Office of the Integrity Commissioner of Ontario

ANNUAL REPORT

2025–2026

Encouraging a Culture of Integrity

Legislative Assembly of Ontario

Assemblée législative de l'Ontario

Office of the Integrity Commissioner
Cathryn Motherwell, Commissioner

Bureau du commissaire à l'intégrité
Cathryn Motherwell, commissaire

July 2026

The Honourable Donna Skelly
Speaker of the Legislative Assembly of Ontario

Dear Madam Speaker,

It is an honour to present the Annual Report of the Office of the Integrity Commissioner for the period April 1, 2025, to March 31, 2026.

Sincerely,

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Cathryn Motherwell
Integrity Commissioner

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Commissioner's Message

At its core, public sector ethics is about democracy.

It instills trust in the system to ensure that government decision-making is conducted in the public interest. It embeds key principles of transparency and accountability into the work of elected officials and public servants. It creates guardrails, as seen in all of the Office's mandates.

The assumption is that as these ethics principles are established, understood and accepted, they become part of the cultural fabric. The assumption is that trust in the system will follow, and that this will extend to trust in those people responsible for the mechanisms of government.

Cathryn Motherwell
Integrity Commissioner

The principles, the legislation and the rules lay the foundation. They define and mandate ethical conduct, demonstrating democracy at work. Offices such as the Office of the Integrity Commissioner serve to guide and direct behaviour and activities, advise on best practices, provide determinations and directions, and, in some cases, investigate whether the rules have been breached.

Of course, principles and rules can be ignored. As we have seen in other parts of the world, ethics offices have been openly attacked, subject to punitive budget reductions or even eliminated amid public criticism that diminishes and even disdains the work of ethics officers and their staff. They are seen to be getting in the way of progress, as if *doing the right thing* is an impediment to getting a job done. It should go without saying — and yet, unfortunately we do need to say it — that as a society we ignore the rules at our peril. Attacks on critical governance institutions undermine key pinnings of democratic foundations.

I am grateful that the Office and its work are supported and encouraged by all members of the Legislative Assembly of Ontario. In their annual meetings with me this year, MPPs spoke about how much they appreciate the independence of the Office and how they value the opportunity to ask for confidential advice on ethics matters. These meetings are mandatory by law, and MPPs arrive armed with questions and analysis that demonstrate how ethical behaviour frames their actions on behalf of constituents. This is reflected in the 399 requests for my advice received this year from this group alone.

Indeed, this has been a year of remarkable achievements in the Office. As highlighted in this report, the Office has set many records in its mandates. I believe this demonstrates how the Office is considered a key and reliable resource for MPPs and public servants, who understand the importance of knowing when to seek advice or direction and who value the thoughtfulness and rigour that Office staff bring to their work.

The report also highlights some notable milestones in compliance. This is most evident in the Lobbyists Registration mandate, where compliance reviews hit a record 422. The Office gained investigative powers in this mandate in 2016, and 10 years on we find that the compliance message must still be loudly and repeatedly delivered. This year we launched a number of new initiatives, including an education campaign targeted at lobbyists who host functions at Queen's Park and a communication to registered lobbyists that boosted subscriptions to our free online newsletter by more than 200.

Education work such as this is a critical aspect of compliance work, and so I have prioritized opportunities to spread the word, appearing before 11 groups comprising more than 500 people. Each presentation is tailored to the audience and crafted to highlight the uniqueness of the Ontario framework and the specific ethics rules that apply. With seven mandates and five pieces of legislation, we work hard to explain the rules clearly and

provide real-world scenarios so that people can see how the rules readily apply to their work life.

Outreach efforts include my annual individual meetings with all MPPs, twice-yearly online training for public body Ethics Executives, briefings with deputy ministers, online training for newly hired and current ministers' staff, and appearances before public body boards of directors. In addition, this year I appeared before the federal Standing Committee on Access to Information, Privacy and Ethics to speak about my work under the *Members' Integrity Act, 1994* and how it could inform the committee's review of the federal conflict of interest regime. A key topic discussed was the Ontario experience with ethics screens as a tool to mitigate various types of conflicts of interest.

I benefit greatly from the experience of my counterparts across Canada. This year I attended meetings of the Canadian Conflict of Interest Network in Victoria, British Columbia, the Lobbyists Registrars and Commissioners Network in Saint Andrews, New Brunswick, and the Public Interest Disclosure Conference in Canmore, Alberta. I also served as the co-chair of the Council on Governmental Ethics Laws annual conference in Atlanta, Georgia. These meetings are invaluable touchpoints for ethics practitioners to share their experience and expertise.

The year ahead will be similarly remarkable to the one just completed. We face a new year with just as much work and even greater challenges. We are preparing to launch a new mandate in municipal integrity, which I believe demonstrates the value that others find in our work and the confidence they have that we will address it professionally and responsibly. As a result, this coming year, the Office is adding staff, training and communications programs and developing new resources.

This also gives us an opportunity to revitalize our operations and reorganize to address and strengthen high-volume mandates. Later this year, we will be moving to a new office, designed to encourage and facilitate collaborative work and innovation across the board.

With this report, I mark my first year as Integrity Commissioner. The work is engaging, it is important and it is dynamic. This is why I continue the efforts of my predecessor and advocate for a thoughtful review of the *Lobbyists Registration Act, 1998*; the *Public Service of Ontario Act, 2006*; and the *Members' Integrity Act, 1994*. These reviews are long overdue and would serve to re-establish Ontario as a leader in this critical space.

In closing, I thank the staff of the Office for their energy, enthusiasm and dedication to their work in serving Ontario MPPs and public servants. And I thank MPPs and public servants for their continued support of an ethics framework that works.

Outreach

The Office held or participated in 48 training, outreach and speaking events this year. Mandate-specific training and outreach activities are described in the relevant sections of the report.

The Office responded to 76 media inquiries and 366 inquiries from members of the public.

The Integrity Commissioner appeared before the Standing Committee on Access to Information, Privacy and Ethics of the House of Commons of Canada in November 2025 as part of its review of the federal *Conflict of Interest Act*.

The Commissioner and Deputy Commissioner addressed students studying public policy and government relations in ethics courses at York University and Seneca Polytechnic.

The Commissioner and staff participated in the annual meetings of the following Canadian jurisdictional networks:

- Canadian Conflict of Interest Network
- Lobbyists Registrars and Commissioners Network
- Public Interest Disclosure Conference

The Commissioner and staff attended the 2025 Council on Governmental Ethics Laws (COGEL) conference in Atlanta, Georgia. The Commissioner served as the conference co-chair. COGEL brings together North American public sector ethics organizations to share updates and discuss emerging topics and trends.

The Deputy Commissioner participated virtually in the annual general meeting of *Réseau francophone d'éthique et de déontologie parlementaires* in July 2025. The organization, of which the Office is a member, promotes dialogue and networking among French-speaking parliaments and entities with an interest in ethics rules and frameworks for elected officials.

Members' Integrity

The Integrity Commissioner responded to 399 requests for advice from MPPs about their obligations under the *Members' Integrity Act, 1994*, an increase from the 345 requests received in the previous year.

The most common requests were about providing letters of support to constituents. The Commissioner responded to 138 inquiries about letters of support, compared to 107 last year.

The second-most common type of inquiry was for advice about accepting gifts or benefits. There was also a notable increase in inquiries about advocacy for constituents, with requests jumping to 46 requests from 22 last year.

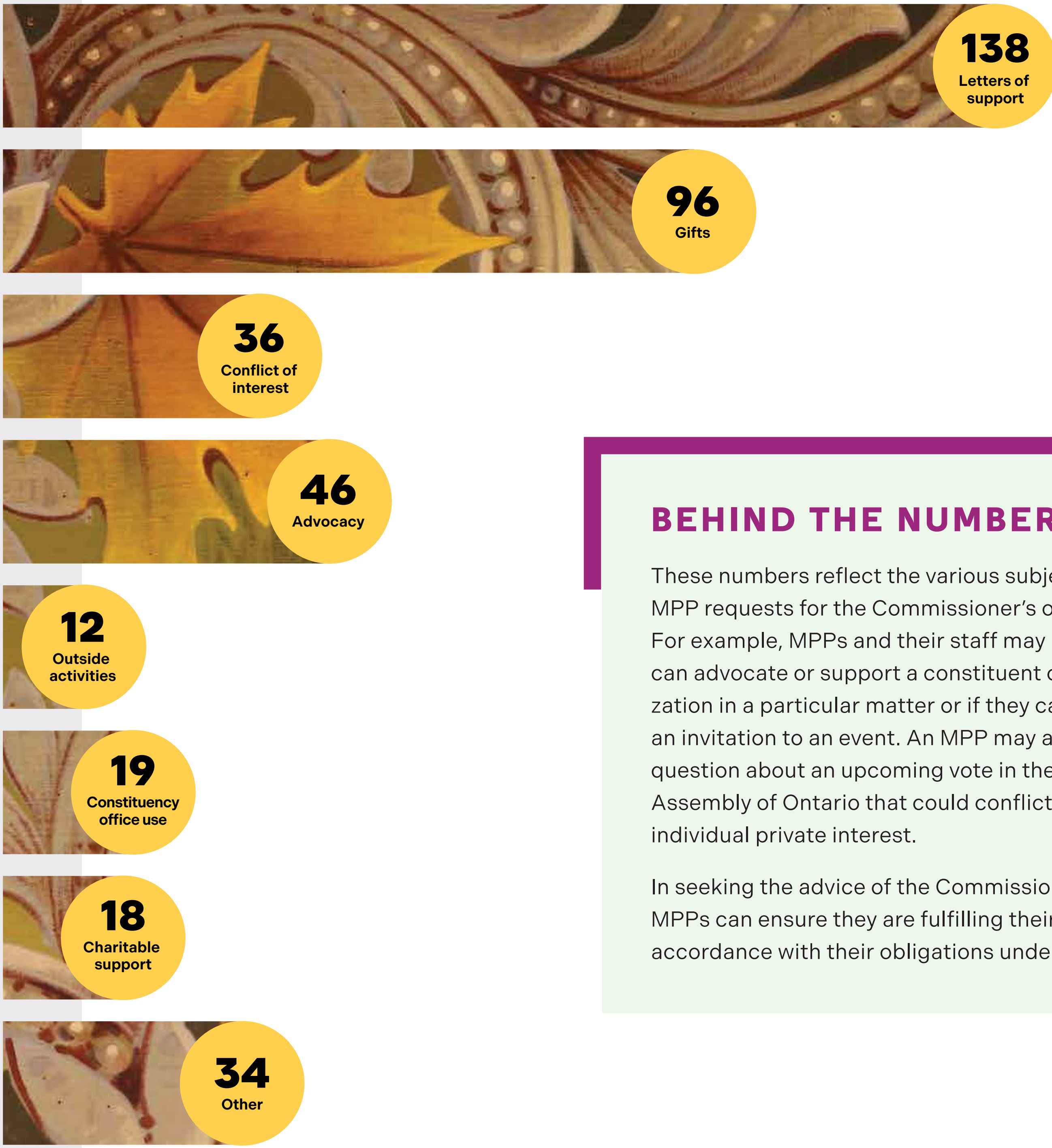
The financial disclosure process for MPPs was completed in the spring after the February 2025 provincial election. The Commissioner met with all MPPs to discuss their private disclosure statements and their obligations under the Act.

WHAT WE DO

- Provide advice to MPPs on their ethical obligations
- Meet annually with each MPP and oversee their annual private and public financial disclosure statements
- Conduct inquiries into alleged contraventions of the *Members' Integrity Act, 1994*, when requested by one MPP about another

399
MPP Inquiries

Types of Inquiries:



BEHIND THE NUMBERS

These numbers reflect the various subjects of MPP requests for the Commissioner's opinion. For example, MPPs and their staff may ask if they can advocate or support a constituent or organization in a particular matter or if they can accept an invitation to an event. An MPP may also have a question about an upcoming vote in the Legislative Assembly of Ontario that could conflict with their individual private interest.

In seeking the advice of the Commissioner, MPPs can ensure they are fulfilling their duties in accordance with their obligations under the Act.

MPP Financial Disclosures

The required annual financial disclosure process was completed in spring 2025. This was because of the provincial election held on February 27, 2025.

These submissions and meetings are usually held in the fall. However, the Act requires MPPs to submit financial disclosures within 60 days of an election. These confidential disclosures include a list of all assets, liabilities, income and benefits for MPPs, their spouses and any minor children. If the MPP was re-elected, any permissible gifts received and valued at $200 or more must also be disclosed.

This year 125 disclosures were filed, as the Act requires submissions from all MPPs and leaders of any recognized parties.

Office staff worked with party caucuses to communicate the requirements and deadline and to help MPPs, especially those newly elected, to complete and file their disclosures. Each submission was reviewed against the requirements of the legislation and analyzed to make sure it aligned with each MPP's responsibilities under the Act.

Cabinet ministers received guidance on their specific obligations, including the restriction on holding or trading securities, stocks and commodities. For ministers, the Act requires that certain financial assets be placed in a management trust. Eight ministers currently have assets in a trust.

The Commissioner met with each MPP to review their financial disclosure. These meetings present important opportunities to discuss the Act and how it can guide legislative work. Newly elected MPPs were provided with an introduction to the Office, as well as an overview of the Act with specific guidance on the gift rule.

The 2025 public disclosure statements were filed with the Clerk of the Legislative Assembly and published on the Office website on July 29, 2025. These statements are redacted versions of the confidential financial declarations provided by MPPs.

Training and Outreach

Training is a critical component of the work in this mandate. The Commissioner and Office staff conducted four training sessions attended by more than 125 people working for MPPs in constituency offices and at Queen's Park. The training sessions provided staff with practical scenarios and explanations of how the requirements of the Act apply in their daily work. The sessions also included information to help staff support their MPP in fulfilling their own obligations under the Act.

The Office also undertook proactive communications with MPPs and their offices. With news that the Toronto Blue Jays would play in the 2025 World Series, the Commissioner sent an email to remind MPPs about the gift rule. This rule prohibits MPPs from accepting a gift, fee or benefit that is directly or indirectly connected to the performance of their duties. MPPs were reminded that game or box seat tickets from government stakeholders were prohibited, and they were encouraged to contact the Office if they had been offered a ticket or World Series–related merchandise. There are limited exceptions to the gift prohibition, and these exceptions can be determined only by the Commissioner.

