

Principles
Integrity

Presented to Committee of the Whole
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Integrity Commissioner Recommendation Report
Respecting Complaint Involving Deputy Mayor John O'Donnell
Committee of the Whole
July 16, 2018

Introductory Comments

- [1] Principles *Integrity* was appointed the Integrity Commissioner for the Township of Ramara on May 28, 2018 by the adoption of By-law Number 2018.37. We are also privileged to serve as Integrity Commissioner for a number of Ontario municipalities. The operating philosophy which guides us in our work with all of our client municipalities is this:

The perception that a community's elected representatives are operating with integrity is the glue which sustains local democracy. We live in a time when citizens are skeptical of their elected representatives at all levels. The overarching objective in appointing an integrity commissioner is to ensure the existence of robust and effective policies, procedures, and mechanisms that enhance the citizen's perception that their Council (and local boards) meet established ethical standards and where they do not, there exists a review mechanism that serves the public interest.

- [2] The Township of Ramara has as part of its ethical framework a Code of Conduct which is the policy touchstone underlying the assessments conducted in this report. It represents the standard of conduct against which all members of Council are to be measured when there is an allegation of breach of the ethical responsibilities established under the Code of Conduct. The review mechanism contemplated by the Code, one which will soon be required in all Ontario municipalities, is an inquiry/complaints process administered by an integrity commissioner.
- [3] Integrity commissioners carry out a range of functions for municipalities (and their local boards). They assist in the development of the ethical framework, for example by suggesting content or commentary for codes of conduct. They conduct education and training for members of council and outreach for members of the community. One of the most important functions is the provision of advice and guidance to members to help sort out ethical grey areas or to confirm activities that support compliance. And finally, but not principally, they investigate allegations that a person has fallen short of compliance with the municipality's ethical framework and where appropriate they submit public reports on their findings, and make recommendations, including recommending sanctions, that council for the municipality may consider imposing in giving consideration to that report.

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- [4] It is important that this broad range of functions be mentioned at the outset of this investigation report. Our goal, as stated in our operating philosophy, is to help members of the Ramara Township community, indeed the broader municipal sector and the public, to appreciate that elected and appointed representatives generally carry out their functions with integrity. In cases where they do not, there is a proper process in place to fairly assess the facts and, if necessary, recommend appropriate sanctions. In every case, including this one, the highest objective is to make recommendations that serve the public interest, if there are recommendations to be made.
- [5] Our role differs from other ‘adjudicators’ whose responsibilities generally focus, to state it colloquially, on making findings of fact and fault. While that is a necessary component when allegations are made, it is not the only component.
- [6] Our operating philosophy dictates the format of this report. The tenets of procedural fairness require us to provide reasons for our conclusions and recommendations, and we have done that. Procedural fairness also requires us to conduct a process where all parties can adequately participate in the review and resolution of a complaint. This we have done by describing to the respondent the nature of the ‘case’ being presented against him, giving him adequate guidance and opportunity to reply, and assessing the information that is presented to us in a fair, independent and neutral manner.

The Complaints

- [7] On June 19, 2018 the Chief Administrative Officer (‘CAO’) of the Township of Ramara, Janice McKinnon, filed a complaint (the ‘Complaint’) with Principles *Integrity*. The Complaint indicated that Ms McKinnon had reasonable and probable grounds to believe that John O’Donnell, the Deputy Mayor of the Township of Ramara, had breached the Town’s Code of Conduct.
- [8] The Complaint consisted of six separate components, involving a number of Code of Conduct provisions. For ease of reference, the allegations, and the corresponding Code of Conduct provisions, are set out in Table 1 below:

Table 1

No.	Allegation	Code Ref.	Code Text
1	Over the past several months, Deputy Mayor John O’Donnell has repeatedly disregarded Council direction to follow the Code of Conduct. At the April 9, 2018 Council meeting, the Mayor clarified to all members of Council that the Council Code of Conduct required members of Council to contact the	19.4	Inquiries of staff from Members should be directed to the Chief Administrative Officer or the appropriate senior Managers as directed by the Chief Administrative Officer

