ANNUAL REPORT
OF THE INTEGRITY COMMISSIONER

Sherri Walsh

January 1, 2023 – December 31, 2023

ANNUAL REPORT
OF THE INTEGRITY COMMISSIONER

TABLE OF CONTENTS

I. Commissioner's Message 1
II. Advice to Members 3
III. Complaints 9
IV. Communications with the Public and Outreach Activity 16
V. Budget 18
VI. Voluntary Lobbyist Registry 19
VII. Conclusion 21

ANNUAL REPORT OF THE INTEGRITY COMMISSIONER

JANUARY 1, 2023 – DECEMBER 31, 2023

I. Commissioner's Message

I am pleased to present my annual report for the period January 1 to December 31, 2023.

Starting in 2017, Winnipeg's City Council ("Council") established a new ethics and accountability framework that includes:

1. a code of conduct which translates high level principles into a set of practical rules, along with a mechanism for enforcing those rules; and

2. an Integrity Commissioner who performs the dual role of providing advice to Members of Council ("Members") about how to comply with those rules and objective scrutiny of whether Members have met the standards that are set out in the code of conduct.

The preamble to the City's *Code of Conduct for Members of Council* (the "*Code*")[1] says that:

> *A written code of conduct demonstrates that Members of Council share a common understanding of the ethical obligations which are essential to the fair and effective operation of government.*

A shared understanding of ethical values, however, does not simply happen by accident. By setting out specific rules of conduct, the *Code* gives Members a road map to follow when performing their duties of office – ensuring that they put the public's interest before their own, at all times.

As Integrity Commissioner, I take a proactive approach to promoting a culture of ethical conduct – focusing on education and advice as a means of promoting compliance with the *Code.*

---

[1] Code of Conduct for Members of Council, By-law No. 19/2018, Schedule A

In performing my work I strive to avoid politicization of my Office and to respect the distinction between ethical issues which engage the *Code* and issues which are political in nature and should therefore be left to be addressed by voters at the ballot box.

In assessing the efficacy of my work, I look at factors such as how well Members understand their ethical obligations and how willing they are to engage with my Office.

In the seven years that I have been in this role, I am pleased to say that generally, Members have developed a greater understanding of how to perform their duties of office in a way that complies with the *Code*.

In all my dealings with the Members during the period covered by this report, I found them to be respectful and fully cooperative with my Office.

I continue to have an excellent working relationship with the Office of the City Clerk and his staff. I am grateful for the relationship of trust and respect that exists between our respective Offices.

I also want to acknowledge the invaluable work of my colleagues – Ryan Nerbas, a former associate lawyer in my office and Carol Dougan, my administrative assistant.

Respectfully submitted,

Sherri Walsh, Integrity Commissioner

II. Advice to Members

General Comments

The Integrity Commissioner's mandate to provide advice and education to Members of Council is, in my view, the most effective aspect of the role when it comes to promoting a culture of integrity.

The *Code* is a principles-based document which must be applied and interpreted to a given set of facts on a case-by-case basis.

Members are always encouraged to seek advice from me on a proactive basis to ensure they comply with their ethical obligations, before they act.

Advice provided to Members of Council in 2023

In the period covered by this report, I received **17 requests** from Members who sought my advice on a variety of topics.

I responded to each request within 24 - 48 hours. Advice was provided by telephone, in writing, in person or by video conference.

What follows are some anonymized examples of the inquiries I received from Members and the advice I provided in response.

I note that given the nature of many of the requests for advice that I received, I am not able to speak even in a general way, about the advice I provided because to do so would identify the Member who sought my assistance.

The ability to provide advice on a confidential basis is essential and I am careful to maintain the Members' confidence in that regard.