Meeting with Other Jurisdictions

In September 2025, the Commissioner and staff attended the annual Canadian Conflict of Interest Network (CCOIN) conference in Victoria, British Columbia. Topics discussed at the meeting included online training programs and processes for implementing blind trusts for cabinet ministers. The CCOIN meeting provides commissioners from across Canada with an opportunity to share updates and discuss emerging issues related to ethics rules for elected officials.

Report under Section 31 of the Act

This year the Commissioner issued one report under section 31 of the Act.

Conflict of Interest: Participating in a Decision and Insider Information

The Commissioner received a request for an opinion from Ted Hsu, MPP for Kingston and the Islands, on whether the Honourable Doug Ford, Premier and MPP for Etobicoke North; the Honourable Andrea Khanjin, former Minister of the Environment, Conservation and Parks; the Honourable Todd J. McCarthy, Minister of the Environment, Conservation and Parks; and the Honourable Stephen Lecce, Minister of Energy and Mines, contravened sections of the Act.

Specifically, Mr. Hsu requested an opinion on whether Premier Ford and ministers Khanjin, McCarthy and Lecce contravened sections 2, 3, 4 and 8 of the Act with respect to the exemption of the Dresden Landfill from an environmental assessment, as enacted through *Bill 5, Protect Ontario by Unleashing our Economy Act, 2025*.

Under the Act, when a request is made by an MPP under section 30, the Commissioner is required to first determine if there are sufficient grounds to conduct an inquiry.

In her report published on August 20, 2025, the Commissioner determined that the request did not provide sufficient evidence to establish reasonable and probable grounds to conduct an inquiry regarding Premier Ford and ministers Khanjin, McCarthy and Lecce.

The report laid out the Commissioner's reasons for not conducting an inquiry, including an analysis on the reliance of news stories to form the basis of a request.

Requests under Section 30 of the Act

The Commissioner received two requests for opinions under section 30, which remained open at fiscal year-end.

The Commissioner received these separate requests for an opinion from Marit Stiles, Leader of the Official Opposition and MPP for Davenport, and from Stephanie Smyth, MPP for Toronto–St. Paul's, on whether the Honourable David Piccini, Minister of Labour, Immigration, Training and Skills Development, contravened sections of the Act and Ontario parliamentary convention in selecting applicants to Rounds 4 and 5 of the Skills Development Fund Training Stream.

As the two requests covered similar subject matter, the Commissioner announced on December 18, 2025, that she was commencing an inquiry that would deal with the requests together.

As required by the Act, a report will be filed with the Speaker of the Legislative Assembly once the inquiry has concluded. It will also be published on the Office website.

WHEN TO CONTACT THE OFFICE

The Integrity Commissioner receives more than 300 inquiries from MPPs each year and provides them with case-specific advice related to their obligations under the *Members' Integrity Act, 1994*.

MPPs and their staff can contact the Office when they have questions about the requirements of the Act. Inquiries should provide as much information as possible and be specific to the MPP's situation.

Common types of inquiries include questions about conflicts of interest, letters of support, gifts or benefits, the use of social media, advocacy for constituents and the appropriate use of constituency offices.

Commissioner's Jurisdiction

The Commissioner occasionally receives inquiries from MPPs or their staff about matters outside the Office's purview.

The Commissioner has jurisdiction only to provide advice to MPPs about their obligations under the Act. Among other requests, the Commissioner cannot:

- communicate with constituents on behalf of MPPs;
- provide legal advice;
- provide advice on constituency office operations;
- advise on global budget expenditures; or
- advise on the commissioning of documents.

If MPPs or their staff are unsure if their inquiry would be covered under the Act, they can seek guidance from the Office.

Inquiries

The following are samples of the inquiries received by the Commissioner this year. These summaries are published to help MPPs and their staff identify circumstances that could give rise to issues under the Act. The inquiries and the opinions are abbreviated, the identities of those involved are anonymized and gender has been randomized. The cases are provided to highlight specific requirements of the Act and how these play out in real situations. It is important to remember that each opinion is based on its own set of disclosed facts and should not be considered a substitute for asking for the Commissioner's advice.

Letters of Support

Permit Application to Provincial Government

A minister was asked to provide a letter in support of an organization's permit application. The permit was to be issued by another provincial ministry. Could the minister provide the letter?

It was the Commissioner's opinion that the minister should not provide the letter. Cabinet ministers' advocacy efforts are restricted when directed at provincial ministries and agencies. This is the case even if advocacy activities, such as writing letters, are carried out in the minister's capacity as an MPP. A cabinet minister should not appear as an advocate or supporter on a decision being made within any ministry when it follows an established process. Such conduct could give rise to the appearance of inappropriate influence.

Grant Application to Foreign Government

An MPP was asked to provide a letter to support a local organization's application for a grant administered by the government of a foreign country. Could the MPP provide the letter?

It was the Commissioner's opinion that the MPP could provide the letter in his capacity as an MPP since it was to be sent to a foreign government. The MPP was reminded that the letter should be specifically addressed to the decision-makers for the grant to maintain control over the letter's use.

Letter to School Board

A minister was asked to write to a school board in support of a local school's proposal to expand its programming. Could the minister write to the school board on constituents' behalf?

It was the Commissioner's advice that the minister should not send the requested letter since the Ministry of Education has oversight of school boards and ministers should not be advocating to organizations that fall under another minister's jurisdiction. The Commissioner noted that this would still be the case even if the minister were to provide the letter in her capacity as an MPP.

Reference Letter to Federal Government

An MPP was asked to write a reference letter to an official working in a federal department on behalf of an individual the MPP knows personally. Could the MPP provide the letter?

It was the Commissioner's opinion that the MPP could provide the reference letter. However, since the MPP knew the individual in his personal capacity, it was the Commissioner's advice that the letter should be written on personal letterhead and his MPP title should not be referenced. This would ensure that there was no suggestion of improper influence.

Gifts

Gift from Foreign Government

At a meeting with an official from a foreign government, a minister was presented with a gift valued at $50. Could the gift be accepted?

Given that the gift was from a foreign government, it was the Commissioner's opinion that the minister could accept it because its receipt was considered an incident of the protocol that normally accompanies his responsibilities of office.

Since the value of the gift was below the $200 reporting threshold, the minister was not required to file a statement of gifts and personal benefits.

Gala Invitation

A charitable organization invited an MPP to its anniversary dinner and to be a guest speaker at the event. The ticket value was $75. Could the invitation be accepted?

When assessing whether it is appropriate for an MPP to accept an invitation, the Commissioner considers not just the value of the ticket, but also the individual or organization extending the invitation and their interactions with government, the type of event and whether the MPP is to have a role during it.

In consideration of these factors and the information provided in this case, it was the Commissioner's opinion that the invitation to the dinner was not intended to influence the MPP in the performance of her duties of office. For this reason, the Commissioner advised that the MPP could accept the invitation.

Gala Invitation from Lobbyist

An MPP, who is a parliamentary assistant, was offered a ticket to a charitable organization's gala by a business that is registered to lobby the provincial government. The parliamentary assistant's ministry was listed as a lobbying target. Could the ticket be accepted?

Since employees at the business lobbied the parliamentary assistant's ministry, the Commissioner concluded that accepting the ticket could give rise to a reasonable presumption that it was offered to influence the member in the performance of her duties of office. The Commissioner advised the MPP to decline the invitation.

Social Media

Promoting Community Businesses

After meeting with a business in the riding, an MPP asked if a photo of the meeting could be posted on social media along with messaging that encouraged shopping at local businesses. Was this permissible?

Since the posting was to promote local shopping generally as opposed to an endorsement of a specific business, it was the Commissioner's opinion that the MPP could post the photo and the accompanying message.

Constituency Office Operations

Hosting Webinars

An MPP was planning to host a series of webinars through his constituency office to provide information to constituents on various government programs and services. Was this permissible?

The purpose of a constituency office is for MPPs to meet with constituents and to help them navigate government programs and services. As such, it was the Commissioner's opinion that the MPP could host the public information webinars. The Commissioner noted that this activity would be considered one in which an MPP would normally engage on behalf of constituents in accordance with Ontario parliamentary convention.

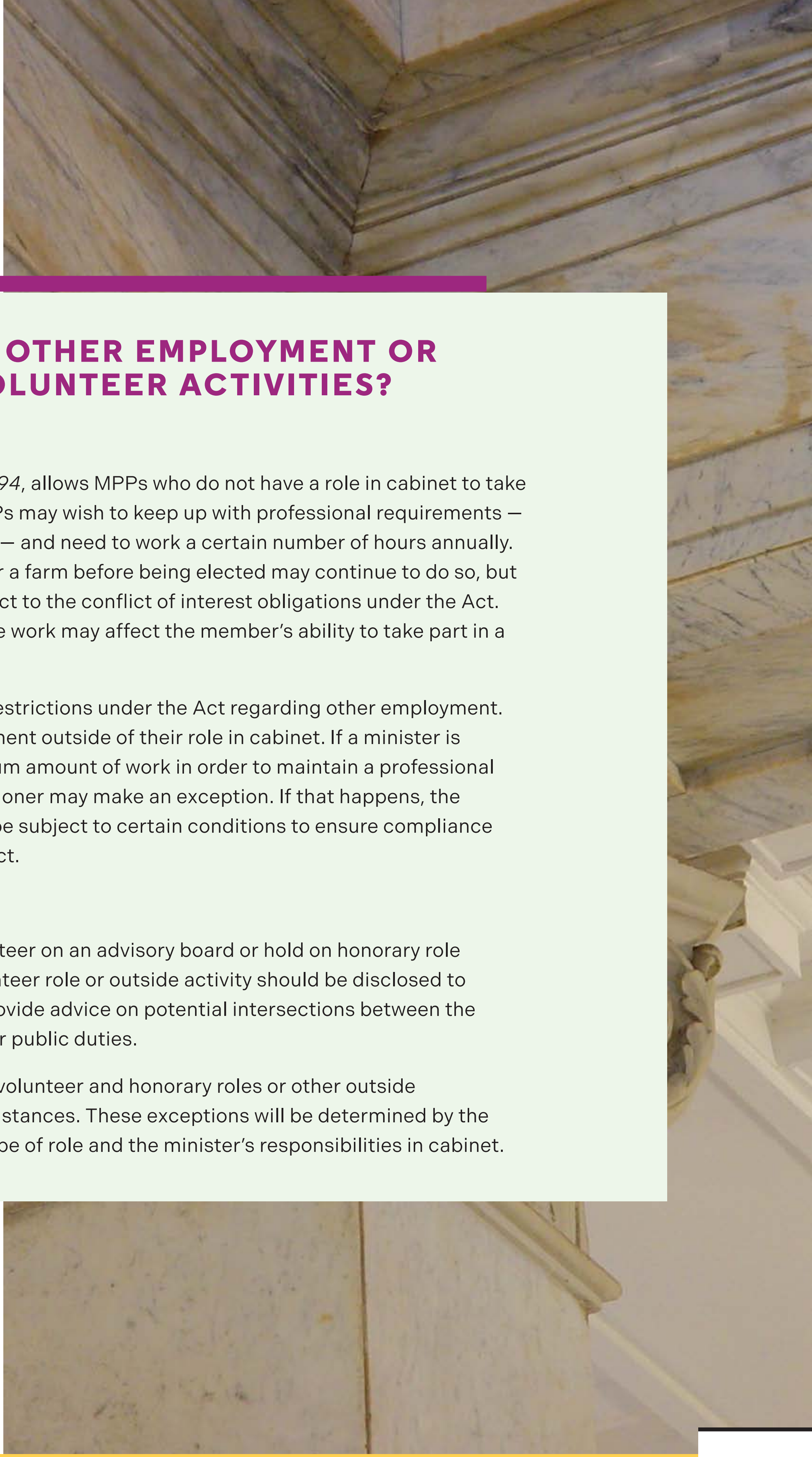
Organizing a Rally

Upon receiving constituent feedback on a provincial matter, an MPP wished to organize a community rally. Could the MPP host a rally and ask constituency office staff to assist in its organization?

In reviewing the matter, it was the Commissioner's opinion that the MPP could hold the rally. However, as the facts indicated that the nature of the event would be partisan, she advised that the organization of the event should not be done at the constituency office and should not use any office resources, including staff time. There is an Ontario parliamentary convention that an MPP's office should be free of partisan activity.

The Commissioner advised that the constituency office staff could organize the rally offsite outside of working hours.

The Commissioner also cautioned that the constituency office and the MPP's website should not advertise the event, nor should any constituency office mailing lists be used for advertising purposes. Finally, the MPP was advised that the constituency office should not be used as the rally's meeting spot.



CAN MPPs HAVE OTHER EMPLOYMENT OR TAKE PART IN VOLUNTEER ACTIVITIES?

Employment

The *Members' Integrity Act, 1994*, allows MPPs who do not have a role in cabinet to take part in other employment. MPPs may wish to keep up with professional requirements — such as medical qualifications — and need to work a certain number of hours annually. MPPs who owned a business or a farm before being elected may continue to do so, but these activities would be subject to the conflict of interest obligations under the Act. For example, the MPP's outside work may affect the member's ability to take part in a vote in the legislature.

Cabinet ministers have more restrictions under the Act regarding other employment. Ministers cannot hold employment outside of their role in cabinet. If a minister is required to engage in a minimum amount of work in order to maintain a professional licence, the Integrity Commissioner may make an exception. If that happens, the minister's outside work could be subject to certain conditions to ensure compliance with the requirements of the Act.

Volunteering

In most cases, MPPs can volunteer on an advisory board or hold on honorary role with an organization. Any volunteer role or outside activity should be disclosed to the Commissioner, who can provide advice on potential intersections between the MPP's outside activity and their public duties.

Cabinet ministers can take on volunteer and honorary roles or other outside activities only in limited circumstances. These exceptions will be determined by the Commissioner based on the type of role and the minister's responsibilities in cabinet.

Outside Activities

Honorary Chair for Charitable Fundraiser

A minister was asked to be the honorary chair for an organization's fundraising gala. The role involved attending the gala, giving remarks and promoting community engagement. The organization confirmed that there would be no fundraising obligations. Could the minister accept this role?

Since the role was honorary without any operational responsibilities, it was the Commissioner's opinion that the minister could accept the role since she was merely lending her name to the event. The Commissioner advised that while the minister could give remarks and speak about the good work of the organization, she was not to solicit donations on the organization's behalf.

Advocacy

Expedited Hearing Request

A constituent requested an MPP's assistance to expedite a case before a provincial tribunal. The MPP asked what appropriate level of assistance could be provided.

It is the Commissioner's advice that it is acceptable for MPPs or their staff to contact a ministry, agency, board or commission for the purposes of requesting information. This includes finding out about the status of a matter or asking for an explanation of a policy or procedure. The MPP was advised that it would be permissible to contact the tribunal to ask about the approximate wait times for a hearing.

