

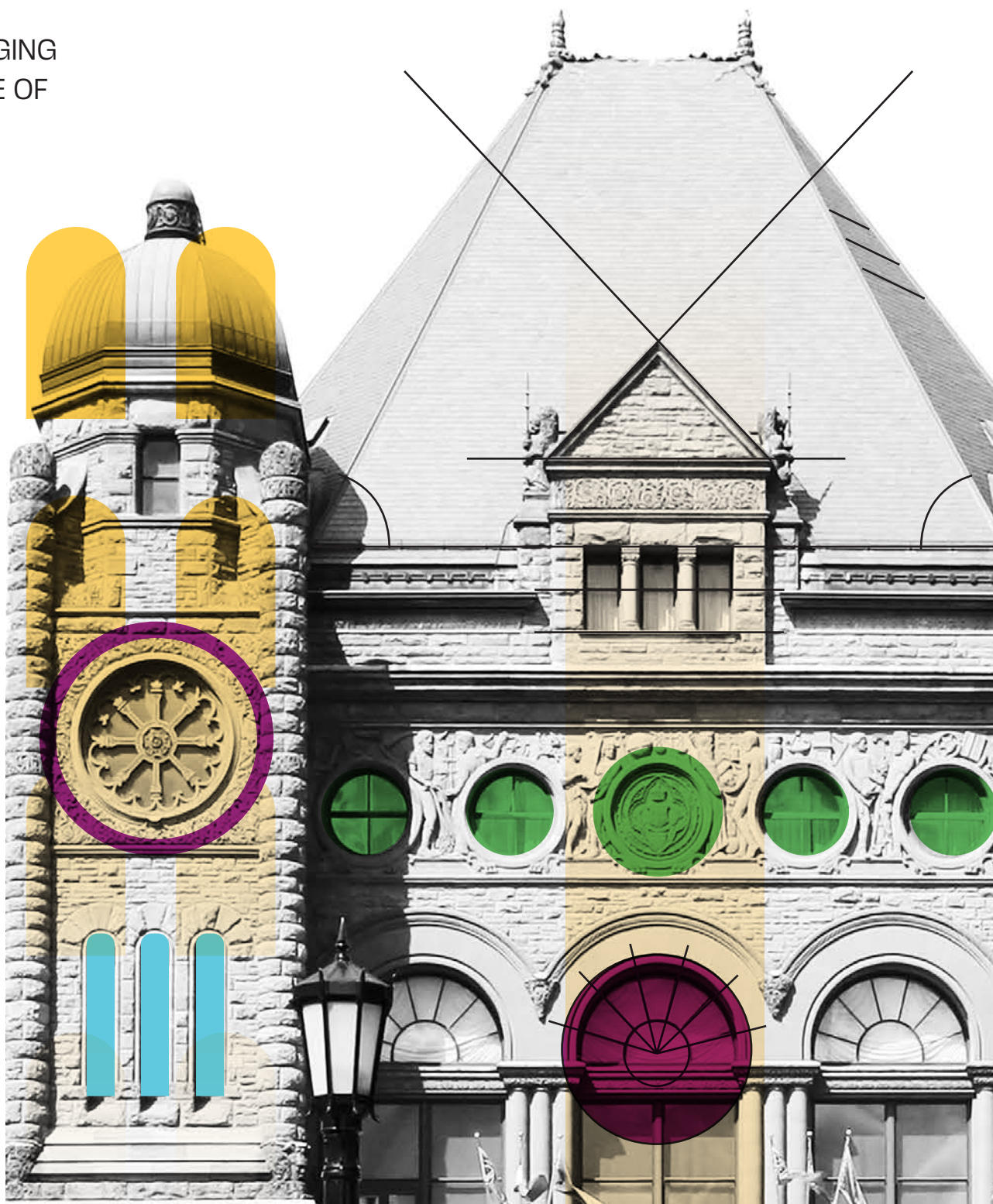
Annual Report

2024–2025

ENCOURAGING
A CULTURE OF
INTEGRITY



Office of the
**Integrity
Commissioner
of Ontario**



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

June 2025

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, 2024, to March 31, 2025.

Sincerely,

Cathryn Motherwell
Integrity Commissioner

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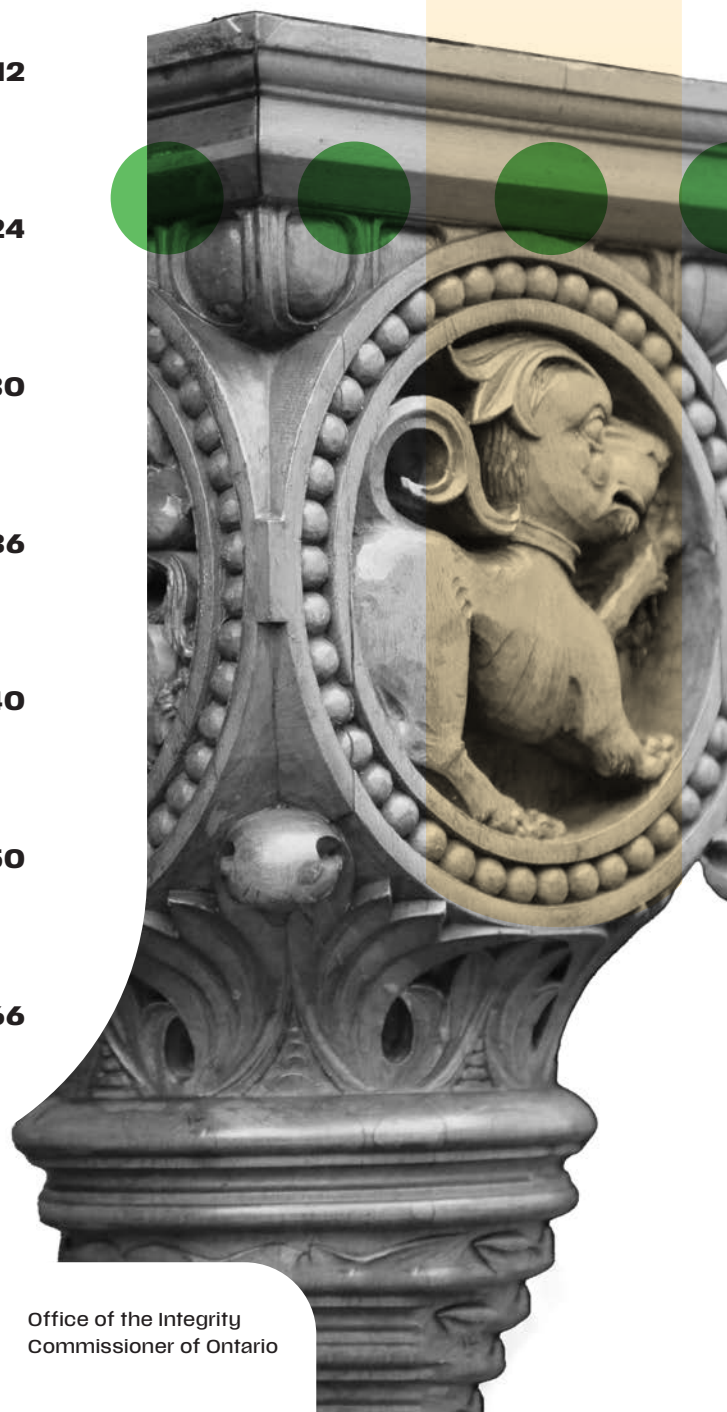
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Year in Review

345

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58

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17

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13

disclosures of wrongdoing
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40

disclosures of wrongdoing
submitted

3,519

active lobbyists

187

ministers' staff inquiries

54

outreach, training
and speaking events

4,094

expense claims reviewed

94

media inquiries

260

public sector ethics
matters addressed

39

Ethics Executives trained

Commissioner's Message

It is an honour to introduce the Office of the Integrity Commissioner's 2024–2025 Annual Report. Integrity Commissioner J. David Wake, K.C., retired on February 28, 2025, after serving nine years as Commissioner. The work outlined in this report reflects the bold initiatives that he undertook in promoting ethics, transparency and accountability in Ontario.

The Office hit near-record volumes of work in all of its seven mandates, impressive milestones that are testament to the depth and breadth of the Office's work in government ethics. It is important to recognize the effort that is undertaken to support each "digit" in these tallies: inquiry assessment, phone calls or meetings to gather additional information, legislative analysis, internal discussions of critical issues, and careful drafting and review of the final product. Some work, such as lobbyist compliance investigations and disclosure of wrongdoing files, can run for months, with all steps carefully managed and reviewed to ensure they follow the processes prescribed by the legislation.

The ethics principles of transparency and accountability underpin everything we do. I thank all members of staff for the professionalism and dedication they apply daily to their work supporting Ontario public office holders, public servants, lobbyists and their staff.



Cathryn Motherwell
Integrity Commissioner,
Appointed April 16, 2025

Mandate Updates

Members' Integrity

The Commissioner works closely with all MPPs to assist them in complying with the *Members' Integrity Act, 1994*. This activity takes many forms throughout the year, providing regular touchpoints that underscore the rules and ethics obligations for MPPs. A cabinet shuffle in June 2024 brought new members to the executive council and introduced new ministry names. The Office worked with all ministers to ensure that they were in compliance with the Act, completing conflict checks and assisting two ministers in placing their assets in a trust. Financial declarations from all 124 MPPs were

received in the fall. The MPPs then had in-person meetings with the Commissioner to review their ethical obligations under the Act. Throughout the year, the Commissioner provided timely and confidential advice to MPPs on 345 occasions, covering a wide range of topics including letters of support, advocacy on behalf of constituents, gifts and constituency office operations.

Following the election on February 27, 2025, I was invited by the Clerk of the Legislative Assembly to meet with the 18 newly elected MPPs to provide them with an overview of the Act and the work of this Office. This was an invaluable opportunity to explain the unique provisions of the legislation and was followed by an opportunity for staff to provide MPPs with materials and resources to support them in their work.

Lobbyists Registration

The Office's work under the *Lobbyists Registration Act, 1998* is separated into two categories: operations and compliance.

The operations team fulfills the demanding role of assisting lobbyists with their registrations, responding to inquiries, navigating technical issues and legislative requirements, and ensuring that each registration, amendment and notice of termination meets the obligations of the law.

Changes to cabinet in June 2024 and then as a result of the 2025 election required extensive updates to the lobbyist registry, including adding new ministers' offices and ministry names. Lobbyists had 30 days to update their registrations to reflect current targets of their lobbying activity, generating hundreds of registrations submitted to the Office for review and publishing online in a tight timeframe.

The volume of work is extensive, as lobbyists respond to changing legislative developments and policies and ensure that their registrations are current. These demands are considerable, prompting us to increase the registry team to four people in early 2025.

Where the operations team identifies a potential breach of the LRA, the investigations team steps in. This past year saw a tremendous amount of work examining complicated factual and legal issues, many of which arose from the Greenbelt inquiry¹ undertaken in 2023. These investigations under the LRA resulted in two firsts: the first penalties naming lobbyists who were found to have placed public office holders in a real or perceived conflict of interest; and the first penalty naming a lobbyist and prohibiting him from lobbying the Ontario government for two years. Collectively, six penalties were imposed in the 17 investigations concluded this fiscal year.

As noted, these penalties were implemented by the Commissioner, as Lobbyist Registrar, in accordance with the LRA. They come about as the result of extensive investigations that reviewed thousands of pages of documents and undertook lengthy witness interviews. Also in accordance with the LRA, these investigation reports remain confidential. The Registrar can publish only a summary of the matter in the annual report, and where a breach is found and a penalty is imposed, the Registrar may publish the lobbyist's name and a description of the non-compliance on the Office website.

1 Report under section 30 of the *Members' Integrity Act, 1994* re: the Honourable Steve Clark, August 30, 2023.

It is also important to note that these penalties reflect the evolution of compliance work by the Office. The Commissioner, as Registrar, received investigative powers under the LRA in 2016. At that time, Commissioner Wake focused on educating the lobbyist community to help it become familiar with the legislation and with the extent of powers available to the Registrar. In his 2017–2018 report, he wrote:

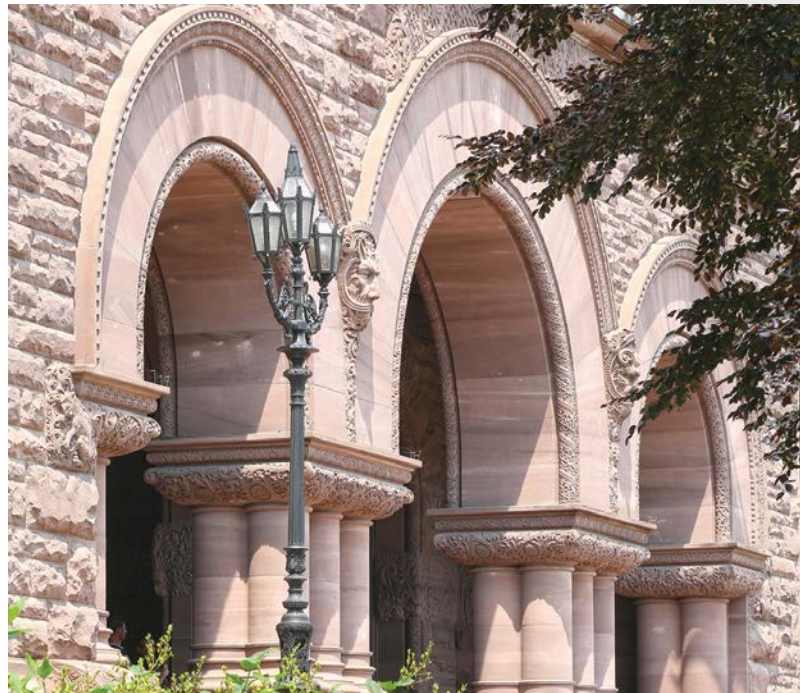
In the few dispositions rendered to date, I have been reluctant to impose a penalty after a breach has been found. My reluctance to penalize these breaches is because of the mitigating circumstances of the cases themselves, but also because the penalty regime is still new and lobbyists are still working to understand their obligations under the LRA. As time goes by, I will give less weight to this factor, particularly to repeat offenders, and will expect a higher degree of compliance, failing which penalties will be imposed.

It has been nine years since the investigation and penalty provisions came into force. The Office will continue to provide resources and Advisory Opinions to assist lobbyists in complying with the Act; however, as the recent investigations signify, penalties for serious non-compliance may be imposed where the Registrar finds that the LRA has been breached.

Disclosure of Wrongdoing

The Disclosure of Wrongdoing, or whistleblowing, mandate had one of its busier years, receiving a record 40 disclosures from current or former members of the Ontario Public Service. The number of disclosures dipped during the pandemic but has seen a steady increase since public servants returned to the office in person. The disclosures covered many types of alleged wrongdoing but focused largely on allegations of improper hiring or promotions and of breaches of the Conflict of Interest Rules around outside activities. The ensuing independent investigations revealed several serious matters that have resulted in senior managers updating policies and procedures, improving communication with staff and, in some cases, with individuals leaving the public service.

This is all to underscore the importance of a strong disclosure of wrongdoing regime, and the benefits it yields to the workplace. It takes courage to make a disclosure, and the independent status of this Office gives disclosers assurance that their matters will be received and addressed professionally within the parameters of the legislated framework.



Ministers' Staff

As the Ethics Executive for ministers' staff, the Commissioner provided 187 determinations and direction to public servants working in ministers' offices. Most of this work focuses on conflict of interest matters and on post-employment direction as staffers leave government. More than 45% of inquiries were about the post-employment rules. This reflects the considerable turnover in the cohort, and it also highlights the importance of regular training opportunities to acquaint new hires with the Conflict of Interest Rules.