Example 1: Confidential Information

Rule 1 of the *Code* says that Members must not disclose and shall only use confidential information as required for their duties of office. Confidential information is defined as:

> "*... information which is otherwise not available to the general public, including information contained in the agenda for or discussed at an in-camera meeting held pursuant to the City's In-camera By-Law and information in the possession of or received in confidence by the City that the City is either prohibited from disclosing, is required to refuse to disclose, or may refuse to disclose pursuant to the provisions of the Freedom of Information and Protection of Privacy Act.*"

In 2023, several Members asked for advice before attending briefing meetings that were held with senior members of the City's administration to discuss litigation in which the City was involved. In particular, Members asked me whether they would need to sign a Non-Disclosure agreement when attending such meetings.

My advice was that because of the Rule relating to Confidentiality referenced above, they were already subject to an obligation not to disclose the information they were about to receive because it was "information which is otherwise not available to the general public" and would therefore likely not need to sign anything further to indicate their understanding of that obligation. This, the Members advised, was consistent with the information they ultimately received from senior administrators.

Example 2: Gifts and Benefits

Rule 4 of the *Code* requires that Members not solicit or accept any gift or personal benefit that would, to a reasonable, well-informed person create the appearance that the donor is seeking to influence the Member or gain the Member's favour.

This prohibition also applies to any gift or benefit provided to a Member's staff if it is connected directly or indirectly with the performance of the Member's duties.

The reason for this general prohibition (to which the Rule provides some exceptions) is to prevent elected officials from being inappropriately influenced in their decision-making.

As has been pointed out:

> *Officials are merely part of the government, individuals sitting in government positions at the moment. They are doing, or supposed to be doing, nothing but their government work and to be paid nothing but what the budget says they are paid. In other words officials do not personally act and should not personally benefit from what they are required to do as part of their public role. They should not be given special treatment, that is, no tickets, invitations to play golf or go on a vacation, or the like, because they should do nothing special for anyone. They should not be involved in reciprocity or feel gratitude to anyone in their role as an official.*[2]

In 2023, one Member provided me with a photograph of a piece of art which they said had been given to them as a matter of protocol following a meeting they attended with an out-of-town entity. They wanted advice on what they should do with the gift.

I told them that since the gift was provided as a matter of protocol it fell within the exception to the rule which allows for acceptance of: *"gifts or benefits received as an incident of accepted protocol or normal expression of courtesy."*

I also confirmed that they would need to disclose the gift on the City's online Gift Registry. The registry requires Members to disclose who a gift is from, the reason the gift was offered, its approximate value and what they did with the gift.

Example 3: Advice Sought Regarding a Prospective Publication

One Member sought my advice about information they intended to publish in one of the communications they regularly provided to their constituents. There were two specific pieces of information on which they sought my advice:

1. an announcement about an open house being held by a local food bank, which included a request for donations to the food bank; and

[2] Robert Weschler, Cityethics.org

2. proposed wording about a project being undertaken in the Member's ward which included a comment about the extent to which they believed a previous Member of Council had made an impact.

With respect to the first matter, I advised that publishing information about the work of a not-for-profit organization in the Member's ward was the type of activity that fell within the scope of their duties of office as a Member of Council and would not, therefore, violate Rule 5 of the *Code* relating to use of influence which requires that Members not use the influence of their office for purposes other than for the proper exercise of their duties of office.

With respect to the second matter, I advised that the proposed wording which set out their opinion about the work of a former Member of Council did not amount to a breach of Rule 9 of the *Code* relating to respectful conduct.

On this point I noted that as elected officials, Members are entitled to express their views free of interference by the Integrity Commissioner, so long as in expressing themselves they do not breach the *Code* by, for example, making comments of a harassing, abusive or intimidating nature.

In this case, I advised the Member that the comments they wanted to publish represented their political opinion, were not expressed in a way that amounted to abuse, harassment or intimidation and therefore did not amount to a breach of the *Code*.

Advice Provided to All Members

Political Activity

On August 31, 2023, I sent an email to all Members of Council reminding them about their obligations under the *Code* in the context of the upcoming provincial election.

I noted that I had sent similar letters to them in 2019 and 2021, in relation to provincial and federal elections.

