropriate” and “abusive” and that “the context and the tone of the communications illustrates evidence of an intent to force the CAO to provide disclosure to Council that was deemed by the Member to be appropriate.” The Court further found that the IC report was reasonable in concluding that the Applicant had publicly berated staff, which was not her role as an individual member of council.



WORKFLOW PROCESS MAPPING AND REVIEW PROJECT

In May 2023, the Office of Transformation and Strategy completed the Workflow Process Mapping and Review Project (the “Project”) for this Office, including a jurisdictional scan, current-state analysis and future-state recommendations for the intake and processing of inquiries, informal complaints, formal complaints and Lobbyist Registry matters.

The OICLR operates on a “no wrong door” premise: the public, staff and Members have an open door to ethics guidance, and if they raise matters outside the mandate, they are redirected to the appropriate channel rather than

turned away. The Project mapped the Office’s work into four end-to-end processes, identifying the steps involved in each:

Process	Steps
General Inquiries	7
Informal Complaint	23
Formal Complaint	42
Lobbyist Registry	20

GENERAL INQUIRIES (7 STEPS)

Each telephone call or email is received, reviewed and given a preliminary jurisdictional determination. Some inquiries can be answered directly; others require clarification from the individual, research, or coordination

INFORMAL COMPLAINTS (23 STEPS)

A complainant who perceives a Code violation may approach the Member directly, or may ask the Integrity Commissioner to assist in the informal resolution of the matter. Complaints are documented through the general inbox, jurisdiction is confirmed through preliminary review, and clarification meetings are held where needed. The

FORMAL COMPLAINTS (42 STEPS)

The formal process typically follows an attempted informal resolution, although a complainant may proceed directly to it. It affords both parties a full opportunity to understand the process and their rights, within the timelines prescribed by the Code (extensions are often granted for submissions and responses). Investigation involves significant research and review of minutes, video of Council meetings, interviews with the complainant and sometimes

with City departments. Where a matter is not within the mandate, the Office refers the individual to the appropriate department, policy or outside agency.

process typically involves research — Council and Committee minutes, online material — and, because the Office holds elected office in the highest regard, the Member is always contacted for comment; on occasion Members have retained external counsel even at the informal stage.

the Member, witnesses and departments as appropriate. Where the Integrity Commissioner finds a contravention of the Code, a public report goes to Council, which may adopt, vary or reject the recommended sanction; a sanctioned Member’s recourse is judicial review, in which the Integrity Commissioner, where named, instructs counsel to respond. Where the Integrity Commissioner concludes an MCIA investigation, she decides whether to

apply to a judge for a determination, advises the parties, and publishes written reasons within 90 days where no application is made.

LOBBYIST REGISTRY (20 STEPS)

The Office supports lobbyists before registration and throughout the life-cycle of their communications with public office holders, including online prompts that help individuals and companies determine whether they must register. The Lobbying By-law permits registration before the first communication or within five business days after;

lobbyists have generally shown a desire to comply, and frequently contact the Office themselves where communication occurred before registration. Registration requests are reviewed for completeness, rarely denied, and email requests for clarification are answered promptly.

INDEPENDENT MEASUREMENT: THE 2023 WORKFLOW PROJECT

The Project conducted an end-to-end mapping of the Office's processes, both to give the City a sound understanding of the OICLR workflow and to serve as a best-practice document for other Ontario municipalities. The OTS independently measured what each type of file takes:

Process	Average hours per file	Range (hours)	Illustrative annual volume
Inquiry (Code and non-Code)	3	1.5 – 4.5	424 inquiries ≈ 1,272 hours (≈35% of annual time)
Informal complaint	28	18 – 39	6 files ≈ 170 hours
Formal complaint	85	31 – 192	3 files ≈ 255 hours
Lobbyist Registry file	10	—	48 registrations ≈ 480 hours

DEPARTMENT CAPACITY

On the OTS's average-maximum measure, department time distributes as follows:

Process	Dept. hours	Dept. % time	IC hours	IC % of time
Inquiries	1,908	60%	1,272	67%
Lobbyist Registry	480	15%	72	4%
Informal complaints	232	7%	180	9%
Formal complaints	576	18%	383	20%
Total	3,196	100%	1,907	100%

- The OTS data assumes a full-time schedule (1,820 annual hours per role; 3,640 for the department). The Integrity Commissioner is contracted on a part-time basis.
- Measured against the four identified processes alone, the department operates at between 60% and 88% of capacity — excluding education, outreach and other mandate activities, which are difficult to quantify and would push utilization higher.
- Not every file runs the full process, and some run well beyond the average maximum; decision points throughout each process affect overall timing.