Public Sector Ethics

The Commissioner is the Ethics Executive for certain senior officials and appointees of public bodies. The Commissioner also serves as an advisor to Ethics Executives in those organizations, providing them with advice on their own proposed determinations. This is an important role, assisting these senior officials in navigating the ethics rules and providing consistency in interpretation and mitigation strategies from one entity to another.

As this was an election year, many determinations and directions were provided to individuals who were running for elected office or working on campaigns. The Office also receives financial disclosures from senior public servants. This year, staff reviewed the holdings of 137 people, analyzing their holdings against their roles as public servants and identifying real or potential conflicts of interest. Such matters are referred to the respective Ethics Executive for their own assessment, determination and direction.

Expenses Review

The Office completed 2,152 reviews of expenses under the *Cabinet Ministers' and Opposition Leaders' Expenses Review and Accountability Act, 2002*. It further completed 1,942 reviews of expenses under the *Public Sector Expenses Review Act, 2009*. The volume of expense claims received has been climbing steadily as travel resumed after the pandemic, requiring the Office to assign additional resources to process the reviews.

This work is a secondary review that is conducted after public servants have been reimbursed; it is undertaken to ensure that the claims are in compliance with the relevant directive or rules. As a result, there can be requests for repayment, which can unfortunately take months to process. I urge all public servants to ensure that they understand the rules and spending limits when they travel; and if they are contacted by this Office as part of these reviews, I ask that they respond in a timely manner.



Other Developments

In December 2024, the government introduced Bil 241, *Municipal Accountability Act*. This followed a request from Premier Doug Ford, in which he asked for Commissioner Wake's views on the role of integrity commissioners in Ontario's 444 municipalities. While the Office has not had a statutory role in this framework, the Commissioner submitted a report in September that identified issues with the existing framework and codes of conduct and offered several proposals. The legislation did not proceed beyond committee when the provincial election was called. The legislation was reintroduced in the Legislative Assembly on May 1, 2025, as Bill 9.

Looking Ahead

The pace of activity in all mandates promises to be sustained. The provincial election on February 27, 2025, triggered the requirement in the *Members' Integrity Act, 1994*, for all MPPs to submit their financial declarations within 60 days. Each MPP is required to meet with the Commissioner to review their obligations under the Act, after which a redacted report of their holdings is published on the Office website. This work normally takes place in the fall, but due to the timing of the election, the necessary file reviews and meetings with MPPs will be well underway at the release of this Report.

The Office additionally undertakes extensive training and outreach activities after an election. These include reviews for staff in all ministers' offices so that they understand their obligations as public servants under the *Public Service of Ontario Act, 2006* and the Conflict of Interest Rules. Select staff in ministers' offices are trained in the requirements of the *Cabinet Ministers' and Opposition Leaders Expenses Review and Accountability Act, 2002*. Constituency staff in

MPP offices are provided with training on request. The Ontario Lobbyists Registry is also reviewed and updated to address any changes in ministry and agency names, resulting in hundreds of updates to lobbyist registrations.

Legislative Review

In previous annual report messages, Commissioner Wake highlighted mandate areas that require legislative review: the *Lobbyists Registration Act, 1998*, the *Public Service of Ontario Act, 2006*, and the *Members' Integrity Act, 1994*. It is incumbent on me to continue this push and for us to not lose sight of its importance as we focus on the volume of post-election work. The Office has undertaken extensive and detailed reviews of legislation and highlighted various areas that would benefit from review and amendments. Where once Ontario led the country in ethics legislation, it has fallen behind. The Office has previously outlined specific areas for amendments and stands ready to participate in further efforts to update the legislation.

Retirement of Commissioner J. David Wake

Finally, I would like to thank Integrity Commissioner J. David Wake for his leadership of the Office for the past nine years. He has seen it through a remarkable transformation that saw the Office grow in size from 13 employees to almost 30, adding new responsibilities such as investigations under the *Lobbyists Registration Act, 1998*, and the merger with the Office of the Conflict of Interest Commissioner. The pandemic hit shortly after this union, when he led the Office into a fully remote environment and then gradually back to an in-person operation.

He has been a trusted, patient and thoughtful advisor to members of provincial parliament, ministers' staff, secretaries of the cabinet, deputy ministers and government appointees. He produced a record 27 reports under the *Members' Integrity Act, 1994*, presenting carefully crafted analysis in a significant body of work that is routinely consulted by counterparts across the country. An inspiring mentor, he leaves an indelible mark on government ethics across Canada. I join all colleagues in thanking him for his service and wishing him a healthy retirement filled with travel, rounds of golf and many opportunities to spend time with family and friends.

**Office of the Integrity
Commissioner staff,
December 2024.**



Outreach

This year the Office held or participated in 54 outreach, training and speaking events. Mandate-specific training and outreach activities are described in the relevant sections of this report.

The Office conducted outreach activities and training sessions in both in-person and remote formats.

The Office responded to 94 media inquiries and more than 300 inquiries from members of the public.

The Integrity Commissioner spoke to interns from the 2024–2025 Ontario Legislature Internship Programme and addressed students studying public administration at York University.

The Deputy Commissioner delivered a presentation about the ethical framework for elected officials to the speaker and clerk of the New South Wales Legislative Assembly (Australia).

The Commissioner and staff also 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 2024 Council on Government Ethics Laws (COGEL) conference in Los Angeles, California. COGEL brings together public sector ethics organizations from across North America and beyond to share jurisdictional updates and to discuss emerging trends and issues.

As a member of the *Réseau francophone d'éthique et de déontologie parlementaires*, the Commissioner and staff attended the organization's annual general meeting in October 2024. The organization aims to promote dialogue and networking between French-speaking parliaments and entities with an interest in ethics rules and frameworks for elected officials.



Members' Integrity

The Integrity Commissioner responded to 345 requests for advice from MPPs about their obligations under the *Members' Integrity Act, 1994*, a decrease from the 413 requests received in the previous year. In line with a parliamentary cycle, this decrease could be attributed to an election year. The most common type of inquiry was about providing letters of support or reference for constituents. Inquiries about accepting gifts, such as a ticket to an event, were also common.

The cabinet shuffle in June 2024 and the provincial election in February 2025 resulted in additional work by the Commissioner and Office staff to ensure MPPs received the information and advice necessary to understand and comply with their requirements under the Act. The provincial election gave rise to several inquiries about what activities constituency staff could undertake during the writ period, in addition to questions about MPPs engaging in political activity.

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 breaches of the *Members' Integrity Act, 1994* when requested by one MPP about another



Year in Numbers

Types of inquiries:

107

Letters of support

80

Gifts

53

Conflict of interest

22

Advocacy

18

Writ period/political activity

14

Constituency office use

12

Charitable support

7

Social media

32

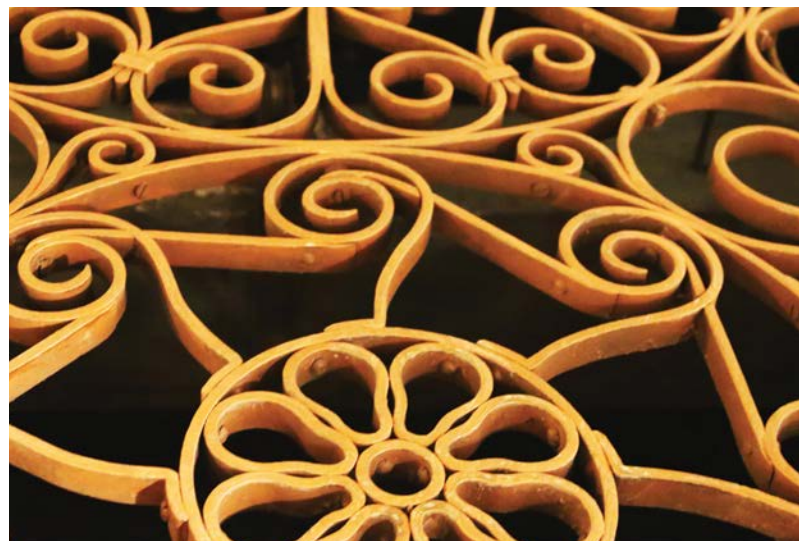
Other

345 MPP Inquiries

Behind the Numbers

These numbers reflect the various subjects of MPP requests for the Commissioner's opinion. For example, MPPs and their staff regularly receive requests to advocate or support a constituent or organization, as well as invitations to attend events. They also have questions about upcoming votes in the Legislative Assembly of Ontario.

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 carried out in the fall, with all sitting MPPs submitting confidential disclosures of their personal finances to the Office. These disclosures include information on the assets and liabilities for MPPs, their spouses and any minor children.

As in past years, staff worked closely with the party caucuses to assist MPPs in completing this important requirement. All submissions were carefully reviewed and analyzed against the requirements of the Act and within the context of each MPP's responsibilities in the legislature. Additionally, as part of the requirement for cabinet ministers to place certain financial assets in a management trust, two trusts were established following the June 2024 cabinet shuffle. This brought the total number of trusts to eight.

Based on the information provided, Office staff prepare a public disclosure statement for each MPP, which includes the nature of certain income, asset and liability sources. The statement also lists any gifts worth more than \$200 that the Integrity Commissioner determined that MPPs could accept.

The Commissioner met with all MPPs to review their financial disclosures and discuss their obligations under the Act. The 2024 public statements were filed with the Clerk of the Legislative Assembly of Ontario and made available on the Office website on January 28, 2025.

As a provincial election took place on February 27, 2025, the annual disclosure process began earlier than in other years. The Act requires that members submit their financial disclosure within 60 days of being elected or re-elected.



WHAT'S IN AN ETHICAL TOOLBOX?

MPPs are expected to arrange their private interests in a manner that does not give rise to conflicts of interest when performing their duties of public office.

The Commissioner employs several tools to mitigate conflicts of interest and to restrict asset holdings, where applicable. This toolbox includes the following:

Recusal

If an MPP has a private interest in a matter before the Legislative Assembly, the Commissioner may advise the member to abstain from voting or even speaking on the matter. The Act allows that if a decision or matter affects a member as one of a broad class of person, it is not considered a private interest.

Ethics Screen

An ethics screen is used to prevent an MPP or a minister from working on, or having access to information about, a particular file or matter where a conflict may arise. The screen includes a description of the stakeholders involved and provides steps to be taken in the event that the file or matter arises, including identifying an alternate decision-maker where necessary.

No Buy, Sell or Trade Agreements

If an MPP has a role or position that could conflict with a financial asset they hold, the Commissioner may advise divestment of the holding. Alternatively, an MPP may be permitted to retain an interest in the financial investment provided that they agree not to purchase, sell or trade those investments.

Management Trust

Under the Act, ministers cannot hold or trade in securities, stocks, futures or commodities, nor can they own and run a business. However, a minister's interest in restricted assets may be entrusted to a trustee. The Commissioner must approve the provisions of the trust and the selection of an arm's-length trustee. No communication is permitted between the minister and the trustee while the trust is in place.

Training and Outreach

The Commissioner and Office staff conducted four training sessions attended by more than 45 employees working for MPPs at Queen's Park and in constituency offices. The sessions also provided information on how employees can assist MPPs in complying with their obligations under the Act. The sessions covered scenarios on

the acceptance of gifts, requests from constituents for advocacy or letters of support, and appropriate use of the constituency office.

When the provincial election was called, the Office sent guidance to all MPPs and their constituency offices to help them understand what activities could be carried out during the writ period. As MPPs no longer hold office once an election is

called, they were reminded that they could not use their MPP letterhead or sign congratulatory scrolls, but that constituency offices could remain open for staff to assist constituents.

Following the election, the Commissioner Designate was invited to speak to newly elected MPPs at Queen's Park. The event was an opportunity to explain the role of the Commissioner and to introduce new MPPs to their responsibilities under the Act. Office staff also met with the new MPPs to review the financial disclosure process.

Meeting with Other Jurisdictions

In September 2024, the Commissioner and staff attended the annual Canadian Conflict of Interest Network conference in Quebec City, Quebec. The meeting provides a valuable opportunity for commissioners from across Canada to exchange updates on their work and share best practices for providing ethics advice to elected officials.

MAKING AN INQUIRY

The *Members' Integrity Act, 1994* provides MPPs with an ethics framework on how they are expected to conduct themselves as public office holders. It covers such topics as conflicts of interest, financial disclosures and influence.

Under section 28, MPPs can seek confidential advice from the Integrity Commissioner. Generally, an MPP will request advice before taking an action such as accepting an invitation to an event, providing a letter of support or participating in a vote on a matter in which the MPP has a private interest or connection. The Commissioner considers whether the facts of the situation will intersect with the obligations of the Act. The Commissioner will also determine if any Ontario parliamentary conventions apply, such as the convention that a constituency office should not be used to host charitable or partisan events. The Commissioner frequently asks for additional information from the MPP in order to understand the situation.

When contacting the Office with an inquiry, MPPs or their staff should provide as much information as possible.

Tips for making an inquiry:

- ➔ **Ask promptly.** Give the Commissioner as much time as possible to provide a response. While every effort is made to respond quickly, some issues can be complex and take time to assess.
- ➔ **Be clear and specific.** Inquiries should be made in writing and clearly articulate the question being asked. The Commissioner will respond in writing so that the MPP can rely on the advice given.
- ➔ **Provide as much detail as possible.** Background and contextual information will help the Commissioner determine if the facts of the situation will intersect with the obligations of the Act. Examples of helpful details include: information about the organization or entity making a request of the MPP, the decision-making process for the government funding program in question, or how the MPP knows the constituent or stakeholder who is offering a gift or extending an invitation.

MPPs and their staff are always encouraged to seek case-specific advice when they have questions about the requirements of the Act.

Report under Section 31

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

Conflict of Interest and Insider Information

Re: The Honourable Kinga Surma, Minister of Infrastructure and MPP for Etobicoke Centre

The Commissioner received a request for an opinion from Marit Stiles, Leader of the Official Opposition and MPP for Davenport, on whether Kinga Surma, Minister for Infrastructure and MPP for Etobicoke Centre, contravened sections 2 and 3 of the Act in relation to the Ontario Place revitalization project, including the agreement with Therme Group Canada.

When a request is made by an MPP, the Commissioner first determines if there are sufficient grounds to conduct an inquiry. To do this, the Commissioner will assess both the request and materials provided by the respondent.

In his report published on January 16, 2025, Commissioner Wake determined that there were insufficient grounds to conduct an inquiry, mainly because Minister Surma was not the minister responsible for the majority of the period under scrutiny related to the project and the agreement with Therme. The prior actions of others could not be attributed to Minister Surma. The submissions in the request did not contain a specific allegation as to how Minister Surma contravened the Act by improperly furthering Therme's interest after she became the minister responsible for Ontario Place.

Request under Section 30 of the Act

In October 2023, the Commissioner received a request from Marit Stiles, Leader of the Official Opposition and MPP for Davenport, on whether Kaleed Rasheed, then MPP for Mississauga East–Cooksville contravened the Act. The request was in relation to a trip to Las Vegas, Nevada, that was described in the Commissioner's Report of August 30, 2023, regarding Steve Clark, then Minister for Municipal Affairs and Housing and MPP for Leeds–Grenville–Thousand Islands and Rideau Lakes.

The Act restricts the Commissioner from conducting an inquiry into a matter if the subject matter of the inquiry is being investigated by police. The matter was held in abeyance given that the RCMP had announced it was conducting an investigation that could overlap with the subject matter of, and individuals named in, the request by Ms. Stiles.

The Act also requires that the Commissioner suspend any inquiry when the writ is issued for a general election. If an inquiry is suspended because of an election, the Act stipulates the circumstances under which a matter can be continued. A written request must be provided by either the member who made the initial request or the member (or former member) whose conduct is the subject of the request. It must be submitted in writing to the Commissioner within 30 days after polling day.

As no request was received within the 30-day timeframe, the Commissioner Designate informed the parties involved and the Speaker of the Legislative Assembly that the matter was closed and that no report will be provided under the Act.

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 seeking the advice of the Commissioner.

