



# Evolution of an Accountability Framework for Municipal Elected Officials

Developing and Promoting a  
Culture of Ethical Behaviour in a  
Political Environment

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**Sherri Walsh, Hill Sokalski Walsh LLP**

Prepared with the assistance of Ryan Nerbas, Hill Sokalski  
Walsh LLP

# About the Presenter

- Managing Partner, Hill Sokalski Walsh LLP
- Civil litigator; adjudicator; arbitrator
- Integrity Commissioner for the City of Winnipeg
- Municipal Codes of Conduct Appeals Director for the Province of Manitoba

# Ethics and Accountability Frameworks

- An effective democracy requires that the public has confidence in the actions of its elected officials.

# Public Trust

Three primary ethical duties required of public officials:

1. Do not abuse the public's trust that you will put the public interest before your private interest;
2. Act impartially when carrying out programs which are established by law; and
3. Account to the public for your activities and decisions.

# Public Trust

- *"The proper operation of our city's government requires:*

*That its public officials and employees act as fiduciaries entrusted with and responsible for the property and resources of the community;*

*That they make governmental decisions and policies in the proper channels of the government structure , free of coercive or other improper influence;*

*That they use their position in the best interests of the city rather than for personal interests, whether their own interests or those of their family, friends or business associates; and*

*That they do not, directly or indirectly, in a positive or negative sense, treat anyone preferentially, that is, other than in a manner generally accorded to city residents."*

- Robert Weschler, *Model Municipal Code of Ethics*, City Ethics Inc., 2006

# Ethical Standards Promote Economic Prosperity

- *“Standards in public life matter for the UK’s democracy, economic prosperity, and international standing. Lord Evans said that he had personally been struck by the evidence given by business leaders to CSPL’s inquiry, arguing that the perceived fairness, predictability and low levels of corruption in the UK’s political system were a major factor in investment decisions.”*
  - The Constitution Unit Blog, citing Lord Jonathan Evans, Chair of the Committee on Standards in Public Life (CSPL), *Upholding Standards in Public Life*

# Ethics and Accountability Frameworks

- Establishing a formal ethics and accountability framework allows for ethical issues and complaints about the conduct of members of Council, to be dealt with in a fair and consistent manner.
- The Integrity Commissioner forms an integral part of the City of Winnipeg's ethics and accountability framework, which includes:
  - a Code of Conduct which contains a mechanism for accepting, investigating and reporting on complaints made about the ethical conduct of members of Council; and
  - an Integrity Commissioner who performs the dual role of providing advice about compliance with the Code and objective scrutiny of whether an elected official has met the standards set out in the Code.

# Integrity Commissioner

- The Integrity Commissioner is independent of Council.
- The role is intended to encourage and sustain a culture of integrity and accountability for the members of Council of the City of Winnipeg.



# Integrity Commissioner

- Integrity Commissioners carry out a range of functions:
  - assist in the development of the ethical framework by suggesting content and commentary for Codes of Conduct;
  - conduct education and training for members of Council and outreach for members of the community;
  - provide confidential advice and guidance to members of Council to support compliance with the Code;
  - investigate allegations that a member of Council has fallen short of compliance with the municipality's ethical framework and where appropriate, submit public reports on their findings and make recommendations, including recommending sanctions, that support the public interest.

# Integrity Commissioner

- In performing their work, therefore, Integrity Commissioners must:
  - avoid politicization of the office;
  - ensure effective communication of their mandate and decisions while maintaining the obligations of confidentiality necessarily associated with the work;
  - address inherent challenges in the subject matter itself; and
  - balance the need to adhere to standards with practical considerations so as not to make it impossible for elected officials who are human, to engage in politics.

# The Integrity Commissioner's Role

- It is inevitable that aggrieved members of the public who feel they are not being adequately represented by their council will seek out people whom they think can help them obtain the remedy they want.
- The very title “Integrity Commissioner” invites some people who are seeking integrity from their elected officials to enlist the ethics professional’s assistance in getting what they want council to achieve.

# The Ballot-Box Remedy

- While Integrity Commissioners can address complaints alleging certain conduct has breached specific rules of the code it is up to the voters to decide if their elected officials meet the voters' standards of integrity.