RECOMMENDATIONS BEING IMPLEMENTED

- A process manual guide for the department.
- Communications templates.

- Case management integrated with City IT infrastructure (SharePoint, Teams, Outlook sub-folders).
- Training templates and modules for in-house City of Vaughan learning.

EXAMPLES OF ADVICE AND ISSUES OF NOTE

Q

A Member of Council requested advice from this Office about their obligations under the Code with respect to a public record position of the City of Vaughan and whether their comments publicly and in their newsletter would be considered as running afoul of the Code. The Member advised that the community group in their Ward was organizing a public meeting for residents to come and be educated on the matter. Political leaders from all parties, including the Minister responsible, were invited to attend the public meeting. The Member of Council advised this Office that they would not be making any negative references to Council or to other levels of government.

A

This Office advised that in and around December 2023, the Director, Corporate and Strategic Communications consulted with the OICLR on Members' support of community groups. The Member was advised that some of the advice provided in the December communication may be relevant to their request for advice. This Office advised that the communication to the Mayor and Members of Council on support to community groups set out that:

Members are not precluded from sharing information about a charitable or not-for-profit initiative or event in their Newsletters as long as a Member of Council is affording equal opportunity to organizations that seek their support. In other words, as long as the Member of Council is not affording special treatment to one group over another and as long as all City policies are being followed.

Rule 2.3 of the Code states that nothing included in this section affects the entitlement of a Member of Council to: "ii. urge constituents, businesses and other groups to support community events and advance the needs of a charitable organization put on by others in the Member's Ward or elsewhere in the City." There is a distinction between City departments providing support — i.e. through corporate communications channels — and an individual Member of Council.

This Office advised the Member that because the community group hosting the public meeting had a social media handle that stated an entrenched position, it is reasonable to take the position that the group and its supporters object to / do not want the project that the City of Vaughan voted on to go forward. This Office advised that if the City of Vaughan has taken a position publicly, for this reason, it is the position of this Office that a Member is permitted under the Code to lend their support to the event and may consider advising the public of the meeting rather than including the community group flyer in their Councillor newsletter. The City has taken a public position on the matter and the group may include other content in the flyer that goes beyond the position taken by Council.

Q

A Member of Council asked this Office whether, if a Councillor sends out a newsletter from their office, they are permitted to use their campaign colours as opposed to City of Vaughan corporate colours.

A

This Office responded advising that if a Member believes that another Member has contravened the Code, they should pursue the matter through the informal or formal Code complaint procedure.

Typically, if in receipt of a Code complaint, the OICLR would review a Member's newsletter based on whether it is genuinely an informational communication connected to the Council Member's official role, or whether it could reasonably be viewed as election campaign activity. The determination of whether the use of certain colours in a newsletter would be tantamount to the communication being defined as campaign-related activity is a matter that this Office could only review through the Code complaint procedure.

Q

A Member of Council advised that a constituent had reached out to them to seek clarification on the process for the registration of residential condominiums. The constituent was referred to the responsible City staff. Dissatisfied with the responses they received, the individual contacted this Office alleging that the City of Vaughan was delaying a condominium registration due to park easements of a City public park. The constituent requested a list of agreements in place with the developer and planners.

A

This Office advised the Member that they correctly referred the matter to staff for response as appropriate. After receiving subsequent correspondence from the constituent, this Office advised that the Office of the Integrity Commissioner does not have jurisdiction to receive or address complaints that deal with City, staff or Council decisions, omissions or actions, nor does this Office have the authority to receive or address a matter that appears to be a planning matter and/or more appropriately addressed under another City policy or a policy of another level of government.

The Office advised that the OICLR is responsible for providing policy advice, complaint resolution and education to Members of Council on issues of ethics and integrity. The Office has no jurisdiction to investigate planning matters and/or development fees. This Office provided links to the City of Vaughan's website to the constituent and advised the Member of Council whom the constituent had contacted that referring the constituent to planning staff and the relevant City processes was appropriate.



MANDATORY LOBBYING REGIME

The City's mandatory Lobbyist Registry allows the public to see who is communicating with public office holders about City business. Lobbying, when transparent and conducted in accordance with the Lobbying By-law, is a legitimate activity that facilitates Council's receipt of information necessary to make effective decisions.