Gifts

Gift from Lobbyist

A minister was sent a bottle of wine from an organization that lobbies the provincial government. The minister's office was listed on the organization's lobbyist registration as a lobbying target. Could the gift be accepted?

Since the organization lobbied the minister, the Commissioner concluded that accepting the bottle of wine could give rise to a reasonable presumption that it was given to influence the minister in the performance of her duties of office. As such, the Commissioner advised that the wine be returned.

Invitation to a Gala

A minister was invited to attend a gala hosted by a group raising funds for a charitable organization. The recipient charitable organization extended the invitation to the minister to be its guest. The ticket was less than \$200. Could the invitation be accepted?

Given the nature of the event, the charitable organization's ties to the gala as the beneficiary and the fact that this organization was not a stakeholder of the minister's ministry, it was the Commissioner's opinion that the invitation was not offered in an attempt to influence the minister in the performance of her duties of office. The invitation could be accepted.

Since the value of the ticket was below the \$200 reporting threshold, the minister was not required to file a Statement of Gifts and Personal Benefits.

Festival Tickets

A local music festival offered an MPP tickets to several concerts at the festival. Could the MPP accept the tickets?

It was the Commissioner's advice that the tickets should not be accepted. The festival was a stakeholder that received funding from the government and the offer of tickets to multiple festival events seemed excessive. As the value of the tickets was significant, the Commissioner concluded that accepting the tickets would likely give rise to a reasonable presumption that they were offered to influence the MPP in the performance of his duties of office.



Donations to a Community Barbecue

Several local organizations offered to supply food for an MPP's community barbecue. Could these offers be accepted?

The Commissioner advised that donations for the MPP's community barbecue would be considered gifts under the Act. The appropriateness of accepting donations from organizations would depend upon what is being offered, whether the donation is being offered in order to influence the member, and whether the organization or business in question is a government stakeholder. The Commissioner cautioned that going forward, donor organizations may expect something in return from the MPP.

Another consideration was that organizations and businesses typically wish to advertise their respective organizations when they donate and serve food at MPP community events. The Commissioner advised that constituency office resources should not be used to promote or advertise organizations or businesses, including local organizations.

For the above reasons, it was the Commissioner's advice that the MPP should not accept donations for their community events.

Investments

Financial Holdings Conflicting with a Government Bill

An MPP held shares in a corporation that was the subject of legislation. The MPP asked whether she should abstain from participating in debate and voting on the bill.

The Commissioner considered the content of the bill, the value of the shares and section 2 of the Act, which states that:

A member of the Assembly shall not make a decision or participate in making a decision in the execution of his or her office if the member knows or reasonably should know that in the making of the decision there is an opportunity to further the member's private interest or improperly to further another person's private interest.

In consideration of the above, it was the Commissioner's opinion that the MPP was in a conflict of interest and should recuse herself from participating in the debate and from the vote.

Letters of Support

Grant Application to Provincial Government

An MPP was asked by an organization in the riding for a letter supporting its grant application to a provincial government ministry. The MPP had attended many of the organization's functions in the past. Could the MPP provide the letter?

The Commissioner advised that the MPP could provide the support letter, subject to his guidelines:

- 1 | The MPP knows the individual or entity involved.
- 2 | The MPP maintains as much control over the letter as possible. The letter should be specifically addressed to the intended recipient.
- 3 | The MPP selects the appropriate letterhead — personal, MPP or ministry — in relation to the capacity under which the letter is being sent.
- 4 | The letter should not be generic, but rather as specific as possible to the matter at hand. It should directly discuss the organization or cause and should address the reason(s) the letter is being written.

Reference Letter to a Provincial Agency

A minister was asked to provide a letter of reference on behalf of a constituent who was applying for a position with a provincial government agency. The minister knew the applicant well. Could the minister provide the letter?

It was the Commissioner's opinion that the minister should not provide the letter because cabinet ministers' advocacy efforts are restricted when they are directed at provincial ministries and agencies. Parliamentary convention prohibits cabinet ministers from appearing as advocates or supporters about a decision to be made by a provincial agency, board or commission about a particular matter affecting an individual or organization. The convention has evolved to ensure that members of the agencies, boards or commissions can carry out their duties free of influence and the appearance of influence by cabinet ministers.

Grant Application to Federal Government

A minister was asked by an organization in his riding for a letter supporting its grant application to a federal government department. The minister received the request the day before the election writs were to be issued. Could the minister provide the letter?

It was the Commissioner's advice that the minister could provide the support letter on MPP letterhead since it was to be sent as part of an application for a federally funded program. However, the Commissioner advised that the letter should be dated and sent in advance of the election writs being issued since the minister would no longer be an MPP once that occurred.





Grant Application to Private Sector

An MPP asked whether he could provide letters supporting applicants seeking grants administered by private sector organizations.

While it may be acceptable for the MPP to write support letters on behalf of individuals and organizations applying for private sector grants in some circumstances, the Commissioner cautioned that there may also be situations when it is not appropriate. The Commissioner would consider whether the organization administering the grant lobbies the government, or if it is a government stakeholder. It would also be necessary to consider the MPP's government roles. In cases where the grant administrator is a lobbyist or government stakeholder and the organization to which the MPP has lent his support is selected, the Commissioner cautioned that there could be an expectation that a favour may be granted in return.

Given the above, it was the Commissioner's advice that the MPP should seek case-specific advice if asked to provide a letter supporting a grant application to a private sector organization and to provide as much information as possible so that all of the relevant factors could be considered.

Social Media

Supporting Charitable Organizations

An MPP was asked by a charitable organization to post messaging on his social media accounts advocating for donations on the organization's behalf. The MPP asked whether he could post the messages and sought guidance on social media posts generally.

When posting on social media, MPPs must follow the conflict of interest, insider information and influence provisions (sections 2, 3 and 4) of the Act. Regarding the specific issue of MPPs supporting charitable initiatives, the Commissioner's advice is the same, regardless of whether MPPs are speaking in person, expressing their support in writing or posting on social media. The Commissioner generally advises members to avoid directly asking for donations on behalf of organizations. While members are free to participate in charitable events and may choose to speak publicly or post messaging on social media about the good work of a particular organization, soliciting donations or encouraging public participation can be seen as an improper use of their influence, contrary to section 4 of the Act.

For these reasons, it was the Commissioner's opinion that the MPP should not post the donation request on behalf of the charitable organization. However, the Commissioner advised that if the MPP wished to post a positive message about the organization, he could do so, provided that he did not solicit any donations in the messaging.

Promoting a Community Event

An MPP was asked to promote a community safety information session organized by nonprofit organizations in the riding. Could the MPP promote the event on his social media pages?

Since the information session was a community-driven event and open to the public, it was the Commissioner's opinion that the MPP could promote the event on social media.

Constituency Office Operations

Ministers' Staff Visits to the Constituency Office

A minister wanted staff from her ministry office to make occasional visits to her constituency office so they could learn about the role of the office and its work supporting the community. Was this permissible?

It was the Commissioner's opinion that the minister's staff could make occasional visits to the constituency office provided that it was for observation and learning purposes only. The Commissioner reminded the minister that it is parliamentary convention that MPPs do not use resources of the executive branch inappropriately to support their work in other capacities.

Ministers' staff should not conduct constituent case work or any other work that is conducted in an MPP's constituency office. Similarly, resources allocated for an MPP's constituency office from the MPP's global budget should not be assigned to do work for the minister's office.

Charitable Drive Participation

An MPP's constituency office was asked to be a collections location for a charitable donation drive. Was this permissible?

It was the Commissioner's opinion that the constituency office should not be used to collect donations on behalf of charitable organizations since this would stray beyond the constituency office's intended purpose and would be contrary to parliamentary convention. The purpose of the constituency office is for MPPs to meet with constituents and to assist them in navigating government programs and services.

However, the Commissioner advised that the constituency office staff could assist with the charitable drive provided that they did so on their own time without using any constituency office resources.



Advocacy

Requesting Information

A grant application submitted by a local organization was disqualified by a provincial government agency. A constituent, who represented the organization, asked the MPP for help. The MPP inquired whether it would be appropriate to contact the agency on the constituent's behalf to ask for an overview of the grant process, whether appeals were possible and whether he could get information on how the organization could appeal the decision.

The Commissioner indicated that MPPs or their staff may contact any ministry, agency, board or commission for the purposes of requesting information (i.e., status, policy and procedures). However, the Commissioner also noted that members must be careful not to seek, or to suggest to others that they are seeking, preferential treatment from decision-makers because of their status as an MPP, particularly given section 4 of the Act, which states that:

A member of the Assembly shall not use his or her office to seek to influence a decision made or to be made by another person so as to further the member's private interest or improperly to further another person's private interest.

Based on the facts of the situation, it was the Commissioner's opinion that the MPP could contact the agency and request the information, as outlined by the member. However, the Commissioner cautioned against any advocacy in an effort to reverse the agency's decision.

Outside Activities

Auctioning Lunch with the Minister

A charitable organization asked a minister to donate "Lunch for two with the MPP" as a silent auction item at its fundraiser in the riding. Could the minister make the donation?

While it would not be considered a contravention of the Act to make such a donation, the Commissioner advised that MPPs should be mindful that they will have no control over the person or entity that successfully bids for their time. For example, the successful bidder could be a government stakeholder that they do not wish to host, or one that places them in a potential conflict of interest. As such, it was the Commissioner's advice that if the minister wished to proceed, that she implement a measure allowing her to deny the successful bidder should she deem acceptance inappropriate given her ministerial and MPP roles.

Ministers' Staff Ethical Conduct

The Integrity Commissioner responded to 187 inquiries from ministers' staff this year, down slightly from the 204 inquiries received last year. The most common type of inquiry related to questions about the post-employment rules, which apply when public servants leave their positions in ministers' offices. This was followed by questions about outside activity and questions about political activity, such as seeking a nomination to run in an election.

The Commissioner serves as the Ethics Executive for ministers' staff under the *Public Service of Ontario Act, 2006* and the Conflict of Interest Rules found in Ontario Regulation 382/07 of the Act. Ministers' staff can seek this direction at all stages of their employment in a ministers' 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



Year in Numbers

Types of Inquiries:

87

Post-employment

19

Pre-employment

37

Outside activity
(including political activity)

7

Gifts/invitations

34

Conflict of interest

3

Other

**187 ministers'
staff inquiries**

Behind the numbers

These numbers reflect the various subjects about which ministers' staff will seek direction from the Commissioner regarding their ethical 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

Training and outreach are key components of the work in the ministers' staff mandate.

In May and October, the Commissioner and staff delivered virtual presentations to new ministers' staff employees about the Conflict of Interest Rules and political activity restrictions. When requested, the Commissioner also provided training for individual ministers' offices. All training sessions focus on reinforcing the Conflict of Interest Rules by using interactive, real-life scenarios that illustrate how the Rules and the Act apply to their work.

In keeping with this, when the provincial election was called, the Office wrote to all chiefs of staff in ministers' offices to remind them and their staff about their political activity restrictions, including the prohibition on using government resources including offices, equipment and time for campaign work.

Post-employment

The Conflict of Interest Rules include obligations and restrictions that come into effect when a public servant leaves their position. All ministers' staff are bound by these post-service rules and should immediately contact the Office when they interview for a new position or before they accept a new role.

The post-employment process begins with a meeting with Office staff to learn about how Rules will apply to future employment. Staff will gather information about what files and responsibilities the individual had in the minister's office and what the new role will entail.

The Commissioner, as their Ethics Executive, will review this information and provide specific direction to avoid a conflict of interest and ensure compliance with the Rules. Ministers' staff may also need to be screened from certain files in their current job. This helps them avoid the appearance of providing preferential treatment towards a prospective employer.

There can be circumstances where ministers' 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. It applies if they had substantial involvement with the prospective employer (i.e., a public body, entity or person) while working for the government, and they had access to confidential information that, if disclosed to the prospective employer, could harm the Crown or give the employer an unfair advantage. This restriction is in place for 12 months after leaving government.

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

- ➔ the minister (or ministers) of the ministry where the minister's staff 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.

This restriction applies to former staff who go to work for government relations firms and to those who take positions with for-profit or not-for-profit organizations that lobby the government.

As the Commissioner also serves as Lobbyist Registrar under the *Lobbyists' Registration Act, 1998*, information about obligations under that law is often provided as well.

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 and should not be considered a substitute for contacting the Office to obtain the Commissioner's direction on a particular matter.

Conflict of Interest

Formerly Employed as a Consultant Lobbyist

A newly hired member of a minister's staff formerly worked for a government relations firm. He proactively asked for direction to ensure compliance under the Rules.

Upon review of the Ontario Lobbyists Registry, the Commissioner noted that the government relations firm was registered to lobby the relevant minister's office and ministry on behalf of several clients. Under the Rules, ministers' staff have an obligation not to provide preferential treatment, or the appearance of preferential treatment, to any person or entity. In order to mitigate the risk of the ministers' staff being placed in a real or perceived conflict of interest, the Commissioner directed that an ethics screen be implemented to separate him from matters involving the firm and the clients that he previously represented. The Commissioner advised that the minister's staff could work on files related to other clients of the firm but that meetings should be handled by other members of the minister's staff. He was further directed that if it was necessary to deal with specific clients of the firm, he could meet with those clients provided that he received the permission of his chief of staff and that employees of the firm were not in attendance. In keeping with Office practice, a copy of the screen was received.

MEETING WITH STAKEHOLDERS

While conducting their duties, ministers' staff interact with different people, businesses and organizations that wish to influence the government. These stakeholders may be engaging in lobbying. This is a legitimate avenue for information to be exchanged with government but can involve obligations under the *Lobbyists Registration Act, 1998*.

Ministers' staff are encouraged to check the Ontario Lobbyists Registry on the Office website to see if ministerial stakeholders are registered. Registration is not required for every stakeholder, but the Registry can provide important information about lobbying goals.

When meeting with stakeholders or lobbyists who may be trying to influence government decisions, ministers' staff should remember that these in-service Conflict of Interest Rules apply:

- ➔ Do not participate in decision-making that would benefit them;
- ➔ Keep government information confidential;
- ➔ Do not accept gifts (including meals or tickets to cultural, sports or social events); and
- ➔ Do not give preferential treatment or the appearance of preferential treatment.

Investment Holdings

A minister's staff asked if she needed to declare the stocks in her investment portfolio.

There are no restrictions on the types of securities in which ministers' staff can invest, but certain investments, such as stocks and sector-specific mutual funds, can have the potential to create a conflict with government work. In this matter, the minister's staff was advised that the Rules make clear that she cannot use her employment with the Crown to directly or indirectly benefit herself and cannot participate in any decision in her public service role if she could personally benefit from the decision. As such, the Commissioner directed that she contact the Office for further direction if she finds an intersection between her government work and her investments.

Owning a Commercial Building

A minister's staff advised that she owned a commercial building with multiple tenants. The tenants were not government stakeholders. Was this permissible?

The Commissioner determined that there could be a potential for intersection between her commercial business and her government work. The Commissioner determined that her property ownership did not present a conflict but noted that this could change depending on the policy matters she would be assigned in the minister's office. In the event that this occurred, she was directed to contact the Office for direction.

Gifts

Invitation from a Lobbyist to an Event

A minister's staff received a complimentary ticket from a registered consultant lobbyist to attend an event. A different lobbyist at the same firm was registered to lobby his minister's office. The ticket had a value of \$500. Could he accept the invitation?

The Commissioner reviewed the matter under section 4 of the Rules, the provision on accepting gifts. Given that the ticket was received from a consultant lobbyist whose firm was registered to lobby his minister's office, the Commissioner determined that a reasonable person might conclude that the gift could influence the minister's staff when performing his duties to the Crown. The Commissioner directed him not to accept the ticket. However, he was advised that he could attend the event if he personally purchased the ticket.

Outside Activity

Contributing Online Opinion Pieces

A minister's staff wanted to contribute opinion pieces to an online blog. The topics were not related to her work in the minister's office. Was this permissible?

