

**ANNUAL REPORT
OF THE INTEGRITY COMMISSIONER**

Sherri Walsh

January 1, 2025 – December 31, 2025

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JANUARY 1, 2025 – DECEMBER 31, 2025

I. Commissioner's Message

I am pleased to present my annual report for the period January 1 to December 31, 2025.

I want to take a moment to acknowledge the passing of Councillor Jason Schreyer. Councillor Schreyer served his constituents with integrity and dedication. I offer my condolences to his family.

It has been 8 years since Winnipeg's City Council established a more formal ethics and accountability framework to govern the conduct of its 16 members when they perform their duties of office. This framework includes:

1. a code of conduct which translates high level principles into a set of practical rules (the "Code")¹; and
2. an Integrity Commissioner who performs the dual role of providing advice to the members of Council ("members") about how to comply with their obligations under the Code and objective scrutiny as to whether they have met those obligations.

In this report I describe the work my Office carried out in 2025 which included:

- providing advice to members;
- receiving and assessing complaints alleging that a member has breached the Code;
- conducting education sessions for members on matters relating to the Code; and
- engaging with members of the public about the ethical expectations that are required of members under the Code.

The fact that there was a by-election in October provided an opportunity to give members advice about election-related activity. I was also able to provide orientation and education about the Code and the Integrity Commissioner's role, to the newly elected member of Council.

¹ Code of Conduct for Members of Council, By-law No. 19/2018, Schedule A
<https://dmis.winnipeg.ca/Mobile/ViewByLawDocument?bylawId=8871&version=C>

The Preamble to the Code says:

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.

By setting out specific rules of conduct and a complaint mechanism for enforcing those rules, the Code allows members to perform their duties of office in an ethical, consistent and transparent manner, ensuring that in doing so they put the public's interest before their own.

In my role as Integrity Commissioner, I strive to support members by giving them practical and timely advice and by following fair and transparent processes when addressing complaints that allege they have breached the ethical standards they undertook to uphold.

Looking ahead to the coming year, because it is an election year, I will be providing further guidance to members about complying with the Code's requirements regarding their election-related activity.

I also plan to provide education to the members' staff about compliance with the Code, so that they can assist the members with whom they work in that regard and can ensure that their own conduct complies with the Code, since they are also to be governed by its provisions.

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

Based on those dealings, I am pleased to report that in the eight years since I first started in this role, members have demonstrated an ongoing willingness to perform their duties of office in compliance with the expectations of ethical behaviour that are essential to the fair and effective operation of government.

Sherri Walsh
Integrity Commissioner

II. Advice to Members

General Comments

Since the Code as a principles-based document is applied and interpreted to a given set of facts, the Integrity Commissioner's mandate to provide advice to members of Council is an essential tool in promoting a culture of ethical behaviour. I always encourage members to seek advice from me on a proactive basis to ensure they comply with their obligations under the Code when they perform their duties of office.

Advice provided to Members in 2025

In the period covered by this report, I provided advice to members on **21 occasions**, on a variety of topics including issues relating to fundraising, election-related activity and acceptance of gifts.

My initial response to each request was provided within 24 - 48 hours. My advice was given by telephone, in writing, in person or by video conference.

As has been my practice, in this report I include anonymized examples of some of the inquiries I received from members and the advice I provided in response.

I note, however, that because my ability to provide advice on a confidential basis is essential to being able to maintain a relationship of trust and confidence with members, the amount of information that I can disclose about specific requests for advice is somewhat limited.

Example 1: Fundraising and Use of Influence

Request for Advice

A member inquired whether the Code allowed them to send an email to their colleagues on Council, asking them to support a local social justice initiative by providing a small community fund grant to the organization involved.

Advice Provided

This request for advice primarily engaged Rules 3 and 5 of the Code relating to fundraising and use of influence respectively:

3. Fundraising

Members shall not solicit funds from any person or organization if doing so would constitute an improper use of the influence of their office.

5. Use of Influence

Members shall not use the influence of their office for purposes other than for the proper exercise of their duties of office.