In brief, I said that Members and their staff must not use the influence of their office to carry out activities to support or oppose a political party or candidate, including fundraising, in the context of federal, provincial or municipal elections. The rules of the *Code* which I noted as being most relevant were the rules relating to: Use of Influence; and Use of Staff, Resources and Property - Rules 5 and 6 of the *Code* respectively:

> **5. Use of Influence**
>
> a. Members must not use the influence of their office for purposes other than for the proper exercise of their duties of office.
>
> **6. Use of Staff, Resources and Property**
>
> Members must not use or permit the use of staff or City resources or property for purposes other than those connected with the discharge of their duties of office.

These rules, I advised, must be read with an understanding of the *Code's* definition of "duties of office" which states:

> "**Duties of Office**" are the duties and activities that relate to the position of the Member, namely participation in activities relating to the proceedings and work of Council and activities undertaken in representing the City or the Member's ward or constituents but do not include:
>
> - activities related to the private interests of the Member;
> - a Member's election-related activities; and
> - activities including fundraising activities designed, in the context of a federal, provincial or municipal election, or any other local election, to support or oppose a political party or an individual candidate.

Quite simply, I advised that supporting candidates at other levels of government was not part of their "duties of office" as a Member of Council.

I told Members that as private citizens, of course, they were entitled to support any party or candidate in the election. However, using their position as a Member of Council, including using their title or City resources and staff to do so, would not be appropriate, even if they felt that it would be beneficial for their ward or the City if a particular candidate or party were to be elected.

I also noted that this advice was consistent with the provisions of the Councillors Ward Allowance Fund Policy which says that "Advertising that promotes ... other levels of government, political parties, or candidates in any election campaign" is not an eligible expense.

I said that if they were supporting a candidate or party they had to be careful to do so in their capacity as a private citizen. I reminded them that the obligations under the *Code* applied equally to their conduct on social media and that, for example, they could not use a social media platform which identified them as a Member of Council in the biography or handle, or one that they used in the course of performing their duties of office as a Member of Council, to promote or support a political candidate.

My email prompted a number of Members to seek my advice about whether and to what extent they could support or participate in the election campaign of a particular candidate.

It also prompted them to scrutinize the campaign activity of various provincial candidates for whom they had pledged support to ensure that they were not being identified as a Member of Council in that candidate's campaign materials.

Some Members asked for guidance about how to respond if they were asked questions about their work as a Council Member when they were campaigning for a provincial candidate in their personal capacity. My advice was that they should simply tell the individual to contact them at their constituency office in order to discuss the matter at a separate time.

In each case, when providing advice I was clear to let the Member know that their obligations under the *Code* were not in any way intended to restrict their participation in the democratic process of the provincial election.

Overall, I was impressed at the diligence with which Members of Council pursued their ethical obligations regarding this issue.

Publication of Advisory Bulletin on Respectful Conduct

The rule in the *Code* regarding respectful conduct, Rule 9, requires that all Members treat members of the public, one another, and staff with respect and without abuse, harassment or intimidation. This rule is often the subject of both requests for advice and complaints.

On October 5, 2023, I published an updated Advisory Bulletin on Rule 9, which I posted on the Integrity Commissioner's page on the City's website[3]. I also emailed it to each of the Members, for their information.

III. **Complaints**

General Information

The *Complaint Procedures* which are found at Appendix "B" to the *Code* set out the process for filing complaints.

The *Code* allows the Integrity Commissioner to receive both formal and informal complaints.

Informal Complaints

Any person may follow the informal complaint process by: contacting the Member directly to advise that their behaviour or activity appears to contravene the *Code*; or asking the Integrity Commissioner to assist in informal resolution of a matter.

Parties are encouraged to take advantage of the potential for the Integrity Commissioner to play a potential role in this regard. Complaints which are initially brought to the Integrity Commissioner's attention on an informal basis can still be submitted as a formal complaint at any time.

[3] https://legacy.winnipeg.ca/council/integritycommissioner/

While I will only consider investigating formal complaints I nonetheless respond to every complaint I receive, whether formal or informal.

Formal Complaints

Formal complaints are submitted using the form which is prescribed under the *Code* and located on the City's website.[4] The form must be signed and dated by the complainant. There is no fee for filing a formal complaint.

