

Saskatoon Municipal Review Commission: 2022 Municipal Code of Conduct Committee Report



Saskatoon, Saskatchewan
June 1, 2022

Saskatoon Municipal Review Commission: Paul S. Jaspar (Chair), Linda Moulin (Vice-Chair), Joan White, Adele Buettner and Jennifer Lester

Linda Moulin
Code of Conduct Committee Chair
Email: ismoulin@gmail.com

Researcher: Kurt Terfloth
Research.MunicipalReview@gmail.com

TABLE OF CONTENTS

PART I: INTRODUCTION	3
PART II: METHODOLOGY	4
PART III: SMRC RECOMMENDATIONS	4
Recommendation #1. Periodic Review	4
Recommendation #2. Statutory Obligations.....	5
Recommendation #3. Mandatory Courses and Orientation.....	5
Recommendation #4. Gifts and Benefits.....	6
Recommendation #5. Clarify Influence	6
Recommendation #6. Election Period Social Media.....	7
Recommendation #7. Integrity Commissioner Annual Reports	8
Recommendation #8. Informal Complaints	9
Recommendation #9. Clarity in Complaint Procedures	10
Recommendation #10. Integrity Commissioner Time Discretion	10
Recommendation #11. Complainant Privacy	11
Recommendation #12. Informed Complainant and Defendant.....	11
Recommendation #13. Dual Mandate.....	12
PART IV: REFERENCES.....	13

PART I: INTRODUCTION

The original City of Saskatoon *City Council Code of Conduct* was adopted in 2012, but it soon became clear that a more extensive policy was required. In 2014, the Government of Saskatchewan announced plans to amend *The Cities Act*¹ to require a Municipal Code of Ethics. As the City required a policy review, the City of Saskatoon (the City) created a policy recommending body formed of community members, that was independent of the City Council. *Bylaw No. 9242, The Saskatoon Municipal Review Commission*²: (SMRC), gave the group the following mandate for policy advisement:

- *“the roles and obligations of members of Council;*
- *the standard of conduct for members of Council, including during municipal elections and by-election campaigns;*
- *the investigation and enforcement of standards;*
- *guidelines for use, disclosure, and access to confidential information;*
- *the use of City assets and receipt of gifts or benefits by members of Council; and*
- *the conduct of members campaigning for re-election.”*

On February 11, 2016, the SMRC presented an extensive proposal for a revised Council Code of Conduct. In that report³, 21 recommendations were offered to bolster the 2012 Code so that it better reflected City principles, provided clear guidance, and introduced processes for externally investigating complaints. Most of this advice was accepted, with a few recommendations dismissed largely due to matters of legislative authority⁴.

After many intermediary steps⁵, in 2019 the City adopted *Bylaw 9537, the Code of Ethical Conduct for Members of City Council*⁶ (the Code). Overall, the policy is reported to be working well and is compliant with *The Cities Act*⁷, *The Freedom of Information and Protection of Privacy Act*⁸, and *The City of Saskatoon Strategic Plans*^{9,10}. The Code has been recognized as a policy leader across Canada and is often used as a policy template.

This report discusses the SMRC’s policy recommendations and reasoning. The SMRC recognizes that more time is necessary to fully reveal the depth of the Code, but also that there are reports of issues and requests for specific revisions and additions. To address the needs of the City Council, City officials, and the public, the SMRC offers 13 new recommendations that will help bring clarity, transparency, and fairness to the Code.