# Practical Considerations for an Integrity Commissioner

- Must be sensitive to the political, social and legal landscape in which council members are required to perform their duties of office.
- Must be alert to the specific needs of council members.
- While the Integrity Commissioner should not be drawn into political debate, they cannot ignore the political climate and context in which they function and must be alert to areas which require better education for the public and members of Council.
- See, for example, the recent advisory bulletin regarding council members' use of social media and accompanying memorandum:
  - <https://winnipeg.ca/council/integritycommissioner/pdfs/AdvisoryBulletin-20211019-SocialMediaandCodeofConduct.pdf>
  - <https://winnipeg.ca/council/integritycommissioner/pdfs/AdvisoryBulletin-SocialMediaandtheCodeofConductMemo.pdf>

# The Integrity Commissioner's Key Relationships in Winnipeg

- The Clerk
- The Speaker and Chair of the Governance Committee.

# Efficacy

- The advisory and educational aspects of the Integrity Commissioner's office are the most effective aspects of the role when it comes to shaping the conduct of elected officials.

# Measurements of Success

- How often the Integrity Commissioner is contacted by members of council for advice
- How well members of council understand their ethical obligations
- How willing members of council are to engage with the Integrity Commissioner
- Despite what the public says, the following are not measurements of success:
  - number of complaints received;
  - number of complaints investigated; or
  - number of published reports finding a breach of the code.



# History of the Creation of the Role for the City of Winnipeg

- February 2009 – City of Winnipeg Council asked the Province of Manitoba to review and amend the existing legislation to create stronger conflict of interest rules and guidelines for the City of Winnipeg and Council through such measures as the establishment of a separate municipal office for the Conflict of Interest Commissioner
- December 2013 – Council adopted the creation of an Office of Ethics Commissioner and asked the Province of Manitoba to amend the City of Winnipeg Charter to provide the Ethics Commissioner with investigative powers and the ability for Council to sanction members of council, statutory officers and members of the Winnipeg Police Service, on the recommendation of the Ethics Commissioner.
  - The Province did not amend the Charter and advised that the City of Winnipeg had the authority to establish an Ethics Commission under the existing framework.

# History of the Creation of the Role for the City of Winnipeg

- June 17, 2015 – Council instructed the Winnipeg Public Service to create an Office of Ethics Commissioner, with the maximum authority under the existing Charter.
- December 9, 2015 – Council adopted the recommendation in the Report on the Office of the Integrity (Ethics) Commissioner that the Office of the Integrity Commissioner be created.
- February 22, 2017 – Council adopted the recommendation of the Executive policy Committee that Sherri Walsh be awarded a contract as the City of Winnipeg's Integrity Commissioner.

# City of Winnipeg Integrity Commissioner's Mandate

- <https://www.winnipeg.ca/council/integritycommissioner/>
- Advisory
  - provide advice to Members of Council and Council as a whole on questions under the City's Code of Conduct.
- Investigative
  - investigate complaints and conduct inquiries into whether a Member of Council has contravened the City's Code of Conduct
- Educational
  - publish annual reports on the work of the office of the Integrity Commissioner, including examples in general terms of advice rendered and complaints received and disposed of.
- Other
  - oversee the City's Lobbyist Registry

# Approval of a Voluntary Lobbyist Registry

- April 26, 2017 – approval of the creation of a Voluntary Lobbyist Registry for the City of Winnipeg.
- The Integrity Commissioner oversees the Voluntary Lobbyist Registry, including assisting Members of Council, City Staff, and members of the public with questions regarding the Registry.
- The Integrity Commissioner is responsible for further review and changes to the process implemented by the City of Winnipeg.
- The Integrity Commissioner will recommend changes to the City of Winnipeg Charter, in consultation with the City Solicitor, related to the creation of a mandatory lobbyist registry.

# Developing a Code of Conduct for Members of Council

- *“Codes of ethics in the public sector are intended to promote integrity in public affairs and to provide guides to acceptable behaviour. They are intended to gain and retain public confidence and trust in public institutions. They are intended to help ensure decision making is fair; that information is appropriately shared and confidence is maintained; that public resources are properly used; and that office is properly attended, acquired and utilized. Codes are about promoting fairness at large, and avoiding corruption and corrupt influences. They are intended to promote a public service imbued with a sense of public purpose and propriety.*

*Such documents provide guides, and may be part of the professionalization of interpersonal relations in government. They help to instil understandings of fair play, and the need to curtail favouritism and abuse. They can buttress both the real and apparent independence and neutrality of civil services.”*

- Gregory J. Levine, *Municipal Ethics Regimes*, Municipal World Inc. 2009

# Code of Conduct for Members of Council

- A code of conduct is a set of rules which reflects the values and principles to which all members of council agree to adhere. As such it is a strong statement from Council – made with the intention of promoting public confidence in government.