A Council member's primary concerns about using their influence to fundraise involves avoiding:

1. putting themselves into a potential conflict of interest; and
2. creating a situation where the donor feels they may obtain an advantage if they agree to make a donation or conversely fears they will not be treated equitably if they refuse to make a donation.

I advised the member that unless they were personally involved with this organization, for example, by being a volunteer or a director on its board or because they had a financial relationship with the organization, I did not see that their request for support gave rise to a private interest on their part within the meaning of the Code such that they would have a conflict of interest and need to recuse themselves from voting or discussing any applications the organization might bring forward to Council in the future.

With respect to whether the request was a proper use of the member's influence, I said that subject to confirming that this organization had not previously applied for City funding for the same initiative and the request had been denied, I did not consider the request they wanted to make to their colleagues to be a misuse of their influence

I also advised them to ensure that members were in fact entitled to allocate funds to the particular initiative and I recommended the member consult with the Clerk's office in that regard, before sending out their request.

Finally, I reminded the member that as is the case with all fundraising efforts, they must make sure not to personally involve themselves with receiving or distributing any monies associated with the fundraising request.

Example 2: Events sponsored by members

Request for Advice

On several occasions throughout the year, members sought my advice about their ability to host events which were intended to provide information to the public on various subjects. In particular, members asked me about their ability to host an event to encourage people to run for office, especially people who are underrepresented in leadership positions.

The members who wanted to host such an event asked whether they could use City resources to do so.

Advice Provided

- *Hosting the event on City premises*

This request engaged Rules 6 and 7 of the Code relating to Use of Staff, Resources and Property and Election-Related Activity respectively:

6. Use of Staff, Resources and Property

Members shall 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.

7. Election-Related Activity

...
Members shall not use the facilities, equipment, supplies, services or other resources of the City (including Members' newsletters or websites linked through the City's website) for any election-related activities.

Members shall not use the services of staff for election-related purposes during hours in which those staff members are in the paid employment of the City or paid by the use of City resources.

The answer to this question, therefore, depended in part on how to interpret the term "Duties of office".

The term is defined in the Code as follows:

"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.*

The Preamble to the Code says that it is to be given a broad and liberal interpretation and is to be applied in a reasonable and pragmatic manner.

Accordingly, I chose to give the term “duties of office” a broad interpretation and advised members that holding such an event was consistent with their duties of office because it was intended to encourage members of the public to run for office, thereby promoting a vibrant democracy. The event was not being used for members’ private interest or advantage, nor did I perceive what was being planned as amounting to election-related activity to promote particular candidates.

I therefore advised the members there was no prohibition in the Code that prevented them from using City resources to hold such an event.

Example 3: Endorsing a candidate in the by-election

Request for Advice

The election which took place in October prompted several requests for advice. One such request was whether a current member could endorse a candidate who was running in the by-election.

Advice Provided

I confirmed that members could certainly endorse a candidate, so long as they did so in their personal capacity. I told them they should be careful not to use their Council or City related profile including email addresses and social media handles that they use for performing their Council duties, when providing such support.

Example 4: Gifts and Benefits

Request for Advice

A member left me a voicemail saying that a local business owner had offered them an item of clothing and a photo opportunity if they would promote the owner’s business. The member asked if they could accept this offer.

Advice Provided

This request engaged Rule 4 of the Code which starts by saying:

4. Gifts or Benefits

Acceptability

- a. *Members shall not solicit or accept any gift or benefit that would, to a reasonable, well-informed person, create the appearance that the donor is seeking to influence the Member or gain the favour of the Member.*

Fortunately, when I returned the member's call, they confirmed that not only did they recognize they could not accept the gift, but the business owner had already called them back to say they realized they ought not to have made the offer.

I was pleased to note this interaction demonstrated that both members of Council and members of the public have gained an understanding of the ethical standards that members of Council must uphold.

Example 5: Gifts and Benefits

Request for Advice

A member advised that a not-for-profit cultural institution had sent them a gift after the member supported one of the institution's projects with grant money. The member asked whether they were correct to consider returning the gift.