¹ Government of Saskatchewan - *The Cities Act*, section 66.1, page 49 (link in References 1)

² *Bylaw No. 9242. The Saskatoon Municipal Review Commission Bylaw, 2014*, page 7 (link in Reference 1)

³ *Saskatoon Municipal Review Commission: Municipal Code of Conduct Committee Report (Feb. 11, 2016)* (link in Reference 3)

⁴ *Comments - Report from the SMRC Commission Code of Conduct Committee* (link in Reference 4)

⁵ *Bylaw 9424 - The Code of Ethics for Members of City Council Bylaw, 2017* (link in Reference 5)

⁶ *Bylaw 9537, the Code of Ethical Conduct for Members of City Council* (link in Reference 6)

⁷ Government of Saskatchewan - *The Cities Act*, section 66.1, page 49 (link in Reference 4)

⁸ Government of Saskatchewan - *The Freedom of Information and Protection of Privacy Act* (link in Reference 7)

⁹ *The City of Saskatoon Strategic Plan 2013-2023, Our Corporate Values*, page.15 (link in Reference 8)

¹⁰ *The City of Saskatoon 2022-2025 Strategic Plan, Our Values*, page 24 (link in Reference 9)

PART II: METHODOLOGY

The basis of the SMRC's recommendations for amendments originate from a survey of members of the City Council, updates of regulations from *The Cities Act*¹¹ and the Saskatchewan Ombudsman¹², literature reviews, and investigations of the Codes of Canadian municipalities, including revisitations of previous and updated policy models. To gain an understanding of the daily use, processes, and issues with the Code, the SMRC discussed the policy with those that it directly impacts, those administering it, and its authors. The SMRC held interviews with the Mayor, City Manager, City Solicitor, City Clerk, the Internal Auditor, and the past and present Integrity Commissioners. The opinions voiced in those consultations helped inform this report, and we thank all participants.

For this report, the SMRC gave considerable scrutiny to the Code's sections regarding the position of Integrity Commissioner, as that office is new and active. The SMRC discovered that many concerns raised were matters of City administrative practice and Integrity Commissioner preference, and that these were not suitable for Code of Conduct recommendations. The City and Integrity Commissioner are still developing functional and communication procedures, and we hope that our conversations proved helpful in highlighting items of concern and potential resolutions.

PART III: SMRC RECOMMENDATIONS

Recommendation #1. Periodic Review

1. That the City amend *Periodic Review, Section 6* (page 4) to ensure that *Bylaw 9537 may be amended at the end of each term of Council as well as at other times, as per the "living document" status of the Code.*

Code Section: *Periodic Review, Section 6* (page 4); *Bylaw 9424, The Saskatoon Municipal Review Commission Bylaw, 2014*

"Periodic Review

6. This Bylaw shall be reviewed in accordance with subsection 13. (4) of The Saskatoon Municipal Review Commission Bylaw, 2014."

Reasoning: In 2016, the City agreed to the SMRC recommendation of a "living document" policy status¹³. This would ensure that the Code was periodically revised and was continually clarified as needed by the City Council, Integrity Commissioner, City Clerk, and City Solicitor. However, in practice this rule was unclear, resulting in delays to policy housekeeping and Information Note updates. City officials were instead often waiting for the SMRC review period to act. Explicit permission would ensure that the living document status is well understood.

¹¹ *Government of Saskatchewan - The Cities Act, section 66.1, page 49 (link in Reference 1)*

¹² *Ombudsman's Resources on Conflicts of Interest (link in Reference 10)*

¹³ *Saskatoon Municipal Review Commission: Municipal Code of Conduct Committee Report (Feb. 11, 2016, pages 6, 15, 17) (link in Reference 4)*

Recommendation #2. Statutory Obligations

2. (a). That the City review and update *Section 17. Statutory Obligations' list of policies and bylaws.*

2. (b). That the City clarify the phrasing of *“the City’s bylaws and policies, including, but not limited to:”*.

Code Section: 17. *Statutory Obligations* (pages 8 and 9)

“17. A member must respect and comply with all obligations imposed on the member by statute or other legal enactment, and by the City’s bylaws and policies, including, but not limited to:”

Reasoning: In view of recent discussions about this section, the City may wish to include some additional Council policies and bylaws in Section 17’s list.

Section 17 may be improved by rephrasing, or the inclusion of Information Notes in that section, to further explain the Integrity Commissioner’s ability to refer to, or rule on, City policies and bylaws whether listed in Section 17 or not.

