



**WINDSOR ACCESSIBILITY ADVISORY COMMITTEE AGENDA**  
held Tuesday, June 1, 2021  
at 10:00 a.m.  
via Zoom video conference

**1. Call to Order**

**2. Declarations of Conflict**

**3. Adoption of the Minutes**

Adoption of the minutes of the meeting held November 24, 2020 – ***attached***

**4. Presentation - Adie Knox Expansion Feasibility Study**

Anthony Gyemi, Archon Architects and Tracy Beadow, Project Administrator to be in attendance.

**4. Business Items**

**5.1 Lions Club International Foundation Award**

Peter Best, Co-Chair was presented with the Melvin Jones Fellow Award for dedicated humanitarian services.

**5.2 Windsor-Essex AAC Meeting Update**

**5.3 Financial Variance Report – WAAC 2021 Operating Budget**

The Financial Variance Report for the period ending May 7, 2021 is ***attached***.

- 5.4 Navilens- Pilot Project**
- 5.5 Facility Accessibility Design Standards (FADS) Update**
- 5.6 Diversity and Accessibility Officer Updates**
- 5.7 Autumn 2021 Forum**
- 5.8 Advisory Bulletin regarding the Conflict of Interest – *attached.***
- 5.9 Accessibility Hub**
  
- 6. New Business**
  
- 7. Date of Next Meeting**  
To be determined.
  
- 8. Adjournment**

## **Windsor Accessibility Advisory Committee**

Meeting held November 24, 2020

A meeting of the Windsor Accessibility Advisory Committee is held this day commencing at 10:00 o'clock a.m. via Zoom video conference, there being present the following members:

Sally Bennett Olczak, Co-Chair  
Peter Best, Co-Chair  
Councillor Ed Sleiman  
Kristy Franklin  
Yo Son Dah Nost Huff  
Sheila McCabe  
Ricardo Pappini  
Nicholas Petro  
Caleb Ray

### ***Guest in attendance:***

Linda Mackenzie, Chairperson, Friends of Adie Knox

### ***Also present are the following resource personnel:***

Gayle Jones, Accessibility/Diversity Officer  
Stephen Lynn, Manager Social Policy & Planning  
Leonardo Gil, Project Manager CDHS  
Katie Pavlovski, Coordinator Community Development  
Greg Rusk, Supervisor Community Programming  
Mark Keeler, Human Resources Assistant  
Karen Kadour, Committee Coordinator

### **1. Call to Order**

The Chair calls the meeting to order at 10:04 o'clock a.m. and the Committee considers the Agenda being Schedule A attached hereto, matters which are dealt with as follows:

### **2. Declaration of Conflict**

None disclosed.

### 3. Adoption of the Minutes

Moved by Councillor Sleiman, seconded by N. Petro,  
That the minutes of the Windsor Accessibility Advisory Committee of its meeting held June 9, 2020 **BE ADOPTED** as presented.  
Carried.

Councillor Sleiman refers to Alexander Park as referenced in the foregoing minutes and he advises a new accessible washroom has been constructed

### 4. Presentation – Windsor-Essex Regional Community Safety & Well-Being Plan

Leonardo Gil, Project Manager appears before the Windsor Accessibility Advisory Committee to provide a Presentation entitled “Update Report: Windsor-Essex Regional Community Safety and Well-Being Plan. The salient points of discussion highlighted in the Presentation are as follows:

- Community Safety and Well-Being Planning (CSWB) is an integrated approach to service delivery planning that involves multi-sector partnerships to proactively enhance or develop strategies to address local priorities related to crime and complex social issues.
- The CSWB planning framework promotes upstream activities by focusing on social development prevention, and risk intervention.
- CSWB Plans leverage and build upon existing efforts and partnerships and encourages the development of shared goals across sectors.
- CSWB Plans are living documents, which involve an ongoing process of issue identification, and planning through continued collaboration with community organizations, leaders and residents.
- Ultimately, all members in a community are seen to have a role to play and as such, identified strategies must strive to be culturally and socially responsive.
- The purpose of the Enhanced Sector Network (ESN) is to leverage existing strategies and leadership within Windsor and Essex County.
- To ensure diverse voices from historically unrepresented communities are heard and priorities are woven throughout the planning process.
- The ESN will consist of eight network groups. Each group will be comprised of 10-15 representatives from existing committees and community organizations which includes:
  - Indigenous Communities
  - Racialized persons
  - Newcomers
  - Youth
  - Seniors
  - 2SLGBTQ+

- Accessibility Communities
- Broader Community Groups
- Group members will be asked to participate in two meetings over the course of the project.
- Meetings will be two hours in length.
- Meetings will involve qualitative activities piloted in previous community conversations as well as a prioritization process based on the results of public consultation data analyses.
- If the committee would like to participate in the CSWB planning process, we would be asking the following:
  - Select 2-3 members to partake in 2 meetings.
- Meeting 1 to be scheduled between November 20, 2020 to January 30, 2021.
- Meeting 2 to be scheduled between April-July 31, 2021.