However, the Commissioner also noted that members must be careful not to seek or to suggest to others that they are seeking special treatment from decision-makers because of their status as an MPP. Section 4 of the Act prohibits MPPs from using their office to seek to influence a decision that would improperly further another person's interest. It was therefore the Commissioner's opinion that the MPP should not ask the tribunal to expedite a hearing date or to request that the constituent's case be prioritized.

Conflict of Interest

Family Dealings

A member of an MPP's extended family sent emails to the constituency office expressing an opinion about a local issue that fell under the jurisdiction of the provincial government. The MPP was not being asked to take any specific action on the family member's behalf. The MPP asked for advice on how these communications should be handled.

Since the family member's emails provided information only, it was the Commissioner's opinion that it was not necessary for the MPP to take any action. However, if the MPP received any requests for advocacy, the Commissioner advised the MPP to explain to the family member that she could not advocate on their behalf because of the family relationship. The family member's concerns could then be redirected to a neighbouring MPP.

Ministers' Staff Ethical Conduct

The Integrity Commissioner received and provided direction on 170 inquiries from ministers' staff this year. While this was slightly lower than the 187 inquiries handled in the previous year, it is within the typical range seen in the last five years. Inquiries about post-employment obligations made up half of the requests this year. Ministers' staff also contacted the Office regularly with questions about outside activity, which can include volunteer roles and part-time paid employment.

The Commissioner is the Ethics Executive for ministers' staff under the *Public Service of Ontario Act, 2006.* Public servants who work in ministers' offices are required to follow the Conflict of Interest Rules found in Ontario Regulation 382/07 of the Act. Ministers' staff can seek a determination and direction from the Commissioner about their obligations under the Rules at all stages of their employment in a minister's office, including when they are first hired and may have a potential conflict of interest related to a previous employer.

WHAT WE DO

- Provide direction to ministers' staff to help them understand and follow the Conflict of Interest Rules
- Answer questions about their obligations under the *Public Service of Ontario Act, 2006*, and the Conflict of Interest Rules on topics such as gifts, political activity in the workplace, outside activity and post-employment
- Provide training to ministers' offices to assist staff in understanding their obligations

170 ministers’ staff inquiries

Types of Inquiries:

BEHIND THE NUMBERS

These numbers reflect the various subjects about which ministers’ staff sought direction from the Commissioner regarding their ethics obligations under the Act.

Inquiries under the “Outside activity” category include questions about political activity, volunteer work or outside employment. Inquiries under the “Pre-employment” category include questions from successful candidates to ministers’ staff positions or requests for direction from a chief of staff regarding a new hire.

Training and Outreach

The Commissioner and staff delivered three virtual training sessions to more than 200 ministers' staff in June and October 2025 and February 2026. These sessions were focused on providing ministers' staff, particularly those who were new in their roles, with an overview of the Conflict of Interest Rules and political activity restrictions found in the *Public Service of Ontario Act, 2006*. The sessions were also designed to provide attendees with real-life scenarios illustrating how the Act's rules and restrictions may apply or affect their work.

Once it was official that the Toronto Blue Jays would be participating in the 2025 World Series, the Commissioner sent an email to all chiefs of staff in ministers' offices with information about the gift rule. The Commissioner highlighted the prohibition on accepting gifts or benefits from anyone who does or wants to do business with the Ontario government. The limited exceptions to the gift rule can be approved only by the Commissioner. The email specified that gifts were prohibited from lobbyists and ministry stakeholders, and included meals, invitations, event tickets, as well as any team promotional items such as hats or jerseys.

Post-employment

When a public servant leaves government, they must follow obligations and restrictions in the Conflict of Interest Rules. All ministers' staff are bound by these post-service rules and should contact the Office when they interview for a new position or before they accept a new role. Contacting the Office early in the process is important because ministers' staff may also need to be screened from certain files in their current job to avoid the appearance of providing preferential treatment towards a prospective employer.

Office staff will meet with the minister's staff to obtain information about the new role and learn about the files and responsibilities they had in the minister's office.

As their Ethics Executive, the Commissioner will review information and provide written direction to ensure compliance with the Act and to mitigate any potential conflicts of interest.

The Rules also contain a lobbying restriction, and the Commissioner's direction will provide instructions regarding potential lobbying activities. For 12 months after leaving their position, ministers' staff cannot lobby:

- their minister or ministers of the ministry where they worked in the preceding 12 months;
- public servants who work in that minister's office (or those ministers' offices); or
- public servants who work in that ministry or those ministries.

As Lobbyist Registrar, the Commissioner may also provide departing ministers' staff with detailed information about any obligations that apply to them under the *Lobbyists' Registration Act, 1998*.

In some circumstances, a minister's staff could be restricted from taking a job. This is considered through a two-part test as set out in section 19 of the Rules. If the test applies to their circumstances, a minister's staff could be prevented from taking a particular job for 12 months after leaving their role in the minister's office.

MUNICIPAL ELECTIONS AND THE POLITICAL ACTIVITY RULES

Did you know the Integrity Commissioner can provide direction to ministers' staff who want to get involved in the upcoming municipal elections?

Ministers' staff have specific political activity rules they must follow as Ontario public servants. Under the *Public Service of Ontario Act, 2006*, the definition of political activity includes being a municipal candidate, as well as supporting or opposing a candidate in a municipal election.

The political activity rules for ministers' staff acknowledge that certain political activity is allowed when it is being carried out in support of the minister. This is unlikely to occur in relation to the municipal election.

Staff working in ministers' offices should contact the Office if they are considering running as municipal candidates or if they want to work or volunteer on a municipal campaign. They can also contact the Office about school board trustee campaigns. The Commissioner will provide specific direction based on the individual's position as a minister's staff and their obligations under the political activity rules.

Inquiries

The following sample inquiries are intended to help ministers' staff identify conflict of interest issues. The inquiries are abbreviated, the identities of those involved are anonymized and gender has been randomized. The Commissioner's determinations as Ethics Executive are provided to raise awareness about the Conflict of Interest Rules. As the facts of each situation will be different, the information should not be considered a substitute for contacting the Office to obtain the Commissioner's direction on a particular matter.

Conflict of Interest

Family Member Employed as Ministers' Staff

A minister's staff asked for direction regarding a family member who was employed in another minister's office.

The Commissioner reviewed the matter under section 7 of the Rules, which prohibits ministers' staff from hiring, supervising or reporting to a spouse, child, parent or sibling. Given that the minister's staff and her family member were employed in different offices and that her role did not include responsibility for the ministry in which her family member was employed, the Commissioner determined that she was not in a position of conflict.

If a matter arose in her role that involved having direct dealings with her family member, the Commissioner directed that she recuse herself from that discussion and contact the Office for further direction. In addition, she was also told to contact the Office if her responsibilities in the minister's office changed and her work intersected with the ministry in which her family member was employed.

Non-active Union Member

A minister's staff had membership in a union through an outside hobby. The minister's staff advised that his minister's office was considering legislative changes that would have a direct impact on the union and that he would be helping to draft the policy. Was this involvement permissible?

In reviewing the facts of the situation, the Commissioner determined that since the ministers' staff was a non-active member of the union, he was not in a position of conflict. However, in the event that his membership status changed and he became an active member, the Commissioner directed that he recuse himself from any related discussions and contact the Office for further direction.

Gifts

Invitation to Attend an International Conference

A minister's staff received an invitation to attend an international conference. Could he accept the invitation?

The Commissioner reviewed this matter under section 4 of the Rules, which outlines the gift provisions for ministers' staff. Ministers' staff are prohibited from accepting a gift or benefit from anyone who does business with the Crown or wants to do business with the Crown. Given that the minister's staff would be covering all costs associated with his attendance and that the organization holding the conference did not have any dealings with his minister's office, the Commissioner determined that the Rules did not prevent him from accepting the invitation.

The Commissioner also reminded him that section 6 of the Rules prohibits him from providing preferential treatment or creating the appearance that he is providing preferential treatment to a person or entity. As such, if the organization that invited him had any future dealings with his minister's office, he would be required to abide by his obligations under this section.

Outside Activity

Providing a Letter of Recommendation

A minister's staff asked for direction with respect to providing a former university professor with a letter of recommendation for a specific application process.

Given that the minister's staff was providing the letter in her personal capacity as a former student, the Commissioner determined that the Rules did not prevent her from doing so. However, the Commissioner cautioned her that the use of the letter for other applications could result in the message being conveyed in a way that was not intended. As such, she was directed to follow these directions:

1. Seek her minister's approval.
2. Not represent herself as a member of a minister's staff. This included not using government letterhead and making it clear that she was speaking in her capacity as a former student. She could, however, state the position she held in the Ontario government.
3. The letter had to clearly state its intended use, and not be used in other ways, including for other applications. If the professor wanted to reapply or use the reference for a different application, a new letter would need to be requested.
4. Not use any government resources, including government time, emails or phone, to do any work related to the request.

Leave of Absence

A minister's staff inquired about a leave of absence from her role in the minister's office to undertake work with an organization. It was a fixed-term contract position, and her minister's office did not have any dealings with the organization.

The Commissioner advised that a public servant on an authorized leave of absence remains a public servant and is subject to the in-service conflict of interest rules. The Commissioner also confirmed that this Office does not have a role in approving a leave of absence.

The Commissioner reviewed the matter under section 8 of the Rules, which precludes ministers' staff from engaging in an undertaking that could conflict with their duties to the Crown.

Based on the information provided, the Commissioner determined that the Rules did not prevent the minister's staff from taking a leave of absence, provided that she followed these directions:

1. Ensure that any actions undertaken during the leave of absence do not conflict with her duties to the Crown.
2. Not represent herself as a minister's staff while carrying out her duties with the organization.
3. Not use any government resources for any work that she undertakes with the organization.
4. Not disclose any confidential information obtained during her employment as ministers' staff without authorization.

The Commissioner also told the minister's staff to contact the Office once her leave of absence concluded, as a review would need to be conducted to determine whether any additional directions would be necessary when she returned to her former position.

Post-employment

Position with Another Provincial Government

A minister's staff applied for a position in the government of another province. She did not have any professional involvement with this provincial government during the last 12 months of her employment in the minister's office. Was it permissible for the ministers' staff to pursue this opportunity?

The Commissioner reviewed the matter under section 19 of the Rules. It is under this section that the Commissioner can restrict ministers' staff from accepting future employment. The analysis conducted consists of a two-part test. The Commissioner first examines if the minister's staff had substantial involvement with the prospective employer in their last 12 months of employment with the Crown. If that part of the test is met, the Commissioner then determines if the minister's staff had access to confidential information that, if disclosed to the prospective employer, could result in harm to the Crown or could give that prospective employer an unfair advantage.

Since the first part of the two-part test did not apply here, the minister's staff was able to accept the job.

Client Restriction

A former minister's staff now employed with a government relations firm asked for direction regarding a newly retained client. The former staff member had previously received a letter of direction outlining his post-employment obligations and restrictions, which included a special direction to contact the Commissioner if his firm retained a client with whom he had professional involvement in the last 12 months of his employment with the Crown and if he was asked to work on the file.

The minister's staff advised that he had involvement with this client in his former role as minister's staff. He also confirmed that he held confidential information as former ministers' staff pertaining to a file in which the client was involved. Could he work with the client?

As the former staff member held confidential information regarding the client's file, the Commissioner determined that the restriction on disclosing confidential information outlined in section 17 of the Rules applied. To address the confidentiality concerns, the Commissioner directed that the minister's staff be restricted from working on matters related to the file for a 12-month period. This meant he could not assist the client that his firm retained or any other client with matters related to this file, or review any materials developed by the firm in support of this file.

Public Sector Ethics

The Integrity Commissioner received and addressed 235 matters related to the Conflict of Interest Rules and political activity restrictions in the *Public Service of Ontario Act, 2006*.

Ethics Executives from 24 public bodies and ministries contacted the Office on matters related to the Act, including about their own obligations or to receive guidance about the determinations they were providing to other public servants, including board appointees.

The Office noted an increase in requests for advice on prospective appointments. Due to the timing of the financial declaration process, fewer declarations from public servants were received than in the previous year.

WHAT WE DO

- Provide advice and determinations to Ethics Executives (chairs of public bodies, the Secretary of the Cabinet and other designated individuals) on matters related to the Conflict of Interest Rules found in Ontario Regulation 381/07 and the political activity restrictions in the *Public Service of Ontario Act, 2006*
- Review financial declarations submitted by public servants working on matters that involve the private sector
- Provide conflict of interest advice, upon request, to the Premier's Office regarding appointments to public bodies and other entities
- Approve new or revised conflict of interest rules for public bodies and ethics plans of adjudicative tribunals

235
matters addressed under the Act*

Types of Matters:

*** Included in the number of matters is the revocation of the conflict of interest rules for a public body. This public body resumed following the Conflict of Interest Rules under the Act.**

BEHIND THE NUMBERS

Advice: The Commissioner provides advice to Ethics Executives to assist them in making conflict of interest or political activity determinations for the employees or board appointees in their public bodies or ministries.

Determinations: These are formal directions by the Commissioner to an Ethics Executive related to their own conflict of interest or political activity matters. This category includes political activity authorizations. Ethics Executives may also refer a matter to the Commissioner about public servants in their public bodies in order for the Commissioner to make the determination.

Appointment Advice: The Premier's Office may ask for the Commissioner's conflict of interest advice on prospective appointments to public bodies. The Commissioner will assess declared conflicts and provide advice and mitigation strategies related to the proposed role.

Rules and Ethics Plan Approval: The Act allows public bodies to develop their own conflict of interest rules, but these must meet the standards in the Conflict of Interest Rules and be approved by the Commissioner. Under the *Adjudicative Tribunals Accountability, Governance and Appointments Act, 2009*, the Commissioner approves ethics plans for tribunals.

Training and Outreach

In May and November, the Office held online Ethics Executive orientation sessions for designated Ethics Executives, public body chairs and the employees who support them. The sessions covered the Conflict of Interest Rules and political activity restrictions and provided information on how Ethics Executives can get assistance from the Office. Participants were presented with hypothetical scenarios and were given the opportunity to discuss how they would apply the Act and the Rules in those situations. The disclosure of wrongdoing framework and the obligations public bodies have under the Expenses Review mandate were also covered. A total of 63 public body appointees and employees from 40 public bodies were trained, 38 of whom were Ethics Executives.