Recommendation #3. Mandatory Courses and Orientation

3. a. That the City expand the ethical conduct and conflict of interest course training and available resource materials discussed in *Section 16.*

3. b. That the City expand *Code Section 16. to include* a respectful workplace and anti-harassment course, and that this training instructs Council on *Policy C01-025, The Anti-Harassment Policy*

Code Section: *Transparent, Accountable and Good Governance, Section 16. (page 8)*

“16. (1) A member must attend all training to be provided to members as directed by Council.

(2) The training directed by Council will include a mandatory ethical conduct and conflict of interest course, presented by the Integrity Commissioner, to be held within one month of the first meeting of Council following the general election.”

Reasoning: Stakeholders indicated that expanding training and providing additional resource materials on conflicts of interest, ethics, as well as respect and harassment is needed. The latter training is highly recommended as it contributes to building a healthy workplace culture and addresses procedures for addressing problematic behaviour. *Policy C01-025, The Anti-Harassment Policy*¹⁴, is referenced in Section 17. It predates the creation of the Integrity Commissioner position and requires policy housekeeping.

¹⁴ *Policy C01-025, The City of Saskatoon Anti-Harassment Policy and Investigative Procedures for Members of City Council and Senior Administration (link in Reference 11)*

Recommendation #4. Gifts and Benefits

That the City amend *Gifts and Benefits, Section 38. (h)* to include language analogous to that used in the *City of Edmonton Council Code of Conduct*.

Code Section: *Property: Gifts and Benefits, Section 38.* (page 17).

*“(h) tickets to meals, banquets, receptions, sporting events, or similar activities if:
(i) attendance serves a legitimate purpose associated with the member’s duties;
(ii) the person extending the invitation or a representative of the inviting organization is in attendance; and
(iii) the value is reasonable and the invitations infrequent.”*

Reasoning: Restricting attendance from community events has proven to be problematic with respect to the ambassadorial role of members of Council for both Saskatoon and Edmonton. Edmonton’s Code¹⁵, which was used as the policy model for this section, was recently amended to alleviate this problem.

Edmonton’s revised Code, *Part L: Gifts and Benefits, Sections 1. (g) (i), (iii), and (iv)* (see below) is recommended as a policy model. Section 1. (g) (ii) is not to be included, because it was struck from that policy.

*“1. g) admission to, and food and beverages consumed at, community events and widely attended events such as conventions, conferences, sporting and arts events, banquets, or training and education programs, provided that:
i) the Councillor’s attendance serves a legitimate purpose associated with the Councillor’s duties;
ii) subsequently deleted
iii) the admission is unsolicited by the Councillor; and
iv) the value is reasonable and the invitations infrequent.”*

Recommendation #5. Clarify Influence

5. (a). That the City amend *Division V, Influence (Sections 52-59)* to describe “*Influence*” and “*Conflicts of Interest*” as separate sections.

5. (b). Move *Section 43., Support for Charities* and place it within *Division V, Influence*, following a discussion of conflicts of interest.

5. (c). Amend phrasing used within *Section 43., Support for Charities* to reflect its connections to conflicts of interest and influence.

Code Section: *Division V, Influence, Sections 52-59 (pages 20-21); Support for Charities, Section 43 (pages 18-19).*

¹⁵ *City of Edmonton - Bylaw 18483, Council Code of Conduct - Part L: Gifts and Benefits (page 12) (link in Reference 12)*

Reasoning: Presently, “conflicts of interest” are not clearly defined in the Code, yet much information on the topic is spread throughout the policy. For example, *Division V, Influence and Support for Charities* both relate to conflicts of interest, but neither refers to conflicts of interest. The City of Edmonton’s *Council Code of Conduct - Part G: Conflicts of Interest*; and *Part H: Use of Influence*¹⁶ would be a suitable policy model for such clarification.

In 2014, Ombudsman investigated a case involving breaches of trust and conflicts of interest in the RM of Sherwood No. 159¹⁷. This case would spur on the code of ethics amendments to *The Cities Act*¹⁸, but prior to this legislation passing, the Ombudsman helped develop a Code of Conduct for the RM¹⁹. The RM’s policy specifically included a section on *Support for Charities*, which presented ways to avoid conflicts of interest. Under the advice of the Ombudsman, in 2016, the SMRC recommended the *Support for Charities* section. Moving and reframing this section as a discussion of influence and conflicts of interest would bring clarity to this portion of the Code.