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No.	Allegation	Code Ref.	Code Text
	CAO to seek permission to speak to any staff members.		
2	Some members contacted me to request to speak to a Manager on various occasions. However, Deputy Mayor John O'Donnell has never requested permission but continues to speak to staff. On May 28, 2018 at a Council meeting, at approximately 10:40 p.m. Deputy Mayor John O'Donnell advised that he had been speaking with [redacted], Manager of Environmental Services. I asked if he had been given permission to speak with him and he said "no". The Mayor advised him that he is to ask permission of the CAO, at which Deputy Mayor John O'Donnell, said "Oh Jesus Christ".	5.3	Members will conduct their dealings with each other in ways that maintain public confidence in the office to which they have been elected, are open and honest, focus on issues rather than personalities, and shall avoid aggressive, offensive or abusive conduct.
3	On June 6, 2018, Deputy Mayor John O'Donnell, phoned and left a message for [redacted] indicating that he wanted [redacted] to put an e-mail that he received on the Agenda. Again, he had not requested permission to speak to her, nor does [redacted] have anything to do with placing matters on a Council agenda.	19.4	Inquiries of staff from Members should be directed to the Chief Administrative Officer or the appropriate senior Managers as directed by the Chief Administrative Officer
4	On Friday, June 15, 2018, Deputy Mayor John O'Donnell called [redacted], Manager of Treasury Services and asked her when the auditors would be coming to Council. Again, he did not seek permission to speak to her.	19.4	Inquiries of staff from Members should be directed to the Chief Administrative Officer or the appropriate senior Managers as directed by the Chief Administrative Officer.
5	On Monday, June 18, 2018, during a Committee of the Whole meeting, when Deputy Mayor John O'Donnell referenced a matter related to the Environmental Services, he was asked who he had been talking to and he commented "I can't remember"!		

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No.	Allegation	Code Ref.	Code Text
6	On Monday, June 18, 2018, at approximately 3:24 p.m. Deputy Mayor John O'Donnell called and left a message on Chris Robinson, Building Inspector/Bylaw Enforcement Officer's phone, requesting a call back or to look at [address] regarding a fence that is encroaching on public property. He was calling from a resident's phone, Mr. [redacted] of [redacted]. Deputy Mayor John O'Donnell did not hang up the phone properly and the recording goes on with him commenting that he has to receive permission from the (expletive) CAO, and that he has received (expletive) at the last two meetings because he didn't and that he will talk to whoever he (expletive) wants to. The person agreed with him and the recording stopped. The original voice message is saved on Chris Robinson's phone.	5.5	Members shall perform official duties and arrange their public affairs in a temperate and abstemious manner that promotes public confidence and respect and will bear close public scrutiny.
		5.6	shall be the duty of all Members to abide by all applicable legislation, policies and procedures pertaining to their position as a Member.
		5.13 c) & e)	Members of Council: c) Must uphold the law and conduct themselves with the highest degree of ethical behaviour and integrity e) Must seek to advance the public interest with honesty and treat members of the public and staff with dignity, understanding and respect
		19.1	Mutual respect and cooperation are required to achieve the Council's corporate goals and implement the Council's strategic priorities through the work of staff.
		19.3	Under the direction of senior municipal administration, and in accordance with the decisions of Council, employees serve the municipal corporation as a whole. Council directs staff through its decisions as recorded in the minutes and resolutions of Council. Members have no individual capacity to direct members of staff to carry out particular functions.
		19.4	Inquiries of staff from Members should be directed to the Chief Administrative Officer or the appropriate senior Managers as directed by the Chief Administrative Officer.
		19.5	Only Council as a whole and no single member including the Mayor has the authority to direct staff, approve budget, policy, committee processes and other such matters, unless specifically authorized by Council.
19.6	Members shall be respectful of the role of staff to advise based on		

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		<p>political neutrality and objectivity and without undue influence from any individual member or faction of the Council. Accordingly, no member shall maliciously or falsely injure the professional or ethical reputation, or the prospects or practice of staff, and all members shall show respect for the professional capacities of the staff of the Township.</p>
	20.6	<p>Without limiting the generality of the foregoing, Members shall not:</p> <ul style="list-style-type: none"> a) Speak in a manner that is discriminatory to any individual, based on that person's race, ancestry, place of origin, creed, gender, sexual orientation, age, colour, marital status, or disability. b) Make indecent, abusive, insulting or inappropriate comments or gestures to or about an individual where such conduct is known or ought reasonably to be known to be offensive to the person(s) to whom they are directed or are about; c) Display materials or transmit communications that are inappropriate, offensive, insulting or derogatory;

[9] As required by the Code we provided a copy of the Complaint to the Deputy Mayor, and provided him with fourteen days to submit a written reply. Also as required, the response of the Deputy Mayor was provided to the CAO, the Complainant, who in turn was requested to submit a reply which she did on July 5th.