Advice Provided

This request engaged Rule 4 of the Code which generally prohibits a member or their family or staff from accepting gifts.

I confirmed to the member that they needed to return the gift, because it fell within the Code's definition of "gift or benefits":

***"Gift or Benefit"** means an item or service of value that is received by a Member for their personal use or for the use of their family or staff. It includes, but is not limited to: money, gift cards, tickets to events, clothing, jewelry, pens, food or beverages, discounts/rebates, free or subsidized meals, entertainment, participation in sport and recreation activities, and invitations to paid social functions.*

I noted that while one exception to the prohibition on accepting gifts is where the gift or benefit is offered as an incident of protocol or as a normal expression of courtesy, I did not consider a gift that was offered in exchange for receiving grant money, to fall within that exception.

I told the member that the Code required them to return the gift to the donor without making any use of it. I also reminded them that the Code makes a distinction between “acceptance” and “disclosure” of a gift. That is, any time a member is offered a gift valued over \$50.00, they must disclose that it was offered to them, regardless of whether they accepted it.

I therefore advised the member to return the gift to the donor and disclose that the gift had been offered and declined, on the public online gift registry.

Example 6: Conflict of interest

Request for Advice

The member advised that their spouse was a member of a local sports club.

They asked whether they would have to recuse themselves from any Council or Committee vote or discussion relating to that particular club including ones involving providing grants to the club.

Advice Provided

This request engaged both the provisions of the Municipal Council Conflict of Interest Act C.C.S.M. c.M255 (the “Act”) and Rule 2 of the Code relating to conflict of interest. That rule 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.*
- b. *A Member is presumed not to have a private interest in any appointment to serve in their official capacity on any commission, board or agency, or in matters arising in relation to that commission, board or agency.*
- 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 Code defines private interest as follows:

***"Private Interest"** includes any personal benefit, whether or not pecuniary, but does not include an interest:*

- (a) in matters of general application;*
- (b) in matters that affect a Member as one of a broad class of the public;*
- (c) that concerns the remuneration and benefits of the Member as a Member of Council; or*
- (d) that is trivial.*

Under the Act, members are required to recuse themselves where, during any meeting, there arises a matter in which they or any of their dependents have a direct or indirect pecuniary or financial interest. "Dependent" is defined under the Act to include a member's spouse.

The Code extends members' obligation to recuse themselves and not participate in voting or discussing a matter, to situations where they have any personal interest, whether or not financial, and to situations which give rise to apparent conflicts.

Any decision regarding the club that had the potential to affect the club's financial interests, for example awarding a grant to the club, could affect the club's membership fees. This would be something in which the member's spouse clearly had a financial interest.

I therefore advised the member that by virtue of their spouse's membership in the club, the member had both a "private interest" within the meaning of the Code and potentially, a disqualifying pecuniary interest under the Act, regarding the club. Accordingly, I told them they must recuse themselves from all decision-making relating to the club, including any consideration about awarding it a grant.

I went on to point out, however, that if a matter came before the member that affected the club as part of a broader group, for example, a matter that related to all similar clubs in the City, that would likely bring the member's interest within the exceptions to the recusal requirement that are contained in both the Act and the Code in which case they would be able to participate in such votes and decisions that would affect policy making at a broader level.

Example 7: Advice and Information Provided to all Members of Council

From time to time, I send emails to all the Council members to provide them with information of a general nature. Here are some examples:

- I circulated a copy of the annotated Code with Commentary after I updated it at the beginning of the year, because of amendments that were made to the Code at the end of 2024; and
- In response to seeing that the Association of Manitoba Municipalities had recently issued a "Toolkit for Supporting Manitoba Municipalities to Address Anti-government Hate and Harassment", I reminded members that my Office has previously addressed their concerns about how to deal with members of the public whom they feel are harassing them on social media or by email, in the Advisory Bulletin I published regarding Use of Social Media.²

On this last point, my advice has always been that members do not have to tolerate receiving abuse, harassment or discrimination on their social media platforms. Typically, however, I recommend they pursue the least intrusive manner of limiting access to their Council related social media by

²<https://www.winnipeg.ca/media/4357>

muting rather than blocking an individual. I also reminded members that each case turns on its facts and encouraged them to seek my advice as needed.

