

## **Ethical Framework for the Thunder Bay Police Services Board**

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**PART II – WORKPLACE VIOLENCE****Chapter 1:****Chapter 2:****PART III – SOCIAL MEDIA POLICY****Chapter 1:****Chapter 2:****PART IV: - EXPENSE POLICY****Chapter 1:****Chapter 2:****PART V - PROCEDURE BY-LAW****Chapter 1: By-Law PC5-2020****Chapter 2:****PART VI -****Chapter 1:****Chapter 2:****PART VII –****Chapter 1:****Chapter 2:****A. General Introduction**

The Thunder Bay Police Services Board (“the Board”) is responsible for providing adequate and effective police services within Thunder Bay. Members of the Board are both accountable to the community and subject to the oversight of the Ontario Civilian Police Commission (“OCPC”). Members of the Board recognize their obligation to serve in a conscientious and diligent manner understanding that as leaders in the community, they are held to a higher standard of behaviour and conduct.

Members of the Board recognize that ethics and integrity are at the core of public confidence in Police Services Boards; that Board Members are expected to perform their duties and arrange their private affairs in a manner that promotes public confidence, maintains impartiality and avoids the improper use of influence and conflicts of interests, both apparent and real. They recognize the need to uphold both the letter and the spirit of the law including policies adopted by the Board.

This *Ethical Framework* strives to ensure that Members of the Board share a common basis and understanding for acceptable conduct of Members of the Board, in concert with and beyond the minimum standards of behaviour set out in Ontario Regulation 421/97, Members of Police Services Boards – Code of Conduct (the “Statutory Code”).

This Ethical Framework includes existing policies and By-Laws adopted by the Board. As new policies and By-Laws are developed and adopted by the Board, they will be added to the Ethical Framework. This is a comprehensive document for Members of the Board to use as a guide for matters associated with their ethical responsibilities.

This Ethical Framework is consistent with the requirements of the Statutory Code and the principles of transparent and accountable government, and is reflective of the Board’s core values, set out in its Strategic Plan, respecting Trust, Integrity, Leadership, Inclusivity and Collaborations.

## **B. Framework and Interpretation**

1. This *Ethical Framework* applies to all Members of the Thunder Bay Police Services Board (“Members”). It is to be given broad, liberal interpretation in accordance with applicable legislation and the definitions set out herein. As a living document the Ethical Framework will be brought forward for review at the end of each term of the Board, when relevant legislation is amended, and at other times when appropriate to ensure that it remains current and continues to be a useful guide to Members of the Board.
2. The Ethical Framework supplements the Statutory Code and in relevant circumstances can be used as an interpretive tool for the Statutory Code.
3. Commentary and examples used in this *Ethical Framework* are illustrative and not exhaustive. From time to time additional commentary and examples may be added to this document by the Integrity Commissioner and supplementary materials may also be produced as deemed appropriate.
4. Where a Board Member discloses all known facts to the Integrity Commissioner and as long as those facts remain unchanged, the Member may rely on written advice provided by the Integrity Commissioner. The Integrity Commissioner will be bound by the advice given, as long as the facts remain unchanged, in the event that they are asked to investigate a complaint.
5. Board Members seeking clarification of any part of this *Ethical Framework* should consult with the Integrity Commissioner.
6. The *Police Services Act* is the primary piece of legislation governing Police Services Boards however there are other statutes that govern the conduct of Members of Police Services Boards. It is intended that the *Ethical Framework* operate together with and as a supplement to the following legislation:

- *Municipal Conflict of Interest Act (MCIA);*
- *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*
- *Criminal Code of Canada;*
- *Ontario Regulation 421/97, Members of Police Services Boards – Code of Conduct.*

In addition to legislative requirements, Board Members are subject to the common law which imposes fiduciary obligations on them.

## Definitions

- a. “Family” includes “child”, “parent” and “spouse” as set out, and also includes
- step-child and grand-child;
  - siblings and step-siblings;
  - aunt/uncle, niece/nephew
  - in-laws, including mother/father, sister/brother, daughter/son
  - any person who lives with the Member on a permanent basis.

“Child” includes biological offspring, adopted children, and a person whom a parent has demonstrated a settled intention to treat as a child of his or her family;

“Parent” means a parent who has demonstrated a settled intention to treat a child as a member of his or her family whether or not that person is the natural parent of the child;

“Spouse” means a person to whom the person is married or with whom the person is living in a conjugal relationship outside of marriage;

- b. “Member” means a member of the Thunder Bay Police Services Board.
- c. “Social Media” means publicly available, third party hosted, interactive web technologies used to produce, post and interact through text, images, video and audio to inform, share, promote, collaborate or network.
- d. “Staff” includes the Secretary to the Board and the Assistant to the Secretary, members of the Thunder Bay Police Service, and such full-time, part-time, contract, or other persons retained by the Board from time to time.
- e. “Statutory Code” means the code of conduct established under the *Police Services Act* pursuant to Ontario Regulation 421/97, Members of Police Services Boards – Code of Conduct.

## **C. Guiding Principles**

1. Members of the Board shall discharge their duties in a conscientious and diligent manner.

2. Members of the Board shall discharge their duties with loyalty, faithfulness, impartiality, integrity, and transparency.

3. Members of the Board shall discharge their duties in a manner that will inspire public confidence in the abilities and integrity of the board.

4. There is a benefit to boards when members have a broad range of knowledge and continue to be active in the communities served, whether in business, in the practice of a profession, in the community organizations, and otherwise.

**D. Specific Chapters**

**Chapter No. 1**  
**Statutory Code**

**Police Services Act**

**ONTARIO REGULATION 421/97**  
**MEMBERS OF POLICE SERVICES BOARDS — CODE OF CONDUCT**

***This is the English version of a bilingual regulation.***

1. Board members shall attend and actively participate in all board meetings.
2. Board members shall not interfere with the police force's operational decisions and responsibilities or with the day-to-day operation of the police force, including the recruitment and promotion of police officers.
3. Board members shall undergo any training that may be provided or required for them by the Minister of Community Safety and Correctional Services.
4. Board members shall keep confidential any information disclosed or discussed at a meeting of the board, or part of a meeting of the board, that was closed to the public.
5. No board member shall purport to speak on behalf of the board unless he or she is authorized by the board to do so.
6. A board member who expresses disagreement with a decision of the board shall make it clear that he or she is expressing a personal opinion.
7. Board members shall discharge their duties loyally, faithfully, impartially and according to the Act, any other Act and any regulation, rule or by-law, as provided in their oath or affirmation of office.
8. Board members shall uphold the letter and spirit of the Code of Conduct set out in this Regulation and shall discharge their duties in a manner that will inspire public confidence in the abilities and integrity of the board.
9. Board members shall discharge their duties in a manner that respects the dignity of individuals and in accordance with the *Human Rights Code* and the Canadian Charter of Rights and Freedoms.
10. Board members shall not use their office to advance their interests or the interests of any person or organization with whom or with which they are associated.
11. (1) Board members shall not use their office to obtain employment with the board or the police force for themselves or their family member.  
(2) For the purpose of subsection (1),  
"family member" means the parent, spouse or child of the person, as those terms are defined in section 1 of the *Municipal Conflict of Interest Act*.
12. A board member who applies for employment with the police force, including employment on contract or on fee for service, shall immediately resign from the board.