The Commissioner reviewed the matter under the Rules and the political activity provisions found in the Act and determined that she was not prevented from writing the pieces, provided that she follow these directions:

- 1 | Obtain her minister's approval.
- 2 | Ensure that the contents of the articles do not identify her by her title in the minister's office and that she makes it clear that the opinions expressed are her own.
- 3 | Not to use any government resources, including government time, email, phones and computers to write these opinion pieces.
- 4 | Recuse herself from any discussions or decisions that arise in the course of her provincial government work that directly relate to this specific blog.

The Commissioner also reminded her of her confidentiality obligations under section 5 of the Rules, which prohibit her from disclosing or using any confidential information obtained in the course of her employment by the Crown, unless authorized to do so.

Finally, the Commissioner reminded her that she would need to ensure that her outside work is in full compliance with section 97 of the Act, which included recusing herself from any topics that could conflict with the interests of the Crown.

Post-employment

Advising the Crown on an Ongoing Negotiation

A ministers' staff applied for a position with a government relations firm. He indicated that he had only a few interactions with the firm during the last 12 months of his employment. However, he had advised the Crown on an ongoing negotiation that included a client of the firm. The firm was not involved in these negotiations. Could he accept the job?

Under section 19 of the Rules, the Commissioner determined that the minister's staff could accept the offer of employment given his lack of substantial involvement with the firm. However, since he was a key decision-maker with respect to the ongoing negotiation, the Commissioner determined that under section 20 of the Rules he was restricted from advising or assisting the client with this specific negotiation until the Crown ceased to be involved.



Public Sector Ethics

This year the Integrity Commissioner and staff handled 260 matters related to the Conflict of Interest Rules and political activity restrictions in the *Public Service of Ontario Act, 2006* and its regulation. This was a significant increase from the 183 matters addressed in the previous year, due largely to financial declarations submitted by public servants working in ministries.

Ethics Executives from 31 public bodies contacted the Office to seek advice or determinations about their own obligations under the Conflict of Interest Rules or ask for guidance about the obligations of other public servants, including board appointees. The provincial and federal elections also contributed to an increase in the number of inquiries regarding political activity.

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

Year in Numbers

Types of Matters:

25

Advice

43

Information

40

Determinations

1

Rules and Ethics Plan approval

14

Appointment advice

137

Financial declarations

**260 matters addressed
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 on a candidate's circumstances related to the proposed role. The Commissioner regularly suggests strategies to mitigate conflicts of interest but does not assess or provide any comment on an individual's suitability for the 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.

Financial Declarations

The Conflict of Interest Rules require the Public Service Commission to maintain a list of positions of public servants working in ministries who routinely work on a matter that might involve the private sector. Public servants on this list are required to complete a financial declaration form and submit it to the Office of the Integrity Commissioner. The Office reviewed 137 financial declarations from public servants this year.

Office staff reviewed the financial disclosures to ensure that each public servant's financial holdings, such as stocks or other investments, did not conflict with the matters on which they work or about which they have confidential information. Where appropriate, public servants were provided direction on how to mitigate any conflicts.



Training and Outreach

In May and October, the Office held online Ethics Executive orientation sessions for public body chairs and designated Ethics Executives, as well as the public servants who support them. The sessions provided information about the Conflict of Interest Rules and political activity restrictions, as well as information on how an Ethics Executive might seek assistance from the Office. The orientation also covered the disclosure of wrongdoing framework and the obligations of public bodies under the Expenses Review mandate. Participants were presented with different hypothetical scenarios based on recent matters received by the Commissioner, and they discussed how they would apply the Act and the Rules to address the situations. A total of 64 public body appointees and employees from 45 public bodies attended the sessions, 33 of whom were Ethics Executives.

As in past years, the Commissioner also spoke to newly appointed deputy ministers about Ontario's ethical framework. Additionally, Office staff presented to a public body board on the Conflict of Interest Rules, political activity restrictions and the disclosure of wrongdoing framework. In total, the Office provided training to 39 Ethics Executives.

As part of these outreach activities, the Commissioner sent introductory letters to the 10 newly named public body Ethics Executives to explain the roles of the Office and offer assistance in fulfilling their duties under the Act. This ensures Ethics Executives know when and how to contact the Office.

When the provincial election was announced, the Office also sent all public body Ethics Executives information about the political activity rules.

THE ROLE OF ETHICS EXECUTIVES

Ethics Executives are designated individuals responsible for promoting ethical conduct within their organizations. They ensure that public servants are familiar with the Conflict of Interest Rules and political activity restrictions under the *Public Service of Ontario Act, 2006*.

Ethics Executives are responsible for making a determination on the rules and providing direction where an actual or potential conflict of interest is found. They also provide advice to public servants on the application of the Rules and make inquiries if they determine a public servant may have contravened a rule.

ETHICS EXECUTIVES IN PUBLIC BODIES

Every public servant has an Ethics Executive. Ontario Regulation 146/10 of the *Public Service of Ontario Act, 2006* lists the public bodies that are subject to the Conflict of Interest Rules and that have Ethics Executives. These are the Ethics Executives for those public bodies:

CURRENT/FORMER PUBLIC SERVANT	ETHICS EXECUTIVE
Chairs of public bodies	Integrity Commissioner
Appointees of public bodies	Chair of the public body
Public body employees	Chair of the public body or the person listed in O. Reg. 147/10
Persons listed in O. Reg. 147/10	Integrity Commissioner
Former public body employees and appointees	Integrity Commissioner

For many public bodies, the chair is the Ethics Executive for both appointees and employees. However, public bodies listed under Ontario Regulation 147/10 list the senior public servant (e.g., CEO or general manager) as the Ethics Executive for the employees of the public body.

The Integrity Commissioner is the Ethics Executive for all chairs and for the senior public servants listed in Ontario Regulation 147/10.

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.

Role of an Ethics Executive

An Ethics Executive asked whether he had the ability to determine a conflict of interest if a member of his board did not declare it?

In response to his question, the Commissioner drew the Ethics Executive's attention to subsection 65(4) of the Act, which reads:

Inquiries

(4) The ethics executive may make such inquiries as he or she considers appropriate in response to a request, a notification or where the ethics executive has concerns that a conflict of interest rule has been or is about to be contravened by a public servant or former public servant.

Additionally, subsection 65(5) establishes that an Ethics Executive shall make a determination with respect to any matter brought to the Ethics Executive's attention about the application of the Conflict of Interest Rules or a matter that is the subject of an inquiry under subsection 65(4).

Accordingly, the Commissioner advised the Ethics Executive that after reviewing a matter, he may determine that a member is in a conflict of interest even if the member does not declare it. The Ethics Executive was also told that he has the sole authority to make determinations that there is a conflict of interest or potential conflict of interest and can issue directions that he considers appropriate to address the conflict of interest or potential conflict of interest.

Speaker at a Conference

An Ethics Executive of a public body was invited to speak on a panel at an upcoming international conference. Organizers of the conference informed her that they normally waive the conference registration fee for speakers. The organization does not have any dealings with the public body.

Based on the information provided, the Commissioner determined that the Rules did not prevent the Ethics Executive from having her conference fee waived, given that she would be a speaker at this conference, that registration fees for speakers are generally waived and that the organization hosting the conference does not have dealings with her agency.

The Ethics Executive was also reminded of her obligations under section 6 of the Rules, which prohibits her from providing preferential treatment, or creating the appearance that she is providing preferential treatment, to a person or entity. To that end, she was told that it was important for her to abide by her obligations under this section in the event that the organization in question had any future dealings with her public body.



OUTSIDE ACTIVITY

The Conflict of Interest Rules outline obligations that all public servants must consider when taking part in an outside activity, such as engaging in business, volunteering or taking part in other employment.

These obligations ensure the activity does not influence or conflict with a public servant's duties.

Under the Rules, an employee or appointee cannot become employed by or engage in a business or undertaking (including in a volunteer capacity) if:

- ➔ the public servant's private interests in connection with the employment or undertaking could conflict with his or her duties to the Crown;

- ➔ the activity would interfere with, is likely to influence or could detrimentally affect the public servant's ability to perform his or her duties to the Crown;
- ➔ the employment would constitute full-time employment for another person²;
- ➔ any person would derive an advantage from the public servant's employment as a public servant in connection with the employment or undertaking; or
- ➔ government premises, equipment or supplies are used in the employment or undertaking.

Public servants should seek a determination from their Ethics Executive before engaging in any outside activities, including voluntary positions.

2 Exceptions to this include if a public servant is employed part-time by the Crown or if a public servant is on an authorized leave of absence from his or her position, as long as the employment is not contrary to or inconsistent with the terms of the leave of absence.



Expenses Review

The Office reviewed **4,094** expense claims in the two Expenses Review mandates, higher than the **3,304** claims reviewed last year.

Training and outreach were a focus for both mandate areas this fiscal year. Two cabinet shuffles and regular staff changes resulted in individual training sessions for 29 ministers' offices and the Office of the Leader of the Official Opposition. These are valuable opportunities to work in small groups to discuss the Allowable Expense Rules, explain the expense review process and provide examples of how to submit a claim. On request, and as part of other training activities, Office staff also provided information and education to agencies about the expenses review process and the Travel, Meal and Hospitality Expenses Directive. A total of 50 agencies were provided information on expenses review and the Directive.

Throughout the year, Office staff work with their contacts in ministers' offices and the Opposition Leader's office, as well as in agencies that are under review, to explain the expenses requirement and answer questions, as needed.

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 Rules



Year in Numbers

2,152

minister and Opposition
leader expense
claims reviewed

1,942

agency expense
claims reviewed

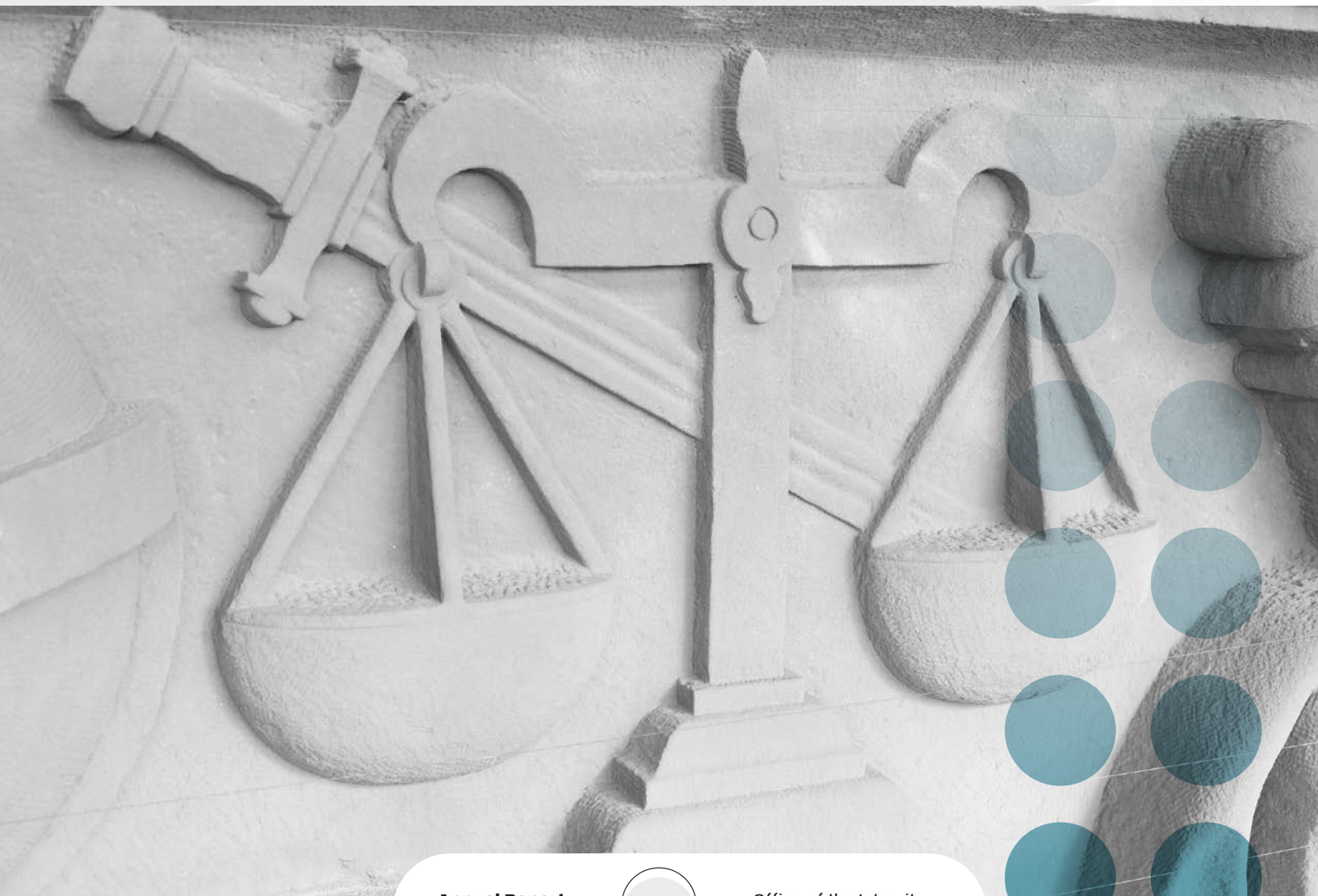
16

agencies reviewed

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.

The number of agencies reviewed includes agencies that were added or released from review during the fiscal year.



Cabinet Ministers' and Opposition Leader's Expenses Review

This year the Office reviewed 2,152 expense claims from ministers, parliamentary assistants, the Opposition Leader and their respective staff. This number is slightly lower than the 2,315 claims reviewed last year due to the provincial election.

Each year the Commissioner is required to submit a report reflecting the fiscal year's expense claims to the Speaker of the Legislative Assembly. 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. All expenses reviewed during this fiscal year were deemed to be compliant with the requirements of the Act.

Office staff conducted online training sessions for almost every minister's office to explain the expenses submission process and review the Allowable Expense Rules. This training is beneficial because it ensures that the submitted claims have the appropriate supporting documentation, such as receipts and other information required for review. It also provides an opportunity for Office staff to answer questions about the expense review process.

Agency Expenses Review

The Office reviewed 1,942 expense claims from appointees, designated senior management employees and the top five employee expense claimants³ of the 16 agencies, boards and commissions under review. This number of claims is more than twice the 989 claims reviewed last year.

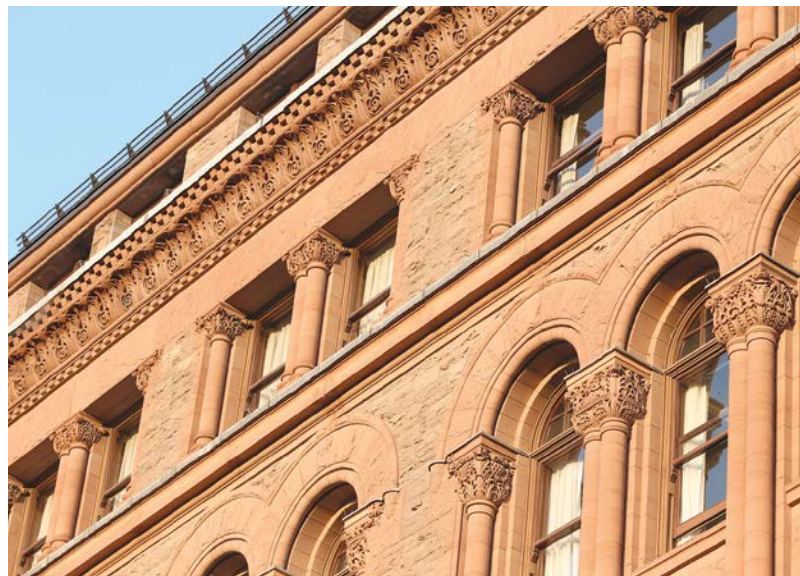
The Commissioner may review the expenses of any public body listed in Ontario Regulation 146/10 under the *Public Service of Ontario Act, 2006*, as well as Ontario Power Generation and the Independent Electricity System Operator.