For interest's sake, I also brought to the members' attention the Public Conduct Policy that the City of Ottawa has put in place. It applies to all Ottawa City employees and members of Council and governs those individuals' ability to restrict interaction with a member of the public, where necessary.

III. Individual Meetings with Members

The enforcement section of the Code requires that each member meet with the Integrity Commissioner at least once annually in order to discuss their obligations under the Code. This requirement demonstrates to the public that members are committed to promoting and following a culture of ethical behaviour and is consistent with the Integrity Commissioner's mandate to provide ongoing education.

I confirm that in 2025 I had an opportunity to speak individually with each member of Council and was able to engage in frank and intelligent discussions with them about matters relating to the Code.

IV. Complaints

General Information

The Code says that complaints alleging a member has breached the Code can be made both formally and informally.

Informal Complaints

Any person may follow the informal complaint process by contacting a member directly to advise that their behavior or activity appears to contravene the Code or by 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 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.

As Integrity Commissioner, I can only consider investigating complaints which are submitted through the formal process.

Formal Complaints

Formal complaints are submitted using the form which is prescribed under the Code.³ The form must be signed and dated by the complainant. There is no fee to submit a complaint.

Whenever the Integrity Commissioner receives a formal complaint, the Code requires that they conduct a preliminary assessment to determine whether they will investigate the matter.

After conducting that assessment, the *Complaint Procedures* under the Code say:

- 10. 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.*

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.

³ [Complaints process | City of Winnipeg](#)

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

If the Integrity Commissioner decides not to investigate a complaint, they send the complainant a dismissal letter which outlines the assessment process that the Integrity Commissioner performed and the Commissioner's reasons for not conducting an investigation.

The Code requires that the Integrity Commissioner provide the member who was the subject of the complaint with copies of both the complaint and the Commissioner's dismissal letter to the complainant.

The reason for providing this information to the member is two-fold: to inform them about the nature of a concern which has been raised about their conduct; and to show them how the Integrity Commissioner applied and interpreted the Code to a given set of circumstances.

Unless it is necessary 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, the complainant's name and personal information are removed from both the complaint form and the dismissal letter, before those documents are sent to the member.

Complaints Received in 2025

In 2025, I received a total of **18 complaints: 12 formal and 6 informal**.

Of the 12 formal complaints, one was clearly on its face outside my jurisdiction to consider and I advised the complainant accordingly in writing. One complaint which was submitted to me at the end of the year remains outstanding because the complainant advised they had more information to give me.

The other 10 formal complaints were dismissed after I conducted a preliminary assessment, because there were no grounds for conducting an investigation or because it was unlikely that the complaint would succeed. Five of those complaints were made about the same incident.

Complaints Addressed by the Acting Integrity Commissioner

In my annual reports for the periods ending December 31, 2023 and December 31, 2024, I reported on 4 formal complaints that I received in 2023, all of which arose out of litigation where, it was a matter of public record, lawyers in the firm of which I was at that time a member, had acted for one of the parties, and I therefore retained the services of the Integrity Commissioner for the City of Edmonton (the “Acting Integrity Commissioner”) to address those complaints.

I indicated in those annual reports that I had no involvement with how each of those matters would be resolved other than to note that once the Acting Integrity Commissioner had dealt with them, they would advise me of the outcome so that I could report on the matters in my annual reports.

In my annual report for the period ending 2024, I reported that the Acting Integrity Commissioner advised that one of the complaints was dismissed on the ground that there was insufficient evidence to warrant conducting an investigation and two complaints were being kept in abeyance pending the outcome of related litigation. I expect that those will be dealt with in 2026.

With respect to the fourth complaint, as I said in my report for 2024, while the Acting Integrity Commissioner found that the subject member had breached the Code, Council had not completed its deliberations with respect to the matter by the end of that year.