**13.** Board members shall refrain from engaging in conduct that would discredit or compromise the integrity of the board or the police force.

**14.** (1) A board member whose conduct or performance is being investigated or inquired into by the Commission under section 25 of the Act or is the subject of a hearing before the Commission under that section shall decline to exercise his or her duties as a member of the board for the duration of the investigation or inquiry and hearing.

(2) If the application of subsection (1) results in a board not having enough members able to exercise their duties in order to constitute a quorum during an investigation, inquiry or hearing under section 25 of the Act, the chair of the Commission may appoint that number of persons necessary to constitute a quorum, who shall act in the place of the members who are unable to exercise their duties.

(3) The chair of the Commission,

- (a) shall specify in an appointment made under subsection (2) that the appointee may only exercise such duties as are necessary for the effective operation of the board during the investigation, inquiry or hearing and, for such purpose, may specify the duties the appointee may or may not exercise; and
- (b) shall cancel an appointment made under subsection (2) as soon as a member of the board who declined to exercise his or her duties under subsection (1) resumes exercising his or her duties or is replaced under subsection 25 (8) of the Act.

**15.** If the board determines that a board member has breached the Code of Conduct set out in this Regulation, the board shall record that determination in its minutes and may,

- (a) require the member to appear before the board and be reprimanded;
- (b) request that the Ministry of Community Safety and Correctional Services conduct an investigation into the member's conduct; or
- (c) request that the Commission conduct an investigation into the member's conduct under section 25 of the Act.

## **Chapter No. 2**

### **Avoidance of Conflicts of Interest**

In this Chapter:

- a. “disqualifying interest” means an interest in a matter that, by virtue of the relationship between the Member of the Board and other persons or bodies associated with the matter, is of such a nature that reasonable persons fully informed of the facts would believe that there is a substantial risk that the Member of the Board not fully fulfil their duty to participate impartially in the decision-making processes related to the matter.
- b. “non-disqualifying interest” means an interest that does not rise to the level of a disqualifying interest, and is of such a nature that reasonable persons fully informed of the facts would believe that the Member will fulfil their duty to participate impartially in the matter so long as:

The Member of the Board fully discloses the interest so as to provide transparency about the relationship; and

The Member of the Board states why the interest does not prevent the Member from making an impartial decision on the matter.

#### **Commentary**

*Whether or not the duty of procedural fairness applies, Members of the Board have obligations of loyalty and faithfulness that require that conflicts of interest be properly addressed.*

*Not all interests arise to the level of disqualifying. A non-disqualifying interest can be thought of as involving a ‘near-miss’ situation. While the interest of the Member of the Board does not amount to a disqualifying interest, there may be those in the community who might perceive it as such, making it appropriate to make the interest known. A simple example is this: The Member has the same last name as a proposed vendor to the Board in a controversial matter; there are those in the community who have drawn the conclusion that because of the identical names, the Member must be prohibited from participating (assuming that the Member and the proposed vendor are related). By acknowledging the interest (the shared last name), but clarifying that there is no substantial connection between the Member and the vendor, any community concern about conflict or undue influence is resolved.*

1. Members of the Board shall not participate in the decision-making processes associated with their office when prohibited to do so by the Municipal Conflict of Interest Act.
2. Members of the Board shall not participate in the decision-making processes associated with their office when they have a disqualifying interest in a matter.

3. In any event:
  - a. Members of the Board shall not participate in the decision-making processes associated with their office when they have a direct, indirect or deemed pecuniary interest in a matter, except in compliance with the *Municipal Conflict of Interest Act*.
  - b. Members of the Board shall not participate in the decision-making processes associated with their office when they have an interest that though in compliance with the *Municipal Conflict of Interest Act*, is nevertheless a disqualifying interest by virtue of the nature of the relationship between the Member and other persons or bodies to be affected by the decision.
4. Treatment of Non-Disqualifying Interests:
  - a. Members of the Board may participate in the decision-making processes associated with their office when they have a non-disqualifying interest provided they file at their earliest opportunity a Transparency Disclosure in a form and manner established by the Secretary to the Board acting in consultation with the Integrity Commissioner.
  - b. Transparency Disclosures are public documents and shall be available for public viewing on the Board web site.
  - c. The determination of whether an actual disqualifying interest or an actual non-disqualifying interest exists, when challenged, is subject to the determination by the Integrity Commissioner of whether a reasonable person fully informed of the facts would believe that the Member of the Board could not participate impartially in the decision-making processes related to the matter.

### Commentary

*Members of the Board should be committed to performing their functions with integrity and to avoiding the improper use of the influence of their office, and private conflicts of interest, both apparent and real. Members of the Board shall also not extend in the discharge of their official duties, preferential treatment to Family Members, organizations or groups in which they or their Family Members have a direct or indirect pecuniary interest.*

*Members of the Board have a common understanding that in carrying out their duties as a Member of the Board, and pursuant to Section 10 of the Statutory Code they will not participate in activities that grant, or appear to grant, any special consideration, treatment or advantage to a Family Member or an individual which is not available to every other individual.*

*Members of the Board are governed by the Municipal Conflict of Interest Act (MCIA). The Integrity Commissioner is empowered to investigate and rule on all conflicts of interest, whether pecuniary or non-pecuniary, however individual complainants may choose to seek their own remedies by making an application to a judge.*

*Members of the Board may seek conflict of interest or other advice, in writing, from the Integrity Commissioner. Where members choose to seek external legal*