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 two agencies:

- ➡ Ontario Trillium Foundation
- ➡ Province of Ontario Council for the Arts (Ontario Arts Council)

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 under review, 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.

Inquiries

The following are examples of questions the Office received from ministers' offices and agencies that sought advice and guidance to ensure compliance with the Travel, Meal and Hospitality Expenses Directive and Allowable Expense Rules. These inquiries are provided in order 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.

Accommodation within Office Area

If an employee from an agency needs to remain close to the office to attend late-night meetings and be at the office for an early start time the next day, are they eligible to claim the cost of a hotel room for this purpose?

The employee may be able to claim this expense. Generally, as indicated in section 5.7 of the Directive ("Accommodation"), reimbursement for overnight accommodation close to an employee's office is not permitted. However, limited exceptions apply for emergencies and unusual situations. If the employee typically has a longer commute and needs to stay close to the office for a much longer period of time than their standard working hours or if their work is considered necessary in an emergency, they may be permitted to claim the expense. Prior approval to stay at the hotel is required.

Catering Meals in Office

Can catering expenses be claimed for a meeting, and are there any meal rate limits that need to be followed?

The Directive states that if a work meeting must be held over a meal period, catering can be expensed if the amount per person attending does not exceed the established meal allowance rates. These rates, found in section 6.3 of the Directive, include taxes, delivery fees and gratuities. Claimants should provide receipts with their claims and obtain prior approval, as required.

Agencies are expected to exercise fiscal restraint and follow the guiding principles of accountability and transparency to ensure that taxpayer dollars are used prudently and responsibly.

Mileage

If an employee works a hybrid schedule and must be in office two days a week, can they be reimbursed for mileage?

This is not permitted. The expense reimbursement provisions in the Directive applies only when travel is required as part of regular job duties. Travel does not refer to a person's regular commute to and from work. Expenses related to a person's regular commute are not reimbursable.

Repayments

If an employee has left government, do they still need to make a repayment?

Yes, if someone has left government, they are still required to repay any outstanding overpayments. An overpayment is considered a debt owed to the government and must be repaid. Efforts should be made to collect the repayment. If the outstanding overpayment cannot be collected, the matter will be referred to the Integrity Commissioner for review.



Disclosure of Wrongdoing

This year the Office received 40 disclosures of wrongdoing, the highest number of disclosures from public servants since the inception of the framework in 2007. The Office received 32 disclosures last year.

In Ontario's disclosure of wrongdoing framework, when the Integrity Commissioner receives a disclosure, it is assessed first to determine if the Commissioner has jurisdiction to accept it. If a disclosure does fall within the jurisdiction, it must be referred for investigation to the appropriate Ethics Executive in the public service. This year the Commissioner referred a record 18 matters for investigation.

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

59

contacts from
public servants

40

disclosures from
public servants

18

disclosures accepted
and referred for investigation

13

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 the Commissioner is satisfied with the results of the investigation. It can also include matters in which the Commissioner has investigated and sent a report to a senior official within the Ontario government and the responsible minister.

Training

The Office provided training on the disclosure of wrongdoing framework during its Ethics Executive orientation sessions, which were held in May and October 2024. The training assists Ethics Executives in understanding their role in receiving,

assessing and investigating disclosures of wrongdoing from public servants. 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 orientation sessions include examples of cases and allegations that have been investigated in the past, and offer guidance on how to ensure an effective investigation into a matter.

When speaking to public body boards or addressing newly appointed deputy ministers, the Commissioner highlights the importance of meaningfully addressing disclosures and viewing them as opportunities to learn about and address issues within a workplace.

Meeting with Other Jurisdictions

The Commissioner and staff attended the annual Public Interest Disclosure Conference in St. John's, Newfoundland, in September 2024. The conference is a platform for Canadian jurisdictions with a public interest disclosure framework to share updates on their respective work and best practices related to investigating disclosures. This year, the Commissioner's staff gave a presentation on lessons learned from reviewing investigation reports.

HOW THE INTEGRITY COMMISSIONER DETERMINES JURISDICTION

Each disclosure made to the Office is assessed thoroughly to determine if the Commissioner has jurisdiction to accept it under the *Public Service of Ontario Act, 2006*. When a disclosure is received, the Commissioner considers four elements:

- ➔ 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 a “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, usually where another process exists to address the concern.

In order to assess the allegations, Office staff will work with a discloser to understand and clarify the information they are providing. Many disclosures contain several allegations, and each allegation is considered in the context of the four elements above. When considering a disclosure, the Commissioner assumes the allegations are true for the purposes of determining jurisdiction.

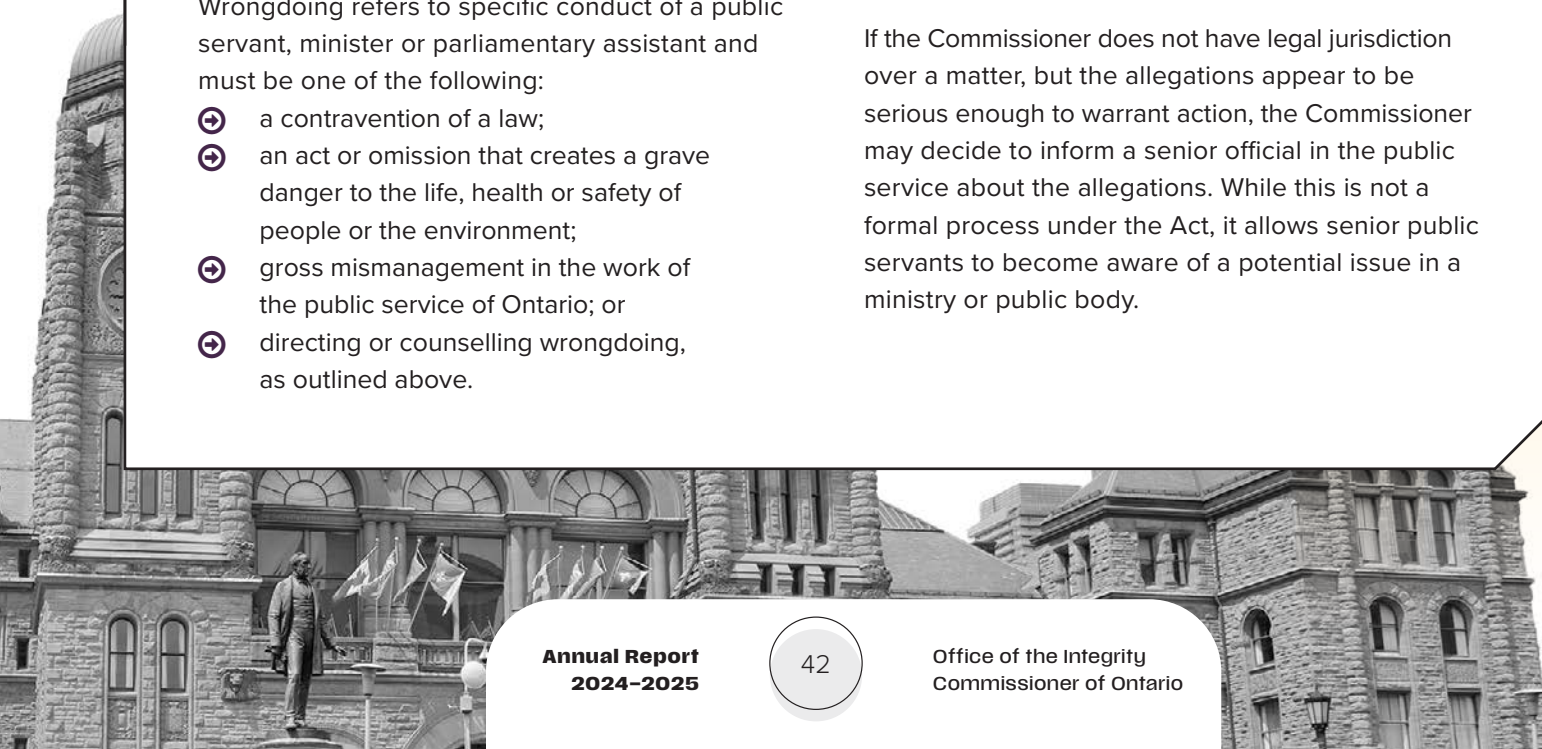
Wrongdoing refers to specific conduct of a public servant, minister or parliamentary assistant and must be one of the following:

- ➔ a contravention of a law;
- ➔ 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.

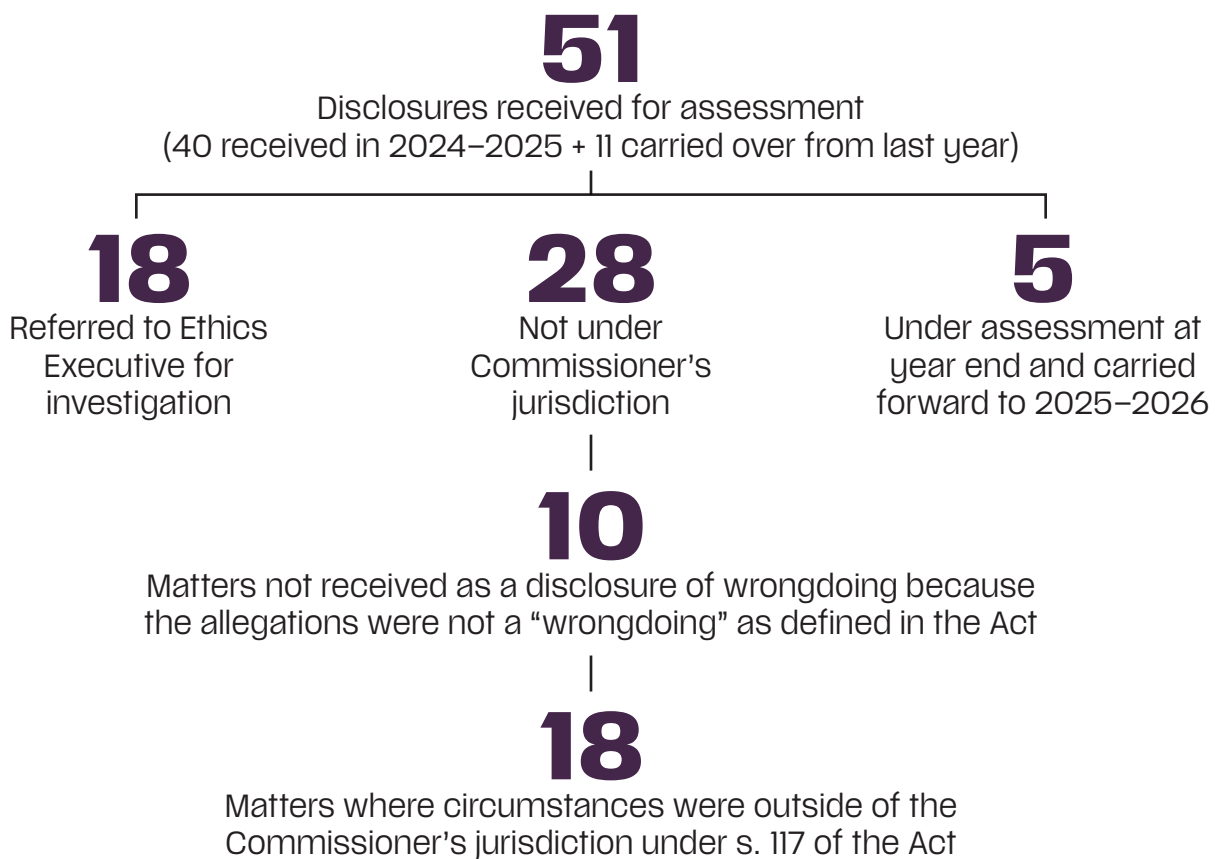
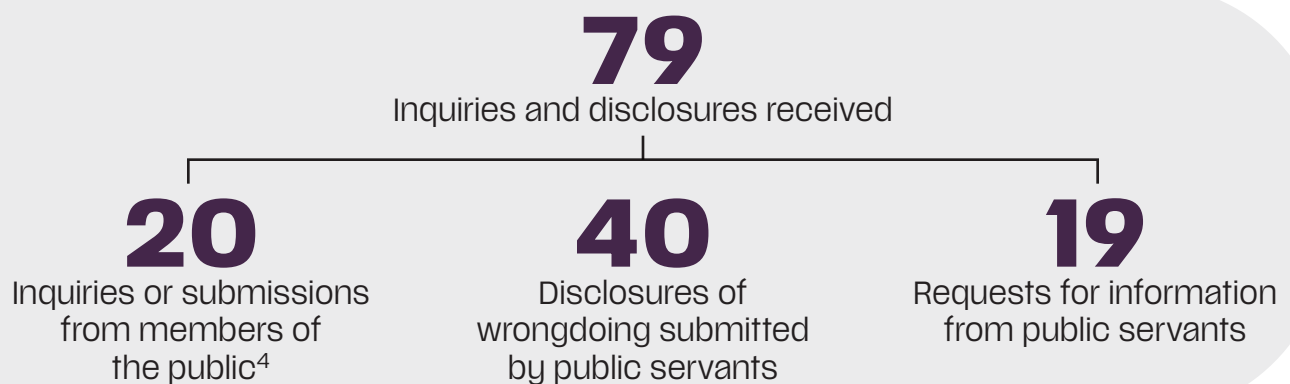
After each individual allegation has been assessed to determine if it is potential wrongdoing under the Act, the allegations that amount to potential wrongdoing are assessed to determine if the Commissioner cannot accept them for a reason outlined in section 117 of the Act. The Commissioner must decline jurisdiction if there is a more appropriate way for an allegation to be addressed or if the allegation is already being addressed elsewhere. For example, the Commissioner cannot accept jurisdiction over employment or labour relations matters that can be dealt with through a grievance procedure under a collective agreement or through a dispute resolution process under an act. The Commissioner must also decline jurisdiction over allegations that are being dealt with as a matter of law enforcement or that relate to a court or tribunal decision or a public policy decision. Jurisdiction may also be declined if the level of information provided by the discloser is insufficient to pursue the matter.

If the Commissioner can accept jurisdiction over the disclosure, the Office will inform the public servant who made the disclosure that the Commissioner will be referring the matter for investigation to an appropriate senior official in the public service.

If the Commissioner does not have legal jurisdiction over a matter, but the allegations appear to be 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 become aware of a potential issue in a ministry or public body.



Disclosure Activity



⁴ As the *Public Service of Ontario Act, 2006* does not allow for non-public servants to file disclosures, where possible, Office staff will redirect members of the public to other entities that may be able to assist them with their concerns.

Case Summaries

When a disclosure matter is referred for investigation to the appropriate Ethics Executive in the ministry or public body concerned, that Ethics Executive must provide the Commissioner with the results of the investigation and information about any action taken. The Commissioner will review this information to ensure that the matter has been addressed in an appropriate and meaningful way. If satisfied with the investigation, the Commissioner may make recommendations and monitor corrective action. Alternatively, the Commissioner may commence an independent investigation.

If the Commissioner conducts an independent investigation, a report will be sent to a senior official within the Ontario government and the responsible minister.

This year the Office closed 13 matters, with wrongdoing substantiated in six of these. The Commissioner or Commissioner Designate made recommendations to the Ethics Executive in four 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 gross mismanagement and grave danger (referral)

A discloser alleged that a public servant engaged in gross mismanagement, created grave danger and contravened an act. The discloser also alleged that several other public servants in a ministry engaged in gross mismanagement by failing to investigate a complaint about this particular public servant.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found that the public servant engaged in wrongdoing by breaching various policies, procedures and protocols and by engaging in highly unprofessional and grossly inappropriate conduct. However, the deputy minister also found that management had already investigated the allegations involving this public servant and had taken corrective actions. Therefore, with respect to the other named public servants, the deputy minister found the allegations of wrongdoing were unsubstantiated. The Commissioner recommended further corrective action with respect to a manager who was not named by the discloser, but whose involvement was described in the investigative report. The deputy minister confirmed steps had been taken to address with this manager the issues identified. The Commissioner was satisfied with the investigation and the corrective actions and closed the file.