Whenever a formal complaint is received, the *Complaint Procedures* require that I conduct a preliminary assessment to determine whether I will accept the complaint for investigation.

After conducting this assessment, the Complaint Procedures say that:

> 7. *If the Integrity Commissioner is of the opinion that:*
>
> a. *the conduct described in the complaint is not within the Integrity Commissioner's jurisdiction to investigate;*
>
> b. *the complaint is frivolous, vexatious or not made in good faith;*
>
> c. *there are no grounds or insufficient grounds for an investigation, or that it is unlikely that the complaint will succeed; or*
>
> d. *an investigation would serve no useful purpose;*
>
> *the Integrity Commissioner shall not conduct an investigation and, where this becomes apparent in the course of an investigation, shall terminate the investigation.*

There are also time limits within which complaints must generally be filed.

Conducting a preliminary assessment can include reviewing documents and communications between the complainant and the Member who is the subject of the complaint, speaking with the parties and reviewing videos of public meetings.

---

[4] https://legacy.winnipeg.ca/council/integritycommissioner/complaintprotocol.stm

If I determine that I will not investigate a complaint and therefore dismiss it at intake, I send the complainant a detailed dismissal letter which outlines the review that I have undertaken and my reasons for why I will not be conducting an investigation.

The *Code* requires that I provide the Member who was the subject of the complaint with copies of both the complaint and my dismissal letter.

The reason for providing this information is two-fold: to inform the Member about the nature of a concern which has been raised about their conduct; and for educational purposes to show the Member how I applied and interpreted the *Code* in a given circumstance.

Unless it is necessary for me to disclose the identity of the complainant for reasons of procedural fairness or because their identity is otherwise clear from the factual underpinnings of the complaint, I redact the complainant's identifying information from both the complaint and the copy of my dismissal letter, before sending the documents to the Member.

Complaints Received in 2023

In 2023, I received a total of 21 complaints: 10 formal and 11 informal. Of the 11 complaints which were originally filed as informal, three ultimately became formal complaints.

I also completed work on 4 complaints which were outstanding at the end of December 31, 2022. Following my preliminary assessment of each of those 4 complaints I determined that an investigation was not warranted under the *Code* for any of them and I sent dismissal letters explaining my decision to each of the respective complainants, by the end of the first quarter of 2023.

Four of the formal complaints that I received in 2023 arose out of litigation where, it was a matter of public record, lawyers in my firm had acted for one of the parties.

I therefore retained the services of the Integrity Commissioner for the City of Edmonton to deal with those matters. I had no involvement with how each of those matters would be resolved other than to note that once the Integrity Commissioner for Edmonton has dealt with the complaints she will advise me of the outcome, so that I can report on them in my next annual report.

One of the formal complaints filed in 2023 was withdrawn before I had an opportunity to assess it. Another was resolved with the participation of the respondent Member without the need to conduct an investigation after the Member publicly acknowledged their misconduct. More about that complaint is discussed later in this report.

I dismissed two of the formal complaints I received without conducting an investigation and provided letters notifying the complainants of my decision, within the calendar year.

My preliminary assessment of three of the formal complaints I received in 2023 was not completed by the end of December 2023 and will be reported on in the annual report I publish for 2024.

Finally, I determined that I would conduct an investigation of two of the formal complaints submitted in 2023. The parties involved in those two complaints were notified of my determination to do so by the end of December 2023. I expect to have the investigations of both of those matters completed in 2024.

The following summaries are anonymized examples of how I applied the *Code* in response to some of the formal complaints that I received in 2023 and some of the complaints made in 2022 that were resolved in 2023.

Example #1 – Conflict of Interest

The complainant in this matter raised a concern about a Member's conduct towards a developer who made a delegation at a Committee meeting.

The complainant alleged that the Member was partial to the developer's proposal, citing, among other things, that the Member complimented the developer on the design of the buildings and suggested further items that might be enhanced features.

The complainant alleged they felt the Member's conduct was not impartial and did not put the public's interest before the Member's private interest.