LOBBYING AND THE 2026 MUNICIPAL ELECTION

Lobbyists are permitted to make contributions in their personal capacity as individuals who are residents of Ontario, in accordance with the requirements of the Municipal Elections Act (the "MEA"), to candidates in the election. They may not do so as part of their lobbying activities as a consultant, in-house or voluntary unpaid lobbyist.

In responding to queries from the public, this Office has advised that fundraising by a lobbyist creates a significant likelihood that a conflict of interest will result, should the lobbyist engage in lobbying that Member of Council or candidate, once elected.

Justice Bellamy recommended:

113. Professional lobbyists should not engage in any type of political fundraising for candidates or councillors they lobby, beyond making their own donations.

120. When registering, lobbyists should certify that they have not engaged in political fundraising at the City beyond making their own allowable donations.

Therefore, this Office has advised that lobbyists should not fundraise for a candidate if their intent is to lobby that candidate once elected, or if they are concurrently lobbying a candidate who is a Member of Council during the election period.

Source: *The Toronto Computer Leasing Inquiry / Toronto External Contracts Inquiry*, City of Toronto, *The Honourable Madam Justice Denise E. Bellamy, Commissioner*, 2005, pp. 95–96.

NUMBER OF REGISTRATIONS BY YEAR AND CATEGORY

LOBBYIST REGISTRY — REGISTRATIONS BY YEAR

21 2024
registered

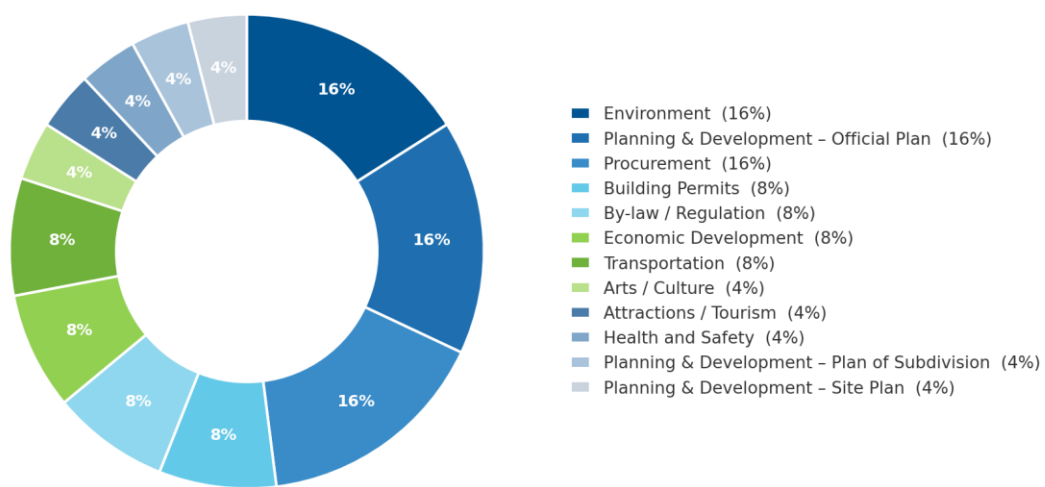
33 2025
registered · 3 declined

24 2026
registered · 23 active

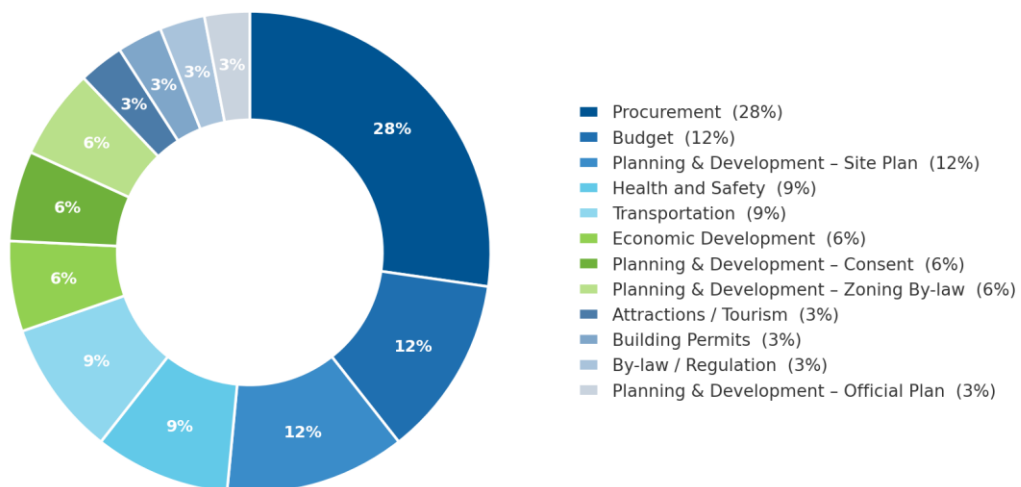
2023: following the 2025 Lobbyist Registry software upgrade, legacy data has been retained for legal/litigation/records retention purposes.