Alleged gross mismanagement and conflict of interest (referral)

A discloser alleged that a public servant engaged in gross mismanagement and breached several Conflict of Interest Rules by using their employment to benefit another public servant with whom they had a romantic relationship and that they also gave or appeared to give preferential treatment to this public servant. It was alleged that the public servants failed to notify human resources and their Ethics Executive of their relationship. Finally, it was also alleged that the first public servant engaged in outside activity during work hours and used their employment to benefit their outside activity.

The Commissioner referred the matter to the appropriate senior official, who investigated and found that all the allegations were unsubstantiated. The senior official found that the public servants were not in a romantic relationship but did have another type of relationship outside of work. However, they were not in a direct reporting relationship and there was no evidence of preferential treatment, real or apparent. The senior official also found that while the public servant did engage in outside activities, management was aware, and the activities took place outside of work hours. The senior official requested that a conflict of interest declaration be provided about the relationship and outside activity. The Commissioner made a further recommendation with respect to the conflict of interest determination to be provided but was satisfied with the investigation and the corrective actions proposed and closed the file.

Alleged grave danger, gross mismanagement and direction to contravene an act (referral)

A discloser alleged that a senior public servant created grave danger, engaged in gross mismanagement and/or directed another public servant to contravene a regulation in relation to the safe operation and maintenance of potentially dangerous equipment. The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found the allegations were unsubstantiated. However, the investigation also revealed serious concerns about the appropriate amount of training given to employees who operate the equipment. To address these concerns, the deputy minister directed that additional training be provided. The Commissioner was satisfied with the investigation and the corrective actions and closed the file.



Alleged gross mismanagement and contravention of an act (referral)

A discloser alleged that two senior public servants engaged in gross mismanagement and/or contravened an act with respect to certain review processes permitted by the senior public servants that could affect the independence of tribunal decision-making. The Commissioner referred the matter to the appropriate senior official to investigate. The senior official found the allegations were not substantiated. The senior official determined that while staff may review and comment on draft decisions, this did not affect the independence of the decision-making process. The investigation found no evidence of any attempt by staff to influence tribunal decision-making. The investigating official did, however, make recommendations to improve the written rules and process for staff involvement to provide further clarity and avoid the appearance of interference with the independence of tribunal decision-making. The Commissioner was satisfied with the investigation and the corrective actions and closed the file.

Alleged conflict of interest—outside activity (referral)

A discloser alleged that a public servant contravened various subsections of the Conflict of Interest Rules by engaging in two outside activities that interfered with his work as a public servant, that constituted full-time employment and for which he used government premises, equipment or supplies. It was also alleged the public servant contravened section 65(3) of the *Public Service of Ontario Act, 2006* by failing to inform his Ethics Executive of his outside activities.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found the public servant failed to inform his Ethics Executive of his outside activities, which included another full-time job for a private employer. The deputy minister found the public

servant contravened subsections 8.2, 8.3, 8.4 and 8.6 of the Rules, as his outside activities interfered with his ability to perform his duties, one of them constituted full-time employment and the public servant used government resources and worked on his outside activities during work hours. Finally, the deputy minister also found the public servant engaged in other outside activities not identified by the disclosure, which also contravened the Act and the Rules. The public servant resigned during the investigation. The deputy minister identified corrective actions to strengthen management skills within the division in issue and the larger ministry. The Commissioner recommended further corrective actions, which were accepted by the deputy minister. The Commissioner was satisfied with the investigation and closed the file.

Alleged conflict of interest (referral)

A discloser alleged that a public servant contravened certain sections of the Conflict of Interest Rules by being involved in the administration of the selection process for an award while also being nominated for the same award. The Commissioner referred the matter to the deputy minister to investigate. The deputy minister initially concluded that there were no contraventions of the Rules; however, the Commissioner raised concerns about certain conclusions in the investigation report. After further review, the deputy minister agreed that there had been a technical contravention of section 6(2), in that reasonable people might perceive a conflict of interest in this situation. While senior managers had been aware of the potential conflict, they had not provided direction to the public servant to take different steps to address it. The deputy minister acknowledged that there should have been proactive steps to address the conflict. The public servant was counselled on how to proceed in order to avoid actual or perceived conflict of interest in the future. The deputy minister also took steps to clarify roles and responsibilities in the award selection process in general. Following this, the Commissioner was satisfied with the investigation and the corrective actions and closed the file.

Alleged conflict of interest—self-benefit and preferential treatment (investigation)

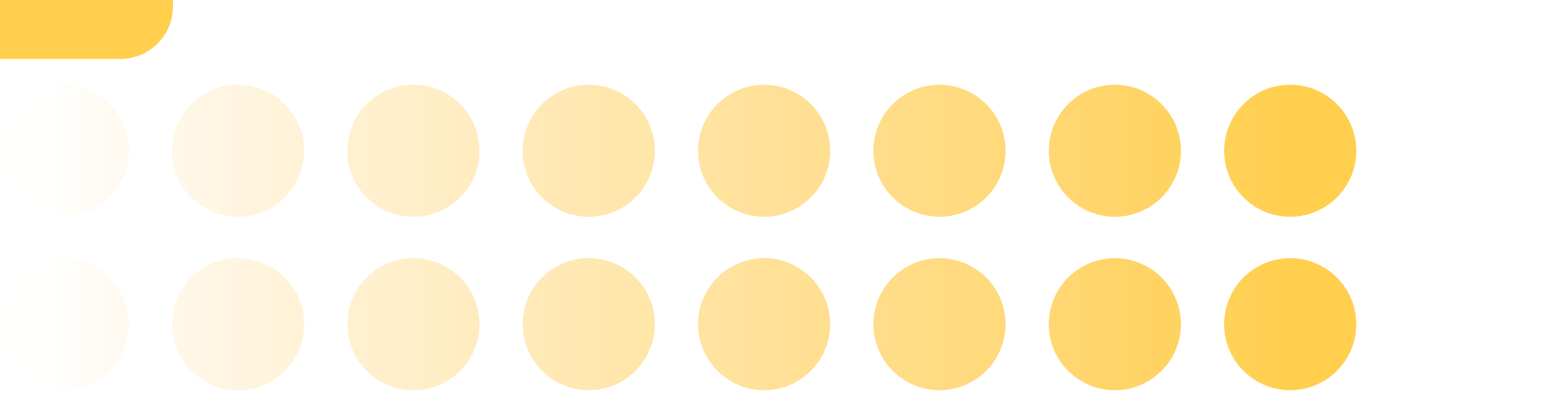
A discloser alleged that a public servant breached the Conflict of Interest Rules by using his position as a public servant to benefit himself and by giving, or appearing to give, preferential treatment to friends and associates. The discloser also alleged that the public servant had participated in decision-making by the Crown when he could benefit from the decision. The Commissioner investigated and determined that there was no evidence to suggest that the public servant had used his position to benefit himself, that he had given or appeared to give preferential treatment or that he had participated in decision-making when he could benefit from the decision. The Commissioner found that the public servant had not breached the Rules. The Commissioner was satisfied that there was no wrongdoing and closed the file.

Alleged grave danger and gross mismanagement (referral)

A discloser alleged that several senior public servants engaged in gross mismanagement and created a grave danger by failing to properly design, implement and maintain a program. The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found that none of the individual respondents had engaged in wrongdoing but also found that there were structural and systemic issues with the program. The deputy minister directed that a review of the program be conducted and an action plan created to address the concerns identified, with regular reports back to the deputy minister by senior public servants. The Commissioner was satisfied with the investigation and the corrective actions and closed the file.

Alleged conflict of interest—outside business (referral)

A discloser alleged that a number of public servants contravened the Conflict of Interest Rules and any related direction given by their Ethics Executive by working for their outside businesses during work hours. The Commissioner referred the matter to the deputy minister for investigation. The deputy minister noted that all the public servants had submitted conflict of interest declarations and that their Ethics Executive had approved their outside businesses subject to certain conditions and directions, including the direction not to use government premises, equipment or supplies for activities related to their outside business. With respect to one public servant, the investigation showed some emails related to the outside activity had been forwarded to their work email account. The public servant explained that this was done to avoid scheduling conflicts. The deputy minister found that the public servant had contravened subsection 8.6 of the Rules as well as information technology policy by using government IT resources for the outside business and sending emails between personal email accounts and work email accounts. However, the deputy minister also found that this public servant did not work for an outside business during regular work hours. The deputy minister found there was insufficient evidence to demonstrate any other public servants engaged in any wrongdoing. The deputy minister proposed reminding public servants about the various policies, rules and guidelines in relation to engaging in outside businesses. The Commissioner was satisfied with the investigation and the corrective actions proposed and closed the file.



Alleged gross mismanagement and conflict of interest—preferential treatment (referral)

A discloser alleged that two senior public servants engaged in gross mismanagement and contravened the Conflict of Interest Rules by giving preferential treatment or by failing to avoid creating the appearance of preferential treatment in their dealings with a vendor. The vendor had been awarded a large contract for a complex project. Another discloser also came forward with the same allegation.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found the allegations were unsubstantiated, as the decisions made by the two public servants were considered operationally necessary and reasonable. However, the investigation did identify opportunities for improvement in the communication of executive decision-making to ministry staff and education about the Rules. The deputy minister advised of steps to be taken to improve these communications. The Commissioner was satisfied with the investigation and the corrective actions and closed the file.

Alleged contravention of a regulation (referral)

A discloser alleged that a senior public servant contravened a regulation by failing to ensure there was appropriate training for staff about the handling and use of inherently dangerous items required for their work. The Commissioner referred the matter to the deputy minister for investigation. The deputy minister found the allegation was substantiated, as the senior public servant had failed to ensure staff received training appropriate to their particular duties. The deputy minister found other staff members breached their obligations with respect to the handling and use of these items and, while some of the breaches were attributed to inadequate oversight, others were caused by individual staff members' sub-standard approach to their duties. The deputy minister advised the Commissioner that steps would be taken to address the issues related to staff members' obligations to their duties. Further, the deputy minister provided a copy of an action plan to address the concerns identified and assigned another senior public servant to oversee the implementation of the plan. The Commissioner was satisfied with the investigation and the corrective actions proposed and closed the file.

Alleged conflict of interest— preferential treatment (referral)

A discloser alleged that a public servant contravened the Conflict of Interest Rules in two matters: first, when the public servant contracted with two different companies that employed family members, and second, when the public servant offered a series of short-term contracts to a long-time friend and supervised their work. It was also considered whether the public servant contravened section 65(3) of the *Public Service of Ontario Act, 2006* by failing to inform his Ethics Executive about these actions, which could raise an issue under the Rules.

The Commissioner referred the matter to the deputy minister for investigation. The deputy minister provided an initial report providing factual conclusions about what had taken place and proposed corrective actions. The Commissioner requested that the deputy minister also provide legal conclusions about the allegations, in particular whether wrongdoing had occurred.

In the updated report, the deputy minister made the following findings. First, he found that the public servant did not engage in wrongdoing with respect to contracting with one company where a family member worked because the public servant had filed a timely conflict of interest declaration, received direction from his Ethics Executive about how to mitigate the conflict and had followed that direction. Second, the deputy minister found the public servant had contravened the Rules and subsection 65(3) of the Act by contracting with another family member's company on behalf of the ministry without advising his Ethics Executive.

Finally, with respect to the hiring and supervision of his close friend, the deputy minister found the public servant had not engaged in wrongdoing because he had followed hiring practices approved by his managers under the terms of a collective agreement. The public servant retired from his position during the investigation. The deputy minister identified corrective actions, including reiterating the appropriate conflict of interest practices and policies, as well as those relating to the hiring obligations with staff and management.

The Commissioner Designate was satisfied with the investigation but not satisfied with the hiring practice in place whereby the hiring and supervision of friends on short-term contracts was not considered a conflict of interest within that branch. The Commissioner Designate recommended that management and staff be clearly advised that the hiring and supervision of close friends is a conflict of interest matter that must be reported promptly to the deputy minister as Ethics Executive, who is to provide a determination and direction. The deputy minister accepted the recommendation and the Commissioner Designate then closed the file.

Lobbyists Registration

The Ontario Lobbyists Registry saw a slight decrease in year-over-year active registrations, with 3,514 registrations as of March 31, 2025, compared with 3,628 registrations last year. This decrease may have been caused by the provincial election, since a writ period often results in the winding down of lobbying activity. The number of active registered lobbyists overall increased to 3,519 from 3,446 in the previous year. The increase of lobbyists was primarily in the categories of in-house registrations for businesses and organizations.

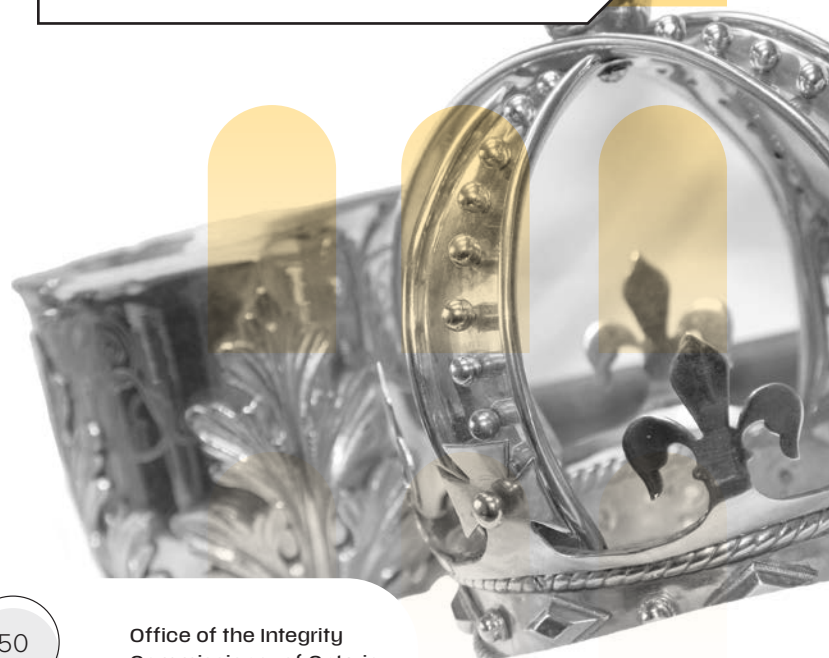
The June cabinet shuffle and the March naming of a new cabinet after the election meant that lobbyists and senior officers had to update the lobbying targets in their registrations. Both events led to several hundred registrations being reviewed by Office staff. They continue to review an average of 500 new, updated and renewed registrations each month.

The Office increased its compliance reviews of registrations, focusing on ensuring lobbyists and senior officers were meeting the timelines and the information requirements of the *Lobbyists Registration Act, 1998*.

A large number of investigations under the Act were concluded this year, some of which resulted in penalties being imposed on individuals who were found to be non-compliant with the requirements of the Act.

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

3,519

active registered lobbyists
listed in 3,514 registrations

58

Advisory Opinions

309

compliance reviews

27

investigations opened

17

investigations concluded



Outreach and Training

The Office published six issues of its newsletter, *ON Lobbying*. This year's editions provided subscribers with information on how to navigate the registry system and highlighted resources available on the Office website. As of March 31, 2025, the newsletter had 870 subscribers.

Following the cabinet shuffle in June, the provincial election in February and the appointment of a new cabinet in March, Office staff communicated with lobbyists about the requirement to update their lobbying targets in all active registrations, as well as provide guidance for lobbyists who choose to participate in political activity. Regular outreach to lobbyists about their obligations improves compliance with the Act.