S. Bennett Olczak, Co-Chair thanks Leo Gil for his presentation and asks if any members are interested in participating in this initiative. The following members indicate their interest – R. Pappini, Y. Huff, K. Franklin, C. Ray and N. Petro.

## **5. Business Items**

### **5.1 Recreation Master Plan Update**

Katie Pavlovski, Coordinator Community Development appears before the Committee and reiterates that the intention of the Recreation Master Plan is to:

- Develop a network of representatives from diverse communities to intentionally include underrepresented people in recreation programs and services.
- Develop inclusion and Access procedures specific to Recreation and Culture services.
- Consult on program and service development.
- Ensure public spaces and places for recreation are safe and welcoming to all diverse populations through community consultation.
- Improve communication and promotions of various activities.
- Ensure that participation in recreation programs and services is reflective of the community it serves.
- In terms of developing a Network, the following key representatives are provided:
  - Community Development Coordinator, Recreation
  - Diversity Committee Members
  - Windsor Accessibility Advisory Committee Members
  - Multicultural Council Partners
  - WE LIP Partners – Windsor Essex Local Immigration Partnership
  - Windsor Pride Community

K. Pavlovski thanks Peter Best for coming forward to assist in this initiative. She adds a virtual meeting will be scheduled with the partners in December or January.

## 5.2 Adie Knox Pool

Linda Mackenzie, Chairperson, Friends of Adie Knox Pool is present to request the opening of Adie Knox Pool for people with physical challenges. She reads her letter to the Committee as follows:

*"Good morning. Thank you for inviting me to address the Windsor Accessibility Advisory Committee. I'm here representing 'Friends of Adie Knox' a group of over 250 people who are concerned about the future of the Adie Knox Herman Recreation Complex. My focus today is to get Adie Knox re-opened specifically for those with accessibility issues.*

*The City seemingly views Adie Knox as a "community pool", servicing those in a geographic area – the West End. What they have failed to understand is that over the years, Adie Knox has become the only facility that provides easy access to folks with physical challenges. Its core patrons are people who travel from all over the County for its free parking, indoor ramp access, one level entry, pool chair lift, stairs into the pool, a large shallow end and a therapy pool. It became a natural haven for those recovering from surgery, suffering from arthritis or diabetes, age mobility issues, and more. Because of its lighting and acoustics, it also became the preferred pool for those with visual and hearing impairment.*

*Over the last year, Friends of Adie Knox has started a Facebook group, designed a logo, sent out flyers, and started a petition to keep the facility open long term. (I have the 4500 signatures in my office, but we had to stop collecting in March.) We have gained the support of the Windsor District Labour Council and Assumption Cares and been the focus of a Dan MacDonald radio show. The Windsor Star has printed 3 of our Letters to the Editor (2 from Rene Jacques and one from me); and we recently presented a small targeted petition with 220 signatures to City Council to re-open Adie Knox in Stage 3. The intent of this petition was to demonstrate the 'demand' the City said they were looking for. Friends of Adie Knox has received comments like: "Aqua Fitness is my lifeline", "I would drown in the downtown pool", and "The City doesn't care about us – they only care about fitness swimmers".*

*Since March 2020, many have found other ways to maintain physical, mental and emotional health. Some have taken up walking or cycling. Some have joined private health clubs that have pools. But those who have physical challenges are typically unable to benefit from these alternative forms of exercise. I remember all too well the joy on the faces of people who came to Adie Knox with canes, walkers and wheelchairs. Once they were in the water, they were **able** to move like they were teenagers. The world outside didn't matter, and we were all just a group of people having fun. It's these people I'm fighting for. I personally know several people who are stuck in their apartments, unable to do **anything** to keep moving. They are lonely, their spirits are down, and they tell me their mobility issues are getting worse. We've all had to bear the cross of Covid-19, but none have had a tougher road than those who have accessibility issues.*

*Why can't the City re-open (or partially re-open) the Adie Knox Pool for seniors and those with mobility issues?"*

P. Best, Co-Chair indicates that the city should support this request to open the pool.

In an e-mail from Jen Knights, Manager, WIATC Adventure Bay & Aquatics Services, she provides the following information:

- As directed by Council, the City of Windsor does not plan on opening or operating additional aquatic facilities to the public unless the demand exceeds the capacity that we have available at the WFCU Centre Community Pool and the WIATC.
- Our staff has been working with residents to assist them in attending programming at the WFCU and WIATC pools.
- Both of these aquatic facilities are accessible and include parking directly adjacent to the facility, reduced distance from the parking lot to the pool entrance, direct access to the pool as well as a ramp (WFCU) and lift (WIATC) if needed.
- The water temperature at the WFCU Community Pool is 85 degrees F and we are offering both reserved fitness lanes and reserved shallow aqua fitness classes at this time.
- The water temperature at the WIATC is 83 degrees F and we are offering reserved fitness lanes at this time.
- Both facilities have accessible washrooms and changing facilities for residents to use on the way out of the facility.

K. Franklin states that she is a personal trainer and has worked at Water World in the past. She notes that the water temperature at the WFCU Community Pool and the WIATC is too cold for people with physical challenges.