# Code of Conduct for Members of Council

- *“The process of code development is at least as important, if not more important, than the product in terms of realizing the potential benefits and avoiding unforeseen consequences of adopting a code.”*
- Dr. Paul G. Thomas, *“A Code of Ethics or Code of Conduct for Political Parties as a Potential Tool to Strengthen Electoral Democracy in Canada – A Discussion Paper on the Advantages and Disadvantages of a Code Prepared for Elections Canada”*, December 2014

# Code of Conduct for Members of Council for the City of Winnipeg

- <https://www.winnipeg.ca/council/integritycommissioner/pdfs/CodeofConduct.pdf>
- Enacted pursuant to Members of Council Code of Conduct By-law No. 19/2018, effective February 22, 2018
- Replaces 1994 Code of Conduct
- This Code was developed and passed in collaboration with all Members of Council for the City of Winnipeg



# Integrity

- *"Government ethics is not about being "good" or " a person of integrity".... In fact, conduct that is praiseworthy outside of government , such as helping a family member get a job or returning a favor one has been given, is considered wrong in a government context.*

*Government ethics is about acting responsibly and professionally, as a government official or employee, under certain circumstances and following certain rules and procedures. It is about preserving institutional rather than personal integrity. Government ethics decision-making should be just another professional routine."*

- Robert Weschler: *Local Government Ethics Programs In a Nutshell*, City Ethics Inc., 2013.

# Code of Conduct for Members of Council for the City of Winnipeg

## ▪ A. PREAMBLE

- Members of Council for the City of Winnipeg recognize that they hold office for the benefit of the public and that their conduct must adhere to the highest ethical standards, exceeding the minimum obligations required by law.
- 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.
- Members of Council first instituted a Code of Conduct in 1994. This Code of Conduct stems from the principles set out in that Code.
- Although the Preamble cannot support a stand-alone contravention of the Code of Conduct, together with the Key Principles listed below, it provides a helpful framework within which to review the actions of Members of Council.
- To further assist Members of Council and members of the public in understanding and interpreting the Code of Conduct, the Code of Conduct document shall be made available in a version which includes commentary provided by the Integrity Commissioner.
- That commentary, which will be updated from time to time by the Integrity Commissioner, does not form part of the Code of Conduct itself.

# Key Principles - *Code of Conduct for Members of Council* for the City of Winnipeg

- The public interest is best served when Members:
  - perform their duties of office honestly and with integrity, impartiality and transparency, putting the public interest before private and self-interest;
  - conduct themselves in such a way as to promote respect for Council and municipal government;
  - serve their constituents and the City in a conscientious and diligent manner and approach decision making with an open mind; and
  - perform their duties of office and manage their private interests in a manner that promotes public confidence and trust in the political process.

# The Code and Expectations

- Elected officials need to know what is expected of them.
- While it is not possible to predict every factual situation to which a code will be applied it is important to import some level of certainty into the provisions of a code of conduct.
- Otherwise it is back to the “Chancellor’s foot”.
- This is why the broader principles that are set out in a code of conduct, for example, in the Preamble or in a statement of Key Principles, while there to assist in interpreting and applying the code cannot be the subject of stand-alone obligations, the breach of which amounts to a contravention of the code.
- Only the rules in the code, therefore, are capable of being the subject of a complaint investigation which may lead to finding that the code has been breached and sanctions are recommended.

# Code of Conduct for Members of Council of the City of Winnipeg

- Sets out 11 rules of conduct for members
  - The rules regulate such matters as, for example: respectful conduct, use of influence, avoiding conflict of interest and acceptance of gifts
- Members are required to meet at least once annually with Integrity Commissioner
- Integrity Commissioner may:
  - Receive and investigate complaints alleging that rules of conduct have been breached; and
  - Make findings and report to council in accordance with Complaint Procedures
- Members are encouraged to seek advice from Integrity Commissioner and may obtain binding written advice

# Examples of some of the Rules

- Rule 2 – Conflict of Interest
- Rule 4 – Gifts and Benefits
- Rule 8 – Conduct Concerning Staff
- Rule 9 – Respectful Conduct
  
- <https://www.winnipeg.ca/council/integritycommissioner/pdfs/CodeofConduct.pdf>

## Rule 2 – Conflict of Interest

- Encountering a conflict of interest is not generally a problem. What matters is that the conflict be dealt with responsibly and transparently.
- This Code regulates:
  - pecuniary interests;
  - non-pecuniary interests; and
  - apparent conflicts of interest.