[10] Given the approach of Nomination Day, marking the time at which the Integrity Commissioner must hold reports stemming from investigations until the new term of Council, the timeliness of the parties in providing their respective responses was appreciated.

Process Followed for this Investigation

[11] In conducting this investigation, Principles *Integrity* applied the principles of procedural fairness and was guided by the complaint process set out under the Code of Conduct.

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[12] This fair and balanced process includes the following elements:

- Reviewing the complaint to determine whether it is within scope and jurisdiction and in the public interest to pursue, including giving consideration to whether the complaint should be restated or narrowed, where this better reflects the public interest
- Notifying the Respondent of the complaints, providing adequate disclosure of the information we possessed so that he could prepare a response, and seeking his response
- Reviewing the Code of Conduct
- Conducting interviews of persons with information relevant to the Complaint, including the Complainant Janice McKinnon and the Respondent John O'Donnell

Analysis of Complaints:

The Specifics of the Applicable Code of Conduct Provisions, and their Interpretation:

[13] The Code of Conduct (the 'Code') for Members of the Council of the Township of Ramara was enacted/adopted on November 28, 2011 and is the standard against which the complaints have been assessed.

[14] The stated purpose and intent of the Code is to:

[E]stablish standards of conduct for Members of Council, Local Boards and Committee Members in the individual conduct of their official duties.

The Code represents the general standards. The Code does not replace the Member's roles, responsibilities, actions and behaviours required by various statutes, by-laws and policies.

[15] The Code also contains a Statement of Principle:

A written Code of Conduct helps to ensure that the members of Council, Local Boards and Committees share a common basis of acceptable conduct. These standards are designed to supplement the legislative parameters within which the members must operate. These standards are intended to enhance public confidence that the Township of Ramara's elected and appointed officials operate from a basis of integrity, justice and courtesy.

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- [16] As is noted in section 5.13 c) of the Code, Members of Council must ... “conduct themselves with the highest degree of ethical behaviour and integrity”.
- [17] The Code intentionally sets a very high standard for Members of Council to follow.
- [18] In analyzing the Complaint, its contents fall into two categories.
- [19] First, there is the assertion that Deputy Mayor O'Donnell failed to adhere to a Code of Conduct provision that speaks to how Members of Council are to make inquiries of staff (referencing s. 19.4 of the Code, which states that “Inquiries of staff from Members should be directed to the Chief Administrative Officer or the appropriate senior Managers as directed by the Chief Administrative Officer.”). In this regard, s. 5.6 of the Code, which requires Members to abide by all applicable legislation, policies and procedures pertaining to their position of Member is relevant, as are ss. 19.3 and 19.5, which broadly speaking address the role and authority of Councillors, Council and staff. We call these components of the Complaint the “**Staff Contact Issue**”.
- [20] Second, there is the assertion that Deputy Mayor was flagrantly disrespectful of the role of staff. This is best represented by the provisions of s. 19.6 of the Code, which includes the statement that “no member shall maliciously or falsely injure the professional or ethical reputation, or the prospects or practice of staff, and all members shall show respect for the professional capacities of the staff of the Township. The assertion can be blended with the assertion that Deputy Mayor O'Donnell conducted himself in a discreditable manner with respect to the sixth element of the Complaint (the voicemail message left on the Building Inspector/By-law Enforcement Officer's office phone). In this regard the Code provisions referenced in the table above are relevant, some of which are paraphrased here:

Members must:

- be temperate, and perform their duties in a manner that promoted public confidence and respect (s. 5.5)
- conduct themselves with the highest degree of ethical behaviour and integrity, and treat members of the public and staff with dignity, understanding and respect (s. 5.13 c) & e))
- not make indecent, abusive, insulting or inappropriate comments about an individual where such conduct is known or ought reasonably be known to be offensive to the subject person (20.6 b))

- [21] We call the second component of the Complaint the “**Civility Issue**”.