Office staff conducted five virtual training sessions on navigating the registry system for more than 220 lobbyists, senior officers and the primary contacts who assist with registrations. The training sessions featured interactive explanations of the system and allowed Office staff to answer questions about the registration and account creation process.

The Commissioner spoke at two events organized by the Ontario Chapter of Public Affairs Association of Canada this year. In May 2024, he covered general obligations under the Act, and in February 2025, he spoke about the registration requirements during elections and the conflict of interest obligations related to political activity.

Lobbyist Registrars and Commissioners Network

In September, the Integrity Commissioner and Office staff attended the annual conference of the Lobbyists Registrars and Commissioners Network (LRCN) in Ottawa. This year's conference was hosted by the Office of the Commissioner

of Lobbying of Canada, with regulators and commissioners from eight provinces and two municipalities in attendance.

The three-day event covered topics that included thresholds for in-house lobbyist registrations in different jurisdictions. Participants also discussed the *Foreign Influence Transparency and Accountability Act* and its potential implications on lobbying regulation at all levels of government.

In February, the Office was host to a virtual mid-year meeting, which covered topics on lobbying compliance during an election and lobbying restrictions for former public servants.

The network provides jurisdictions with an opportunity to share updates and best practices, as well as discuss emerging issues in lobbying.

THE IMPORTANCE OF REGISTRY UPDATES

Consultant lobbyists and senior officers of businesses and organizations that lobby are responsible for ensuring their registrations are always up to date. An election, no matter the result, often leads to changes to ministerial and legislative responsibilities, which means that the lobbying targets in registrations will need to be updated. Cabinet shuffles within an election cycle will also result in changes to the titles of ministers and the names of ministries. Additionally, lobbyists may adjust which members of provincial parliament they are lobbying based on parliamentary assistant, critic and committee chair roles, and this will need to be reflected in their registrations.

Consultant lobbyists and senior officers have 30 calendar days under the *Lobbyists Registration Act, 1998* to provide updates or new information about their lobbying activity, such as the accurate names of their lobbying targets. Updates also include adding to or refining the description of the lobbying goal to identify any particular law, policy, program or contract that is part of the lobbying activity.

This contributes to the goal of transparency.

While most lobbyists and senior officers diligently update the information in their registration, those who do not may be contacted as part of a compliance review.

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 lobbying activities or their obligations can request an Advisory Opinion.

The Commissioner provided 58 Advisory Opinions this year. The most common topics were:

- ➔ Conflict of interest (includes questions about political activity and the offering of gifts and invitations to events)
- ➔ Whether registration is required
- ➔ What information to include in a registration

The non-binding guidance in an Advisory Opinion 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 it is not a substitute for legal advice.

Compliance

Individuals, firms, companies and organizations participating in lobbying activity are required to comply with the Act. While the onus to meet these obligations is on consultant lobbyists, in-house lobbyists and senior officers of companies and organizations that lobby, the Lobbyist Registrar is committed to assisting and implementing measures that promote awareness of the Act and the registration requirements. Important components of this work are compliance reviews and the informal resolution process established for less serious non-compliance with the Act.

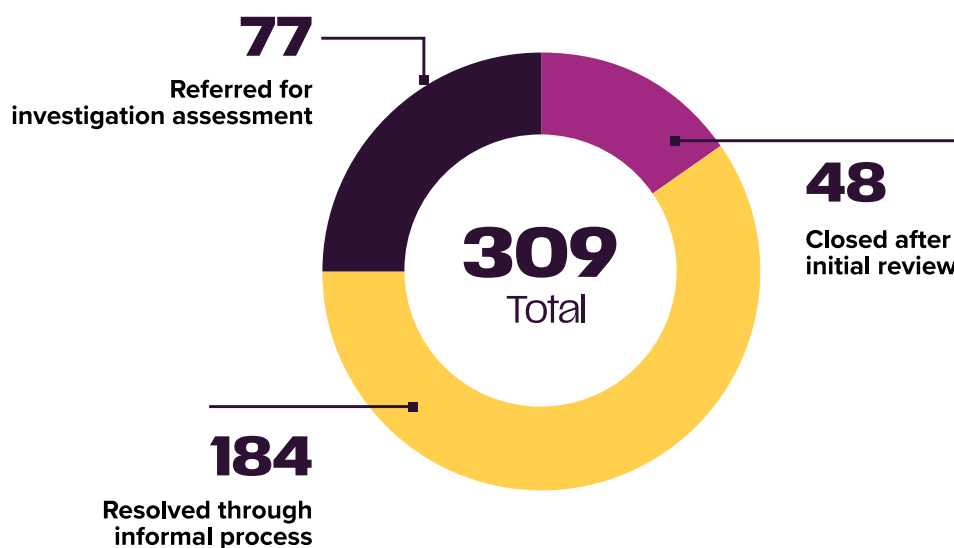
Office staff will review lobbyists' compliance with the timelines for registration that are set out in the Act. For example, they check whether lobbyists have updated their registrations within 30 calendar days after certain information changes, such as the names of government ministries. When it appears that a lobbyist has missed a deadline, the Office first assesses the matter through an informal

resolution process. If a 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 his or her responsibilities.

If the deadline was missed by a longer period or the lobbyist or senior officer has missed several deadlines in the past, the matter will be referred for investigation assessment. Additionally, if the Office learns about potential non-compliance, such as unregistered lobbying or activity that could be a contravention of the prohibition on placing a public office holder in a conflict of interest, this information will be assessed to determine if an investigation is warranted.

Compliance Activity

Compliance Reviews in 2024-2025



This year 309 instances of potential non-compliance were identified, most of which related to issues of delay in filing or updating registrations. This marked the highest number of annual compliance reviews in the last six years.

Of these, 48 matters were closed at initial review because it was deemed that the deadline was not missed and 184 were resolved through the Office's informal process. A remaining 77 matters were referred for investigation assessment.

REGISTRATION TIMELINES

Consultant lobbyists and senior officers are responsible for ensuring that their registrations are always up to date and following the timelines set out in the *Lobbyists Registration Act, 1998*. Most lobbying compliance issues stem from failing to comply with required timelines.

Consultant Lobbyists

Initial Registration

Consultant lobbyists must register within 10 calendar days of their first communication with a public officer holder on behalf of a client.

Registration Updates

Any changes to the information in an existing registration or the addition of new information must be made within 30 calendar days of the change occurring or when the knowledge of the new information is acquired.

Renewals

Registrations must be renewed annually on the anniversary date of the initial registration if the lobbying is ongoing.

Termination

Registrations must be terminated within 30 calendar days of ending the lobbying activity.

Senior Officers (In-House Lobbyists)

Initial Registration

Senior officers of companies and organizations employing in-house lobbyists must register their entity within two months of the 50-hour threshold being met. The threshold is met when the combined number of hours spent lobbying Ontario public office holders by all employees, paid officers and paid directors reaches 50 hours or more in a 12-month period.

Registration Updates

Any changes to the information in an existing registration or the addition of new information must be made within 30 calendar days of the change occurring or when the knowledge of the new information is acquired. This includes adding the names of any new in-house lobbyists who have begun contributing to the 50-hour threshold.

Renewals

Registrations must be renewed every six months if the lobbying is ongoing.

Removing Lobbyists

When an in-house lobbyist leaves their position or stops lobbying, their name must be removed from the Current In-House Lobbyist section of the registration and added to the Former In-House Lobbyist section within 30 calendar days. If the business or organization no longer has in-house lobbyists, the registration may be terminated.

Investigations

The Commissioner may investigate to determine if any person or persons have not complied with any provision of the Act. Following an investigation, after giving that person an opportunity to be heard, the Commissioner may find that a person has not complied with the Act. After making a finding of non-compliance, 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.

The Act requires the Office to keep confidential all information about an investigation, allowing only limited exceptions, including a requirement that the Commissioner provide a statistical summary of investigative activity for the year, as well as brief descriptions of investigations that have been concluded.

Investigation Activity	2023–2024	2024–2025
Matters referred for investigation assessment	33	77
Investigations commenced	10	27
Matters refused for investigation	24	44
Matters remaining under assessment for potential investigation at fiscal year-end	2	8

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 informal resolution process in order to ensure future compliance. For example, the Commissioner may request an explanation of 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.

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

Investigation Summaries

This year the Commissioner concluded 17 investigations, some of which had commenced in previous years. When the Commissioner makes a finding of non-compliance, he must then determine if a penalty is appropriate. The Commissioner imposed a penalty on six lobbyists this year. Information about imposed penalties is available on the Office website.

Completed investigations are summarized below, with two investigations described in one summary.

Consultant Lobbyists

ISSUE: Late to register

The Commissioner investigated to determine if a consultant lobbyist had contravened the Act by not registering his lobbying activity within the 10-day period set out in the Act with respect to one client. The Commissioner ceased the investigation because the lobbyist had filed a registration, albeit 184 days late, fully cooperated with the Commissioner's requests for information and documents, had no prior record of non-compliance with the Act, expressed contrition for the late registrations and promised future registrations would be filed promptly. The Commissioner reminded the lobbyist of his responsibility to comply with all requirements of the Act and that any further contraventions may result in a new investigation and potentially a penalty.

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

The Commissioner investigated whether a consultant lobbyist placed a public office holder in a position of real or perceived conflict of interest in the course of lobbying by selling tickets to the public office holder's fundraiser. The investigation revealed that the lobbyist had assisted one of his clients who asked him about purchasing tickets to the fundraiser, but he was not otherwise involved in organizing the fundraiser or selling tickets generally.

Further, the lobbyist had not lobbied or had any contact with the public office holder for eight months following the fundraiser. After also considering that the lobbyist accepted responsibility for their actions, had no prior record of non-compliance with the Act and fully cooperated with the Commissioner's requests for information, the Commissioner ceased the investigation, explaining that the subsequent eight-month period was sufficient for any sense of obligation to dissipate given the lobbyist's very limited involvement with the fundraiser.

ISSUE: Placing a public office holder in a conflict of interest, late to register and failure to provide information

The Commissioner investigated to determine if a consultant lobbyist placed a public office holder in a position of real or perceived conflict of interest by assisting with organizing a fundraiser for a public office holder whom he was registered to lobby. The Commissioner also investigated whether the same lobbyist had contravened the Act by not registering lobbying activity within the 10-day period set out in the Act with respect to two different clients and by failing to respond to requests for information from the Commissioner. The evidence showed that the lobbyist did not organize the fundraiser or lobby the public office holder in the 12-month period after the fundraiser. The investigation also revealed that while the lobbyist had failed to file two registrations within 10 days, the delay was minimal, with each being 17 and 14 days late respectively. The lobbyist had no prior record of non-compliance, cooperated fully with the investigation and apologized for the delay in registering and lack of timely response. He further explained how he would avoid future delays in registering and in responding to requests for information. The Commissioner decided to cease the investigation.

ISSUE: Failure to register

The Commissioner investigated to determine if a lawyer had contravened the Act by not registering lobbying activity within the 10-day period set out in the Act after receiving documents indicating the lawyer had scheduled meetings with public office holders on behalf of a client. The investigation revealed that the lawyer had acted under the direction of a senior lawyer in the law firm. The senior lawyer took responsibility for this direction and was investigated separately. The lawyer fully cooperated with the investigation and had no prior record of non-compliance with the Act. The Commissioner decided to cease the investigation.

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

The Commissioner investigated to determine if a consultant lobbyist placed public office holders in a real or perceived conflict of interest in the course of lobbying by purchasing restaurant meals for and bringing pastries to a meeting with public office holders. The lobbyist explained he believed the value of each gift was \$35 or less, that it was a normal practice to have modest refreshments available at working meetings and, therefore, these gifts were permitted. During the initial stage of the investigation, the lobbyist advised that he had since reviewed the Act and the guidance available on the Commissioner's website, that he undertook to follow the Commissioner's published guidance about meals and hospitality in the future, and that he was aware he could obtain an Advisory Opinion from the Commissioner prior to offering gifts. The Commissioner ceased the investigation.

The Commissioner's published guidance clearly states that lobbyists may breach the Act if they offer gifts, including meals, to public office holders they are lobbying.

ISSUE: Failure to register

The Commissioner investigated whether a lawyer had engaged in unregistered lobbying on behalf of clients for whom she was also legal counsel.

The Commissioner found that the lawyer lobbied on behalf of one client by sending a letter to a public office holder requesting the removal of client lands from the Greenbelt, which required amendment of a regulation at that time.

The Commissioner also found that the lawyer lobbied by sending one letter to a public office holder requesting amendments to a government policy, specifically the Greenbelt Plan, on behalf of two clients.

The lawyer did not file registrations with respect to any of these clients.

After considering various factors, including but not limited to the public interest in ensuring that lobbying activity is disclosed and transparent and that this lawyer's lobbying activities had become part of a permanent public record through another proceeding, the Commissioner decided to impose the penalty of publication of the consultant lobbyist's name, together with a description of the non-compliance, on the Office's website for a period of one year.

ISSUE: Failure to register, placing a public office holder in a conflict of interest and use of contingency fees

The Commissioner investigated whether an individual had engaged in multiple contraventions of the Act with respect to their work on behalf of several clients over several years. The Commissioner found this lobbyist had engaged in 12 contraventions of the Act.

The Commissioner found this individual had engaged in unregistered lobbying on behalf of five different clients. The clients' goals included amending government policy and legislation; obtaining Minister's Zoning Orders, which are regulations; and removing land from the Greenbelt, which required a regulation change at the time.

The Commissioner also found that, for four of these five clients, the individual had also contravened the Act by lobbying when payment was contingent upon his success in lobbying.

Finally, the Commissioner found that this individual had contravened the Act's prohibition with respect to conflicts of interest. The Commissioner found that this individual placed two public office holders in a position of potential conflict of interest by offering them gifts of a round of golf and tickets to a Toronto Raptors basketball game in the course of his lobbying. The Commissioner also found that he placed a third public office holder in a position of potential conflict of interest while lobbying by organizing a political fundraiser for this official's riding association shortly before an election. The Commissioner found this individual placed a fourth public office holder in a position of potential conflict of interest while lobbying by advising the public office holder that he was bringing a certain amount of funds to a political fundraiser that might benefit this public office holder.

After considering various factors, including that this individual's multiple failures to register, use of contingency fees and placing of multiple public office holders in a position of potential conflict of interest undermine the Act's purpose of transparency and public confidence in the independence of public decision-making, the Commissioner decided to impose two penalties. He decided to publish this consultant lobbyist's name with a summary of his non-compliance on the Office's website for a period of two years. The Commissioner also prohibited this consultant lobbyist from lobbying Ontario public office holders for the same two-year period.

ISSUE: Failure to register

The Commissioner investigated to determine if a planner had contravened the Act by not registering his lobbying activity within the 10-day period set out in the Act. The investigation revealed that, on behalf of one client, the planner sent an email and two letters to public office holders that included or supported a request to remove the client's land from the Greenbelt. One letter was submitted in response to a public consultation, but that consultation was not about the Greenbelt and, therefore,

the Greenbelt removal request did not fall within the exemption from registration applicable to direct responses to a written request for advice and comment from a public office holder.

The Commissioner found that the planner had lobbied public office holders and had not registered. After considering various factors, including that the planner had no prior record of non-compliance, was relatively early in his career and acted under the supervision and direction of a more experienced planner, the Commissioner decided not to impose a penalty in this case.

ISSUE: Failure to register

The Commissioner investigated to determine if a lawyer had contravened the Act by not registering lobbying activity within the 10-day period set out in the Act. The lawyer sent two letters, on behalf of two different clients, to a public office holder requesting that land owned by the clients be removed from the Greenbelt. The Commissioner found that the lawyer had lobbied the public office holder on behalf of both clients and failed to file registrations as required by the Act. After considering various factors, including that the lawyer had no previous history of non-compliance with the Act, fully complied with the investigation and was a junior lawyer acting under the direction of a senior lawyer, the Commissioner decided not to impose a penalty.