In order to conduct my preliminary assessment of the matter I reviewed the YouTube video of the Committee's proceedings in so far as they related to the subject of the complaint.

Ultimately, although the complaint did not specifically identify which rule of the *Code* was engaged, I determined, based on the allegations set out in the Complaint, that Rule 2 (Conflict of Interest) was the appropriate rule by which to assess the Member's conduct.

The conflict of interest rule is aimed at ensuring that Members of Council do not put their private interests before the public's interest. It states in part:

> **2. Conflict of Interest**
>
> a. Members must not act in situations in which they have a real or apparent conflict of interest, whether during a meeting of Council or Committee of Council or at any other time while performing their duties of office.
>
> i. A conflict of interest exists when a Member exercises their duties of office and at the same time knows that in the performance of those duties there is the opportunity to further their private interests.
>
> ii. A **real conflict of interest** exists when a Member has knowledge of a private interest that is sufficient to influence the exercise of their duties of office.
>
> iii. An **apparent conflict of interest** exists when there is a reasonable perception, which a reasonably well-informed person could properly have, that the Member's ability to perform any official duty or function must be influenced by their private interest.
>
> ...
>
> c. A Member who has a conflict of interest with respect to any matter must refrain from influencing the matter and from discussing or voting on any decision with respect to the matter.
>
> d. Should a conflict of interest, real or apparent, arise with respect to a matter that will be discussed or determined at a meeting of Council or a Committee of Council, the Member must:
>
> i. disclose the general nature of the Member's interest, and
>
> ii. withdraw from the meeting without voting or participating in the discussion.
>
> ...

The rule is only engaged when a Member exercises their duties of office and at the same time knows that in the performance of those duties there is the opportunity to further their private interest.

A "private interest" is defined in the *Code* as including any personal benefit whether or not pecuniary.

"Private interests" are interests which are personal to Members and are to be distinguished from "political interests" which are interests that involve a Member's position on the issues of the day.

Having an interest in a matter or taking positions on the issues of the day is critical to democratic debate.

As the Supreme Court of Canada has pointed out, in a democracy, the role played by municipal councillors is both political and legislative.[5] As part of the role they place in the political process, a Council Member is entitled to form views, to hold views, to express views and once in office, to give effect to those views.[6]

In this case, I found there was no evidence that the Member's expressed views on the development engaged any private interest on their part and I therefore dismissed the complaint without conducting an investigation, relying on s.7(c) of the *Complaint Procedures* - that there were no grounds to conduct an investigation.

In doing so, I advised the complainant that the fact that a Member takes a position with respect to a matter such as a development, does not create a "private interest" within the meaning of the rule relating to conflict of interest.

---

[5] Old St. Boniface Residents Association Inc v Winnipeg (City), [1993 SCR117]
[6] Guy Giorno, Integrity Commissioner, Town of Orangeville: Report on Complaint April 27, 2018 citing *R Cadillac Development Corp Ltd v City of Toronto*, (1973) 1 OR 2nd 20 at 43 cited with approval by *Old St. Boniface Residents Association Inc, supra*, AT1193-94

Resolution without Investigation

As I noted above, one formal complaint was resolved informally. The complaint related to a Council Member's Facebook post where the Member described people who have substance abuse problems as being "drug- addicted zombies". The complaint alleged that the Member's conduct breached Rule 9 of the *Code* which requires that Members of Council treat members of the public, staff and Council with respect and without abuse, harassment and intimidation.

Based on my preliminary assessment of the matter, I determined that it fell within my jurisdiction and that there was enough evidence to warrant conducting an investigation. I advised the parties accordingly and sent the complaint to the Member, asking them to provide me with a written response.

In that response, the Member apologized for their conduct. At my request they then met with me to discuss the nature of the harm that had been caused by their remarks.

They also made a public apology at the next Council meeting following our meeting.

Based on the discussion I had with the Member about how their comments fell short of the expectations contained in the *Code,* together with the Member's written response to the Complaint and their public apology, I decided that I did not need to take any further action regarding the complaint.