*advice on conflict of interest or other Ethical Framework issues, these fees will not be reimbursed by the Board and cannot be charged to any office account unless they are subject to the City of Thunder Bay's Indemnification By-Law or if the Board approves the account.*

*Pursuant to Section 10 of the Statutory Code Members may not participate in activities that grant, or appear to grant, any special consideration, treatment or advantage to a Family Member or an individual which is not available to every other individual.*

*When a member, despite the existence of an interest, believes that they may still participate in a matter with an open mind, the public interest is best served when the Member is able to articulate the interest, and why the interest does not amount to a disqualifying conflict of interest.*

*Members shall not participate and shall absent themselves when the Board is asked to consider a matter involving a Family Member or a person or organization with whom the Member has a real or apparent conflict of interest.*

5. Members who seek advice from the Integrity Commissioner with respect to the application of this Chapter may rely on the provisions of Part B. "Framework and Interpretation" (paragraph 3) and the Chapter 17, "Acting on Advice of Integrity Commissioner."
6. Members of the Board shall avoid any interest in any contract made by him/her in an official capacity and shall not contract with the Board for the sale and purchase of supplies, material or equipment or for the rental thereof.
7. Members of the Board, while holding office, shall not engage in an occupation or the management of a business that conflicts with their ability to diligently carry out their role as a Member of the Board, and shall not in any case profit directly or indirectly from such business that does or has contracted with the Board

*Commentary:* *Members of the Board may for example teach, or run a business that does not conflict or interfere with their duties*

8. Despite paragraph 7, a Member of the Board may hold office or a directorship in an agency, board, commission or corporation where the Member has been appointed by the Council of the City of Thunder Bay, or by the Federal or Provincial Government.
9. Despite paragraph 7, a Member of the Board may hold office or directorship in a charitable, service or other not-for-profit corporation subject to the Member disclosing all material facts to the Integrity Commissioner and obtaining a written opinion from the Integrity Commissioner approving the activity, as carried out in the specified manner, which concludes that the Member does not have a conflict between their private interest and public duty. In circumstances where the Integrity Commissioner has given the Member a qualified opinion, the Member may remedy the situation in the manner specified by the Integrity Commissioner.

## Commentary

*Examples of exceptions include hospital boards, charitable boards, community foundations, the Association of Municipalities of Ontario, the Federation of Canadian Municipalities, service clubs such as the Rotary Club, Lions Club and other not-for-profit organizations. Members should exercise caution if accepting such positions if the organization could be seeking a benefit or preferential treatment from the Board at any time.*

*The legislative obligation is set out in the Municipal Conflict of Interest (MCI). If the Member of the Board, or a Family Member of the Member of the Board, sits on a body which has a pecuniary interest in a matter before the Board, that Member has a deemed pecuniary interest. The Member of the Board should disclose the interest and should not participate in or vote on such matter, in compliance with the obligations of s.5, MCI.*

*The Ethical Framework captures the broader common law responsibility and requires members to avoid any appearance of favouring organizations or groups on which the Member's Family Members serve.*

*Family Members of Members of the Board are not precluded, or even discouraged, from serving on not-for-profit organizations or other bodies. However, where Family Members of Members of the Board serve in such a capacity, the Member should declare a disqualifying interest whenever there is a matter for Board consideration in which the not-for-profit organization or body has a pecuniary interest.*

## Chapter No. 3

### **Procedural Fairness and Impartiality:**

1. In this Chapter, a Reasonable Apprehension of Bias exists when a reasonable person, viewing the matter realistically and practically, and having thought the matter through – would conclude that it is more likely than not that the Member, whether consciously or unconsciously, would not be able to render a fair decision on the matter.
2. Members shall maintain their impartiality and uphold the Board’s obligation to provide procedural fairness in circumstances where the rights, privileges or interest of an individual are to be determined by a Board decision.

#### *Commentary:*

*Some Board duties require the Board to make decisions that affect the rights, privileges or interests of an individual. In decisions of this type, the Board has a duty of procedural fairness. Impartiality is one of the requirements of procedural fairness. Where there is a reasonable apprehension of bias in respect of a Member of the Board, the member is considered not to be impartial.*

## Chapter No. 4

### **Gifts, Benefits and Hospitality:**

#### In this Rule:

- a. “Gift” means money, fee, advance, payment, gift, gift certificate, promise to pay, property, travel, accommodation, entertainment, hospitality or any other personal benefit connected directly or indirectly with the performance of a Member’s duties of office, but excludes:
  - i. Compensation authorized by law;
  - ii. Political contributions otherwise reported by law, in the case of Members running for office;
  - iii. Services provided by persons volunteering their time;
  - iv. Contributions of value that are specifically addressed in other provisions of this Code
  - v. Gifts provided to the Board and which are logged, archived and/or publicly displayed as such.
- b. A Gift provided with the Member’s knowledge to a Family Member or to a Member’s staff that is connected directly or indirectly to the performance of the Member’s duties, is deemed to be a Gift to that

Member.

- c. “Token of Appreciation” means such gifts or benefits that normally accompany the responsibilities of office and are received as an incident of protocol or social obligation, or which are a suitable memento of a function honouring the Member.
  - d. “Official Hospitality” means food, lodging, transportation and entertainment provided by Provincial, Regional and local governments or political subdivisions of them, by the Federal government or by a foreign government within a foreign country or at a conference, seminar or event where the Member is either speaking or attending in an official capacity at an official event (such as at meetings of the Ontario Association of Police Services Boards (“OAPSB”), the Canadian Association of Police Governance (“CAPG”), or conducted by providers of continuing education).
  - e. “Business Hospitality” means entertainment, food and beverages consumed at banquets, receptions or similar events, if:
    - i. attendance serves a legitimate business purpose;
    - ii. the person extending the invitation or a representative of the organization is in attendance; and
    - iii. the value is reasonable and the invitations infrequent;
  - f. “Publications” means communication to the offices of a Member, including subscriptions to newspapers, and periodicals.
1. No Member shall accept any Gift unless expressly permitted by this Chapter.
  2. No Member shall accept any Gift involving the use of property or facilities, such as a vehicle, office, club membership or vacation property at less than reasonable market value or at no cost. Notwithstanding this prohibition, with specific approval provided by the Board, a Member may be sponsored to attend educational site visits connected with an identified project.
  3. Gifts identified in Column B of Table ‘1’ may be accepted by a Member provided the Gift is disclosed in accordance with the conditions set out in Column ‘C’.
  4. Gift Disclosure, where required, is to be accomplished by filing within 30 days of receipt of the gift or reaching the annual limit, a Member Information Statement in a form prescribed by the Integrity Commissioner and providing same to the Board Secretary for posting on the Board’s web site.
  5. Gifts identified in Column B shall not be accepted, without the Integrity Commissioner’s specific approval, when the conditions set out in Column ‘D’ are applicable.
  6. In providing advice to a Member about their obligations respecting Gifts, or in considering any inquiry with respect to a Member Information Statement or an assertion that this Rule has been breached, or in providing consent, where required, that a Gift may be accepted, the Integrity Commissioner shall determine whether

the receipt of the Gift or might, in the opinion of the Integrity Commissioner, create a conflict between a private interest and the public duty of the Member. In the event that the Integrity Commissioner makes that preliminary determination, they shall call upon the Member to justify receipt of the gift or benefit.