Recommendation #6. Election Period Social Media

That the City amend *and expand* Section 70. (2) to clarify the requirements of elected members use of personal and City social media accounts during the election period.

Code Section: *Elections, Section 70. (1-4)*

“70. (2) A member will maintain separate websites, social media, email and phone number for all campaign activities and communications. These accounts shall include, where possible, a disclaimer that they are not City-funded, nor do they reflect City policy during a campaign period. Account names should not include the member’s current position title, where possible (for example, Jane Smith is preferable to Councillor Jane Smith).”

Reasoning: Inappropriate social media account use in the election period is a frequent and complex issue, and incumbents and other candidates often have questions that relate to Section 70. The Code’s text or Information Notes ought to be expanded to clarify issues regarding an incumbent’s City social media accounts, including discussions of links to previous City posts, requirements for referencing messages, and that there is no requirement to delete or close existing City accounts or pre-existing shared messages and materials.

¹⁶ *City of Edmonton - Bylaw 18483, Council Code of Conduct - Part G: Conflicts of Interest; and Part H: Use of Influence, pages 8-9 (link in Reference 13)*

¹⁷ *The RM of Sherwood No. 159. Final Report of the Inspection and Inquiry into the RM of Sherwood No. 159. (link in Reference 14)*

¹⁸ *Government of Saskatchewan - The Cities Act, section 66.1, page 49 (link in Reference 1)*

¹⁹ *The RM of Sherwood No. 159. Bylaw No. 04-15, A Bylaw to Provide for a Code of Conduct for Members of Council (link in Reference 15)*

Recommendation #7. Integrity Commissioner Annual Reports

That the City amend Part IV - Integrity Commissioner, Section 84 (k.) to provide a more fulsome description of what may be contained within an Annual Report.

Code Section: *Part IV-Integrity Commissioner, Section 84 (k.).*

“Duties and Responsibilities

84. The Integrity Commissioner shall:

(k) publish an annual report on the work of the Integrity Commissioner including examples in general terms of advice and advance rulings rendered and complaints received and disposed of.”

Reasoning: There were uncertainties as to what information would be included in annual reports, as well as a desire to have the option to request more frequent reports. In addition, there was an interest in requesting information on general trends of both substantiated and unsubstantiated complaints.

The City of Edmonton’s *Integrity Commissioner Bylaw 18567*²⁰ provides a suitable policy model:

At least once annually, the Integrity Commissioner will provide a report to Council that includes:

- (a) a summary of the activities undertaken by the Integrity Commissioner during the past year;*
- (b) an analysis of any trends or general observations that can be drawn from the complaints received and investigations conducted in the past year; and*
- (c) any other matters the Integrity Commissioner deems relevant.*

And the City of Edmonton’s *Council Code of Conduct – Investigation*²¹, provides an addition:

“Nothing in this bylaw restricts the Integrity Commissioner from providing interim reports to Council on any matter relevant to a complaint, including reports of any interference, obstruction, or retaliation with an ongoing investigation.”

²⁰ *City of Edmonton’s Bylaw 18567, The Integrity Commissioner Bylaw – Reporting, Section 11 (page 3) (link in Reference 16)*

²¹ *City of Edmonton’s Bylaw 18483, Council Code of Conduct, Schedule B – Investigations (page 15, final paragraph) (link in Reference 17)*

Recommendation #8. Informal Complaints

8. That the City amend and expand *Informal Complaint, Section 86*, to suggest procedures for addressing complaints and seeking resolutions informally.

Code Section: *Informal Complaint*

“86. Any person who has identified or witnessed conduct by a member that the person believes is in contravention of this Bylaw may advise the member that the conduct violates the Bylaw and encourage the member to stop.”

