

September 3, 2026

## **AMO's Preliminary Advice about the Prosed New Standard Code of Conduct and Municipal Integrity Commissioner Process**

The Association of Municipalities of Ontario (AMO) commends the government for introducing and advancing Bill 9, *Municipal Accountability Act* through to Royal Assent. Elected officials must be held to the highest standards of conduct with an effective integrity commissioner process in place. AMO has long advocated for changes to the ethical framework and appreciates the government's responsiveness. In the lead-up to the current regulation posting, AMO provided preliminary advice to the government to inform regulation drafting as summarized below. AMO is seeking to validate these positions through the consultation process in September 2026.

### Regarding the Code of Conduct, AMO recommends:

- The code should raise the bar overall to a higher standard across the province to ensure a robust ethical framework is in place. This should include standards of conduct related harassment, discrimination, and violence.
- A clear definition should be included in the code about what constitutes a complaint of a serious nature that may warrant removal from office.

### Regarding the Integrity Commissioner (IC) Process, AMO recommends:

- The government should assess and support municipalities with varying capacity to successfully implement the code and the integrity commissioner process including setting a fee schedule for ICs and providing funding to smaller municipalities for IC services.
- A process is needed to mitigate against frivolous or vexatious complaints. For example, a quick determination within 5 days of whether the complaint is deemed to be frivolous or vexatious enough to not warrant further investigation, and/or municipal flexibility to charge a refundable fee.
- Mediation by the IC should be offered as an initial voluntary option before a formal investigation is launched if both parties agree where a council member lodges a complaint about another member.
- The timeline for most complaints should range from 60 to 90 days with more serious complaints warranting potential removal from office taking up to a maximum of 180 days by the local IC.
- Investigations by the Ontario Integrity Commissioner (OIC) should be an administrative review of the municipal integrity commissioner's investigation and completed within 60 days, not a reopening of a new investigation.
- ICs should report to councils about their recommendations balancing considerations for transparency with the need for privacy.
  - This should include an annual report with aggregate details about the number of complains filed, their results, and the number of complaints dismissed as frivolous and vexatious.
- When there is no finding of contravention of the code, there should be no public report.
- The OIC should provide a registry of qualified IC candidates for municipalities.