On January 30, 2025, Council rendered its decision to accept the Acting Integrity Commissioner’s findings and recommendation that the member make a public apology.

The member filed a judicial review application of Council’s decision, which was heard in the Manitoba Court of King’s Bench in November, 2025. A decision from the Court had not been published as at the time of writing this report.

Complaints and investigations from 2024 completed or resolved in 2025

There were three formal complaints which were outstanding at the end of 2024. After completing my preliminary assessment of two of those complaints, I determined that an investigation was not

warranted and I sent dismissal letters explaining my decision to each of the respective complainants, in February 2025.

The third outstanding formal complaint was one that I had accepted for investigation. The complaint was resolved in 2025 after the member voluntarily apologized to the complainants. Based on the discussions I had with the member during the course of addressing that complaint, and the fact that they voluntarily apologized, I determined that the goals of the Code had been satisfied and there was no reason to proceed with the investigation.

As I have repeatedly stressed, I take the view that the complaint process in the Code is intended to be remedial rather than punitive. I am always glad to see that a member has engaged with me to gain a better understanding of their ethical responsibilities – something which in this case I was satisfied had occurred.

V. Communications with the Public

In 2025, I was contacted on **6 occasions** by members of the public. In most cases, they were people who were looking for information about members' obligations under the Code or about the complaint process. In some instances, people wrote to me to express their disapproval or disappointment with actions taken by the City of Winnipeg.

I am always willing to provide general information about the Code to the public, but I will never comment on whether a member is in breach of their ethical obligations except where I publish a report to Council advising that, after conducting an investigation, I am of the opinion that the member breached the Code.

VI. Guidance on Fundraising and Acceptance of Sponsorships and Donations for Members' Community Events

Fundraising

In 2024, the Governance Committee of Council adopted a resolution requesting me to report back within a year to provide additional guidance and policy advice to members about the rule in the Code regarding fundraising activity:

3. Fundraising

Members must not solicit funds from any person or organization if doing so would constitute an improper use of the influence of their office.

Council introduced this rule to the Code in 2019. As discussed in the report I published to Council in 2019 recommending the inclusion of the rule to the Code⁴ and in the annual report I published for that year⁵, this rule reinforces and reminds members that engaging in fundraising activity has the potential to constitute a misuse of the influence of their office. For example, if a member solicits a donation from someone who has a pending application before Council, the targeted donor may perceive complying with the fundraising request as being a way to gain an advantage from the member. Alternatively, the potential donor may fear that if they do not make the requested donation, they will not receive a favourable hearing when they come before Council or a committee of Council. In either case, even if intended to benefit a good cause, the member's direct solicitation would generally constitute an improper use of the influence of their office.

While this rule has been in place for 5 years, members still felt they could benefit from receiving further assistance on the subject. To provide that, my Office conducted an analysis of how fundraising activity is regulated in other cities, whether through their codes of conduct or related policies.

The result of this analysis provided limited guidance, however, primarily because there is no consistency in how other municipal jurisdictions regulate the fundraising activity of their elected officials. One principle that was consistent across the country, however, was the importance of avoiding the danger associated with making a direct, targeted fundraising request, as discussed above.

Some jurisdictions prohibit making a targeted request outright, while others allow for an occasional instance of direct fundraising if it is done pursuant to conditions that are set out by the Integrity Commissioner.

⁴[http://clkapps.winnipeg.ca/DMIS/permalink.asp?id=M20191024\(RM\)C-93](http://clkapps.winnipeg.ca/DMIS/permalink.asp?id=M20191024(RM)C-93)

⁵ [http://clkapps.winnipeg.ca/DMIS/permalink.asp?id=M20200723\(RM\)C-143.pdf](http://clkapps.winnipeg.ca/DMIS/permalink.asp?id=M20200723(RM)C-143.pdf)

After conducting our cross jurisdictional analysis, my colleague and I held an education session about fundraising activity, for all members. The session was well attended and allowed for a lively and informative discussion.