As I have repeatedly stated, the purpose of the *Code* is remedial, not punitive. It is intended to educate Members and create a culture of ethical behavior. In this case, I believed that the Member understood how their conduct breached the *Code* and how they should conduct themselves going forward. I therefore felt that the purpose of the *Code* had been satisfied and there was no need for me to conduct a formal investigation. I advised the complainant of this and thanked them for having brought this matter to my attention.

IV. Communications with the Public and Outreach Activity

Website

As part of my mandate to educate Members and the public about the work of my Office, I make a range of information available on the Integrity Commissioner's page on the City's website, including, for example, publishing an annotated version of the *Code*. [7]

Communications with the Public

In 2023, I was contacted on 18 occasions by members of the public who sought information about a variety of topics including: whether I deal with complaints about City services such as Animal Services or libraries; and whether I have jurisdiction to assess the City's response to requests for public information under the *Freedom of Information and Protection of Privacy Act*,.

In each case when I responded I described the extent of my jurisdiction as Integrity Commissioner, explaining that my authority to accept complaints is confined to receiving complaints about the conduct of Members of Council and whether they have complied with their obligations under the *Code*.

Where a matter falls within the jurisdiction of another entity, to the extent that I am able, I direct the individual to that entity, for example, to a service such as 311.

From time to time members of the public also ask me to give an opinion about something a Member has done. I will not provide an opinion as to whether an individual Member's conduct has met the expectations contained in the *Code*. If a complaint is made, I will address it at that time, in accordance with the process set out in the *Code*. I will, however answer questions of a general nature about the *Code's* provisions.

[7] https://legacy.winnipeg.ca/council/integritycommissioner/codeofconduct.stm

Discussions with the Provincial Ombudsman

In 2023, I had some very constructive discussions with the office of the Provincial Ombudsman about the time limit to submit a formal complaint that is prescribed in the *Code*. This was in response to a complaint the Ombudsman received in 2022 which questioned, among other things, the manner in which that time limit was made known to the public.

As a result of those discussions, I have recommended changes to the *Code* to simplify the language relating to the time limit for filing complaints and to enhance the criteria upon which the Integrity Commissioner relies to accept a complaint that has been filed after the time limit has expired. I also plan to make further changes to the website which will make this issue more accessible to the public. All of these changes will hopefully be accomplished before the end of 2024.

Presentation to the Senior Management Team

In June, at the request of the City of Winnipeg's CAO, I made a presentation to the Public Service's Senior Management Team on the topic of: "The Council-Staff Relationship". The meeting presented a good opportunity to engage with the public service's Directors.

I was also gratified to hear the Directors' general sense that the relationship between the public service and Members of Council has improved since the creation of my Office.

Presentation to Council

In November I presented an education session to all Members of Council. The session was well attended and provided an opportunity for a constructive and lively dialogue on a variety of topics relating to Members' obligations under the *Code.*

A copy of the PowerPoint slides that were presented at the session is posted on the City's website.[8]

[8] https://legacy.winnipeg.ca/council/integritycommissioner/reports.stm

Amendments to the *Code*

In November I met with members of the Governance Committee to discuss recommendations I was proposing to amend the *Code*. Those amendments will be coming forward for Council's approval in 2024.

Presentations to Post-Secondary Institutions

I was invited on several occasions to give presentations about my role as part of Council's ethics accountability framework, to a graduate studies course on Ethics and Advocacy at Seneca College of Applied Arts and Technology School of Media, in Toronto.

In September I gave a similar presentation to third year students at the University of Manitoba's Faculty of Law.

Meetings with other Ethics Professionals

Throughout the reporting period I engaged in regular dialogue and consultation with municipal Integrity and Ethics commissioners from other jurisdictions across Canada and with the Province of Manitoba's Ethics Commissioner, Jeffrey Schnoor.

I am grateful for the opportunity to participate in this collegial network of ethics professionals who willingly share best practices and advice. Through this network I am advised that the provisions of Winnipeg's *Code* are often looked to with approval by municipalities in other jurisdictions.