Reasoning: Stakeholders discussed the issues of harassment, respect, and processes for directly addressing complaints. They indicated that additional guidance in this process may be beneficial, as additional clarity in process is valuable in the stressful moments that problems occur. The SMRC recommends the City of Barrie’s²² *Informal Complaint* section as a potential policy model:

Informal Complaints

25.1 Any individual who has identified or witnessed behaviour or activity by a member that appears to be in contravention of the Code may address their concerns in the following manner:

- (a) Advise the member that their behaviour or activity contravenes the Code;*
- (b) Encourage the member to stop the prohibited behaviour or activity;*
- (c) If applicable, confirm to the member your satisfaction or dissatisfaction with his or her response to the concern identified;*
- (d) Keep a written record of the incidents including dates, times, locations, other persons present, and any other relevant information, including steps taken to resolve the matter.*
- (e) If not satisfied with the response received through the informal process, an individual may proceed with a formal complaint through the Integrity Commissioner as outlined in section 25.2.*

Another good policy model is found in the City of Edmonton’s *Council Code of Conduct* section on *Complaints*²³ which contains a provision allowing the Integrity Commissioner to assist in seeking informal resolutions:

If the Integrity Commissioner determines that informal resolution may be possible, they may, with written consent of both the complainant and respondent Councillor(s), refer the complaint to the Ethics Advisor or another third party for resolution.

If a complaint cannot be resolved informally, the Integrity Commissioner will conduct a formal investigation. Formal investigations must be conducted in a fair, timely, and confidential manner that respects the principles of procedural fairness and natural justice.

²² *City of Barrie Council and Committee Member Code of Conduct, Section 25: Procedure – Complaints - Informal Complaints, section 25.1 (page 14) (link in Reference 18)*

²³ *City of Edmonton’s Bylaw 18483, Council Code of Conduct, Schedule B – Complaints (page 15) (link in Reference 19)*

Recommendation #9. Clarity in Complaint Procedures

That the City amend *PART V Complaints, Sections 86-94* for clarity in language and processes.

Code Section: *PART V Complaints. Sections 86-94* (pages 26-29).

Reasoning: The Complaints section of the Code is written in a legalistic style that may be challenging to interpret, and it is presented in a format that does not present information in the order that is most useful. The text in this section should be accessible to the lay public and presented in clear, step-by-step processes. The SMRC requests that the City revises this section so that a reader can easily find and understand (in order):

1. Their privacy rights, responsibilities, and costs if they choose to issue a complaint.
2. The requirements of a complaint to be suitable for the Integrity Commissioner's mandate.
3. How to issue a complaint, what communication may occur, and the response time frame.
4. The investigation process, duties of the complainant and respondent, and time required.
5. The ruling process, the role of the City Council in the ruling, the duties of the complainant and respondent, and the time periods involved.

The City of Edmonton's *Council Code of Conduct* section on *Complaints*²⁴ provides an example of a clear process in plain language, and it is presented in a logical order. The SMRC suggests it be used as a general model for content and formatting.

Recommendation #10. Integrity Commissioner Time Discretion

That the City amend *PART V Complaints, Sections 86-94* to grant the Integrity Commissioner greater discretion regarding communication and reporting time requirements.

Code Section: *PART V Complaints. Sections 86-94* (pages 26-29).

Reasoning: The former and current Integrity Commissioners indicated that, in the case of complex or multiple cases, more flexibility may be needed in the time periods allotted to address complaints. The *Schedule B Complaints* section of the *City of Edmonton's Code*²⁵ provides a good general example of policy language that addresses this need.

Areas to target include the length of time required for the:

1. Initial complaint response for both accepted and rejected complaints
2. Respondent to give an official response to the Integrity Commissioner
3. Investigation to complete and ruling to be reached
4. Ruling to be shared with the complainant and respondent, with the Governance and Priorities Committee, and with the City Council.