7. Should the Integrity Commissioner determine the receipt of a Gift was inappropriate, the Integrity Commissioner may direct the Member to return the gift, reimburse the donor for the value of any gift or benefit already consumed, or the Integrity Commissioner may order the Member to forfeit the gift or remit the value of any gift or benefit already consumed to the Board, or a Board agency, board or commission. Any such direction ordered by the Integrity Commissioner shall be a matter of public record.

TABLE '1'  
Gift Treatment and Disclosure

A	B	C	D
<u>Type of Gift</u>	<u>Examples</u>	<u>Gift Disclosure</u>	<u>Gift No Longer Allowable</u>
		<i>Apparent Value at which Gift, or the <b>cumulative</b> value from one source in a calendar year is disclosable</i>	<i>Condition or Actual Value beyond which gift is not allowable (Value assessed on basis of single Gift or cumulative Gift value from one source in calendar year) (without IC approval)</i>
Token of Appreciation	Plaques, Pens, Mugs, Vase, Event Photos, and similar	No need to record - Deemed Zero Value	Actual Value of a single gift is over \$<General Gift Threshold> (allowable with IC approval)
	Perishable (includes flowers, food)	No need to record - Deemed Zero Value	Excludes Alcohol with actual value over \$100
	Gift to Board	Not a 'Gift'. No need to record. Board staff (identify) to record and take possession unless otherwise on public display. Deemed Zero Value	N/A
Course of Business	Publications	No need to record - Deemed Zero Value	N/A
	Art	\$100	\$<General Gift Threshold>
	Business Meals	\$100	\$<General Gift Threshold>
	Business Hospitality	\$100	\$<Hospitality Gift Threshold> More than two Event Tickets (Golf, Gala, Sporting, Entertainment) per event More than one event per year from the same person or organization (allowable with IC approval)
	Official Hospitality	\$<General Gift Threshold>	No limit

Commentary

*Gifts and benefits may be received by members in the course of their duties and attendance at public functions is expected and is considered part of their role. Business-related entertainment and gift-giving can be a token of respect and admiration for the member, but can also be seen as an instrument of influence and manipulation. The object of this rule is to provide transparency around the receipt of incidental gifts and benefits and to establish a threshold where the total value could be perceived as potentially influencing a decision.*

*The practical problems that nominal gifts and benefits create require a Code of Conduct that provides clarity and transparency. Personal integrity and sound business practices require that relationships with developers, vendors, contractors or others doing business with the Board be such that no Member of the Board is perceived as showing favouritism or bias toward the giver. There will never be a perfect solution.*

*Each Member of the Board is individually accountable to the public and is encouraged to keep a list of all gifts and benefits received from individuals, firms or associations, with estimated values, in their offices for review by the Integrity Commissioner in the event of a complaint.*

*Use of real estate or significant assets or facilities (i.e. a vehicle, office, vacation property or club membership) at a reduced rate or at no cost is not an acceptable gift or benefit. The purpose of the Code is not to prohibit Members from accepting all invitations to socialize at a vacation property with personal friends at their vacation property, provided the Gift is disclosed in accordance with this Rule.*

*An invitation to attend a charity golf tournament or fund-raising gala, provided the Member of the Board is not consistently attending such events as a guest of the same individual or corporation, is also part of the responsibilities of holding public office. Likewise, accepting invitations to professional sports events, concerts or dinners may serve a legitimate business purpose. Where a Member is uncertain in regards to whether an invitation is or is not appropriate, it may be prudent to consult with the Integrity Commissioner before attending any such event.*

*Regular invitations to lunch or dinner with persons who are considered friends of Members of the Board is acceptable in situations where the Member pays their portion of the meal expense and treats it as a personal expense, meaning a claim is not made for reimbursement from the Board. Proper caution and diligence not to discuss matters before the Board for a decision must be exercised at all times. When in doubt it is prudent to consult with the Integrity Commissioner.*

## **Chapter No. 5**

### **Member's Expenses:**

1. There are a range of expenses that support a Member's role. Members should refer to the City of Thunder Bay's expense policy for guidance of expenses eligible for reimbursement until such time as the Board adopts its own policy to that effect.

## **Chapter No. 6**

### **Confidential Information:**

1. Pursuant to section 4 of the Statutory Code no Member shall disclose the content of any matter, or the substance of deliberations, of *in-camera* meetings until the Board discusses the information at a meeting that is open to the public or releases the information to the public.
2. No Member shall disclose or release by any means to any member of the public or the media, any confidential information acquired by virtue of their office, in either oral or written form, except where required by law or authorized by the Board to do so.
3. No Member shall use confidential information for personal or private gain, for the gain of relatives or any person or corporation or for the gain of any other person or entity.
4. A Member may disclose confidential information to their lawyer for the sole purpose of obtaining legal assistance for themselves. However, confidential information may only be disclosed on the basis that the lawyer will keep such information strictly confidential and not use such information for any other purpose.
5. A Member may use confidential information in a legal proceeding brought reasonably and in good faith but only to the extent reasonably necessary for that purpose. In any event, all reasonable efforts must be taken in the proceeding to maintain the confidentiality of such information.
6. No Member should directly or indirectly benefit, or aid others to benefit, from knowledge respecting bidding on the sale of Board property or assets.
7. Members of the Board should not access or attempt to gain access to confidential information in the custody of the Board unless it is necessary for the performance of their duties and is not prohibited by Board policy.