Often the registration of one lobbyist has multiple subject matter areas of lobbying. Therefore the number registered is not always the same number as the number of subject matter areas listed.

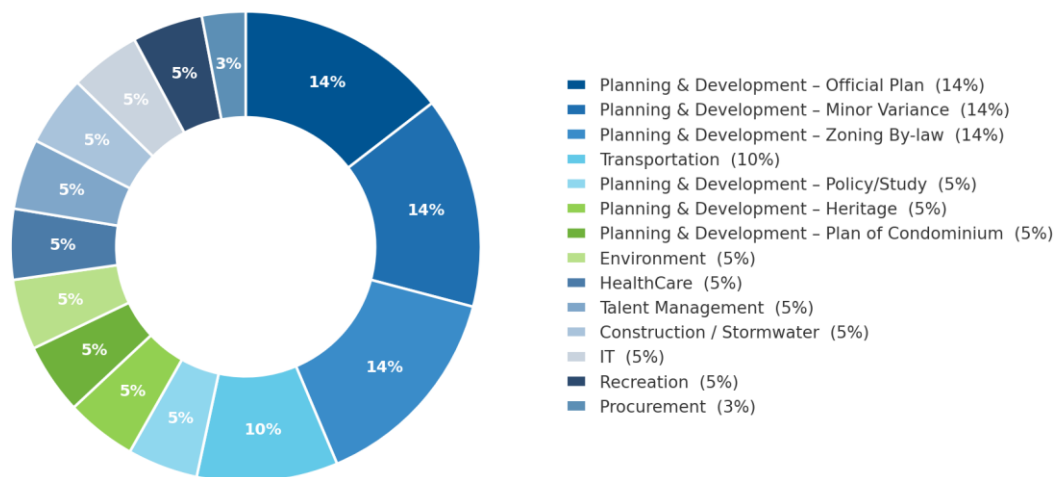
2026 — Lobbying activity by subject matter (share of subject-matter areas, to date)



2025 — Lobbying activity by subject matter (share of subject-matter areas)



2024 — Lobbying activity by subject matter (share of subject-matter areas)



EDUCATION AND OUTREACH

2023

- *Western University – Local Government Conference – Speaker Panelist*
- *Ontario Association of Committees of Adjustment Conference – Speaker, Codes of Conduct*
- *City of Vaughan Library Board – Presentation on the City of Vaughan Accountability Regime*
- *City of Vaughan Council Education Session – Presentation on Decorum at Council*
- *Staff Information Report – with the Office of the City Solicitor – A Brief Summary of Bill 5, the Stopping Harassment and Abuse by Local Leaders Act*
- *Members of Council Information Bulletins*
 - *Members' Conduct and Language at Public Meetings*
 - *Members of Council Travel Information Bulletin*

2024

- *Ontario Bar Association – Municipal Codes of Conduct and the Intersection of Freedom of Expression – Panelist*

2025

- *Society of Ontario Adjudicators and Regulators (SOAR) Annual Conference – Opening Plenary*
- *Co-Chair of the Public Servants Disclosure Protection Act Review Task Force*
- *The Lobbyist Registry Software Upgrade*

2026

- *City of Vaughan Information Bulletin – Lobbying and the Municipal Election (distributed to all registered lobbyists)*
- *Election Activities Information Bulletin*
- *Update to Lobbyist Registry – Preparation for New Term Members of Council and Public Office Holders*

FINANCIAL STATEMENT

The OICLR fiscal year runs from January 1 to December 31.