²⁴ *City of Edmonton's Bylaw 18483, Council Code of Conduct, Schedule B – Complaints (page 15) (link in Reference 19))*

²⁵ *City of Edmonton's Bylaw 18483, Council Code of Conduct, Schedule B – Complaints (page 15) (link in Reference 19)*

Recommendation #11. Complainant Privacy

4. (a). That the City amend *Confidentiality, Section 95* so that it precedes *Initial Complaint Classification (Section 88)* and follows *Formal Request for Investigation (Section 87)*.

4. (b). That the City amend the *Schedule “A” Complaint Form* so that it includes a notice of the privacy rights found in *Confidentiality, Section 95*.

Code Section: *Formal Request for Investigation, Sections 87 (page 29); Confidentiality, Section 95 (page 35); and the Schedule “A” Complaint Form, page 36.*

Reasoning: The privacy and anonymity of the complainant are important concerns when filing a complaint, and other municipalities take care to promptly address these. In the Code, the Formal Request for Investigation section (page 29) describes the process for making a complaint, but a discussion of the privacy rights of a complainant does not appear until Confidentiality, Section 95 (page 35). The inclusion of Confidentiality within the complaints section and a privacy disclaimer on the Complaints form would provide this useful information at the right time in the complaint procedure. The City of Winnipeg’s Code²⁶ provides a good example of complainant privacy rights and disclaimers.

Recommendation #12. Informed Complainant and Defendant

That the City amend Section 91 (1) to include language that requires that the Integrity Commissioner to report their ruling to the complainant, the respondent member, and the Governance and Priorities Committee at the same time.

Code Section: *Investigation Report 91. (1).*

“Investigation Report

91. (1) The Integrity Commissioner shall report to the complainant and the member no later than 90 days after receipt of the complaint.”

Reasoning: In the interest of fairness, it is recommended that the complainant, member, and Governance and Priorities Committee all be informed of the Integrity Commissioner’s ruling at the same time. The change here is that the complainant is informed at this earlier stage, rather than receiving no report until the report to Council.

²⁶ *City of Winnipeg’s Code of Conduct for Members of Council with Commentary (page 16) (link in Reference 20)*

Recommendation #13. Dual Mandate

That the City of Saskatoon continues to petition the Government of Saskatchewan to enact legislation to deal with the issue of dual mandates. At present, provincial law allows members of the municipal councils to also hold elected offices in the provincial government.

Reasoning: The City of Saskatoon approached SUMA on this issue, following the Code of Conduct report in 2015. The SMRC is requesting that to avoid any real or perceived conflict of interest, a Councillor who is elected to an office in another level of government shall resign from their position on Council the day after their election is confirmed. The previous City Solicitor noted: *“There is nothing in provincial legislation which requires this. To make this mandatory, an amendment to provincial legislation is required.”*

PART IV: REFERENCES

Reference 1: Government of Saskatchewan - *The Cities Act*

Link: <https://www.canlii.org/en/sk/laws/stat/ss-2002-c-c-11.1/191573/ss-2002-c-c-11.1.html?docType=pdf>

Reference 2: Bylaw No. 9242 The Saskatoon Municipal Review Commission Bylaw, 2014

Link: <https://www.saskatoon.ca/sites/default/files/documents/city-clerk/bylaws/9242.pdf>

Reference 3: Saskatoon Municipal Review Commission: Municipal Code of Conduct Committee Report (Feb. 11, 2016)

Link: https://www.saskatoon.ca/sites/default/files/documents/city-clerk/reports-publications/2016_mrc_code_of_conduct_committee_report.pdf

Reference 4: Comments - Report from the Saskatoon Municipal Review Commission Code of Conduct Committee

Link: <https://pub-saskatoon.escribemeetings.com/filestream.ashx?DocumentId=53798>

Reference 5: Bylaw 9424 - The Code of Ethics for Members of City Council Bylaw, 2017

Link: <https://www.saskatoon.ca/sites/default/files/documents/city-clerk/bylaws/9424.pdf>

Reference 6: Bylaw 9537 - Code of Ethical Conduct for Members of City Council Bylaw, 2019

Link: <https://www.saskatoon.ca/sites/default/files/documents/city-clerk/bylaws/9537.pdf>