### **Commentary:**

*In no circumstances should a Member disclose confidential information held by the Board except as authorized by this Chapter. In circumstances where the confidentiality of information may be uncertain, it is incumbent upon the Member to seek advice or*

*clarification from the Secretary to the Board or the Integrity Commissioner, about whether or not the information is or remains confidential*

*Confidential Information includes information in the possession of, or received in confidence by, the Board and the Board is either prohibited from disclosing, or is required to refuse to disclose, under the Municipal Freedom of Information and Protection of Privacy Act (“MFIPPA”), or any other legislation.*

*MFIPPA restricts or prohibits disclosure of information received in confidence from third parties of a corporate, commercial, scientific or technical nature, information that is personal, and information that is subject to solicitor-client privilege.*

*As elected or appointed officials, Members of the Board will receive highly sensitive and confidential information concerning policing matters. This is consistent with the nature of the Members’ duties.*

## **Chapter No. 7**

### **Use of Board Resources:**

1. No Member shall use for personal purposes any Board staff services, property, equipment, services, supplies, websites, or other Board-owned materials, other than for purposes connected with the discharge of Board duties.
2. No Member shall obtain personal financial gain from the use or sale of Board developed intellectual property (for example, inventions, creative writings and drawings), computer programs, technical innovations or any other item capable of being patented. Members acknowledge and do not dispute that all such property remains exclusively that of the Board.
3. No Member shall use information gained in the execution of his or her duties that is not available to the general public, for any purposes other than his or her official duties.
4. No Member shall use the services of Board staff, or make requests for document or information from Board staff, unless such information is required for the purpose of carrying out their duties as public officials.

## Chapter No. 7

### **Election Campaigns:**

1. No Member shall use the facilities, equipment, supplies, services, staff or other resources of the Board or the Thunder Bay Police Service for any election campaign or campaign-related activities and all media used by the Member for electoral purposes shall not include the Board's or the Police Service logo or insignia.
  - a) If a Member of the Board uses any social media account for campaign purposes, such account must not be created or supported by Board resources. Social media accounts used for campaign purposes must utilize personal cell phones, tablets and/or computers.
  - b) To avoid confusion with any website or social media accounts used for Board Member work, Members who choose to create or use social media accounts for campaign communications must include, for the duration of the campaign, a clear statement on each campaign website or social media account's home page indicating that the account is being used for election campaign purposes.

## **Chapter No. 8**

### **Improper Use of Influence:**

1. In accordance with section 10 of the Statutory Code, No Board Member shall use their office to advance their interests or the interests of any person or organization with whom or with which they are associated.
2. No Member shall use the influence of his or her office for any purpose other than for the exercise of their official duties.

### **Commentary**

*Examples of prohibited conduct are the use of one's status as a Member of the Board to improperly influence the decision of another person such as the Chief of Police, a police officer, and other members of the police service to the private advantage of oneself, or one's Family Member, or friends. This would include attempts to reduce speeding tickets, attending at an investigation or speaking with a junior officer.*

*Also prohibited is the holding out of the prospect or promise of a future advantage through a Member's supposed influence within the Board in return for present actions or inaction.*

*Members must also comply with the provisions of the Statutory Code of Conduct, including Section 2:*

- 2. Board members shall not interfere with the police force's operational decisions and responsibilities or with the day-to-day operation of the police force, including the recruitment and promotion of police officers.*

## **Chapter No. 9**

### **Business Relations:**

1. In addition to the provisions of Sections 11 and 12 of the Statutory Code, no Member shall allow the prospect of their future employment by a person or entity to affect the performance of their duties to the Board, detrimentally or otherwise.
2. No Member shall borrow money from any person who regularly does business with the Board unless such person is an institution or company whose shares are publicly traded and who is regularly in the business of lending money, such as a credit union.
3. No Member shall refer a third party to a person, partnership or corporation in exchange for payment or other personal benefit.

## **Chapter No. 10**

### **Member Conduct**

#### **Conduct at Board Meetings:**

Members shall conduct themselves at all times, including at Board meetings with decorum in accordance with the provisions of the Statutory Code and By-Law #PC5-2020, being a By-Law to provide rules governing the proceedings of the Thunder Bay Police Services Board and its Committees.

1. Members shall endeavour to conduct and convey Board business and all their duties in an open and transparent manner (other than for those decisions which by virtue of legislation are authorized to be dealt with in a confidential manner in closed session), and in so doing, allow the public to view the process and rationale which was used to reach decisions and the reasons for taking certain actions.

#### **Commentary**

*Members recognize the importance of cooperation and strive to create an atmosphere during Board meetings that is conducive to solving the issues before it, listening to various points of view and using respectful language and behaviour in relation to all of those in attendance.*

*Various statutes, By-Law PC5-2020 and decisions by courts and quasi-judicial tribunals and the Information and Privacy Commissioner of Ontario, influence when the Board can discuss issues in closed session. Transparency requires that the Board apply these rules appropriately so as to best ensure that deliberations are held and decisions are held made in public session as often as possible.*

*Unless prohibited by law, Members should clearly identify to the public how a decision was reached and the rationale for so doing.*

2. Pursuant to Section 1 of the Statutory Code, Members shall make every effort to participate diligently in the activities of the committees, agencies, boards, commissions and advisory committees to which they are appointed by the Board or by virtue of being an elected official.

#### **Commentary**

*Pursuant to Section 1 of the Statutory Code, Members shall not be absent from Board meetings without reasonable justification (for example, illness of the Member, family circumstance, City of Thunder Bay Council business) for more than three consecutive scheduled meetings or on a regular basis.*

4. Members shall conduct themselves with appropriate decorum at all times.

#### **Commentary**

*Pursuant to Sections 7 & 8 of the Statutory Code, as leaders in the community, Members are held to a higher standard of behaviour and conduct, and accordingly their behaviour should be exemplary.*

## Chapter No. 11

### **Media Communications:**

1. Pursuant to Section 5 of the Statutory Code, no Member of the Board may speak on behalf of the Board without authorization to do so. In any event Members of the Board will accurately communicate the decisions of the Board, even if they disagree with the majority decision of the Board. When a Member expresses disagreement with a Board decision any communication in that regard, pursuant to Section 6 of the Statutory Code, shall clearly indicate that they are conveying their personal opinion only. Respect for the integrity of the Board's decision-making processes is to be conveyed even when a Board Member disagrees with the outcome.
2. Pursuant to Section 4 of the Statutory Code, Members of the Board will keep confidential information confidential, until such time as the matter can properly be made public, if at all.
3. In all media communications, including social media, Members will treat each other, staff and members of the public with decorum, dignity and respect, and shall avoid messaging that amounts to abuse, bullying or intimidation.