## Rule 4 – Gifts and Benefits

- *“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.”*
  - Robert Weschler, Cityethics.org



# Acceptability of Gifts

- Any gift or benefit which might reasonably be seen to have been given to influence the Member in the exercise of a duty or function of his or her office should not be accepted.
- A Member's family member or staff should not accept gifts which give the same appearance
- A code should address gifts in two ways:
  - by regulating what is acceptable; and
  - by requiring public disclosure of gifts that are accepted.

# Rule 8 – Conduct Concerning Staff

## Conduct Concerning Staff

- a. Members must not directly or indirectly, request, induce, encourage, aid, or permit staff to do something which, if done by the Member, would be a breach of this Code of Conduct.
- b. Members must not compel staff to engage in partisan political activities or subject them to reprisal of any kind for refusing to engage in such activities.
- c. Members must not use, or attempt to use, their authority for the purpose of intimidating, coercing, or influencing staff with the intent of interfering with such staff's duties.
- d. Members must not maliciously or falsely impugn or injure the professional or ethical reputation or the prospects or practice of staff and must at all times show respect for staff's professional capacities.

# Key Relationship between Council and Staff

- *“The relationship between any municipal council and its professional public service is critical to the overall success of local government.”*
- Valerie Jepson, Integrity Commissioner for the City of Toronto, Report Regarding the Conduct of Councillor Josh Matlow, June 18, 2019 at p. 9.

# Council and Staff Must Work Well Together to Support the Public Interest

- *“The municipal council as an elected body provides local sensitivity and ensures that policies fit the local political culture. The professional public service provides expertise in policy development and administration. The best policies are found at the intersection of these two interests – responsiveness to local interests tempered by rational, administrative elements.”*
- Fenn, M. & Siegal, S. (2017), *“The Evolving Role of City Managers and Chief Administrative Officers”* IMFG Papers on Municipal Finance and Governance, No. 31. Toronto: University of Toronto, IMFG Institute on Municipal Finance and Governance.

# Distinction between Council and Staff

- Municipal civil servants work for council as a whole; they do not work for the mayor, or committee chairs, or any individual councillor.
- *“The roles of council members and administration – legally and practically – are separate. The purpose of council is to govern and lead the community from the perspective of locally elected politicians. It is the job of each council member to reflect and represent public issues and concerns to the rest of council.”*

*The role of administration...is to provide council with wise advice as to what needs to be done, and then to carry out the wishes of council in an effective, efficient and sensitive manner.”*

- George B. Cuff, *“Council & Administration: Distinction of Roles”*, 114 Municipal World (October 2004) No. 10, 39-40 at 39.

# Regulation of Conduct Towards Staff

- Members should not try to circumvent the code by asking or suggesting that staff do something that would be unethical for the Members to do themselves.
- Members must be respectful of staff's role to provide advice which is based on political neutrality, objectivity and expertise and without undue influence from any individual Member or faction of council.
- Members are still entitled to express criticism in a respectful manner based on factual matters.
- It is not appropriate for a Member to attempt to influence staff to circumvent normal processes or overlook deficiencies in a file or application.
- It is also inappropriate for Members to involve themselves in matters of administration or departmental management which fall within the jurisdiction of the Chief Administrative Officer and staff.

# Don't Air Dirty Laundry in Public

- *“Municipal government operates in a political arena, with all that that implies. As a result, a councillor may quite properly – or even simply for political reasons – accuse staff of being incorrect, lacking in research or creativity, being insensitive to community concerns, or being too slow to deal with an issue. Staff may not like it, but they have broad shoulders and it is the right of the democratically elected representative to say such things if they are warranted. But there are limits that should not be exceeded.*

*A councillor should never accuse a staff member publicly of stupidity, unethical behaviour, or incompetence. If an elected representative feels that way about a member of staff, he or she should take it up with the CAO (or with the head of council, in the case of the CAO), in private.*

*Likewise, if a staff member feels his or her integrity or honesty is being questioned, or if workplace interactions with a councillor are inappropriate or demeaning, he or she should take the matter up with the CAO and take advantage of the protections afforded to all employees, including in serious cases, access to the municipal integrity commissioner.”*

- Fenn, M. & Siegal, S. (2017), *“The Evolving Role of City Managers and Chief Administrative Officers”* IMFG Papers on Municipal Finance and Governance, No. 31. Toronto: University of Toronto, IMFG Institute on Municipal Finance and Governance.