Expenditure	2023	2024	2025	2026 (to June 30)
Salaries and benefits	IC/LR – 199,362 EA – 104,751	IC/LR – 201,249 EA – 106,846	IC/LR – 203,965 EA – 112,839	IC/LR – 96,723 EA – 55,334
Professional fees	64,834	36,021	53,695	(8,003)
Cellular line charges	691	783	627	126
Memberships / dues / fees	0	0	951	0
Rental, leases – building	28,788	33,050	32,338	15,617

Actual cost including all budget line items: 2023 – 460,447 (variance of 68,299 savings on projected budget); 2024 – 454,458 (variance of 88,480 savings on projected budget); 2025 – 458,830 (variance of 95,044 savings on projected budget); 2026 to June 30 – 172,987 (variance of 76,291 savings on projected budget).



POLICY DEVELOPMENTS

COUNCIL MEMBER SUPPORT FOR CHARITABLE, COMMUNITY AND NOT-FOR-PROFIT ORGANIZATIONS

In conjunction with the Department of Corporate and Strategic Communications, this Office worked to provide guidance to Members of Council with respect to the receipt of requests for corporate support by charities and not-for-profit groups within the community to promote their initiatives and events. Direction was provided to Members of Council advising that:

while their endeavours may be well-intended, providing corporate resources to support them would require approval from Council. To help [Members with] inquiries they receive, attached is a constituent response that outlines the steps to take for groups to make a deputation to Council at an upcoming meeting. If the constituent has any questions, please direct them to the Office of the City Clerk.

SPIRIT OF GENEROSITY

In conjunction with relevant City staff and the OICLR, Members were advised that the Spirit of Generosity Funds can be distributed until April 30 of a regular municipal election year, beginning with the 2026 municipal election,

POLICY ON NAMING RIGHTS

The Partnership and Corporate Initiatives Department worked with the OICLR on the amalgamation of the existing Street Naming Policy and the Naming Parks,

CITY OF VAUGHAN SOCIAL MEDIA POLICY

The Communications, Engagement and Marketing Department worked with the OICLR on the development of a Social Media Policy that included provisions with respect to the obligations of Members of Council.

Members were advised, in consultation with the Corporate and Strategic Communications Department and the OICLR, that the guidance would not preclude Members from sharing information about a charitable or not-for-profit initiative or event as long as a Member of Council affords equal opportunity to organizations that seek their support (in other words, not affording special treatment to one group over another) and as long as all City policies are being followed.

Rule 2.3 of the Code — Nothing included in [this section] affects the entitlement of a Member of Council to: *ii. urge constituents, businesses and other groups to support community events and advance the needs of a charitable organization put on by others in the Member's Ward or elsewhere in the City.*

or until the day that Council declares the office of Mayor vacant and until such time as a new Mayor takes the declaration of office.

Open Spaces, Facilities Policy, with elements of the previous Corporate Partnership Policy, into one comprehensive document for the City.

THE MUNICIPAL ACCOUNTABILITY ACT (BILL 9)

Through Bill 9, the Municipal Accountability Act, 2025, the Province proposed to strengthen accountability by creating enforcement mechanisms allowing municipal councils to remove members who commit egregious breaches of the Code of Conduct, and by introducing enhanced duties for the Integrity Commissioner of Ontario. The Bill passed third reading at Queen's Park on May 26, 2026 and is on its way to becoming law. In summary, the Bill:

- expands the application of municipal accountability regimes and Codes of Conduct to include the removal of a member in exceptional circumstances involving an egregious breach of those rules;
- enables the creation of a standard municipal code of conduct and a code investigation protocol, with the intent of creating consistency across Ontario municipalities;
- creates a role for the Integrity Commissioner of Ontario to provide oversight of municipal integrity commissioners, including training for commissioners and for members of council; and
- establishes a mechanism permitting a municipality to allow the Integrity Commissioner to recommend the removal and disqualification of members of council and certain local boards, for a period of four years, for the most serious Code of Conduct violations. This mechanism would require a concurring report from the Integrity Commissioner of Ontario and a unanimous vote of Council; where such a vote occurs, the member would be removed from office and would be ineligible for re-election (or to sit on a local board) in the municipality for four years.

WHAT THIS MAY MEAN FOR THE CITY OF VAUGHAN

Of the 444 municipalities in Ontario, there are some, such as the City of Vaughan, that have a comprehensive municipal accountability framework, with a Council Code of Conduct, Complaint Protocol and an appointed Integrity Commissioner to administer the provisions of the by-laws that make up the accountability regime. However, there are many municipal integrity commissioner frameworks in Ontario that are not comprehensive, which creates an accountability lacuna to the detriment of the public interest. That being said, there is the possibility that a universal model code may dilute the robust frameworks in those municipalities that have them.