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Preliminary Determination to Narrow the Complaint:

- [22] As noted in the introductory comments to this report, the public interest is an important guidepost to how we conduct our work as integrity commissioners. For example we state in paragraph [4] that “In every case, including this one, the highest objective is to make recommendations that serve the public interest, if there are recommendations to be made.”
- [23] In assessing the evidence encountered during the course of our investigation, we are mindful that recent amendments to the *Municipal Act* to come into force in March of 2019 include a new requirement for municipalities to have a policy on the relationship between members of council and the officers and employees of the municipality.
- [24] The **Staff Contact Issue** is at its core an aspect of the relationship between Council Members and Staff, in this case between the Deputy Mayor and the CAO, and between the Deputy Mayor and staff generally.
- [25] Having heard from both parties and others, we have observed that the deficiencies in these relationships are real, substantive and enduring. By making the preliminary decision about to be recited, we do not in any way wish to be seen to diminish the importance of frictions which develop between Members and Staff, nor in particular the need for Members of Council to stay within the parameters of their dual statutory responsibilities to represent citizens and lead the municipality, rather than administer municipal functions and services.
- [26] On the contrary, we are able to note that deficiencies in Council-Staff relationships are unfortunately far too evident in Ontario municipalities. The subject is of such importance that the province, through Bill 68, has chosen to make it the subject of one of the policies all municipalities will be mandated to adopt and implement.
- [27] In the Township of Ramara, the issue is of such significance that a provision has been included in the Code of Conduct in an attempt to deal with the issue.
- [28] We are of the view that Council should address the issues which arise as the element of the Complaint described as the **Staff Contact Issue** and address them fully in the context of the development of the Township’s Council-Staff Relations Policy.
- [29] In making this preliminary decision, we are mindful that:
- The statutory requirement for the policy means that Council cannot avoid discussion of the issues which arise in the **Staff Contact Issue**

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- To pursue the **Staff Contact Issue** fully and fairly in this report would require additional witness interviews and fact-finding, with commensurate delay and expense
- Given the approach of Nomination Day, and noting the rigid time frames set out in the Code of Conduct which have limited the time available to conduct interviews of witnesses and conduct analysis, there is little flexibility in scheduling the production of a more broadly-scoped report.

[30] Accordingly, in this report we will not be pursuing enumerated items 1-5 in the Complaint of the CAO, nor whether Deputy Mayor O'Donnell has breached the provisions of sections 5.6, 19.3, 19.4 and 19.5 of the Code of Conduct.

[31] The presence of those sections in the Code of Conduct will, however, provide background context to our discussion on the **Civility Issue**.

The Civility Issue:

[32] Item 6 in the Complaint references a telephone call Deputy Mayor O'Donnell made from a resident's phone to Chris Robinson, a Township Building Inspector/By-law Enforcement Officer. The call was recorded in Mr. Robinson's voice mail inbox on the Township's phone system at approximately 3:24 p.m. on June 18, 2018.

[33] Chris Robinson is a relatively new employee of the Township, and at the time of the call it appears that Mr. Robinson and the Deputy Mayor had not yet met.

[34] Two voices are heard on the recording. Deputy Mayor O'Donnell's voice is for the most part dominant on the call. The voice of the resident the Deputy Mayor was visiting is heard periodically, and in the background.

[35] The transcript of the entire call is as follows:

John O'Donnell: Chris this is John O'Donnell, I'm down at [location] I've got a complaint from a gentlemen, a gentlemen here [location]. There's a new fence going up and at the back of the property the neighbours feel that its encroaching on public property and ah there's supposed to be, my understanding from the neighbours is that there's supposed to be 33 feet of a right-of-way through there and they're encroaching on that. Ah they've got the posts in the ground they're still working on the crossers so this needs to be looked at fairly shortly. So, ah, give me a shout back would ya please or if you could look at this? My name is John O'Donnell [number] and my cell is [number]. Thank you.

Resident (in background): Thank you John

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John O'Donnell: so we'll leave that [inaudible]...

John O'Donnell: Oh I get shit all the time. [voice raises in pitch; mocking tone] 'Oh god no I can't phone the by-law officer.' 'I got to phone I gotta get permission to talk to the (pause) bitchin CAO first!' [normal voice] Go to hell.