Reference 7: The Freedom of Information and Protection of Privacy Act

Link: <https://www.canlii.org/en/sk/laws/stat/ss-1990-91-c-f-22.01/latest/ss-1990-91-c-f-22.01.html>

Reference 8: The City of Saskatoon Strategic Plan 2013-2023, Our Corporate Values

Link: https://www.saskatoon.ca/sites/default/files/documents/city-manager/city-managers-reports/2013-2023_strategic_plan.pdf

Reference 9: City of Saskatoon Strategic Plan 2022-2025, Our Values (page 24)

Link: https://www.saskatoon.ca/sites/default/files/documents/2022-2025_strategic_plan.pdf

Reference 10: Ombudsman's Resources on Conflicts of Interest

At present, the Ombudsman's conflicts of interest resources include:

1. *Municipal Conflict of Interest Brochure*
2. *Municipal Conflict of Interest Checklist*
3. *Municipal: Handling Complaints Under Your Code of Ethics*
4. *Municipal Mythbusters*

Link: <https://ombudsman.sk.ca/resources/brochures-and-posters/>

Reference 11: Policy C01-025, The City of Saskatoon Anti-Harassment Policy and Investigative Procedures for Members of City Council and Senior Administration

Link: <https://www.saskatoon.ca/sites/default/files/documents/city-clerk/civic-policies/C01-025.pdf>

Reference 12: City of Edmonton - Bylaw 18483, Council Code of Conduct - Part L: Gifts and Benefits, Section 1. (g) (pages 11-12)

Link: <https://www.edmonton.ca/sites/default/files/public-files/assets/Bylaws/C18483.pdf?cb=1649922331>

Reference 13: City of Edmonton - Bylaw 18483, Council Code of Conduct - Part G: Conflicts of Interest; and Part H: Use of Influence, pages 8-9

Link: <https://www.edmonton.ca/sites/default/files/public-files/assets/Bylaws/C18483.pdf?cb=1649922331>

Reference 14: Saskatchewan Ombudsman - The RM of Sherwood No. 159. Final Report of the Inspection and Inquiry into the RM of Sherwood No. 159.

Link: https://pubsaskdev.blob.core.windows.net/pubsask-prod/89689/89689-Final_Report-Sherwood_V1.pdf

Reference 15: The RM of Sherwood No. 159. Bylaw No. 04-15, A Bylaw to Provide for a Code of Conduct for Members of Council

Link: <http://rmofsherwood.ca/wp-content/uploads/2015/09/Bylaw-No.-04-15-A-Bylaw-to-Provide-for-a-Code-of-Conduct-for-Members-of-Council.pdf>

Reference 16: City of Edmonton's Bylaw 18567, The Integrity Commissioner Bylaw – Reporting, Section 11 (page 3)

Link: <https://www.edmonton.ca/public-files/assets/document?path=Bylaws/C18567.pdf>

Reference 17: City of Edmonton's Bylaw 18483, Council Code of Conduct, Schedule B – Investigations (page 15, final paragraph)

<https://www.edmonton.ca/sites/default/files/public-files/assets/Bylaws/C18483.pdf?cb=1649922331>

Reference 18: City of Barrie Council and Committee Member Code of Conduct, Section 25: Procedure – Complaints - Informal Complaints, section 25.1 (page 14)

Link: <https://www.barrie.ca/City%20Hall/MayorCouncil/Documents/2021-04-26%20Council%20and%20Committee%20Member%20Code%20of%20Conduct%20AS%20AMENDED.pdf>

Reference 19: City of Edmonton's Bylaw 18483, Council Code of Conduct, Schedule B – Complaints (page 14)

Link: <https://www.edmonton.ca/sites/default/files/public-files/assets/Bylaws/C18483.pdf?cb=1649922331>

Reference 20: City of Winnipeg's Code of Conduct for Members of Council with Commentary (page 16).

Link: <https://www.winnipeg.ca/council/integritycommissioner/codeofconduct.stm>