The City of Vaughan has a comprehensive Code of Conduct and detailed investigative procedures which are industry best practice.

On August 18, 2026, the Minister of Municipal Affairs and Housing announced during his address at the annual Association of Municipalities of Ontario (AMO) Conference that consultations on the Bill 9, Municipal Accountability Act regulations are open. The Province announced that it is seeking public comments on the proposed regulations until October 2, 2026, and that once finalized, the legislation and regulations would take effect on November 15, 2026, the inauguration day of newly elected municipal councils and school boards.

The City of Vaughan is one of the first municipalities in Ontario that developed a robust and comprehensive Code of Conduct and Complaint Protocol. This Office will continue to monitor the developments of the legislation and provide updates to Council in the new term, working with the municipality to ensure compliance with the updates mandated by the Province.

2026 MUNICIPAL ELECTION

Consistent with the Municipal Act, 2001 and the Code Protocol, no complaint may be received and no report may be made to Council during the period beginning on Nomination Day (August 21, 2026) and ending on Voting Day (October 26, 2026). Where an inquiry was commenced but not completed before Nomination Day, it was terminated, and may be recommenced only where the complainant makes a further written request within six weeks after Voting Day.

While this Office cannot receive Code complaints during the period leading up to the day of the municipal election on October 26, 2026, the Integrity Commissioner remains available to provide guidance to sitting Members on their obligations under the Code until Voting Day. This Office cannot provide candidates with Municipal Elections Act (“MEA”) advice and has no jurisdiction to enforce the rules of the MEA. The Use of Corporate Resources Policy (as contemplated by the Municipal Elections Act) may provide Members with further rules that must be followed.

CONCLUSION

At the City of Vaughan, the leadership has set out that the mission is grounded in service — delivered not just competently, but exceptionally. Best-in-class service builds trust, enhances reputation, and creates lasting value. We measure service through: seamless and clear processes; trust-building interactions; positive experiences.

This Office has worked over the period of this Term to encourage Members to act ethically and in a manner consistent with the rules of their oath of office. However, an individual Member of Council cannot be their own arbiter of what is right. The OICLR manages the Code and enforces the rules, which are designed to provide a reference guide that all Members agree to follow to enhance the City's reputation and integrity.

As I have reported in other municipalities, I find also in the City of Vaughan that during this reporting period, Members of Council and residents questioned whether this Office has jurisdiction over conduct that a Member purports is simply expressing their opinion, or exercising their role as a representative of constituents, or commenting on a Council or staff decision. As was the case in other jurisdictions, some Members of Council in the City of Vaughan stated that they did not believe that expressing criticism should be deemed contrary to the Code because they were simply expressing their opinion. I advised that generally, a Member of Council may express their opinion and may do so forcefully, but that a Member must avoid disparaging or calling into disrepute colleagues, staff or the public. Under the Code, Members of Council may express their opinions speaking to issues. However, they may not denigrate the professional reputation of staff.

Respectfully submitted,

Suzanne Craig

Integrity Commissioner and Lobbyist Registrar
City of Vaughan

Once Council has made a decision, a Member of Council cannot distance themselves from the Council decision. A Member can express why they disagreed with the Council decision, by citing their comments made at Council during the debate, but they may not mount a social media campaign in which they undermine the decision of Council or staff.

Generally, the Code does not prevent a Member from asking questions of clarification to better understand the recommendations in a staff report. However, language that overtly or implicitly suggests that a colleague or staff person is “lying” or has committed an illegal act is a serious statement that disparages an individual and calls their reputation into disrepute. When participating in deliberations and discussions at meetings of Council, including Committee of the Whole, Working Sessions and Public Meetings, during this reporting period, I have advised Members of their obligations under the Code, in particular those rules that underpin the integrity of Members of Council vis-à-vis a respectful relationship with their colleagues, staff and the public. Overall, I am pleased to report that Members of Council have taken their obligations under the Code and the MCIA seriously and have afforded respect to the work and independence of this Office.



City of Vaughan | Office of the Integrity Commissioner & Lobbyist Registrar

For information about the Integrity Commissioner's office
or the Lobbyist Registry, please visit www.vaughan.ca