# Ensure R-E-S-P-E-C-T

- *“To borrow from Aretha Franklin, the first ingredient in any good relationship is a climate of mutual respect. That can be easier said than done, when public criticism of staff by councillors is often popular with journalists or social media.*

*No matter what type of relationship exists between staff and council, the core must be respect for one another: respect for each other’s intelligence and professionalism; respect for the public office, no matter how one might feel about the current incumbent of an office; respect for the challenges that each “side” faces; and respect for the fact that both elected representatives and municipal staff are trying to serve the best interests of their communities and their citizens.”*

- Fenn, M. & Siegal, S. (2017), *“The Evolving Role of City Managers and Chief Administrative Officers”* IMFG Papers on Municipal Finance and Governance, No. 31. Toronto: University of Toronto, IMFG Institute on Municipal Finance and Governance.



# Rule 9 – Respectful Conduct

## Respectful Conduct

- a. All Members have a duty to treat members of the public, one another, and staff with respect and without abuse, harassment, or intimidation.

### **Harassment** includes:

- i. any behaviour, whether a single incident or a course of conduct, that a reasonable person should have known would be unwelcome, and that is inappropriate, demeaning, humiliating, embarrassing, or otherwise offensive, including but not limited to:
  - a. verbal or written insults, abuse or threats;
  - b. racial or ethnic slurs, including racially derogatory nicknames;
  - c. leering or other offensive gestures;
  - d. bullying; or
  - e. patronizing or condescending behaviour; and
- ii. objectionable and unwelcome sexual solicitations or advances.
  - a. While Members may passionately debate issues and promote ideas, they must maintain proper decorum during meetings of: Council, Committees of Council, and boards, agencies or commissions on which they serve as part of their duties of office.

# Workplace Harassment

- The rationale for requiring decorum in Council and Committee meetings was well stated in the Commission Report of The Honourable Madam Justice Denise E. Bellamy (Toronto Computer Leasing Inquiry/Toronto External Contracts Inquiry, 2005):
  - *“Ill-mannered behaviour impedes the effectiveness of Council as a decision-making body and diminishes the stature of Council in the eyes of the public.”*

*Principled criticism of others’ positions is to be expected at times, but it should be delivered respectfully and civilly. Angry or abusive language and personal attacks are inappropriate at all times.”*

# Advice Procedures – Appendix A

- Written advice is binding as long as facts presented are accurate
- Advice may be reconsidered and member will be informed. Original advice stands unless and until amended
- General advice will only be given informally, subject to change
- Will not advise as to whether past conduct was a contravention of the Code. Can only provide general information about how to act in the future
- Advice cannot be used by a member to attack or malign behaviour of another member
- Subject to disclosure required by law, advice is confidential unless:
  - reported following investigation of complaint
  - member makes the advice public
    - if a portion is made public, the entirety may be disclosed
- General and anonymous summaries of advice provided to Members may be included in Annual Report

# Enforcement of the Code

- Promotion of an ethical culture is better achieved through the ability to provide advice and education rather than through the investigation of complaints and imposition of sanctions for misconduct.

# Enforcement of the Code

- Nonetheless, a Code needs some form of formal enforcement mechanism
- The creation of mechanisms to deal with complaints about unethical conduct is essential to ensuring the public that the code is working in a meaningful manner.
- Individuals must be able to make complaints on a confidential basis to an independent person who has authority to investigate the allegations underlying the complaints.

# Enforcement of the Code

- Sanctions for ethical breaches should be seen as a last resort in an effort to preserve and enhance ethics in government.
- “First and foremost should be the cultivation of ethical behaviour in a supportive and educational way”.
  - Toronto Computer Leasing Inquiry/Toronto External Contracts Inquiry, 2005 (the *Bellamy Report*)

# Enforcement of the Code

- The *Bellamy Report* was one of the first reports in Canada to establish best practices for decision making and administration in municipal governments.
- Consistent with this approach the purpose of the complaint process is remedial rather than punitive.
- All complaints, whether formal or informal, may be resolved informally, i.e. without conducting an investigation, publishing a report and requiring council to determine sanctions.
- Education is achieved through public reporting in the IC's Annual Report about the nature of complaints received and how they were resolved.