ISSUE: Failure to register

The Commissioner investigated whether a planner had contravened the Act by not registering his lobbying activity within the 10-day period set out in the Act. On behalf of one client, the planner attended a meeting with public office holders during which his client requested the removal of a property from the Greenbelt, made a submission through a public consultation process that included a request that the property be removed from the Greenbelt and sent another letter to a public office holder to request a meeting to discuss building housing on

this site that referenced the removal of the property from the Greenbelt. On behalf of a second client, the planner made a separate submission through a public consultation process that included a request that a different property be removed from the Greenbelt.

The Commissioner found that these activities all constituted lobbying and that the planner did not file registrations. Of note, the Commissioner found that the letters submitted through the consultation process did not fall within the exemption applicable to direct responses to a request for advice and comment from a public office holder. This is because the planner's letters included requests that the clients' lands be removed from the Greenbelt and the public consultation process did not seek advice and comment about the Greenbelt.

After considering factors including the public interest in transparency, the fact that the planner did not have any previous incidents of non-compliance, and the importance of deterring this planner and other consultant lobbyists, including other planners, from failing to register their activities, the Commissioner decided to impose the penalty of publication of the consultant lobbyist's name, together with a description of the non-compliance, on the Office's website for a period of two years.

ISSUE: Placing a public office holder in a conflict of interest, late to register and failure to update registration

The Commissioner investigated to determine whether a consultant lobbyist had engaged in multiple contraventions of the Act.

The consultant lobbyist lobbied two recently former colleagues on behalf of a client. The Commissioner found that the consultant lobbyist had placed one of these public office holders in a potential conflict of interest while lobbying because he was satisfied there was sufficient evidence of a close relationship that could give rise to a sense of obligation. The Commissioner found there was insufficient evidence of a close relationship with the other former colleague that was lobbied.

The evidence also showed that the consultant lobbyist was 49 days late to file a registration for his lobbying on behalf of another client and, further, that he had failed to update the registration to add a new lobbying goal and target for the same client within the 30-day timeline found in the Act.

Finally, the Commissioner found that the consultant lobbyist had failed to file registrations for two other clients within the 10-day period required by the Act and had filed them 94 and 17 days late, respectively.

The Commissioner ceased his investigation into another allegation that the lobbyist had violated the prohibition against contingency fees in the Act, as it was unsubstantiated by the evidence gathered.

The Commissioner decided against imposing a penalty in this case. The Commissioner considered that, overall, the contraventions of the Act fell on the less serious end, particularly as the consultant lobbyist had filed registrations for his undertakings, albeit late. The consultant lobbyist also disclosed serious personal challenges that he experienced around the time that the contraventions occurred, which the Commissioner found to be mitigating factors that weighed against imposing a penalty. The consultant lobbyist also took responsibility for his actions.

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

The Commissioner commenced an investigation to determine whether an individual had engaged in unregistered lobbying, placed a public office holder in a position of a real or potential conflict of interest in the course of lobbying and undertook to lobby where payment was contingent on the degree of success in lobbying.

After gathering evidence from multiple witnesses, including clients, there was insufficient evidence to show that the individual was lobbying where payment was contingent on the degree of success in lobbying and the Commissioner ceased this aspect of the investigation.

The Commissioner found that the individual had lobbied by speaking to a public office holder on one occasion on behalf of one client. The Commissioner found that the individual had never filed a registration regarding this activity on behalf of his client.

The Commissioner also found that the individual had placed the same public office holder in a conflict of interest in the course of lobbying because, the day before lobbying that person, the lobbyist had offered the public office holder a ticket to a Toronto Raptors basketball game.

The Commissioner decided to impose the penalty of publication of the consultant lobbyist's name, together with a description of the non-compliance, on the Office's website for a period of two years. In deciding to impose this penalty the Commissioner considered various factors, including the fact that failing to register undermines the Act's purpose of transparency and offering a gift to a public office holder in the course of lobbying undermines public trust. The lobbyist had no prior history of non-compliance, but the Commissioner also found that the consultant lobbyist's past experience weighed in favour of a penalty.

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

The Commissioner investigated to determine whether a consultant lobbyist had engaged in multiple contraventions of the Act. As detailed below, the Commissioner found this lobbyist had engaged in six contraventions of the Act.

The Commissioner found the lobbyist had failed to file a registration after lobbying a public office holder about a client's request that lands be removed from the Greenbelt.

The Commissioner found that, in two different registrations filed, the lobbyist had failed to provide sufficient particulars to identify the relevant regulations that were the subject of his lobbying. One client sought removal of its lands from the Greenbelt, which at the time of the lobbying required a change to a regulation. The other

client sought a Minister's Zoning Order, which is a regulation, to permit increased building height and density on its property.

The Commissioner found that the lobbyist put two public office holders in a position of potential conflict of interest in the course of lobbying by offering them a gift of tickets to a Toronto Maple Leafs hockey game.

The Commissioner found that the lobbyist put two additional public office holders in a position of potential conflict of interest while lobbying them because the lobbyist had a close relationship with each, including past employment and political and personal connections.

After considering multiple factors, including the fact that the lobbyist's failure to register, failure to provide particulars and multiple contraventions of the Act's conflict of interest prohibition undermined the Act's purpose of transparency and public trust in government, the Commissioner decided to impose the penalty of publication of the consultant lobbyist's name, together with a description of the non-compliance, on the Office's website for a period of two years.

ISSUE: Failure to register

The Commissioner investigated to determine whether a lawyer had engaged in unregistered lobbying on behalf of clients for whom he also acted as legal counsel.

The investigation revealed no evidence that the lawyer's communications with public office holders regarding proposed amendments to a specific legislative proposal were sent on behalf of a client and the Commissioner, therefore, ceased his investigation into that allegation.

The Commissioner found that, on behalf of two different clients, the lawyer lobbied a senior public office holder when, after the relevant public consultations had ended, the lawyer sent that public office holder a copy of the clients' written submissions requesting policy changes that had been submitted to government during the earlier public consultation. The lawyer sent the public office

holder the same client requests that had already been submitted. However, the Commissioner found that the exemption from registration that applies to lobbying communications made in direct response to a written request from a public office holder for advice and comment did not apply to this lawyer's later communications because the lawyer sent them after the public consultation period had ended.

The Commissioner also found that the lawyer had lobbied on behalf of a third client to request a Minister's Zoning Order related to health and safety.

The lawyer had not filed registrations with respect to any of these matters.

After considering various factors, including the fact that the failure to register undermines the Act's purpose of transparency, the Commissioner decided to impose the penalty of publishing the lobbyist's name, together with a description of the non-compliance, on the Office's website for a period of two years.

In-House Lobbyists

ISSUE: Failure to register

The Commissioner investigated to determine if the senior officer of a university failed to file a registration as required by the Act after publicly available information indicated the senior officer and employees of the university had lobbied public office holders. Extensive evidence gathered from multiple witnesses indicated that the total time spent on lobbying activities by the organization's officers and employees was fewer than 50 hours within any 12-month period, which is the threshold required for registration. As the senior officer was not required to register, the Commissioner ceased the investigation.

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

The Commissioner investigated whether an in-house lobbyist had placed public office holders in a real or perceived conflict of interest in the course of lobbying. The in-house lobbyist had sent an email containing a list of "asks" to two recently former colleagues.

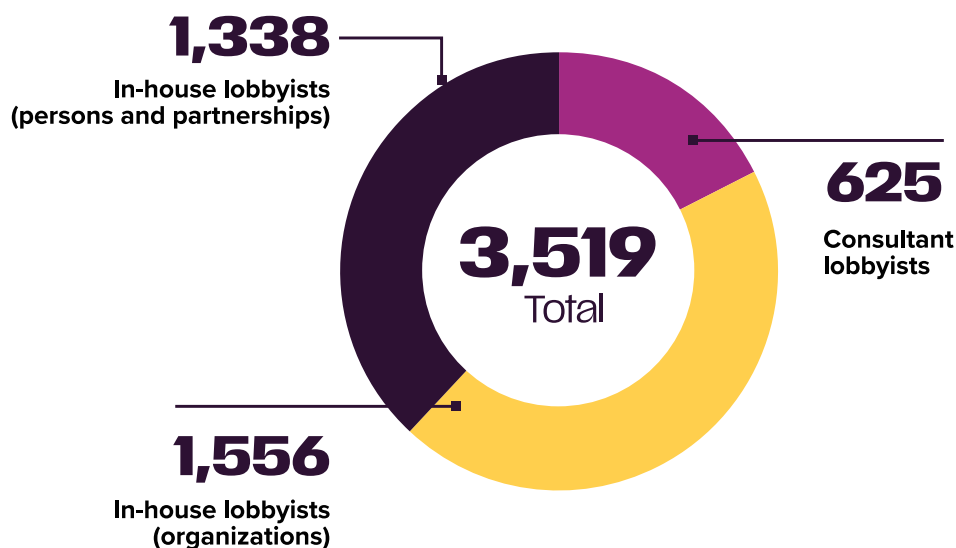
The Commissioner found that sending this email constituted lobbying as it requested changes to government policy and legislation on behalf of the in-house lobbyist's employer. The Commissioner ceased the investigation with respect to one public office holder because the evidence gathered did not indicate a close personal relationship between him and the lobbyist. However, the Commissioner found that the in-house lobbyist and the other public office holder had a close personal relationship, and the in-house lobbyist placed his friend in a position of potential conflict of interest by sending him the list of requests.

After considering multiple factors, including the fact that there was evidence of only a single lobbying communication sent to the public office holder, that there was no prior non-compliance by the in-house lobbyist but rather a history of diligent compliance, that the in-house lobbyist fully cooperated with this investigation and acknowledged making an error by sending the list of requests to this public office holder, the Commissioner decided not to impose a penalty.



Registry Activity

Ontario had 3,519 registered lobbyists on March 31, 2025.



Consultant lobbyists are required to have 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) and will list the names of all employees who lobby in one registration. Full lobbying statistics are available in real time on the Office website.

Registration by type	MARCH 31, 2024	MARCH 31, 2025
Consultant lobbyists	3,050	2,901
In-house (organizations)	336	348
In-house (persons and partnerships)	242	265
Total active registrations	3,628	3,514

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, 2025.

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



Top listed lobbying targets from 2023–2024 are provided for comparison, even if the listed target was not in the top five that year.

Top Listed Members of Provincial Parliament		2023–2024	2024–2025
1.	Office of the Member for Etobicoke North	1,049	958
2.	Office of the Member for Etobicoke Centre	1,042	953
3.	Office of the Member for Mississauga–Streetsville	1,049	951
4.	Office of the Member for Oakville	1,052	948
5.	Office of the Member for Nipissing	1,054	947

Top Listed Ministers' Offices		2023–2024	2024–2025
1.	Office of the Premier and Cabinet Office	2,757	2,728
2.	Office of the Minister of Finance	2,100	2,031
3.	Office of the Minister of Economic Development, Job Creation and Trade	1,917	1,882
4.	Office of the President of the Treasury Board	1,648	1,640
5.	Office of the Minister of Municipal Affairs and Housing	1,291	1,276

Top Listed Ministries		2023–2024	2024–2025
1.	Ministry of Finance	1,757	1,734
2.	Ministry of Economic Development, Job Creation and Trade	1,577	1,610
3.	Treasury Board Secretariat	1,216	1,225
4.	Ministry of Health	1,156	1,161
5.	Ministry of Municipal Affairs and Housing	1,155	1,137

Top Listed Agencies		2023–2024	2024–2025
1.	Ontario Health	350	365
2.	Independent Electricity System Operator	296	302
3.	Ontario Infrastructure and Lands Corporation (Infrastructure Ontario)	259	296
4.	Ontario Energy Board	230	239
5.	Invest Ontario	166	223



Financial Statement

2024–2025

Salaries and Benefits	\$ 3,547,000
Transportation and Communication	\$ 68,000
Services	\$ 623,100
Supplies and Equipment	\$ 28,200
Total	\$ 4,266,300

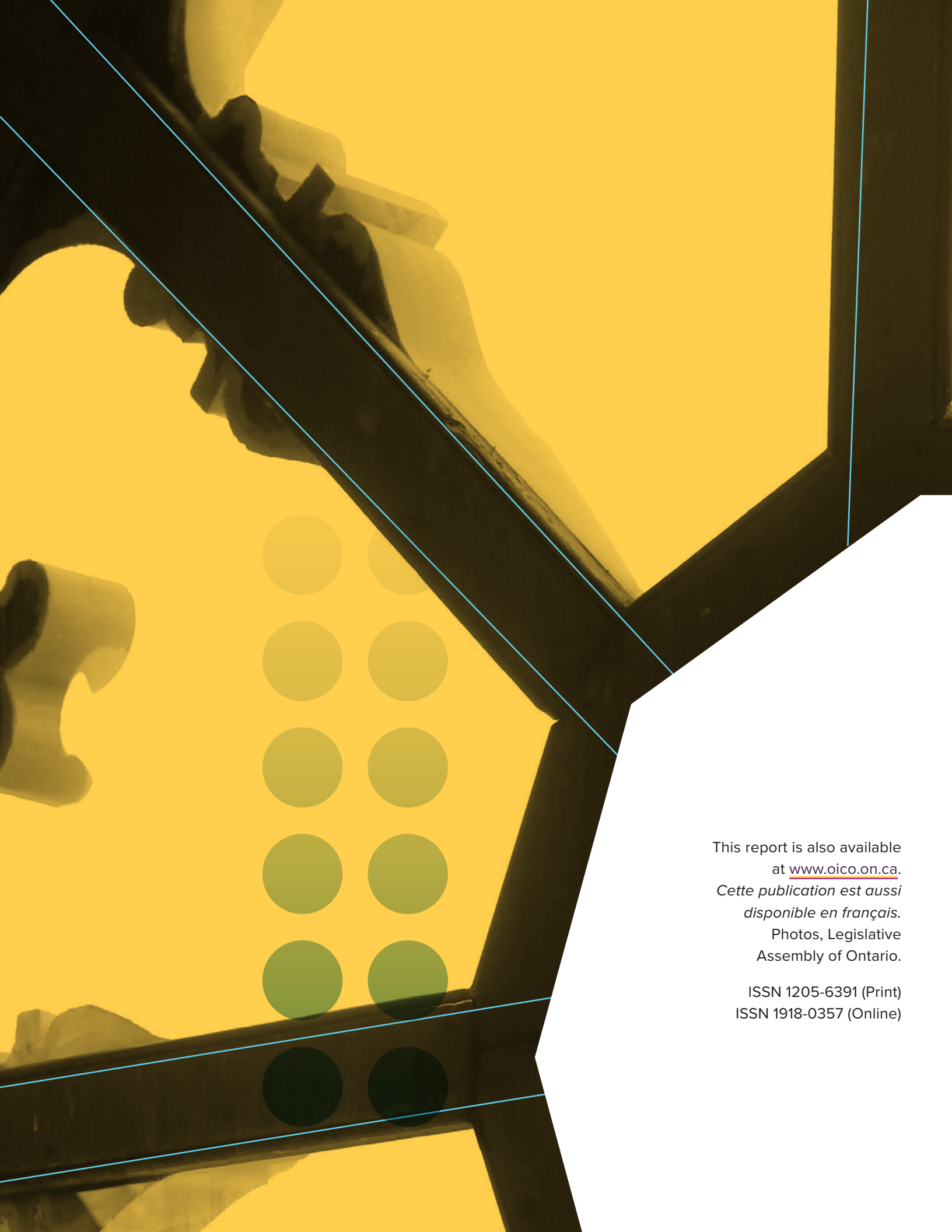
The Office of the Integrity Commissioner's fiscal year runs from April 1 to March 31.

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)

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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