Resident: (brief laughter)

John O'Donnell: The last two meetings I've got shit for talking to somebody without going through her.

Resident: Oh

John O'Donnell: ...talk to whoever I feel like whenever I feel like it.

Resident: Absolutely

Call ends at 2:00 minute mark.

- [36] Having already decided not to pursue the applicability of s. 19.4 of the Code (the provision stating that inquiries from Members should be directed to the CAO), whether or not the purpose of Deputy Mayor's call to the Building Inspector/By-law Enforcement Officer Mr. Robinson is compliant with the Code of Conduct is not a matter to be addressed at this time.
- [37] The recorded call is, however, irrefutable evidence of non-compliance with the Code insofar as the Code requires that Members conduct themselves with civility in the course of their duties.
- [38] The words spoken by the Deputy Mayor, in the presence of a member of the public, were disparaging, profane and insulting.
- [39] The message conveyed by the Deputy Mayor to the resident is that it is OK to blatantly disregard Council policy, and that it is OK to undermine the authority of Township staff in the most coarse terms.
- [40] In particular, we make the following findings with respect to the Deputy Mayor's behaviour as evidenced by the recording with respect to the Code provisions identified by the CAO under item 6 of the Complaint, with the exception of those which have already been disposed of in our preliminary decision.
- [41] The disparaging content and profane language of the voice message violated Code provisions as shown in Table 2:

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Table 2

<p>S. 5.5 Members shall perform official duties and arrange their public affairs in a temperate and abstemious manner that promotes public confidence and respect and will bear close public scrutiny.</p>	<p>The language used by the Deputy Mayor was rude, disparaging and profane and not at all temperate. The call failed to promote respect for both the CAO and for Township policies. We also find that a fully informed reasonable person would if asked to scrutinize the Deputy Mayor's behaviour during the call find that the standards set out in the Code for the Member in that regard have been breached by the words and sentiments used.</p>
<p>S. 5.13 Members of Council: c) Must uphold the law and conduct themselves with the highest degree of ethical behaviour and integrity e) Must seek to advance the public interest with honesty and treat members of the public and staff with dignity, understanding and respect</p>	<p>The overt discard of the Council policy and the disparaging tone of the comments made respecting the CAO do not meet the high ethical standards imposed on Members by the Code of Conduct.</p> <p>Similarly, the Deputy Mayor's disrespectful and profane references to the CAO demonstrated a lack of dignity and respect.</p>
<p>S. 19.1 Mutual respect and cooperation are required to achieve the Council's corporate goals and implement the Council's strategic priorities through the work of staff.</p>	<p>While the disparagement and disrespect evidenced in the phone message was mostly directed to the CAO, to undermine respect for and the authority of the CAO is to do the same for subordinate staff. The need for Council/Staff cooperation to implement Council's strategic priorities highlights the negative effect uncivil behaviour can have on the fostering of cooperative relationships.</p>
<p>S. 19.6 Members shall be respectful of the role of staff to advise based on political neutrality and objectivity and without undue influence from any individual member or faction of the Council. Accordingly, no member shall maliciously or falsely injure the professional or ethical reputation, or the prospects or practice of staff, and all members shall show respect for the professional capacities of the staff of the Township.</p>	<p>The disparaging words directed toward the CAO were in the circumstances malicious and injurious to the professional reputation of the CAO, and failed to show respect for the professional capacities of the CAO and the staff of the Township.</p>

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<p>S. 20.6 Without limiting the generality of the foregoing, Members shall not:</p> <p>a) Speak in a manner that is discriminatory to any individual, based on that person's race, ancestry, place of origin, creed, gender, sexual orientation, age, colour, marital status, or disability.</p> <p>b) Make indecent, abusive, insulting or inappropriate comments or gestures to or about an individual where such conduct is known or ought reasonably to be known to be offensive to the person(s) to whom they are directed or are about;</p> <p>c) Display materials or transmit communications that are inappropriate, offensive, insulting or derogatory;</p>	<p>Of the three enumerated provisions in s. 20.6, the evidence shows that the language used in the phone message was abusive, insulting and inappropriate, and was found to be offensive by the CAO, contrary to s. 20.6 b).</p> <p>Further, the communication was inappropriate, offensive, insulting and derogatory, in contravention of s. 20.6 c).</p>
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Concluding Remarks and Recommendations