### **Commentary**

*Pursuant to Section 6 of the Statutory Code, a Member may state that they did not support a decision, or voted against the decision.*

*A Member must refrain from making disparaging comments about other Members of the Board or about the Board's processes and decisions.*

*When communicating with the media, a Member should at all times refrain from speculating or reflecting upon the motives of other Members in respect of their actions as a Member of the Board.*

*While openness in Board matters is critical, Boards also must respect confidentiality when a matter must remain confidential. Breaches of confidentiality by Members erodes public confidence.*

*While Members are encouraged to actively participate in vigorous debate, Members should understand that they are part of a democratic body and should not engage in social media as if they are outsiders. In this regard, caution should be exercised when blogging, posting, tweeting, re-posting and linking to posts using social media, whether the Member is using a personal account or a Board account.*

*While social media can be an excellent tool for communicating quickly with the public and sharing ideas and obtaining input, social media can breed incivility that generally is avoided in face-to-face interactions. In a world where a transitory comment can become part of the permanent record, Members should exercise restraint in reacting too quickly, or promoting the social media posts of others whose views may be disparaging of the*

*Board's decisions or another Member's perspectives.*

## **Chapter No. 12**

### **Respect for Board By-laws, Policies and Decisions:**

1. Pursuant to Section 13 of the Statutory Code, Members shall encourage public respect for the Board and its by-laws, decisions and the Thunder Bay Police Service.
2. Members shall adhere to such, policies and procedures adopted by the Board that are applicable to them.

#### **Commentary**

*Pursuant to Section 13 of the Statutory Code, a Board Member must not encourage disobedience of a Board decision in responding to a member of the public, as this undermines confidence in the Board and in the Rule of Law.*

## **Chapter No. 13**

### **Respectful Workplace:**

1. Members are governed by the Board's\* Workplace Harassment And Discrimination Policy. All Members have a duty to treat members of the public, one another and staff appropriately and without abuse, bullying or intimidation and to ensure that their work environment is free from discrimination and harassment.
2. All complaints received involving Members of the Board under the Workplace Harassment And Discrimination Policy. shall be referred to the Integrity Commissioner for processing in accordance with both the said policy and the Ethical Framework Complaint Protocol.
3. The *Ontario Human Rights Code* applies in addition to the Board's Workplace Harassment And Discrimination Policy>.

#### **Commentary**

*\*Until such time as the Board has adopted its own policy, the Workplace Harassment And Discrimination Policy of the City of Thunder Bay will apply, with the necessary changes.*

*It is the policy of the Board that all persons be treated fairly in the workplace in an environment free of discrimination or personal and sexual harassment.*

*The Board's Workplace Harassment And Discrimination Policy ensures a safe and respectful workplace environment and provides for the appropriate management of any occurrences of harassment and discrimination as those terms are defined in the policy.*

*The Board's Workplace Harassment And Discrimination applies equally to members of staff and Members of the Board. It will provide guidance to the Integrity*

*Commissioner when a complaint is received involving a Member.*

## Chapter No. 14

### **Conduct Respecting Staff or Members of the Thunder Bay Police Service:**

1. No Member shall attempt to induce Board staff or members of the Police Service to engage in partisan political activities or subject staff or members to threats or discrimination for not engaging in such activities.
2. No Member shall use, or attempt to use, their authority for the purpose of intimidating, threatening, coercing, commanding or influencing any Board staff or members of the Police Service with the intent of interfering in staff's duties, including the duty to disclose improper activity.
3. Members shall be respectful of the role of Board staff to advise based on political neutrality and objectivity and without undue influence from any individual Member or faction of the Board.
4. No Member shall maliciously or falsely impugn or injure the professional or ethical reputation or the prospects or practice of Board staff or members of the Police Service.

### **Commentary**

*Staff serve the Board as a whole, and follow the combined direction of all Members as evidenced through the decisions of the Board. Only the Board as a whole has the authority to approve **budget**, policy, committee processes and other matters.*

*Members of the Board should expect a high quality of advice from staff based on political neutrality and objectivity irrespective of party politics, the loyalty of persons in power, or their personal opinions.*

*Until such time as the Board has adopted its own policy, the Workplace Harassment And Discrimination Policy of the City of Thunder Bay will apply, with the necessary changes, to Members of the Board. Staff and Members of Board are all entitled to be treated with respect and dignity in the workplace.*

*It is inappropriate for a Member to attempt to influence staff to circumvent normal processes in a matter, or overlook deficiencies in a file or application. It is also inappropriate for Members to involve themselves in matters of administration.*

## Chapter No. 15

### **Employment of Board Relatives/Family Members:**

1. Pursuant to Section 11 of the Statutory Code, no Member shall attempt to influence the outcome, or to influence any Board or Thunder Bay Police Service employee to hire or promote a Family Member.
2. No Members shall make any decision or participate in the process to hire,

transfer, promote, demote, discipline or terminate any Family Member.

3. No Member shall supervise a Family Member, or be placed in a position of influence over a Family Member.
4. No Member shall attempt to use a family relationship for his or her personal benefit or gain.

Commentary

Pursuant to Section 11 of the Statutory Code, if a Family Member of a Board Member is an applicant for employment with the Board or police force or is a candidate for promotion or transfer, the Family Member will proceed through the usual selection process pursuant to the Board or police force's hiring policies, with no special consideration.

## Chapter No. 16

### Not Undermine, Work Against the Board's Decisions:

1. In carrying out their obligations under Section 2 of the Statutory Code, Members of the Board shall not actively undermine the implementation of the Board's decisions.

