The Honourable Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Sent by email

October 3, 2025

Dear Minister Flack,

On behalf of the **Association of Municipal Managers, Clerks and Treasurers of Ontario (AMCTO)** and the **Association of Ontario Road Supervisors (AORS)**, we wish to thank you for introducing and advancing **Bill 9, An Act to amend the City of Toronto Act, 2006 and the Municipal Act, 2001 in relation to codes of conduct**. We appreciate the Province's recognition that municipal elected officials must be held to the highest standards of conduct and that municipal staff deserve workplaces free from harassment and abuse.

While we strongly support the intent of Bill 9, we remain concerned that, as currently drafted, it does not yet provide sufficient protections for municipal employees. In particular, municipal staff continue to lack the same rights afforded to other workers in Ontario, leaving them vulnerable to workplace harassment and retaliation without meaningful recourse.

As AMCTO highlighted in its submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy, and as AORS reinforced during its deputation, we respectfully urge you to consider the following amendments:

1. **Whistleblower Protection** – Staff who report misconduct must be able to do so without fear of reprisal, job loss, or further harassment.
2. **Independent Oversight** – Establish a **provincial Integrity Commissioner panel** to adjudicate egregious cases, ensuring consistency, fairness, and independence from local political pressures.
3. **Threshold for Removal** – If Council is to retain authority, the current requirement for *unanimous support* should be replaced with a more reasonable **two-thirds majority**.
4. **Workplace Discrimination** – Explicitly include discrimination as a Code of Conduct violation, recognizing it as a form of abuse.
5. **Proportional Penalties** – Expand available sanctions to include a more progressive range, including suspension, removal for egregious acts, and ineligibility to re-run for **two terms**, with mandatory disclosure of past removal when seeking office.

6. **Automatic Leave for Criminal Charges** – Any member of council charged with assault should be placed on leave until their case is resolved, and if convicted, be automatically removed from office.
7. **Integrity Commissioner Standards** – Require minimum qualifications, training, and consistency in the role, and provide ICs with clear authority to dismiss frivolous or vexatious complaints.
8. **Duty to Report** – Codify responsibility across councils and staff to report harassment, discrimination, or violence to ensure safe workplaces are everyone's responsibility.

We commend the government for taking steps toward greater accountability for elected officials, but believe that without these amendments, Bill 9 will fall short of its intended purpose. Municipal workplaces must be as safe, respectful, and harassment-free as any other workplace in Ontario.

We remain committed to working with you and your ministry to ensure that the final legislation meaningfully addresses these gaps and provides municipal staff with the protections they need and deserve.

Sincerely,

Danielle Manton, AOMC, Dipl.M.M

President, AMCTO

Karla Musso-Garcia, CET, CRS-I

President, AORS

Cc: Hon. Doug Ford, Premier of Ontario
Patrick Sackville, Chief of Staff to Premier
Hon. Prabmeet Sarkaria, Minister of Transportation
Robin Jones, AMO President
Lori Bolton, President, Ontario Municipal Human Resources Association
John Mattocks, Municipal Law Enforcement Officers Association
Graham Walsh, Municipal Law Departments Association of Ontario
Michael DiLullo, Ontario Municipal Administrators Association
Stella Danos-Papaconstantinou, Ontario Municipal Social Services Association