The Commissioner met with newly appointed deputy ministers and discussed Ontario's ethics framework. She also had a separate opportunity to address all deputy ministers to explain the role of the Office and the importance of the Rules.

As part of the Office's outreach activities, the Commissioner sent introductory letters to the 19 newly named public body Ethics Executives to explain the role of the Office and offer support in fulfilling their duties under the Act.

Additionally, Office staff met with three public body boards to review the Conflict of Interest Rules, political activity restrictions and the disclosure of wrongdoing framework. In total, the Office provided training to 46 Ethics Executives.

Appointment Advice

When requested by the Premier's Office, the Commissioner provides conflict of interest advice about prospective appointments to public bodies. In responding to these requests, the Commissioner assesses identified or potential conflicts for the prospective appointee and provides advice on how conflicts can be mitigated. The advice is based on the individual's circumstances in the context of the proposed role with the public body. The Commissioner does not address an individual's suitability for a particular appointment. The advice regularly includes recommendations that the appointee be recused from participating in decisions related to certain matters and a reminder of the need to keep their non-public service roles separate from their public duties. The Commissioner also advises that once appointed, the individual should discuss potential conflict of interest issues with the chair, who is their Ethics Executive. This year, the Commissioner provided appointment advice for 42 potential appointees.

Financial Declarations

As part of a requirement in the Conflict of Interest Rules, the Public Service Commission maintains a list of public servant positions that carry out work on matters that might involve the private sector. The public servants in these positions must submit a financial declaration to the Commissioner.

Each declaration is reviewed to ensure that the public servant's financial holdings do not conflict with their work or are not connected to matters about which the public servant holds confidential information. This year, 100 declarations were reviewed, which was lower than the 137 declarations reviewed last year. This drop was due to the shorter period between declaration cycles, which meant public servants who had filed previously and had no changes to their financial holdings were able to submit an attestation to that effect rather than a new declaration.

If a public servant discloses assets or holdings that may have a connection to their ministry or agency, the Commissioner will provide direction on how to mitigate any conflicts. Public servants must inform their Ethics Executive if the nature or value of their financial holdings changes.

BOARD CHAIRS: MANAGING POTENTIAL CONFLICTS OF INTEREST AROUND THE TABLE

Chairs of public bodies are the Ethics Executives for appointees to the public body.[1] These appointees often serve on a part-time basis and may have other employment, board appointments or volunteer activities. It is common for potential conflicts of interests to exist in this environment, particularly because appointees are often selected for their expertise in the public body's area of work.

Being proactive with the application of the Conflict of Interest Rules is important for a board chair. When a new member is appointed, a chair should prioritize a conversation with the appointee to discuss potential intersections between their private interests and new public duties.

Topics for this meeting include the appointee's past and current employment, other board appointments, and membership in professional or other organizations.

If potential conflicts are identified, the chair can discuss with the appointee how they should be handled. This could mean establishing a protocol in advance on when an appointee should be recused from an agenda topic or a vote at the board table.

The main role of an Ethics Executive is to provide direction to mitigate a public servant's conflict of interest.

Chairs can also request advice from the Integrity Commissioner about the proposed action or protocol they would like to implement for specific appointees, particularly in situations where there are several intersections that raise the potential for conflicts of interest.

Proactive work to identify potential conflicts ahead of time will help avoid delays during meetings, benefiting the work of the board overall.

1 At many public bodies, the chair is the Ethics Executive for both appointees and employees.

Inquiries

The following are examples of the advice and determinations the Commissioner provided to public body Ethics Executives this year. These summaries are abbreviated, the identities are anonymized and gender has been randomized. They are published to assist Ethics Executives and other public servants in consistently interpreting and applying the Conflict of Interest Rules and political activity restrictions found in the Act.

Selecting a Speaker for an Event

An Ethics Executive requested direction with respect to retaining a public speaker for an event that her agency was organizing. When selecting a speaker, the Ethics Executive considered an individual that she knew well through a family friend. She asked if there would be a conflict of interest if her organization retained this individual as the speaker at this event.

The Commissioner considered the matter under section 6 of the Rules, which requires that a public servant not give preferential treatment to anyone in the course of their work and that they also take steps to avoid creating the appearance that preferential treatment is being given.

In order to avoid giving preferential treatment, the Commissioner directed that the selection of a speaker for this event should be undertaken by another staff member. The Commissioner further directed that the selection process should follow a clear and transparent process, which may include identifying multiple individuals and companies that provide similar services, obtaining quotes and using objective criteria to make the decision. The Commissioner also indicated that the process should be well documented.

Delegating the Role of an Ethics Executive

An Ethics Executive asked if it was possible for him to delegate to his general counsel the ability to approve or refuse routine matters under the Act, following direction that he provided in similar cases.

The Commissioner advised that the Act centralizes decision-making with the Ethics Executive. The Ethics Executive can have help and can establish a system where staff receive and analyze conflict of interest submissions from public servants in order to draft responses for the Ethics Executive's approval. Ultimately, however, it is the Ethics Executive who must make the final decision and issue the direction to the public servant. That responsibility cannot be delegated.

POLITICAL ACTIVITY AND THE ROLE OF THE ETHICS EXECUTIVE

Public servants can participate in political activity on their own time, but there are restrictions. Some restrictions depend on the public servant's role — generally, those in more senior roles have more restrictions. Ethics Executives have the responsibility to provide direction to public servants on whether a specific political activity is allowed.

To do this, the Ethics Executive must first establish whether the activity meets the definition of political activity. The definition is set out in section 72 of the *Public Service of Ontario Act, 2006* and includes:

- doing anything in support of or in opposition to a political party or a candidate;
- becoming or seeking to become a candidate in a federal, provincial or municipal election; or
- making public comments on any matter dealt with in the position or policy of a political party or candidate if comments are outside the scope of the public servant's duties and the matter is directly related to their duties.

The Ethics Executive must then consider the role of the public servant.

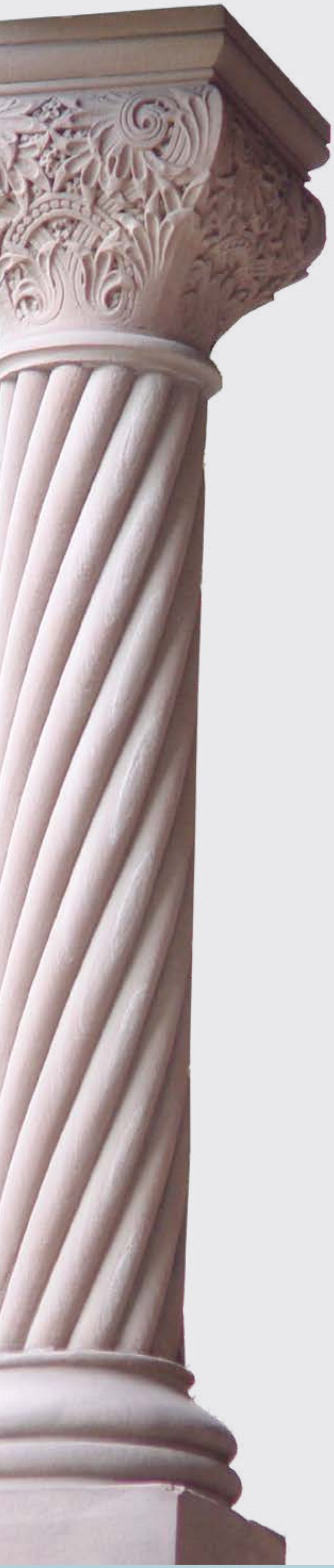
General restrictions apply to all public servants, such as not using government time or resources when taking part in political activity.

Some restrictions apply to most public servants, such as the requirement to take a leave of absence to become a provincial or federal candidate.

The highest level of restrictions apply to public servants in the specially restricted category. Specially restricted public servants, such as full-time tribunal members, cannot become provincial or federal candidates but may seek authorization from their Ethics Executive to become a municipal candidate.

When considering which restrictions apply to a public servant, it is important to have all the facts, including a full description of the political activity. For example, if an Ethics Executive is providing direction to a public servant who would like to volunteer on a municipal campaign, it is helpful to have information about the candidate, the tasks the public servant will have in the campaign and whether they will be fundraising. That information, along with the public servant's role, can then be applied against the relevant restrictions listed in the Act.

The direction issued by the Ethics Executive to a public servant must be followed. The goal is to balance the rights of public servants to engage in the democratic political process with the requirement to maintain a neutral and non-partisan public service.



Disclosure of Wrongdoing

The number of disclosures of wrongdoing submitted by current and former public servants this year was the highest since the implementation of the framework under the *Public Service of Ontario Act, 2006*. The 62 disclosures accounted for more than a 50% increase from the 40 submitted last year.

The higher number of disclosures did not result in a higher number of files accepted under the Integrity Commissioner's jurisdiction. Several disclosures were not accepted due to insufficient information being provided to pursue the matter. While Office staff make significant effort to obtain clear and relevant information from public servants making a disclosure, some individuals cannot or do not respond to questions about the allegations. Lack of information is a challenge when assessing for jurisdiction and limits the ability to investigate allegations appropriately. This year the Commissioner accepted jurisdiction over 10 matters.

The Office closed 11 files that had been investigated. Wrongdoing was substantiated in seven of these. The cases are summarized in this report and demonstrate the importance of investigating disclosures appropriately to address instances of wrongdoing within ministries and public bodies.

WHAT WE DO

- Receive disclosures of wrongdoing from current or former public servants who witness misconduct at work
- Determine whether the Integrity Commissioner has jurisdiction over a disclosure of wrongdoing
- Refer disclosures to the appropriate senior official in the Ontario Public Service for investigation
- Review investigation reports to determine if the Commissioner is satisfied with the work and response
- Conduct investigations initiated by the Commissioner

Year in Numbers

78
contacts from public servants

62
disclosures from public servants

10
disclosures accepted and referred for investigation

11
matters investigated and concluded

BEHIND THE NUMBERS

Disclosures accepted and referred for investigation: The Commissioner can accept jurisdiction over a disclosure from a public servant if the allegations meet the definition of wrongdoing under the Act. However, the Act requires the Commissioner to decline jurisdiction in certain instances, such as when there is a more appropriate way for an allegation to be addressed or if the matter is already being addressed elsewhere.

Matters investigated and concluded: These are the disclosures that have been investigated by an Ethics Executive and where the Commissioner is satisfied with the results of the investigation. It can also include matters that the Commissioner has investigated and for which she sent a report to a senior official within the Ontario government and the responsible minister.

Training

Training under this mandate focuses on providing Ethics Executives at public bodies with information to ensure they understand their role in receiving, assessing and investigating disclosures of wrongdoing. Under the Act, Ethics Executives can receive a disclosure directly from a current or former public servant or have a disclosure referred to them by the Commissioner.

The Office provided training on the disclosure of wrongdoing framework during its Ethics Executive orientations sessions in May and November. The sessions provided guidance on how to effectively investigate matters and included examples of anonymized cases of past disclosures.

When invited to speak with public bodies and newly appointed deputy ministers, the Commissioner highlighted the importance of addressing disclosures appropriately in accordance with the legislation.

Meeting with Other Jurisdictions

In September, the Commissioner and staff attended the annual Public Interest Disclosure Conference in Canmore, Alberta. The conference allows for Canadian jurisdictions with a public interest disclosure framework to share updates on their respective work and best practices related to investigating disclosures. At this year's conference, attendees discussed lessons learned from public reports, managing case volumes and legislative review.

The Disclosure Process

When a disclosure is made to the Office, the Commissioner first assesses it to determine whether she has jurisdiction to accept it under the Act.

The Commissioner considers four factors:

- whether the disclosure was made by a current or former Ontario public servant;
- whether the allegations raised in the disclosure are about an Ontario public servant, minister or parliamentary assistant;
- whether the allegations meet the definition of "wrongdoing" that may be accepted by the Commissioner; and
- whether the circumstances of the disclosure fall into a category that the Commissioner cannot deal with.

Office staff work with each discloser to clarify the information received. Many disclosures contain multiple allegations, and each allegation is considered against the four factors. If the disclosure does not provide sufficient information that allows the matter to be assessed or investigated, the Commissioner is not able to accept jurisdiction.

Wrongdoing refers to specific conduct of a public servant, minister or parliamentary assistant and must be one of the following:

- a contravention of a law or regulation;
- an act or omission that creates a grave danger to the life, health or safety of people or the environment;
- gross mismanagement in the work of the public service of Ontario; or
- directing or counselling wrongdoing, as outlined above.

If an allegation meets the definition of wrongdoing, the Commissioner must determine whether it falls under section 117 of the Act. This section requires the Commissioner to decline jurisdiction if there is a more appropriate process for the allegation to be addressed or if it is already being addressed elsewhere.

For example, the Commissioner must decline jurisdiction over allegations that are being dealt with as a matter of law enforcement or through a court or tribunal. Additionally, matters that fall into the category of employment or labour relations fall outside the Commissioner's jurisdiction, as these can generally be dealt with through a grievance procedure or dispute resolution process.

If the Commissioner does not have legal jurisdiction over a matter but the allegations appear serious enough to warrant action, the Commissioner may decide to inform a senior official in the public service about the allegations. While this is not a formal process under the Act, it allows senior public servants to be made aware of a potential issue in a ministry or public body.

When the Commissioner can accept jurisdiction over a matter, she is required by the Act to refer it to one of several persons set out in the Act, but usually selects the Ethics Executive of the ministry or public body where the alleged wrongdoing has occurred. The person to whom the matter is referred is required to investigate the matter and report back to the Commissioner about the findings and any proposed corrective action. The Commissioner will review the findings to ensure that the matter has been addressed in an appropriate and meaningful way.