Finally, I continue to be a member of the Canadian Bar Association's National Committee on Ethics and Lobbying which is a committee that meets to discuss issues relating to lobbying and ethics for elected officials at all levels of government.

V. **Budget**

For the period covering January 1 - December 31, 2023, Council established a budget for the Integrity Commissioner's office of $125,000.00.

The expenditure for this reporting period was as follows:

Budget utilized: $93,204.40

Hours Associated with professional services: 471.4

VI. Voluntary Lobbyist Registry

Lobbying is an important and legitimate aspect of public life in a liberal democracy. The right of individuals, businesses and interest groups to make representations to government, and the need for government to discuss policy proposals with those who might be affected, is essential.[9]

To enhance the public's confidence in the integrity of its elected officials and public service, lobbying activity must not be associated with secrecy and undue influence.

That is why a lobbyist registry, even a voluntary one, is an important component of a municipal accountability framework.

The Voluntary Lobbyist Registry's page on the City website states:

> *Lobbyists are not required by legislation to register their activities; however registration on a voluntary basis is encouraged in order to enhance the transparency and integrity of business conducted.*[10]

A lobbyist is defined as:

> *an individual who, when representing a financial or business interest, or the financial interest of a not-for-profit with paid staff, communicates with a public official with the intent of influencing a decision on governmental matters outside of the standard process.*[11]

---

[9] United Kingdom, Committee on Standards in Public Life, Upholding Standards in Public Life November 2021
[10] https://legacy.winnipeg.ca/clerks/LobbyistRegistry/default.stm
[11] https://legacy.winnipeg.ca/clerks/LobbyistRegistry/default.stm

A "standard process" is any meeting open to the public in which individuals, organizations or businesses can attend to discuss policy processes or decisions.

If an individual is speaking on the public record during a Council or Committee of Council meeting or during a public process such as a public meeting or open house, therefore, they are not considered a lobbyist.

The Integrity Commissioner's role includes having oversight over the Voluntary Lobbyist Registry.

I am available to provide advice to both Members of Council and the public with respect to how the registry works.

History of Registrations

In the first year following its creation, there were **29 registrations** filed to the Voluntary Lobbyist Registry.

Additional registrations are as follows:

3. *from April 1, 2018 to December 31, 2018, **13 lobbyists** registered their activities;*
4. *in 2019, **10 lobbyists** registered their lobbying activities;*
5. *in 2020, **7 lobbyists** registered their lobbying activities;*
6. *in 2021, **6 lobbyists** registered their lobbying activities;*
7. *in 2022, **5 lobbyists** registered their lobbying activities; and*
8. ***in 2023, 5 lobbyists** registered their lobbying activities.*

I continue to engage with my counterparts in other cities in order to stay current about best practices regarding municipal lobbyist regimes. In January, for example, I attended an online meeting of the Lobbyist Registrars of Ontario.

VII. **Conclusion**

A healthy democracy requires that elected officials conduct themselves with integrity. Confidence in the democratic system is undermined if the public perceives that its elected representatives are not trustworthy.[12]

Public trust is easily lost and slow to rebuild.

Maintaining high ethical standards in public life promote public confidence because these standards:

> "… help prevent politicians and officials from being swayed by outside interests in their decision making, and help to maintain a political culture that fosters open and constructive debate. They thereby contribute to a political system that is fair, inclusive, stable and effective."[13]

The Members' intention to follow a set of high ethical standards is reflected in the *Code of Conduct* they first passed in 2018.

Enforcing and upholding these standards requires vigilance and ongoing commitment not only from the Members but also from the public and members of the public service.

I therefore thank all of the individuals - members of the public, the public service and Council who engaged with my Office during the last year in pursuit of promoting a healthy democratic process for the City of Winnipeg.

Respectfully submitted,



Sherri Walsh
June 26, 2024

[12] The Constitution Unit Blog – https://constitution-unit.com/2022/10/11/protecting-constitutional-principles-what-are-they-and-why-do-they-matter/ at page 7
[13] The Constitution Unit Blog – https://constitution-unit.com/2022/10/11/protecting-constitutional-principles-what-are-they-and-why-do-they-matter/