# Complaint Procedures – Appendix B

- Part A- Informal Complaints
  - integrity Commissioner may assist in informal discussion to settle or resolve the matter
  - encouraged as first means of remedying behaviour
  - integrity Commissioner may act as mediator
  - participation in informal process does not preclude undertaking a formal investigation of the same matter
  - not a prerequisite to pursuing formal complaint



# Complaint Procedures – Appendix B

- Part B- Formal Complaints

- “any individual” may file formal complaint
- Details of complaint disclosed to respondent member, except name of complainant only disclosed where fairness requires it
- Council may direct investigation by resolution
- Must generally be made within 60 days after date of conduct, or 60 days after date complainant became aware of conduct
- May accept complaint filed after expiry of time limit if:
  - delay incurred in good faith;
  - it is in the public interest to conduct an investigation; and
  - no substantial prejudice will result to any person because of the delay

# Complaint Procedures – Appendix B, Preliminary Assessment

- Part B- Formal Complaints
- S. 7 - May refuse to investigate where:
  - outside jurisdiction;
  - complaint is frivolous, vexatious, not made in good faith;
  - no/insufficient grounds, or unlikely compliant will succeed; or
  - investigation will serve no useful purpose
- S. 11 - Where the Integrity Commissioner has declined to conduct an investigation, will provide the Respondent with both an anonymized copy of the complaint and the Integrity Commissioner's response to the Complainant.
- Investigation:
  - both parties provided with details of complaint, submissions, other relevant supporting material
  - may seek information from witnesses

# Complaint Process – General Comments

- Procedural fairness requires a process which allows all parties to adequately participate in the review and resolution of the complaint. The respondent must have the opportunity to have a clear understanding of the nature of the “case being presented against them”, and an opportunity to respond not only to the matter set out in the complaint, but also to the Commissioner’s findings of “fact and fault”, prior to the Commissioner publishing their report to Council.
- The Integrity Commissioner’s report should be written in plain language. Reports are not so much about finding fault, as about education so that municipal governments can function better and members of the public may gain confidence that their municipal council is operating with integrity.
- The main goal in having a process to accept, investigate and report on complaints is to be able to make recommendations that serve the public interest.

# Complaint Procedures – Appendix B

- Part B- Formal Complaints
- Reporting:
  - if contravention found, Integrity Commissioner shall report to Council including findings, opinion as to how member contravened code, any recommended sanctions or corrective action
  - if no contravention, report is provided to respondent member and complainant. Report not provided to council except as part of Annual Report
  - council shall consider and act on report forthwith
  - reports are made public
  - if contravention is found, identity of respondent member shall not be treated as confidential

# Enforcement of the Code

- Complaint process is not complainant driven, i.e. the complainant is not a party to an ethics proceeding.
- Once a complaint is made the ethics program itself takes over, followed by possible consideration of the matter by council .
  - Robert Wechsler, Director of Research, City Ethics Inc.: Local Government Ethics Programs: A Resource for Ethics Commission Members, Local Officials, Attorneys, Journalists and Students, and a Manual for Ethics Reform, City Ethics Inc., 2013, pp.683-684
- In Winnipeg, the City's Procedure By-law restricts delegations when Council receives an investigative report from the Integrity Commissioner, to: the Member who is the subject of the report; and to the Integrity Commissioner, only for the limited purpose of speaking about the process undertaken to prepare the report or about the Complaint Procedure process generally.

# Enforcement of the Code

- Available sanctions for violations of the Code:
  - Reprimand;
  - Public apology;
  - Return gift or benefit/reimburse donor for the value;
  - Remove member from a committee; and
  - Request Mayor to remove the member from their position as Chair of a committee

# Elements which Strengthen the Accountability of Elected Officials

- Self-Regulation- reinforced by:
  - Ensuring Members of Council actively engaged in drafting Code
- Proactivity
  - Integrity Commissioner is available to provide education generally and advice on specific situations on a proactive basis
- Ongoing Education
  - Annual reporting on how the Code has been applied in specific situations
  - Annual meeting with Integrity Commissioner on an individual basis
- Transparency
  - Informing individual Members when complaints are dismissed without investigation
  - Public reporting when Member found to have contravened Code



# Questions?