Disclosure Activity

97
Inquiries and disclosures received

19
Inquiries or submissions from members of the public[2]

62
Disclosures of wrongdoing submitted by public servants

16
Requests for information from public servants

67
Disclosures received for assessment
(62 received in 2025–2026 + 5 carried over from previous year)

10
Referred to Ethics Executive for investigation

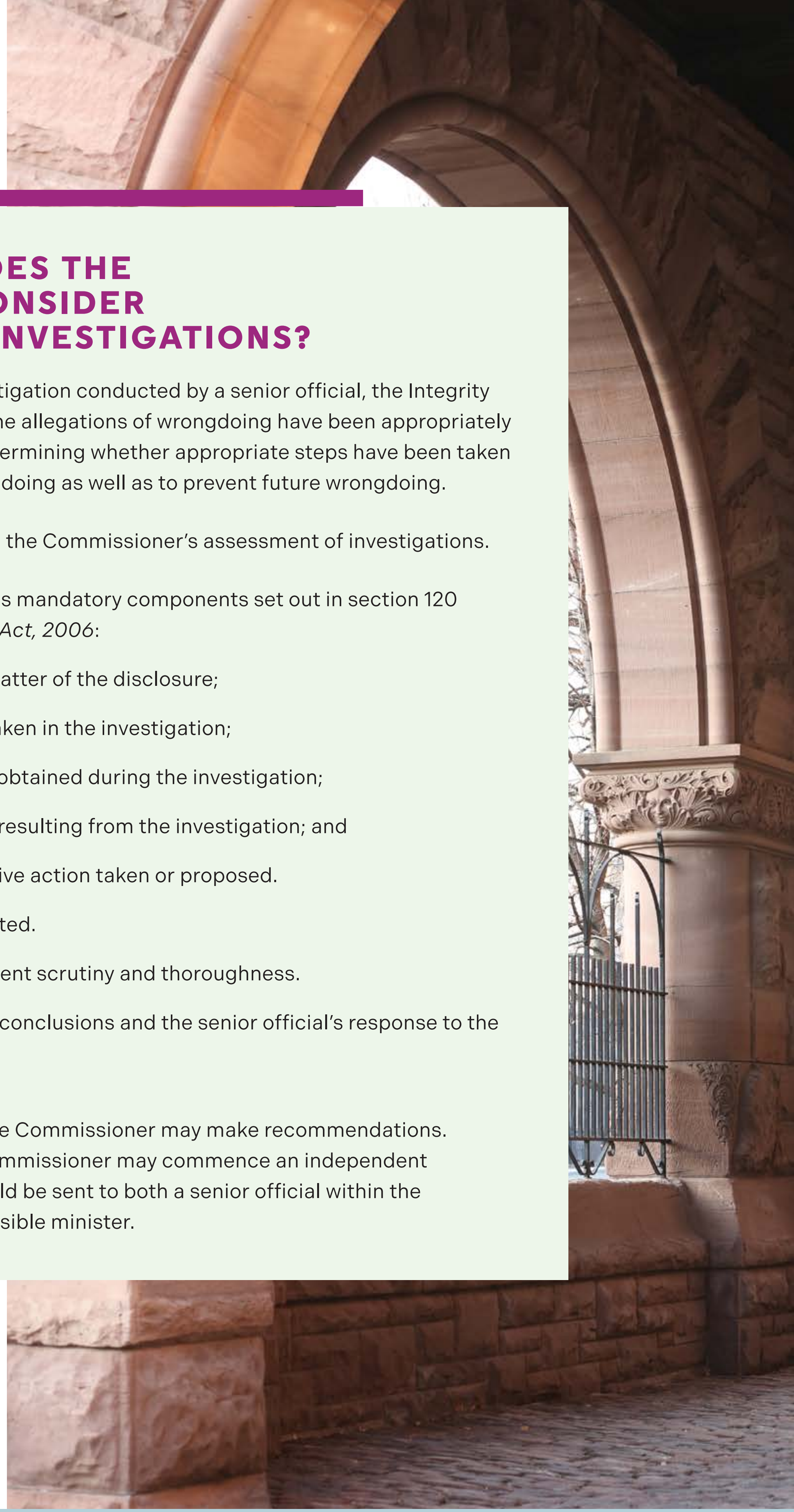
46
Not under Commissioner's jurisdiction

11
Under assessment at year end and carried forward to 2026–2027

13
Matters not received as a disclosure of wrongdoing because the allegations were not a "wrongdoing" as defined in the Act

33
Matters where circumstances were outside of the Commissioner's jurisdiction under s. 117 of the Act

2 As the *Public Service of Ontario Act, 2006* does not allow for non-public servants to file disclosures, Office staff will redirect members of the public to other entities that may be able to assist them with their concerns.



WHAT FACTORS DOES THE COMMISSIONER CONSIDER WHEN ASSESSING INVESTIGATIONS?

When reviewing a report of an investigation conducted by a senior official, the Integrity Commissioner considers whether the allegations of wrongdoing have been appropriately addressed. This review includes determining whether appropriate steps have been taken to address any substantiated wrongdoing as well as to prevent future wrongdoing.

The following factors are relevant to the Commissioner's assessment of investigations.

1. The investigation report contains mandatory components set out in section 120 of the *Public Service of Ontario Act, 2006*:
    - a summary of the subject matter of the disclosure;
    - a description of the steps taken in the investigation;
    - a summary of the evidence obtained during the investigation;
    - a statement of the findings resulting from the investigation; and
    - a description of any corrective action taken or proposed.
2. A neutral investigator was selected.
3. The investigation applied sufficient scrutiny and thoroughness.
4. The report contains reasonable conclusions and the senior official's response to the matter is appropriate.

If satisfied with the investigation, the Commissioner may make recommendations. Alternatively, if not satisfied, the Commissioner may commence an independent investigation for which a report would be sent to both a senior official within the Ontario government and the responsible minister.

Case Summaries

This year the Office closed 11 matters, with wrongdoing substantiated in seven of these. The Commissioner made recommendations to the Ethics Executive in five cases, all of which were accepted. The following are anonymized summaries of the disclosure of wrongdoing matters concluded this year. A matter may include more than one discloser.

Alleged conflict of interest in hiring (referral)

A discloser alleged that two managers each breached Conflict of Interest Rules by hiring a friend or family member and that all four public servants involved contravened the Rules by failing to report the potential conflict of interest to their Ethics Executive. The Commissioner referred the allegations to the appropriate senior official.

Following an investigation, the senior official found that one manager had participated in the hiring and supervision of a friend, and both the manager and the employee failed to report the potential conflict to their Ethics Executive. The senior official proposed corrective action to address the findings with the individuals involved.

The senior official found that the second allegation about the other two public servants was not substantiated because the person hired was not an extended family member of the manager in question. Although no wrongdoing was found, the senior official took action to ensure both public servants were aware of the Rules and about the process for submitting declarations.

The Commissioner was satisfied with the investigation and the corrective actions, and she closed the file.

Alleged preferential treatment (referral)

A discloser alleged that a public servant contravened subsections 3(1), 6(1) and 6(2) of the Conflict of Interest Rules by supervising his spouse and by involving himself in some aspects of his spouse's work. The discloser further alleged that both spouses contravened subsection 7(4) of the Rules and subsection 65(3) of the *Public Service of Ontario Act, 2006* by failing to notify their Ethics Executive of their spousal relationship.

The Commissioner referred the matter to the deputy minister for investigation. The investigation concluded that the respondents each made appropriate conflict of interest declarations and received determination letters from their Ethics Executive. There was also no evidence that the public servant supervised his spouse. The Commissioner found that the deputy minister's conclusion was reasonable.

The investigation identified two instances where the public servant made decisions that involved his spouse. The deputy minister concluded that the decision at issue did not involve supervising his spouse, and, therefore, the Ethics Executive direction did not restrict the public servant from making these decisions. The Commissioner recommended that the Ethics Executive review the determination and consider giving the direction that the respondent should not make decisions involving his spouse. The Commissioner also suggested that the deputy minister consider making staff aware when conflicts of interest are declared and directions given. In appropriate circumstances, this may enhance staff confidence and avoid the appearance of preferential treatment.

The deputy minister accepted the recommendation. The Commissioner closed the file.

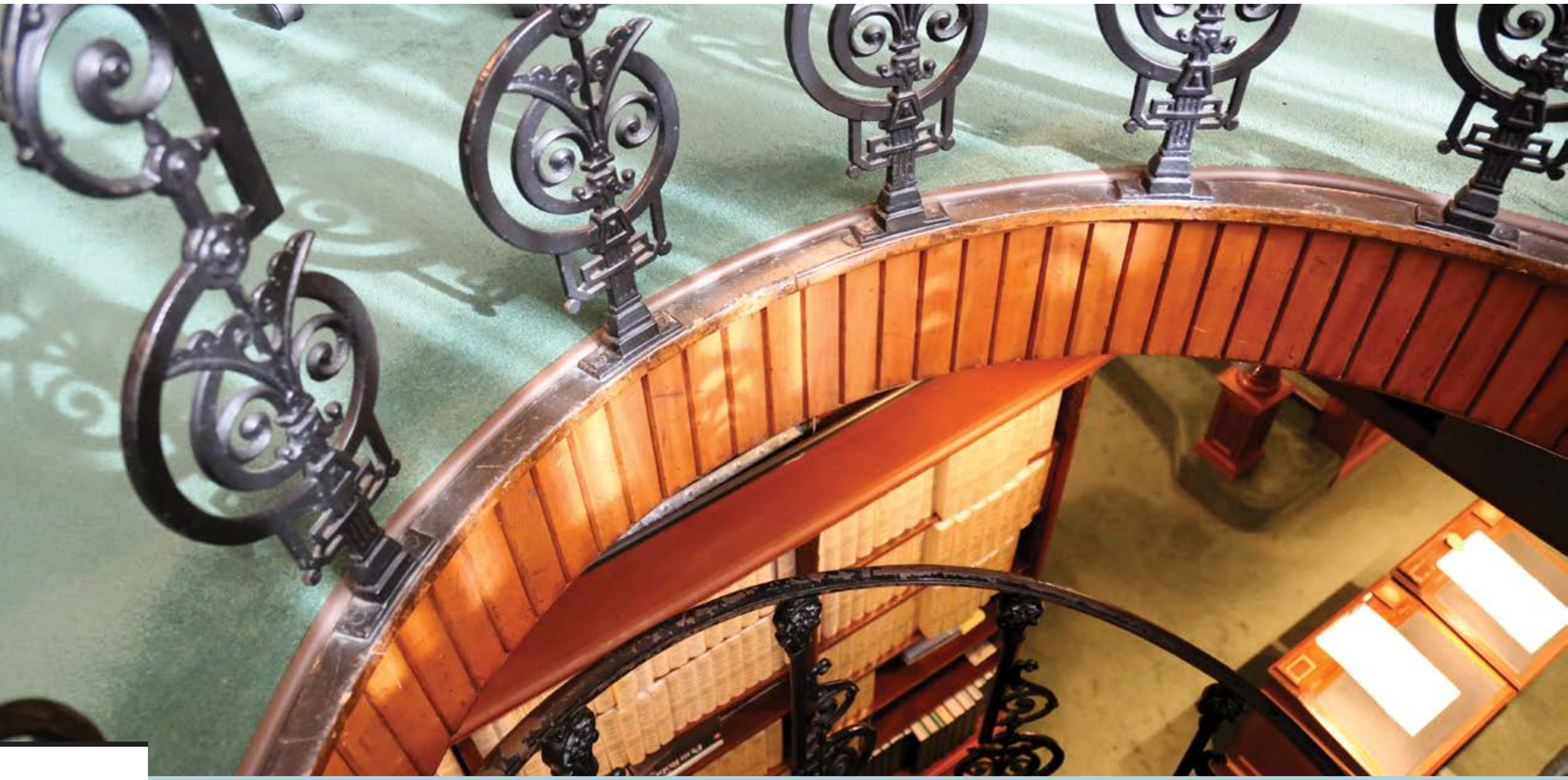
Alleged preferential treatment (referral)

A discloser alleged that a public servant contravened sections 6(1) or 6(2) of the Conflict of Interest Rules by giving preferential treatment, or failing to endeavour to avoid the appearance of preferential treatment, when the public servant assigned temporary positions to three individuals with whom the public servant had personal relationships.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found the public servant contravened section 6(2) of the Rules when the public servant hired one individual who had a history of friendship with the public servant's family member. The deputy minister concluded the public servant did not contravene section 6(2) in the two other temporary assignments. The deputy minister also concluded the public servant did not contravene section 6(1) by giving preferential treatment to any of the three individuals hired because the public servant was addressing staffing issues and had followed OPS hiring practices and the terms of the collective agreement. The deputy minister identified corrective actions, including reviewing best practices and guidance on hiring for temporary positions, reviewing hirings and monitoring hiring processes, requesting hiring managers to notify their reporting manager when they hire family, friends or other known personal acquaintances and to report to their Ethics Executive as required. Resources on temporary hirings were also distributed to management.

The Commissioner was satisfied with the investigation and agreed with the proposed corrective actions but also asked that the deputy minister provide an update on their implementation. The deputy minister confirmed that all the corrective actions had been implemented and that the ministry would monitor matters to ensure that it adhered to best practices.

The Commissioner closed the file.



Alleged preferential treatment in hiring (referral)

A discloser alleged that a public servant contravened subsections 6(1) and 6(2) of the Conflict of Interest Rules. The discloser alleged that the public servant gave preferential treatment, or failed to avoid creating the appearance of preferential treatment, by participating in a hiring panel where the successful candidate was alleged to be a close friend.

The Commissioner referred the matter to the deputy minister for investigation. The investigation concluded that although the public servant socialized with the successful candidate outside of work, the hiring process was fair and aligned with Ontario Public Service (OPS) recruitment best practices. The investigator concluded that the public servant did not confer preferential treatment to his friend, and that because the hiring process followed OPS recruitment best practices, it was also successful in avoiding the appearance of preferential treatment. The deputy minister accepted the investigation's conclusions and found that no wrongdoing occurred, but that remedial education on recruitment would be provided to the public servant and to other hiring managers.

The Commissioner was satisfied with the investigation and with the conclusion that the public servant did not give preferential treatment to his friend during the recruitment process. With respect to the conclusion that the public servant succeeded in avoiding the appearance of preferential treatment, the Commissioner noted that it did not appear that the investigator considered the public servant's duty to notify their Ethics Executive of an issue under the Conflict of Interest Rules, under subsection 65(3) of the *Public Service of Ontario Act, 2006*, a duty which applies in addition to OPS recruitment best practices.

The Commissioner recommended that additional content be added to the remedial education sessions for the public servant and hiring managers, covering the application of subsections 6(1) and 6(2) of the Rules in the recruitment process, along with the statutory requirement under subsection 65(3) of the Act that public servants, including hiring managers, disclose possible conflict of interest concerns to their Ethics Executive and seek direction.

The deputy minister accepted the recommendation and the Commissioner closed the file.

Alleged preferential treatment (referral)

A discloser alleged that two public servants contravened subsections 6(1), 6(2) and/or 6(3) of the Conflict of Interest Rules. The discloser alleged that one public servant gave preferential treatment to another employee with whom he had a personal relationship and that the second public servant gave preferential treatment, or failed to avoid creating the appearance of preferential treatment, by investigating a workplace complaint initiated by someone alleged to be a close friend.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found that the evidence did not establish that either respondent engaged in wrongdoing. In the first allegation, the investigation found that the public servant did not provide assistance that was out of the ordinary or different from what he would have conferred on other employees. In the second allegation, the evidence did not indicate a close friendship that would have influenced the workplace investigation or created a perception of unfairness.

