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January 16, 2025

VIA EMAIL (kklingenberg@caledon.ca)

Mayor and Members of Council
c/o Kevin Klingenberg, Town Clerk
The Corporation of the Town of Caledon
6311 Old Church Road
Caledon, Ontario
L7C 1J6

Dear Mayor and Members of Council:

RE: ANNUAL REPORT OF THE INTEGRITY COMMISSIONER, TOWN OF CALEDON
Our File No. 975-100

I am pleased to submit my first annual report having commenced duties as your Integrity Commissioner effective January 2, 2024.

Code of Conduct Complaints and Investigations

I received a total of 11 Code of Conduct complaints about Council members over the past year, involving four different councillors. I dismissed four for lack of jurisdiction without carrying out an investigation. I investigated but dismissed three other complaints without issuing a report. I investigated and ultimately dismissed complaints against 2 Members of Council but issued reports in respect of those investigations because I felt they had general educational value for all Members, as well as the public. I investigated and issued reports in respect of the remaining two complaints in which I found Code of Conduct violations. In one of those reports, I recommended a 10-day suspension of pay and in the other I recommended a reprimand, an apology and that Council Members undergo cultural sensitivity training.

I currently have no COC complaint investigations in progress.

Requests for Advice

I fielded six requests for advice from councillors, four concerning potential conflicts of interest situations related to specific matters that were to be considered by Council and two relating to potential Code of Conduct issues.

Gifts or Benefits Disclosure

I did not receive any Gifts or Benefits Disclosure Statements pursuant to s. 6.5 of the Code of Conduct during this reporting period.

Education

I was not asked to and therefore did not conduct any MCIA/Code of Conduct/Integrity Commissioner training in 2024.

Code of Conduct Review and Update

Council asked my office in conjunction with the Office of the Town Solicitor to undertake a comprehensive review of the Town's Code of Conduct. We commenced this joint review over the late Spring and Summer of 2024, however, at our recommendation, this was suspended following the announcement by the Minister of Municipal Affairs at the 2024 AMO conference in the latter part of August that a universal code of conduct governing all Ontario municipalities would soon be promulgated. Despite this statement, when Bill 241 (*Municipal Accountability Act, 2024*) was tabled on December 8, 2024, it did not contain terms of a model code of conduct; instead, it proposed that, if passed, the Lieutenant Governor-in-Council was authorized to draft a universal code of conduct.

Given that introducing a standard code of conduct for all Ontario municipalities appears to have been put off indefinitely, we recommend that our review of Caledon's Code together with the Town Solicitor's Office be resumed.

I trust this will be of interest to you. Please do not hesitate to contact me if you have any questions.

Yours very truly,

David G. Boghosian

DGB/dgb/ka