#### Commentary

*The role of Board Members, once a Board decision is made, is to support the implementation of that decision, not to work against its implementation, publicly or behind the scenes. Board decisions are arrived at following discussion and debate, reflecting the democratic process. Members are expected to engage in debate with their fellow Board Members through the democratic process of government. However, once the Board has made its decision, Members must recognize that decision as the duly-considered decision of the Board. As Members of that Board, individual Members – those who did not agree with the decision - are not to engage in activities that seek to challenge or undermine that decision.*

*Pursuant to Section 13 of the Statutory Code, Members can express disagreement with the Board's decisions, but it is contrary to the ethical behaviour of Members of the Board to actively seek to undermine, challenge or work against the Board's decisions.*

2. Members of the Board shall not engage in litigation or other legal challenges against the Board's decisions. Despite this provision,
- a. Members may pursue a complaint or request for investigation under any of the oversight, transparency and accountability mechanisms provided under the *Police Services Act*.
  - b. Members may pursue a complaint or request for investigation under a statutory scheme dealing with access to information, the protection of privacy, or the protection of human rights;
  - c. Members are not restricted from participating in litigation or other legal challenges if they are uniquely impacted by the decision, such as when the Board has imposed a penalty or reprimand following a report of the integrity commissioner;
  - d. Members are not restricted from participating in litigation or other legal challenges if they did not participate, and were not entitled to participate, in the deliberations and respective decision of the Board, or in regard to which the Board has made a decision in regard to their interests, in circumstances where they are uniquely impacted by the decision.

#### Commentary

*When Members are allowed to participate in activities to challenge the Board's properly*

*considered decisions, such as legal challenges or other forms of litigation, this is contrary to the interests of the Board. It can create challenges to staff as to when and how much information can be provided to the Board (legal advice for example) because of the presence of a possible legal challenge, which may benefit by 'insider knowledge'.*

3. Despite this Rule, Members of the Board may seek to have a Board decision reconsidered in accordance with Board's procedural processes.

## **Chapter No. 17**

### **Reprisals and Obstruction:**

1. It is a violation of the *Ethical Framework* to obstruct the Integrity Commissioner in the carrying out their responsibilities.
2. No Member shall threaten or undertake any active reprisal against a person initiating an inquiry or complaint under the *Ethical Framework*, or against a person who provides information to the Integrity Commissioner in any investigation.
3. It is a violation of the *Ethical Framework* to destroy documents or erase electronic communications or refuse to respond to the Integrity Commissioner where a formal complaint has been lodged under the *Ethical Framework*.

## **Chapter No. 18**

### **Acting on Advice of Integrity Commissioner:**

1. Any written advice given by the Integrity Commissioner to a Member binds the Integrity Commissioner in any subsequent consideration of the conduct of the Member in the same matter, as long as all the relevant facts were disclosed to the Integrity Commissioner, and the Member adhered to the advice given.

## **Chapter No. 19**

### **Implementation:**

1. To be discussed.

Commentary:

To be discussed

**THUNDER BAY POLICE SERVICES BOARD  
ETHICAL FRAMEWORK  
COMPLAINT PROTOCOL**

**PART A: INFORMAL COMPLAINT PROCEDURE**

Any person, or representative of an organization, who has identified or witnessed behaviour or an activity by a Member of the Board that they believe is in contravention of the Ethical Framework may wish to address the prohibited behaviour or activity themselves as follows:

- (1) advise the Member that the behaviour or activity contravenes the Ethical Framework;
- (2) encourage the Member to stop the prohibited behaviour or activity;
- (3) keep a written record of the incidents including dates, times, locations, other persons present, and any other relevant information;
- (4) if applicable, confirm to the Member satisfaction with the response of the Member; or, if applicable, advise the Member of dissatisfaction with the response; and
- (5) consider the need to pursue the matter in accordance with the formal complaint procedure outlined in Part B, or in accordance with another applicable judicial or quasi-judicial process or complaint procedure.

All persons and organizations are encouraged to initially pursue this informal complaint procedure as a means of stopping and remedying a behaviour or activity that is prohibited by the Ethical Framework. With the consent of the complaining individual or organization and the Member, the Integrity Commissioner may be part of any informal process. However, it is not a precondition or a prerequisite that those complaining must pursue the informal complaint procedure before pursuing the Formal Complaint Procedure in Part B.

**PART B: FORMAL COMPLAINT PROCEDURE:**

**Initial Complaint**

1. (1) A request for an investigation of a complaint that a Member has contravened the Ethical Framework (the "complaint") shall be sent directly to the Integrity Commissioner by E-mail substantially in the form attached to this Protocol as Schedule "A".
- (2) All complaints shall be submitted by an identifiable individual (which includes the authorized signing officer of an organization).
- (3) A complaint shall set out reasonable and probable grounds for the

allegation that the Member has contravened the Ethical Framework.

The complaint should include the name of the Member, the provision of the Ethical Framework allegedly contravened, facts constituting the alleged contravention, the names and contact information of witnesses, and contact information for the complainant during normal business hours.

### **Classification by Integrity Commissioner**

2. (1) Upon receipt of the request, the Integrity Commissioner shall make an initial classification to determine if the matter is, on its face, a complaint with respect to non-compliance with the Ethical Framework and not covered by other legislation, a complaint with respect to the *Municipal Conflict of Interest Act*, or other relevant Board policies.
- (2) If the complaint, on its face, is not a complaint with respect to non-compliance with the Ethical Framework or another Board policy governing ethical behaviour or the *Municipal Conflict of Interest Act*, or if the complaint is covered by other legislation, the Integrity Commissioner shall advise the complainant in writing as follows:
  - (a) if the complaint on its face is an allegation of a criminal nature consistent with the *Criminal Code of Canada*, the complainant shall be advised that if the complainant wishes to pursue any such allegation, the complainant must pursue it with the appropriate police force;
  - (b) if the complaint on its face is with respect to non-compliance with the *Municipal Freedom of Information and Protection of Privacy Act*, the complainant shall be advised that the matter will be referred for review to the Board Secretary; and
  - (c) the complainant shall be advised that the matter, or part of the matter, is not within the jurisdiction of the Integrity Commissioner to process, with any additional reasons and referrals as the Integrity Commissioner considers appropriate. The Integrity Commissioner may proceed with that part of the complaint that

is within jurisdiction.

- (3) The Integrity Commissioner may assist the complainant in restating, narrowing or clarifying the complaint so that the public interest will be best served were the complaint to be pursued.
- (4) The Integrity Commissioner may report to the Board that a specific complaint is not within the jurisdiction of the Integrity Commissioner.