The Commissioner was satisfied with the investigation and closed the file.

Alleged conflict of interest (referral)

A discloser alleged that a public servant contravened various sections of the Conflict of Interest Rules in the course of their duties by dealing with a matter in which they had a personal interest. The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found that the public servant had contravened section 6(2) of the Rules, the rule requiring public servants to endeavour to avoid any appearance of preferential treatment, by not filing a conflict of interest declaration in a timely way and by undertaking an administrative task related to the matter. The deputy minister found the public servant did not take any steps to benefit themself. The deputy minister identified corrective actions to be taken, including reminding the public servant of their obligations under the Rules.

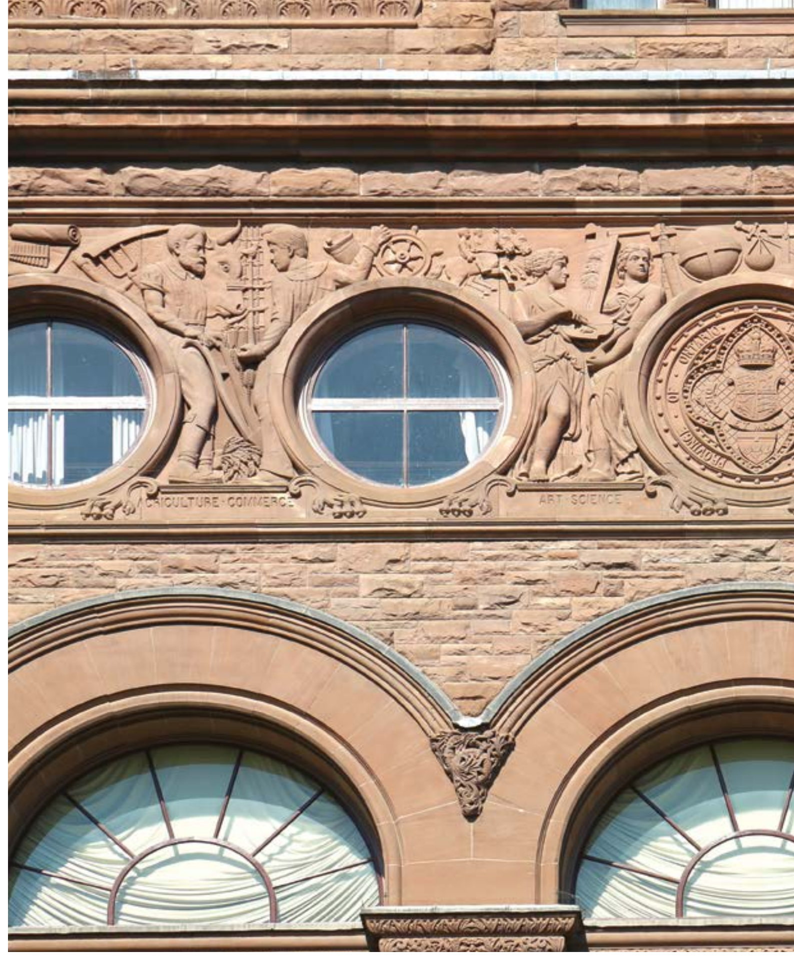
The Commissioner was satisfied with the investigation and closed the file.

Alleged gross mismanagement, grave danger and contravention of a law (referral)

A discloser alleged that a public servant engaged in gross mismanagement, created grave danger, and contravened an act. The discloser also alleged that two other public servants engaged in gross mismanagement and contravened the Conflict of Interest Rules for inappropriately handling an incident involving the first public servant. A second discloser came forward with a similar allegation that various public servants, including one public servant already named by the first discloser, engaged in gross mismanagement, created grave danger and contravened an act by participating in the same actions as described by the first discloser or by taking steps to cover up what had occurred. There were also allegations, related to the same facts, that two public servants with related work responsibilities had failed to disclose personal relationships that could give rise to a conflict of interest.

The Commissioner referred the allegations to the deputy minister for investigation. The deputy minister provided an initial report on the investigation, but the Commissioner had concerns that findings had been made without notifying the respondents or providing them an opportunity to respond. The Commissioner requested additional information and analysis, including that additional witnesses be interviewed.

Following this, the deputy minister delivered an updated investigation report, in which public servants were found to have engaged in wrongdoing or contravened ministry policy. The deputy minister also found that additional public servants, including a manager not named by the disclosers, engaged in wrongdoing or contravened ministry policies. The deputy minister advised that one



of the named respondents no longer worked at the ministry. While the Commissioner was satisfied with the additional investigative work, she questioned the reasonableness of the deputy minister's findings that certain allegations were not wrongdoing under the *Public Service of Ontario Act, 2006*. However, since the deputy minister advised that the conduct of the public servants who had contravened ministry policies would be addressed, regardless of whether it constituted wrongdoing under the Act, the Commissioner did not ask for the findings to be reconsidered. Instead she provided information about criteria to inform such analysis in future.

The Commissioner also requested further information about why disciplinary action was not proposed for some respondents and made a recommendation on corrective action in relation to the conduct of a manager. The deputy minister advised that non-disciplinary action would be taken with respect to the respondents and explained that certain formal disciplinary action options were not possible given the passage of time and intervening events. The deputy minister also identified a change in leadership and listed specific initiatives to address the problems identified by the investigation. The deputy minister also accepted the recommendation regarding follow-up with the manager in question.

The Commissioner was satisfied with the deputy minister's updated information regarding corrective actions and closed the file.

Alleged conflict of interest: hiring and supervising family member (referral)

A discloser alleged that a public servant contravened the Conflict of Interest Rules by hiring and supervising a family member. It was also alleged that the public servant contravened the Rules by using their employment to benefit the family member and that they gave, or appeared to give, preferential treatment.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found that the public servant did not hire or supervise the family member. However, the deputy minister did find that the public servant contravened the Rules by using their employment to benefit the family member, providing preferential treatment and failing to avoid creating the appearance of providing preferential treatment. The deputy minister undertook corrective actions, including issuing a reprimand and providing specific directions and coaching for the public servant.

The Commissioner was satisfied with the investigation and the corrective action and closed the file.

Alleged conflict of interest: benefiting family member and preferential treatment (referral)

A discloser alleged that a public servant contravened subsections 3(1), 6(1) and 6(2) of the Conflict of Interest Rules by using her employment to directly or indirectly benefit a family member and gave preferential treatment or failed to endeavour to avoid the appearance of preferential treatment when she was involved in the hiring of the family member for a short-term assignment. It was also alleged that the public servant and her family member contravened subsection 65(3) of the *Public Service of Ontario Act, 2006* by failing to notify their Ethics Executive of a personal interest that could raise an issue under the Conflict of Interest Rules.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister had already conducted an internal investigation prior to the referral and provided the process and outcome of that investigation. The deputy minister found that the public servant contravened subsections 3(1), 6(1) and 6(2) of the Rules and subsection 65(3) of the Act when she sent the family member's application materials to the hiring manager who had requested suitable candidates for a short-term assignment. The public servant failed to notify her Ethics Executive prior to forwarding the application materials to the hiring manager. The public servant was not involved in the hiring decision, and the family member did not directly report to the public servant.

The deputy minister found that the family member did not contravene subsection 65(3) of the Act because the public servant had filed a conflict of interest declaration prior to the family member's start date.

The deputy minister undertook corrective actions, including senior managers having discussions with the public servant about the conflict of interest concerns and her obligations going forward. The deputy minister also ensured the public servant did not have delegated authority over her family member during the short-term assignment.

Because the deputy minister advised that it is regular practice for managers to provide suitable candidates for short-term assignments to other managers upon request, the Commissioner recommended that the deputy minister remind all managers that they should not be forwarding their family members' or friends' application materials or that they should file a conflict of interest declaration prior to doing so. The Commissioner also suggested that the deputy minister consider making staff aware when conflicts are managed within the ministry in order to make clear that preferential treatment has not been given.

The deputy minister accepted the recommendation and the Commissioner closed the file.

Alleged conflict of interest: supervising family member (referral)

A discloser alleged that two separate romantic relationships in the workplace raised conflict of interest concerns. In each couple, one spouse reportedly had a supervisory role over the other. The discloser alleged that the public servants in supervisory roles may have promoted or supervised their respective spouses, contrary to subsections 3(1), 6(1), 6(2), 7(1), 7(2) and/or 7(3) of the Conflict of Interest Rules. It was also alleged that all four public servants contravened subsection 7(4) of the Rules or subsection 65(3) of the *Public Service of Ontario Act, 2006* by failing to notify their Ethics Executive of their respective relationships.

The Commissioner referred the matter to the deputy minister for investigation. In an initial report, the deputy minister provided conclusions about the facts of the situation and proposed corrective actions. The Commissioner asked the deputy minister to provide conclusions about whether wrongdoing had occurred and for an update on the proposed corrective actions. In an updated report, the deputy minister found that none of the public servants engaged in wrongdoing. The deputy minister found that while the public servants may not have reported their respective relationships and changes in their responsibilities to their Ethics Executive in a timely way, their managers were aware of the relationships, had given some instruction as to how to manage the inherent conflict, and had not directed the public servants to report their relationship to their Ethics Executive. The investigation also found that one of the relationships had ended.

The Commissioner was satisfied with the extent of the investigation but questioned whether sufficient steps had been taken to address its findings. She recommended that the deputy minister review:

- the internal process for ensuring conflicts of interest are brought to the attention of the Ethics Executive as required by the Act;
- whether sufficient steps had been taken to address the conflict in the case of the couple who remained in a relationship; and
- ways to share information about managing conflicts within an organization to address perceptions of an unaddressed conflict.

The deputy minister accepted the recommendations. The ministry redesigned the internal process for public servants to declare conflicts of interest, created updated guidance materials and included steps to ensure matters would be brought to the attention of the Ethics Executive. The deputy minister confirmed the time frame for these changes to be made and noted that the one couple would be provided with updated direction about how to manage the conflict, based on current information.

The Commissioner closed the file.

Expenses Review

The Office reviewed 4,419 expense claims in the two Expenses Review mandates this year, higher than the 4,094 claims reviewed last year. This was largely due to an increase in the number of travel claims received from ministers' offices.

Office staff trained more than 210 staff in 26 ministers' offices, explaining the expenses submission process and providing an overview of the Allowable Expense Rules. Additionally, they conducted several training activities for agencies, providing valuable information about the review process and the requirements of the Travel, Meal and Hospitality Expenses Directive.

The review process in both mandates begins with the submission of expense claims for a specific review period. Office staff review the claims to make sure they are complete and in compliance with the Directive or the Rules, depending on the claimant type.

Staff often request additional information or supporting documents to clarify a claim and complete the review. If the Integrity Commissioner determines that an expense does not comply with the requirements, she may ask for repayment. The Commissioner may also provide feedback or suggestions for future expense claims.

WHAT WE DO

- Review the travel, meal and hospitality expenses of:
  - cabinet ministers, parliamentary assistants, Opposition leaders and their respective staff; and
  - senior executives, appointees and the top five employee expense claimants at agencies, boards and commissions
- Ensure that expenses comply with the Travel, Meal and Hospitality Expenses Directive and Allowable Expense Rules
- Determine whether repayment is required if an expense does not comply with the Directive or the Rules

Year in Numbers

BEHIND THE NUMBERS

One claim may contain several types of expenses. For example, a claim for a trip could contain expenses for air travel, taxis, accommodation and meals.

Cabinet Ministers' and Opposition Leader's Expenses Review

This year the Office reviewed 2,752 expense claims from ministers, parliamentary assistants, the Opposition leader and their respective staff. This is a significant increase from the 2,152 claims reviewed last year.

Office staff conducted 26 online training sessions for ministers' offices, where staff reviewed the Allowable Expense Rules and explained the expense submission process. They stressed the importance of providing pertinent supporting documents, such as receipts, and discussed the business purpose of a claim. The training was also an opportunity to explain that the Commissioner can ask for repayments after reviewing expenses that do not meet the requirements in the Rules.

Each year, the Commissioner submits a report to the Speaker of the Legislative Assembly about the expense claims submitted in the fiscal year. As indicated in the *Cabinet Ministers' and Opposition Leaders' Expenses Review and Accountability Act,* *2002*, the Commissioner can name in the report any person who does not comply with an order to repay or a recommendation for other remedial action. The filed report indicated that all expense claims submitted for review during the previous fiscal year were deemed to be compliant with the requirements of the Act.

Agency Expenses Review

The Office reviewed 1,667 expense claims from appointees, designated senior management employees and the top five employee expense claimants[3] of the 14 agencies, boards and commissions under review. This number of claims is slightly lower than the 1,942 claims reviewed last year, partly due to certain agencies being released from the review process after they demonstrated compliance with the Directive.

Following requests for training from two agencies, Office staff provided an overview of the requirements of the Directive as well as the expense review process.

The Commissioner may review the expenses of any public body listed in Ontario Regulation 146/10 under the *Public Service of Ontario Act, 2006*, as well as Ontario Power Generation and the Independent Electricity System Operator.

When an agency is found to be fully compliant with the Directive on a consistent basis, the Commissioner may release the agency from the requirement to submit expenses for review.

This year the Commissioner released four agencies:

- Centralized Supply Chain Ontario (Supply Ontario)
- Ontario Agency for Health Protection and Promotion (Public Health Ontario)
- Nawiinginokiima Forest Management Corporation
- Royal Ontario Museum

Releasing public bodies reinforces the effectiveness of the expenses review process and outreach efforts as agencies strive to attain full compliance.

The list of agencies under review, as well as the list of those previously reviewed, is available on the Office website. The Commissioner has reviewed the expenses of 43 public bodies since the *Public Sector Expenses Review Act* came into force in 2009.

3 The top five employee expense claimants are those with the highest cumulative expenses in a six-month period, as compared with the expense claims submitted by all other employees of the organization.

WHOSE EXPENSES ARE REVIEWED?

The Expenses Review mandates focus on the review of travel, meal and hospitality expenses for specific public servants and elected officials.

Agencies	Offices of Ministers and Official Opposition Leaders
Appointees	Cabinet ministers, parliamentary assistants
Senior management employees who report directly to the Chief Executive Officer (or equivalent)	Leaders of Opposition parties that have official recognition under the *Legislative Assembly Act*
The five employees with the highest cumulative expenses in a six-month period	Staff working in the offices of the above

Inquiries

The following are examples of questions the Office received from ministers' offices and agencies that asked for advice and guidance to ensure their compliance with the Travel, Meal and Hospitality Expenses Directive and Allowable Expense Rules. These inquiries are provided to raise awareness about allowable expenses. It is important to remember that each answer is based on its own set of disclosed facts and should not be considered a substitute for seeking guidance from the Office.