I always appreciate the many opportunities I have had over the years to engage in such sessions, because they provide an opportunity for mutual understanding between my Office and members – giving me a chance to understand how to apply the Code in a pragmatic way and members a chance to better understand the underlying rationale for my recommendations on how to meet the ethical standards with which they must comply.

After holding the education session and having further discussions with members, at an informal meeting with the Governance Committee, it was determined that given the variety of circumstances in which fundraising activity may occur, rather than codifying the activity any further, my Office would provide more guidance by issuing an advisory bulletin about how to carry out fundraising activity in a way that complies with the Code. My Office has issued advisory bulletins on various topics over the years, all of which are published on the City’s website. I therefore plan to publish an advisory bulletin regarding members’ fundraising activity, in 2026.

Sponsorships and donations for Community Events run by members

Under the Code, members’ ability to receive sponsorships and donations for community events they hold is permitted as an exception to the general prohibition on their ability to accept gifts and benefits set out in Rule 4. The exception in the Rule says that members are allowed to accept:

4c.vii...sponsorships and donations for community events organized or run by a Member or a third party on behalf of a Member.

While the term “community event” is used in both the Code and the Councillors Ward Allowance Fund Policy (the “CWAFF Policy”), it is not specifically defined in either document. In applying and interpreting the Code, I define the term to mean an event that a member holds for the benefit of their ward and constituents. This definition is consistent with the example of a community event which is used in the CWAFF Policy where it discusses eligible expenses related to: “the undertaking of Community Events, initiated by the Councillor and of benefit of the ward, such as Neighbourhood Clean-ups and other related events.” (emphasis added).

Accepting sponsorships and donations for member-run events can still, however, give rise to the same concerns that accompany fundraising activity, for example, the potential to create an expectation on the part of the donor that they can secure a future advantage from a member to whose community event they make a donation.

The cross jurisdictional search my office conducted shows that the municipalities in which such sponsorships and donations to member-run events are allowed, go on to prescribe rules about the types of donations that members can accept for their events, including prohibiting members from accepting donations from certain people, for example, someone who is a registered lobbyist or who may be bringing an application before Council.

Currently, the Code of Conduct for Members of Council for the City of Winnipeg does not provide any limits or restrictions on members' ability to accept sponsorships or donations for community events that they run. This lack of regulation means that the very harm which the rule prohibiting acceptance of gifts is intended to avoid can still occur.

VII. Recommendation to Council

After consulting with members of the Governance Committee I therefore recommend that unless Council wishes to put such regulation in place, for example, by amending the Code to place restrictions on members' ability to accept sponsorships or donations for the community events they run, the best way to prevent the potential harm associated with receiving or obtaining such donations and sponsorships is simply to remove the exception contained in Rule 4 c.vii of the Code, described above. This will not affect members' ability to use eligible funds under the CWAF policy to hold their community events.

VIII. Education

Education is an important part of the mandate of my Office. Members need to have a clear understanding of the ethical expectations they must meet. My ability to provide advice and information to members about how to comply with their obligations under the Code is critical to promoting a culture of ethical conduct.

To this end, as I have already described in this report, I am readily available to give advice to members on a timely basis, including meeting with them in person both individually or as a group.

The education session about fundraising activity that I conducted in the fall of 2025 is also a good example of the type of education I provide.

IX. Website

I updated the versions of the annotated Code and Advisory Bulletins that are posted on the Integrity Commissioner's page on the City's website to reflect the amendments that had been made to the Code in 2024. I also worked with the City Clerk's Office to update that page in order to make it consistent with changes that the City had made to its website generally, to make it more accessible to the public.

I want to express my thanks to Kate McMillan of the Clerk's Office for her gracious and expert assistance with all matters relating to the website.

X. Other Meetings

From time to time throughout the year, I attended both formal and informal meetings with the Governance Committee of Council to discuss areas of guidance that were being sought by that Committee, and to report on recommendations arising from the work that I was mandated to perform.

The contract for my services also requires that I consult with the Director of Legal Services to make recommendations for legislative changes as deemed necessary, to most efficiently carry out the role of the Integrity Commissioner or such other matters under the Integrity Commissioner's jurisdiction.