## **Investigation**

3. (1) The Integrity Commissioner is responsible for performing the duties set out in this Protocol independently and shall report directly to the Board in respect of all such matters. In applying this Protocol, the Integrity Commissioner shall retain the discretion to conduct investigations applying the principles of procedural fairness, and any deviation from the provisions of this Protocol for that purpose shall not invalidate the investigation or result in the Integrity Commissioner losing jurisdiction.
  - (2) If the Integrity Commissioner is of the opinion that a complaint is frivolous, vexatious or not made in good faith, or that there are no grounds or insufficient grounds for an investigation, or that the pursuit of the investigation would not, in the opinion of the Integrity Commissioner, be in the public interest, the Integrity Commissioner shall not conduct an investigation, or, where that becomes apparent in the course of an investigation, terminate the investigation.
  - (3) The Integrity Commissioner shall file a periodic report to the Board, no more frequently than annually, respecting the advice, education and investigations carried out in the previous period, and developments or recommendations of significance related to the role of the Integrity Commissioner. Other than in exceptional circumstances, the Integrity Commissioner will not report to the Board on any complaint described in subsection (2) except as part of an annual or other periodic report.
  - (4) Where the Integrity Commissioner rejects or terminates an investigation pursuant to this section, reasons shall be provided.
4. (1) If a complaint has been classified as being within the Integrity Commissioner's jurisdiction and not rejected under section 3, the Integrity Commissioner shall investigate and may attempt to settle or resolve the complaint.
5. (1) The Integrity Commissioner will proceed as follows, except where otherwise required in the context of a particular situation, the principles of procedural fairness:

- (a) provide the complaint and supporting material (or at the Integrity Commissioner's discretion, a summary or clarification of the complaint and supporting material that accurately reflects the nature and content of the matter to be investigated) to the Member whose conduct is in question (the 'Respondent') and provide the Member with a reasonable opportunity to respond.
  - (b) Conduct an unbiased investigation so as to establish findings on the balance of probabilities whether the allegations in the complaint are substantiated
  - (c) Provide the Respondent a report containing the Integrity Commissioner's draft findings, providing a reasonable period of time for the Respondent's review and reply
  - (d) Consider the reply submissions of the Respondent, if any, and then provide a Recommendations Report to the Board (should the Integrity Commissioner continue to conclude that an ethical standard has been breached) containing sufficient background information to support the Integrity Commissioner's findings, the findings and the reasons for them, and any recommendations and concluding remarks that may be appropriate.
- (2) Except where the Integrity Commissioner determines that it is not in the public interest to do so, the name of the complainant shall be provided as part of the complaint documents.
  - (3) If necessary, after reviewing the written materials, the Integrity Commissioner may speak to anyone relevant to the complaint, access and examine any document or information in the possession of the Board, and may enter any Board work location relevant to the complaint for the purposes of investigation and settlement.
  - (4) The Integrity Commissioner shall not issue a report finding a violation of the Ethical Framework on the part of any Member unless the Member has had reasonable notice of the basis for and an opportunity to comment on the proposed findings.
  - (5) The Integrity Commissioner may make interim reports to the Board where necessary and as required to address any instances of interference, obstruction or retaliation encountered during the investigation.
- 6. (1) The Integrity Commissioner shall report to the complainant and the Member generally no later than 90 days after the making of the complaint.
  - (2) Where the complaint is sustained in whole or in part, the Integrity Commissioner shall also report to the Board outlining the findings, the terms of any settlement, or recommended corrective action.
  - (3) Where the complaint is dismissed, other than in exceptional circumstances, the Integrity Commissioner shall not report to the Board

except as part of an annual or other periodic report.

- (4) Any recommended corrective action must be permitted in law and shall be designed to ensure that the inappropriate behaviour or activity does not continue.
7. If the Integrity Commissioner determines that there has been no contravention of the Ethical Framework or that a contravention occurred although the Member took all reasonable measures to prevent it, or that a contravention occurred that was trivial or committed through inadvertence or an error of judgement made in good faith, the Integrity Commissioner may so state in a report but shall recommend that no penalty be imposed.
8. The Secretary to the Board shall process the report for the next meeting of the Board.

### **Board Review**

9. (1) The Board shall consider and respond to the report using its normal procedures for the consideration of Board items.
- (2) In responding to the report, the Board may vary a recommendation that imposes a penalty but shall not refer the recommendation other than back to the Integrity Commissioner.
- (3) The Board can terminate the Integrity Commissioner only by a two-thirds vote of all Members. A motion to terminate the Integrity Commissioner at the same meeting a Recommendation Report is considered will not be in order.
- (4) Upon receipt of recommendations from the Integrity Commissioner, the Board may, in circumstances where the Integrity Commissioner has determined there has been a violation of the Ethical Framework, impose the following penalty:
  - (a) require the Member to appear before the board and be reprimanded;and may also take the following actions:
  - (b) request that the Ministry of Community Safety and Correctional Services conduct an investigation into the Member's conduct;
  - (c) request that the Commission conduct an investigation into the Member's conduct under section 25 of the Act.

### **Confidentiality**

- (2) The Integrity Commissioner and every person acting under her or his instructions shall preserve secrecy with respect to all matters that come to his or her knowledge in the course of any investigation except as required by law in a criminal proceeding.
- (3) All reports from the Integrity Commissioner to the Board will be made available to the public and debated in public session, except to the extent meeting in the absence of the public is permitted and required.
- (4) Any references by the Integrity Commissioner in an annual or other periodic report to a complaint or an investigation shall not disclose confidential information that could identify a person concerned.
- (5) The Integrity Commissioner in a report to the Board on whether a Member has violated the Ethical Framework shall only disclose such matters as in the Integrity Commissioner's opinion are necessary for the purposes of the report.

**Schedule  
"A"  
Complaint**

I \_\_\_\_\_ hereby request the Integrity Commissioner for the Thunder Bay Police Services Board to conduct an inquiry about whether or not the following member(s) of the Thunder Bay Police Services Board has/have contravened the Thunder Bay Police Services Board Ethical Framework, Ontario Regulation 421/97, Members of Police Services Boards - Code of Conduct or the *Municipal Conflict of Interest Act*.

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I have reasonable and probable grounds to believe that the above member(s) has/have contravened the Thunder Bay Police Services Board Ethical Framework, Ontario Regulation 421/97, Members of Police Services Boards – Code of Conduct and/or the *Municipal Conflict of Interest Act* by reason of the following (please include date, time and location of conduct, the Chapters contravened, and particulars, including names of all persons involved, and of all witnesses, and information as to how they can be reached, (attach additional pages as needed):

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I hereby request the Integrity Commissioner to conduct an inquiry with respect to the above conduct. Attached are copies of documents and records relevant to the requested inquiry.

Date:  
Signature: \_\_\_\_\_

Name:  
Address:

Email:  
Phone:

Email completed Complaint to Principles *Integrity* at:  
<mailto:postoffice@principlesintegrity.org>

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