Loyalty Points

Can an employee who booked accommodation using loyalty points be reimbursed the equivalent monetary value?

This is not permitted. Section 5.5 of the Directive specifies that although loyalty points can be redeemed at the employee's discretion, they cannot be reimbursed for their cash value. If the employee uses the points for business purposes, they should not submit a claim for reimbursement.

Booking Accommodations at a Government Rate

If a government rate is not available or it is not the cheapest rate, can an employee book the best available rate, such as a conference rate, a group rate or a membership rate?

If an employee is booking accommodation outside of Canada, government rates may not be available. In such cases, they should document the reason the government rate was unavailable and provide a hotel rate comparison to show that the lowest rate was selected. Conference, group or membership rates can often be the best available rate in these cases.

The Directive states that reimbursement is permitted only for single accommodation in a standard room at the lowest available rate. Reimbursement for hotel suites, executive floors or concierge levels is not permitted.

Personal Vehicle Accident Claims

Can a car insurance deductible be reimbursed if an employee used their personal vehicle on government business?

A car insurance deductible is not an allowable expense under the Directive. Employees may be permitted to use a personal vehicle for government purposes if they have prior approval, but they are financially responsible and liable for the vehicle.

Under section 5.5 of the Directive, when using a personal vehicle, the following guidelines apply:

- The vehicle must be insured at the vehicle owner's expense for personal motor vehicle liability.
- It is the driver's or owner's responsibility to ensure that the motor vehicle insurance includes coverage for business use of the vehicle.
- The government will not reimburse the costs of insurance coverage for business use, physical damage or liability.
- The government is not responsible for reimbursing deductible amounts related to insurance coverage.
- In the event of an accident, the driver will not be permitted to make a claim to the government for any resulting damages.

Travel Approval for Appointees

Do appointees, such as board members, require advance written approval for travel?

Appointees travelling to regular board meetings do not require prior approval because this activity is considered a part of the normal functions of their role.

However, in some cases, appointees require prior approval for travel. If they are travelling to a conference or meeting outside of regular board meetings, they will require the appropriate travel approvals outlined in section 5.3 of the Directive.

Airfare Travel

Can an employee book a flight that is more expensive but allows flexibility to cancel or reschedule in case they need to make a travel change?

No, the Directive requires that employees select the most economical and practical mode of transportation when travelling. For air travel, the lowest fare available should be selected, even if it is non-refundable and cannot be changed. In most cases, the most economic flight option is Economy Standard.

While some changes or cancellations may result in a lost fare, the overall cost savings from consistently choosing lower fares outweigh these occasional losses.

In cases where the lowest fare is sold out, employees should provide supporting documentation, such as a price comparison, to demonstrate that the next lowest available fare was selected.

Lobbyists Registration

The Ontario Lobbyists Registry saw an increase in active registrations, with 4,124 registrations as of March 31, 2026, compared to 3,514 last year. This could be attributed to a continued increase in lobbying activity following the provincial election in February 2025.

The number of active registered lobbyists increased to 3,807 from 3,519. The Office also noted a higher number of new in-house registrations for both not-for-profit and for-profit entities.

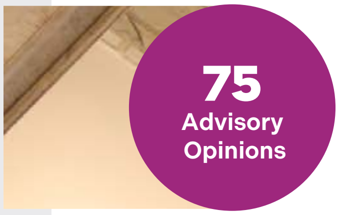
On average, Office staff reviewed close to 600 new, updated and renewed registrations each month.

Compliance reviews of registrations rose from 309 last year to 422 this year. These are noted instances of potential non-compliance with the *Lobbyists Registration Act, 1998*. Part of the reason for the increase was due to lobbyists and senior officers not updating their registrations following the naming of cabinet in March 2025.

WHAT WE DO

- Administer and maintain an online public record of paid lobbyists and their lobbying activities
- Issue Advisory Opinions and Interpretation Bulletins
- Promote understanding about the *Lobbyists Registration Act, 1998*
- Investigate matters of potential non-compliance with the Act

Year in Numbers



Outreach and Training

In the fall, the Office undertook an outreach activity to inform organizations and businesses that hosted events at the Legislative Assembly of Ontario about the registration requirements of the Act. Encouragingly, most of the entities holding events at Queen's Park had active in-house registrations or a consultant lobbyist registered on their behalf.

The Integrity Commissioner wrote letters to the heads of the entities that had hosted a lobby day or reception and did not have an active registration on the Ontario Lobbyists Registry. The letters outlined the main registration obligations of the Act, provided publicly available resources and invited questions regarding compliance with the legislation. Many of the recipients responded to confirm their compliance or to request clarification about their obligations. It was largely determined that the entities were not required to register, either because the entity did not have any paid employees or directors or because the lobbying activity had not met the 50-hour threshold for in-house lobbyists. The Office will continue this outreach exercise when the Assembly is in session.

Office staff also delivered training sessions to the consultant lobbyists at two government relations firms, covering the general obligations of the Act and the registration process.

The Office published six issues of its online newsletter, *ON Lobbying*. Highlights from this year's editions included the introduction of a new registry tips resource, an explanation of lobbying categories and a series providing solutions for common registration mistakes. A successful email campaign to registered lobbyists resulted in a 25% increase in subscribers, who now number close to 1,100.

Meetings with other Jurisdictions

In September 2025, the Commissioner and Office staff attended the annual meeting of the Lobbyists Registrars and Commissioners Network (LRCN) in Saint Andrews, New Brunswick. This year's meeting was hosted by the Office of the Integrity Commissioner for New Brunswick and attended by the federal Commissioner of Lobbying and by registrars and commissioners from eight provinces and two municipalities.

Highlights of the two-day meeting included a presentation on the use of artificial intelligence to support registry operations and discussions about recent legal cases, registration thresholds and cooling-off periods for public officials who leave government. Regulators and commissioners also emphasized the need for updates to their respective laws and their willingness to support legislators with this work to enhance transparency.

In March, the Commissioner and Office staff attended a virtual mid-year meeting, which covered jurisdictional updates and included a discussion about reporting government funding in registrations.

The LRCN provides its members with an opportunity to share best practices and discuss emerging issues while also increasing collaboration.

THE 50-HOUR THRESHOLD

The *Lobbyists Registration Act, 1998* sets out specific registration requirements for lobbyists. For businesses and organizations that employ in-house lobbyists, the Act establishes a 50-hour threshold for registration. This threshold is met when the combined number of hours that all employees, paid officers or paid directors spend lobbying public office holders reaches 50 hours in a 12-month period.

Senior officers of businesses and organizations employing in-house lobbyists must register their entity within two months of the 50-hour threshold being met. The senior officer is the most senior paid officer or employee at the entity.

What is considered lobbying?

The following activities are considered lobbying in Ontario:

- Communicating with the government to influence a law or regulation; a government policy or program; a government grant, contribution or other financial benefit; and the transfer of a Crown asset, good or service to the private sector
- Managing grassroots communications, also known as grassroots lobbying

Not all communications with public office holders are considered lobbying. Making certain submissions, such as a direct response to a written request from the government for advice or comment, does not count towards the threshold.

Businesses and organizations are responsible for keeping track of the time spent lobbying and registering when the 50-hour threshold is met.

Advisory Opinions

The Integrity Commissioner, as Lobbyist Registrar, can issue written Advisory Opinions. Individuals who have questions about the Act and how it applies to their specific lobbying activities or their obligations can request a confidential opinion on the matter.

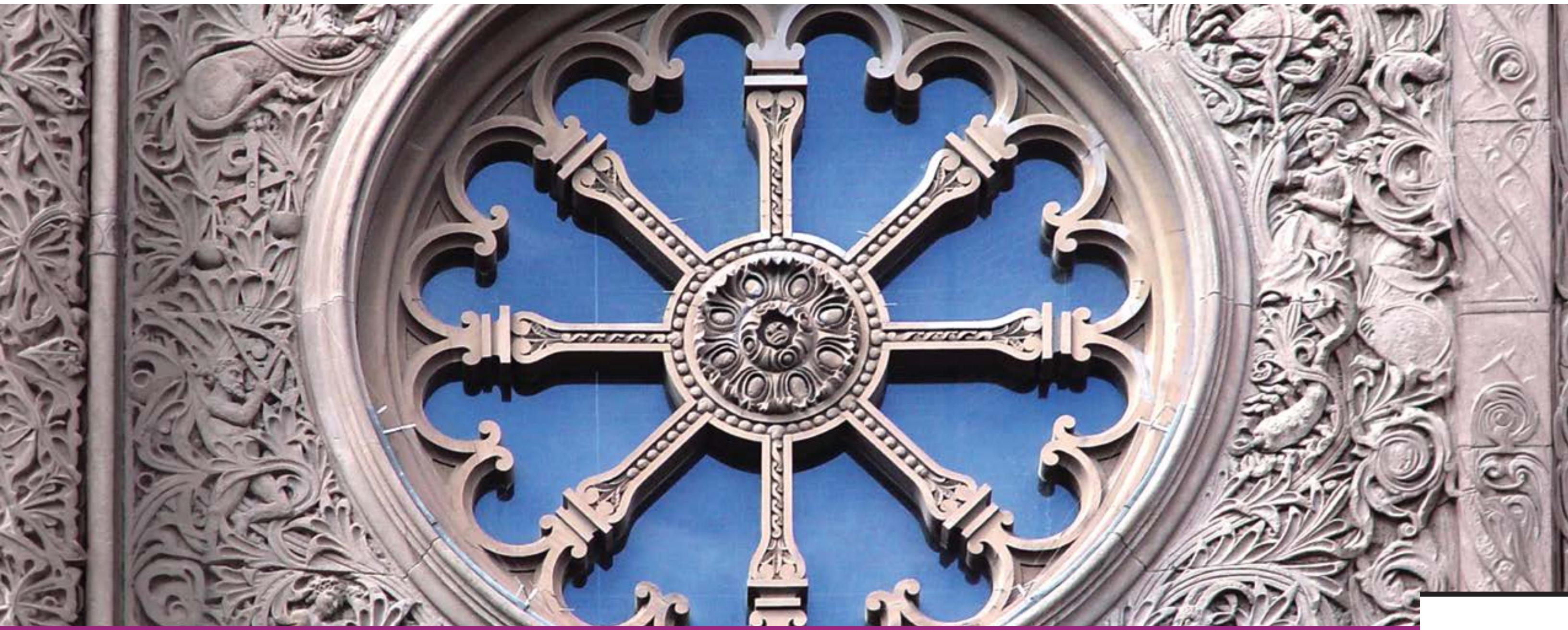
The Commissioner provided 75 Advisory Opinions this year. The most common topics were questions about conflict of interest, whether registration is required and what information should be included in registrations.

The guidance provided in Advisory Opinions is specific to the individual and considers the precise facts of the situation as they relate to the requirements of the Act. It is important to note the guidance is non-binding and is not a substitute for legal advice.

Compliance

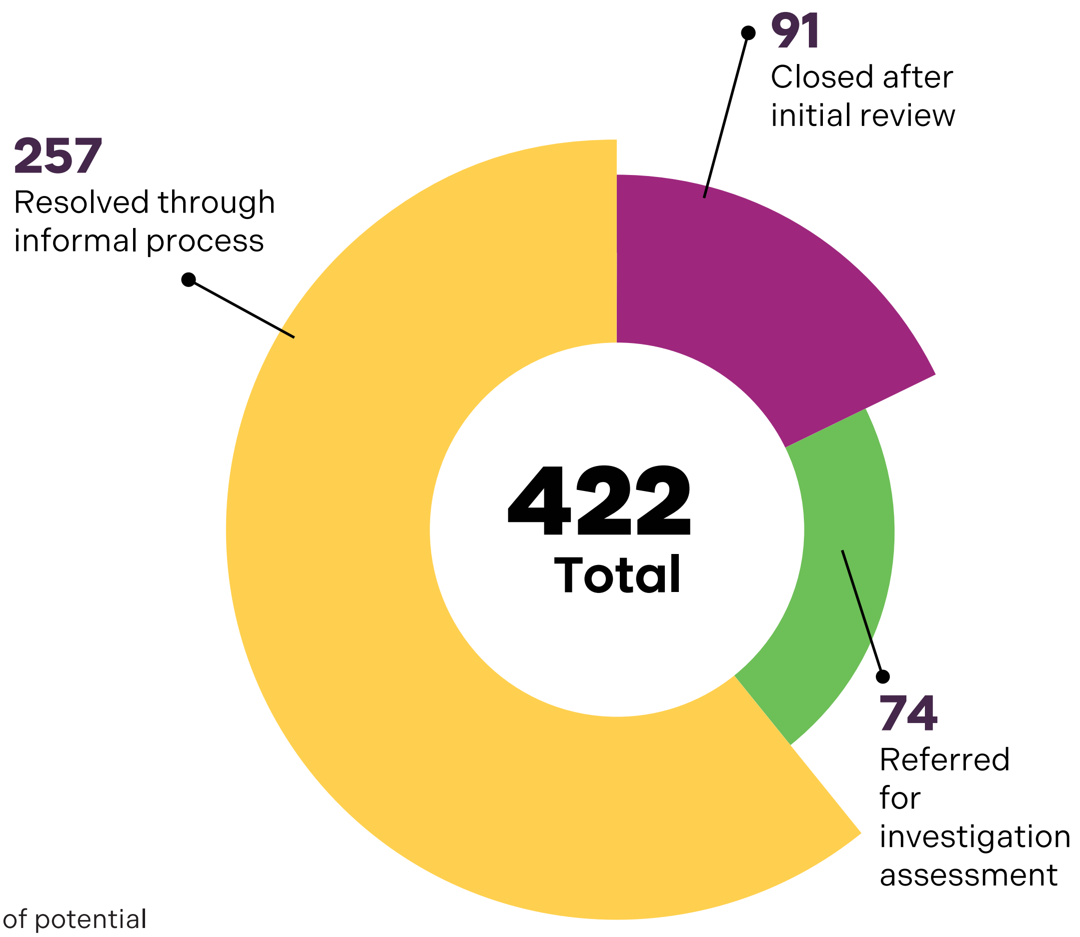
Ensuring compliance with the Act is an important component of the Commissioner's role as Lobbyist Registrar. Along with providing resources and education about the requirements of the Act, the Office has a compliance review process. As part of this, Office staff review lobbyists' compliance against the registration timelines set out in the Act. For example, they check whether lobbyists or senior officers have updated their registrations within 30 calendar days after a change is made to information in their registrations.