- [42] As noted at the outset, we see as our highest objective in concluding an investigation to be the making of recommendations that serve the public interest.
- [43] An Integrity Commissioner's investigation report is not simply the conclusion of a technical exercise to determine whether there has been a breach of codified standards of behaviour. This report is not simply the sum total of analysis of fact and law. We are not simply assigned the duty of bringing adjudication to grievances between individuals.
- [44] The proper function of an integrity commissioner's report is to illustrate, if there have been transgressions, where the behaviour of elected officials has fallen below the accepted standard. The integrity commissioner is required to administer a fair process to draw findings from relevant evidence, to articulate clearly how the findings and evidence relate to the public interest, and to act as a proxy for the 'Reasonable Person' to conclude whether the community's standards have been breached and if so, to recommend what should be done about it. The integrity commissioner is not simply in place to find fault (or to find

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that there has been no fault). The role is as much about education as it is about adjudication, so that municipal government can function better, and that members of the public are able to gain confidence that their municipal council is operating with integrity.

- [45] The integrity commissioner may recommend that certain sanctions be imposed when a complaint has been sustained. The purpose of a sanction is to reinforce Council's ethical framework. In other words, the Code of Conduct must have 'teeth'.
- [46] Not every circumstance of a sustained complaint results in a recommendation of a sanction.
- [47] In this instance, there was evidence, including evidence not cited in this report, that demonstrates the strong need for the Township to consider and develop an appropriate policy to govern Council-Staff Relations. This should be made a priority for Council so that the policy can be put in place prior to the March 1, 2019 deadline mandated by the *Municipal Act*.
- [48] After reviewing the relevant evidence available to us, we made the findings set out in Table 2 of this report.
- [49] To the extent that the CAO's complaints have been sustained as set out in this report, we invite the Deputy Mayor to acknowledge the impact his words and actions have had on Township staff, particularly Ms McKinnon, the CAO.

Recommendations:

- [50] Our decision not to make findings on breach of section 19.4 and related provisions in the Code of Conduct should not be taken as leniency or a signal that our investigation made overt findings that the provisions had not been breached. Rather, we recommend that in the circumstances the most positive way for the issue to be addressed is in the context of the development of a Council-Staff Relations Policy for the Township.
- [51] As is stated in the Statement of Principles set out in the Code, the Code's standards:

are intended to enhance public confidence that the Township of Ramara's elected and appointed officials operate from a basis of integrity, justice and courtesy.
- [52] In the instances described in this report we have found the Deputy Mayor to have fallen below the standard demanded of him.
- [53] What then, is the appropriate remedy?

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[54] A monetary penalty, although not remedial, can serve as a deterrent. In this regard, we would admonish the Deputy Mayor to be more mindful of intemperate and offensive comments in future.

[55] A penalty is warranted to clearly send the message that the Deputy Mayor's discourteous behaviour falls below the standard expected of the community's elected representatives.

[56] With the prospect of an improved relationship between Council and Staff through the development of a Council-Staff Relations Policy, the pay suspension recommended to be imposed in the current circumstances is at the lesser end of the scale of possible monetary sanctions.

[57] Given the irrefutable breach of conduct as evidenced by the telephone recording, the cavalier approach the Deputy Mayor demonstrated with respect to Township policy, and the offence rightfully taken by the CAO in response to the Deputy Mayor's choice of language, our findings call for a remedy beyond an official reprimand. In this case we recommend a 5-day suspension of pay.

[58] We therefore recommend:

1. That Council receive this report for information, and that it be posted on the Township of Ramara's web site for public access;
2. That Council pass the following resolution:

That having been found to have breached the Code of Conduct for Members of the Council of the Township of Ramara, the remuneration paid by the Township to Deputy Mayor John O'Donnell be suspended for a period of five days commencing with his next pay period; and

3. That Council and Staff proceed expeditiously in developing and implementing a Council-Staff Relations Policy.

We wish to conclude by publicly thanking the CAO, the Deputy Mayor and everyone else who was asked to participate in our investigation. We express genuine appreciation for the sharing of time, knowledge and opinions by everyone concerned. Our task would have been much more difficult had there been a reluctance to contribute.

We will be pleased to be in attendance when this report is considered to answer any questions you may have relating to its contents.