In compliance with this requirement, over the years since I was first appointed to this role in 2017, I have met with the respective Directors of Legal Services on several occasions.

I met with the current Director of Legal Services in the summer of 2025 to discuss legislative changes that could be sought from the Province to strengthen the Integrity Commissioner's role. Such changes include: assurance that communications between the Integrity Commissioner and others be kept confidential; giving the Commissioner powers to issue subpoenas; and providing the Commissioner with immunity from having to testify about confidential aspects of their work.

I also met with the Counsel for the Inquiry into the Construction of the Police Headquarters, at her request, to inform her about the steps Council has taken to enhance the ethics and accountability framework for its members, since the events that are the subject of that Inquiry occurred.

XI. Engagement with Colleagues from other jurisdictions

Throughout the reporting period, I engaged in regular dialogue and consultation with integrity and ethics commissioners from other jurisdictions across Canada.

In November, I was invited to attend a session for the Integrity Commissioners of Ontario that was sponsored by the York Collegium for Public Ethics. I am working with the organizer of that session to plan a similar event for municipal ethics professionals in Western Canada, in 2026.

I am grateful to be a part of this collegial network of ethics professionals and continue to hear positive comments from colleagues about the ethics and accountability framework that has been implemented and enforced by Winnipeg's City Council.

XII. Budget

For the period covering January 1 - December 31, 2025, Council established a budget for the Integrity Commissioner's Office of \$120,000.00.

The expenditure for this reporting period was as follows:

- Budget utilized: \$117,175.07 (includes legal fees, taxes and disbursements);
- Hours Associated with professional services: 460.7 (includes those hours which were billed at a nil rate for Articling Students).

The budget expenditure included the services which were provided by the Acting Integrity Commissioner as outlined earlier in this report.

XIII. Voluntary Lobbyist Registry

The Integrity Commissioner has oversight over the 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 an essential part of the democratic process.

However, in order to enhance the public's confidence in the integrity of its elected officials and public service, lobbying activity must be transparent.

That is why a lobbyist registry, even a voluntary one, is an important component of a municipality's ethics and accountability framework.

The Voluntary Lobbyist Registry's page on the City's 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.⁶

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.

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

Therefore, if an individual is speaking on the public record during a Council or Committee meeting or during a public process such as a public meeting or open house, they are not considered to be a lobbyist.

⁶<https://legacy.winnipeg.ca/clerks/LobbyistRegistry/default.stm>

I am available to provide advice about how the registry works to members of Council, staff and the public.

In 2025, 3 lobbyists registered their lobbying activities relating to meetings with members of Council and members of the public service.

I have noted an annual decrease in the number of lobbyists who register their activities, since the registry was first created. This is perhaps not surprising given the voluntary nature of the registration requirement, but in the interest of promoting transparency, I encourage lobbyists to register their activity and members of Council and the public service, to remind lobbyists to do so.

XIV. Conclusion

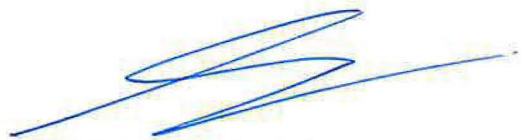
Enforcing and upholding ethical standards requires vigilance not only from elected officials but also from members of the public and the public service. I therefore want to thank all of the individuals who engaged with my Office during the last year.

I also want to thank the City Clerk, Carlos Gameiro and the Deputy Clerk, Andrew Poitras for the generous assistance they gave me in navigating various municipal policies and processes and for their continued good humour in doing so. As always, I am grateful for the relationship of trust and respect that has developed between our Offices.

I also want to thank my colleague Connor Jonsson for his intelligent and careful work in helping me fulfill the requirements of my Office and my assistant Natalia Wurmlinger who is unwaveringly patient and attentive to detail.

Finally, I want to thank the members of Council for placing their trust in my work and for engaging with me to promote public confidence in the democratic process.

Respectfully submitted,



Sherri Walsh
March 13, 2026