When a deadline appears to have been missed, Office staff will first confirm the information that has been provided and then assess the matter through an informal resolution process. If the deadline was missed by a short period and the lobbyist has not had previous issues with non-compliance, the matter may be resolved with an email from the Office or a letter from the Commissioner reminding the lobbyist of their responsibilities under the Act. If the deadline was missed by a longer period or if the lobbyist has missed several deadlines in the past, the matter will be referred for investigation assessment.



Compliance Activity

Compliance Reviews in 2025–2026



This year 422 instances of potential non-compliance were identified, most of which related to issues of delay in filing or updating registrations.

Of these, 91 matters were closed at initial review because it was deemed that the deadline was not missed and 257 were resolved through the Office's informal process. A remaining 74 matters were referred for investigation assessment.

Investigations

The Commissioner may investigate to determine if an individual has not complied with any provision of the Act.

Assessing a matter to determine if an investigation is warranted ensures resources are used effectively to enforce the Act. Generally, matters that the Commissioner decides not to investigate will be dealt with through the Office's informal resolution process in order to ensure future compliance. For example, the Commissioner may request a written explanation for the non-compliance and any system or improvements the lobbyist or senior officer has in place to ensure they are meeting the requirements of the Act going forward.

If the Commissioner investigates a matter, this will usually include the review of documentary evidence and an interview with the individual under investigation. Witnesses may also be asked to provide evidence or attend an interview. Following an investigation, after giving the respondent an opportunity to be heard, the Commissioner may find that there has been non-compliance with the Act. If this occurs, the Commissioner may impose one or both of the following penalties:

- Prohibit the person against whom the finding was made from lobbying for up to two years
- Make certain information about the non-compliance public, including the person's name

The Commissioner is required to give reasons to the person for the finding and for the imposition of any penalty. Information about imposed penalties is available on the Office website.

Investigation Activity

Investigation Activity	2024–2025	2025–2026
Matters referred for investigation assessment	77	82[4]
Investigations commenced	27	11
Matters refused for investigation	44	68
Matters remaining under assessment for potential investigation at fiscal year-end	8	3

This year no investigations were resumed as there are currently no suspended investigations. No matters have been referred to another person or body.

4 This includes 74 matters referred for investigation assessment in 2025–2026 and eight matters remaining under assessment year-end 2024–2025.

CONFIDENTIALITY OF INVESTIGATIONS

The *Lobbyists Registration Act, 1998*, sets out the investigative powers the Integrity Commissioner has as Lobbyist Registrar. The Act has specific confidentiality requirements on the investigative work done by the Office.

Simply put, the Office cannot disclose whether the Commissioner is conducting an investigation under the Act. The restrictions also prohibit the release of any information, document or thing obtained in the course of an investigation.

The limited exceptions to these confidentiality provisions allow the release of certain information in order to:

- carry out the investigation;
- refer a matter to another person or body as part of a law enforcement or other process;
- enforce a penalty issued under the Act (e.g., releasing information about an individual's lobbying prohibition); and
- meet the reporting requirements for the Office's annual report, including a statistical summary of investigative activity.

If the Commissioner issues a penalty, a summary of the non-compliance is published on the Office website.

Investigation Summaries

This year the Commissioner concluded 23 investigations, some of which had commenced in previous years. Completed investigations are summarized below. Summaries may include multiple investigation files and involve multiple individuals.

Consultant Lobbyists

ISSUE:

Late to register

The Commissioner investigated to determine if a consultant lobbyist had contravened the Act by not registering her lobbying activity within the 10-day period set out in the Act with respect to two clients. The lobbyist self-disclosed that she was approximately one year late to register on behalf of one client, and 232 days late to register on behalf of a second client. After gathering evidence, the Commissioner found that the lobbyist engaged in two contraventions of the Act's registration requirement. After considering multiple factors, including that the lobbyist had self-disclosed the non-compliance, taken steps to rectify it, cooperated fully with the investigation, had no previous instances of non-compliance and demonstrated efforts to ensure compliance going forward, the Commissioner decided not to impose a penalty.

ISSUE:
Failure to register

The Commissioner investigated to determine if an individual had contravened the Act by not registering his lobbying activity within the time period set out in the Act with respect to two undertakings. The evidence showed that his registrations had been voluntary, as he was not required by the Act to register either undertaking. The individual's work on behalf of the first matter did not involve communicating with public office holders and, therefore, did not fall within the definition of lobbying in the Act. In the second undertaking, the individual was an in-house lobbyist. For this category of lobbyist, the senior officer of the entity is responsible for filing a registration when the 50-hour threshold for registration for in-house lobbying is met. However, in this instance, the evidence indicated the time spent lobbying fell well short of the registration threshold. The Commissioner also investigated whether the individual failed to indicate that one client was funded in whole or in part by a government and to provide information requested by the registrar within 30 days. The individual cooperated fully with the Commissioner's requests for information and rectified these two issues on his voluntary registrations during the investigation. The Commissioner decided to cease the investigation.

ISSUE:
Placing a public office holder in a conflict of interest

The Commissioner investigated to determine if 18 consultant lobbyists from the same firm had contravened the Act by knowingly placing public office holders in a position of real or potential conflict of interest in the course of lobbying them. The Commissioner's concern arose from the invitation of public office holders to a party hosted by the lobbying firm while those public office holders were identified as targets of lobbying activity on the lobbyists' registrations. A representative of the firm had also sought an advisory opinion from the Commissioner prior to the event and was advised that consultant lobbyists employed by the firm should not invite any public office holders that they were registered to lobby. The Commissioner then received information that public office holders had attended the party.

During the investigation, counsel for the firm advised that its representatives interpreted the Commissioner's advice to mean that, while individual consultant lobbyists should not extend invitations, the firm could send out a mass electronic invitation to its guests, including public office holders. The Commissioner clarified this was not the case. After considering various factors, including that the consultant lobbyists and their firm had fully cooperated with the investigation, that they demonstrated willingness to comply with the Act, and that the firm did not invite any public office holders being lobbied by consultant lobbyists it employs to a subsequent event, the Commissioner decided to cease the investigations. The Commissioner also clarified how the relevant provincial gift rules differ from those of the federal jurisdiction.

In-House Lobbyists

ISSUE:

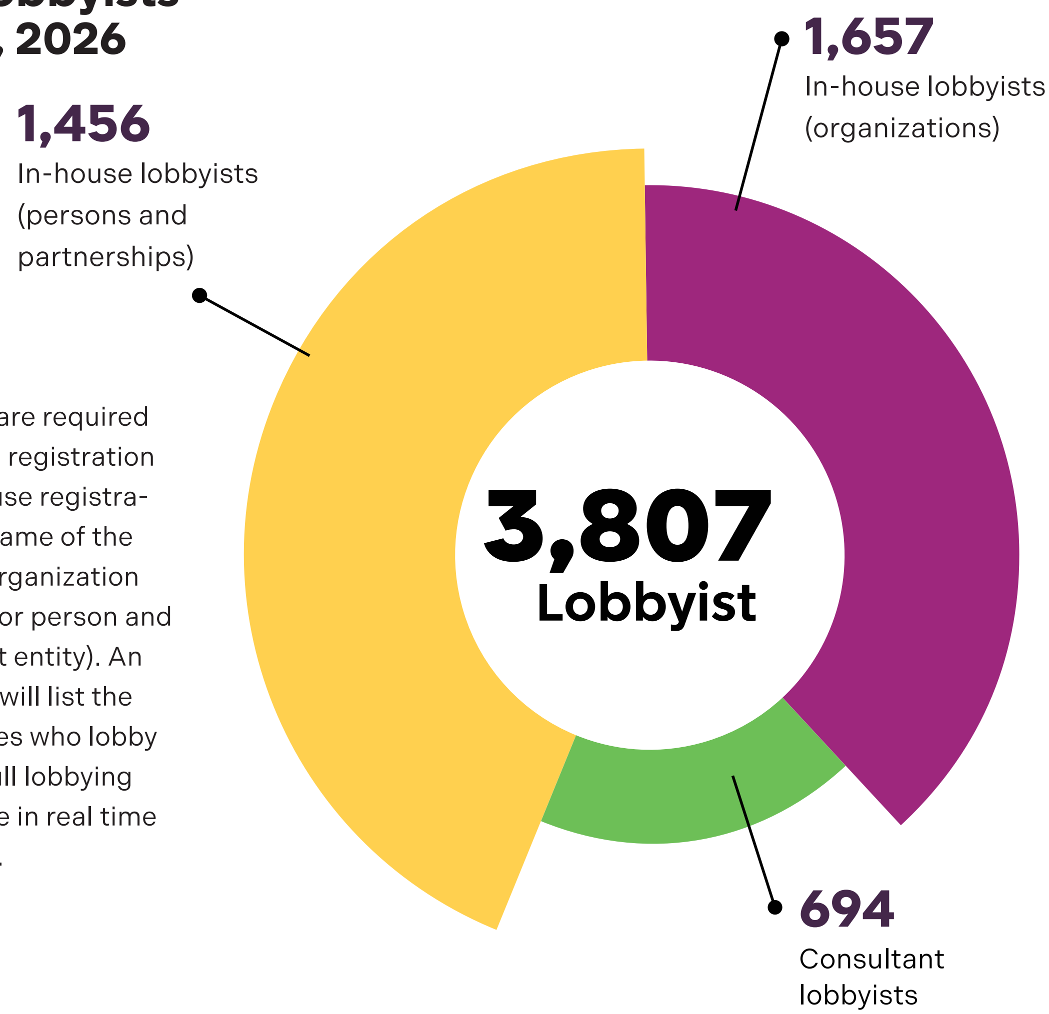
Failure to register and placing a public office holder in a conflict of interest

The Commissioner investigated to determine if the senior officer of an organization failed to file a registration as required by the Act after reviewing public information indicating the senior officer and employees of the organization had lobbied public office holders and another person associated with the organization engaged in political activity. Because the Act's conflict of interest prohibition does not apply to in-house lobbyists until the 50-hour threshold for registration is met, the investigation focused on time spent on registrable lobbying activities. The senior officer cooperated fully with the investigation, disclosing a large amount of documentary evidence. The senior officer's evidence was that the organization spent less than 50 hours in the previous 12-month period engaged in registerable lobbying activities, which is the threshold for registration.

The documentary evidence indicated that employees spent more than 50 hours in a year communicating with public office holders, but that many of the communications were not registerable lobbying activity. For example, the organization frequently provided advice and consultation at the written request of the government. The senior officer voluntarily filed a registration during the investigation. After considering various factors, including the transparency provided by the senior officer's new registration, his full cooperation with the investigation and the evidence regarding the organization's non-registerable communications with public office holders, the Commissioner decided to cease the investigation.

Registry Activity

Ontario had 3,807 registered lobbyists on March 31, 2026



Consultant lobbyists are required to complete and file a registration for each client. In-house registrations are filed in the name of the senior officer of the organization (not-for-profit entity) or person and partnership (for-profit entity). An in-house registration will list the names of all employees who lobby in one registration. Full lobbying statistics are available in real time on the Office website.

Registrations by type	March 31, 2025	March 31, 2026
Consultant	2,901	3,449
In-house (organizations)	348	371
In-house (persons and partnerships)	265	304
Total active registrations	**3,514**	**4,124**

Lobbying Subjects and Targets

The figures listed here indicate the number of times the subject matter or lobbying target was selected in active registrations as of March 31, 2026.

Registrations must include the subject matter of the lobbying activity, as well as the MPPs, ministers' offices, ministries and agencies that are being lobbied.

Top Three Subjects

1,884
Economic development and trade

1,349
Infrastructure

1,282
Municipal affairs

Top listed lobbying targets from 2024–2025 are provided for comparison, even if the listed target was not in the top five that year.

Top Listed Members of Provincial Parliament	2024–2025	2025–2026
1. Office of the Member for Etobicoke North	958	1,149
2. Office of the Member for Elgin–Middlesex–London	944	1,148
3. Office of the Member for Oakville	948	1,147
4. Office of the Member for Brampton South	939	1,139
5. Office of the Member for Etobicoke Centre	953	1,135

Top Listed Ministers' Offices	2024–2025	2025–2026
1. Office of the Premier and Cabinet Office	2,728	3,212
2. Office of the Minister of Finance	2,031	2,369
3. Office of the Minister of Economic Development, Job Creation and Trade	1,882	2,298
4. Office of the President of the Treasury Board	1,640	1,938
5. Office of the Minister of Municipal Affairs and Housing	1,276	1,602

Top Listed Ministries	2024–2025	2025–2026
1. Ministry of Finance	1,734	2,029
2. Ministry of Economic Development, Job Creation and Trade	1,610	1,951
3. Treasury Board Secretariat	1,225	1,446
4. Ministry of Municipal Affairs and Housing	1,137	1,389
5. Ministry of Health	1,161	1,304

Top Listed Agencies	2024–2025	2025–2026
1. Ontario Health	365	433
2. Ontario Infrastructure and Lands Corporation (Infrastructure Ontario)	296	387
3. Independent Electricity System Operator	302	354
4. Invest Ontario	223	339
5. Metrolinx	220	297

Financial Statement

		2025–2026
Salaries and Benefits	$	3,694,770
Transportation and Communication	$	48,050
Services	$	642,540
Supplies and Equipment	$	33,715
Total	**$**	**4,419,075**

The Office of the Integrity Commissioner's fiscal year runs from April 1 to March 31.

Financial transactions are subject to audit by the Office of the Auditor General of Ontario through the accounts of the Legislative Assembly. This financial statement was unaudited at the time of publication.

You can find information about the Office's reporting under the *Public Sector Salary Disclosure Act, 1996* at www.ontario.ca/page/public-sector-salary-disclosure.

Proactive Disclosure

You can find expense claims for travel, meals and hospitality for the Office's senior management and for employees with claims exceeding $5,000 at www.oico.on.ca.

This report is also available at www.oico.on.ca.
Cette publication est aussi disponible en français.
Photos, Legislative Assembly of Ontario.

ISSN 1205-6391 (Print)
ISSN 1918-0357 (Online)

Office of the
Integrity Commissioner of Ontario

The Office of the Integrity Commissioner of Ontario was established in 1988 to maintain high standards of ethical conduct in the Ontario Public Service. Independent of government, the Office strives to encourage and sustain a culture of integrity and accountability. The Office has seven mandates under five pieces of legislation.

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