P. Best, Co-Chair suggests the establishment of a subcommittee to review this matter. K. Franklin, Y. Huff and P. Best volunteer to sit on this subcommittee.

### 5.3 NaviLens

**Clerk's Note:** *NaviLens is a system that allows, through some signals placed in the right places, blind people to detect them with their phone. Each one of these signs indicate, in an auditory way, in what direction one should go and what is the situation of the person with respect to the indicator poster, in addition to containing information of all kinds. The system consists of labels with colour codes similar to bar codes or QR codes that are placed in the points that you wish to identify or in which you want to place relevant information for the user. These codes are read by an application that makes use of the camera of the mobile device. The information obtained from each label is read by voice.*

G. Jones states that NaviLens is a technology created for people with low vision that utilizes QR Bar Codes that can be read from forty feet away in low light situations. She adds the app will guide the person to the QR Code. She indicates

that this technology could be considered as a pilot project with Transit Windsor to use on buses and bus stops. She further adds that NaviLens has also been used to assist people when reading street signs in some cities.

#### **5.4 Windsor-Essex AAC Meeting**

S. Bennett Olczak requests that members of the AAC subcommittee (K. Franklin, P. Best and N. Petro) contact Katherine Hebert regarding the possibility of holding a joint meeting of the AAC Committees and to report back at the next meeting.

#### **5.5 Audio Pedestrian Signals**

Shauna Boakes, Senior Manager Traffic Operations provides the following updates related to the audio pedestrian signals as follows (by e-mail):

- In the last few years we have installed new AODA signals on capital project upgrades including at the following intersections;
  - Huron Church & Malden Road
  - Huron Church & Totten
  - Huron Church & Dorchester
  - Dougall Ave & Ouellette Place
  - Riverside Drive & Lauzon
  - Ouellette & Elliot
- Upcoming or ongoing projects;
  - Wyandotte & Strabane (in construction)
  - Huron Church & Tecumseh (2021)
  - Banwell & Palmetto (in construction)
- We are working with the CNIB and a company called Key 2 Access to install 3 bluetooth systems that will allow users to access the signals through a dongle or phone App. This technology was brought to us from the CNIB but we had to hold off on installing for a time period due to COVID. We are aiming to do this in December.
- We have purchased a new AODA compliant 'wave' button. It has not arrived yet and we are going to determine the location to place this based on input from CNIB. This will probably be a Feb./Mar. activity.
- In general we do not have budget to install new AODA systems across the City. These systems cost \$12,000 plus labour to install. This does not include making physical adjustments to pole locations to meet the AODA regulation; those physical movements make it very difficult to afford many installations. This is the reason why we focus on full intersection re-builds. We are planning 3-5 new intersection re-build projects in 2021. Locations will be determined shortly and tenders issued in early spring.



P. Best, Co-Chair expresses concern that WAAC was not consulted in this matter. It is suggested that members of the transportation subcommittee (P. Best, Y. Huff, C. Ray and S. Bennett Olczak meet with Shauna Boakes.

## 5.6 Facility Accessibility Design Standards (FADS)

G. Jones reiterates that discussion was held in 2019 regarding the potential hiring of a consultant to undertake updating FADS. She indicates that several municipalities are guided by the City of London's FADS. In terms of next steps, she suggests that three quotes be obtained per purchasing protocols to determine the cost of this project.

## 5.7 Alexander Park

G. Jones states that several years ago, discussion was held to enhance accessible features for low vision individuals at Alexander Park. She notes that in a recent visit to the Park, the addition of the following accessible amenities was recommended to be added:

- Reflective high contrast on the benches, garbage and recycling receptacles
- Tactile surface on the paths
- Cement pads for picnic tables near the water

In terms of the concerns related to fishermen and sharing the pathway with low vision individuals, she suggests erecting signage asking people to be considerate and share the path with people with vision impairment.

P. Best, Co-Chair suggests that curbstone or bumpers can cause issues for individuals who are low vision and blind. He suggested that these be avoided, if possible in this park. He thanks Councillor Sleiman and G. Jones for supporting this project.

## 5.8 Financial Variance Report

The balance of the WAAC 2020 Operating Budget is \$8,377.34.

Discussion ensues regarding how to best utilize the WAAC 2020 residual funds for accessibility project(s). G. Jones suggests that consideration be given to a hearing loop system for customer service counters, the purchase of an audio pedestrian signal or to provide funds to the library system to acquire accessible books.

Moved by P. Best, seconded by N. Petro,

That **APPROVAL BE GIVEN** to an expenditure in the upset amount of \$8,377.34 from the Windsor Accessibility Committee 2020 Operating Budget for an initiative to help make the City of Windsor more accessible and barrier free.

Carried.

**6. New Business**

P. Best, Co-Chair requests that an update regarding accessible sports be provided for the next meeting of WAAC.

G. Jones advises that the memorial tree for Wayne Meneguzzi (former WAAC member) has been planted in Jackson Park and a small ceremony will hopefully take place in the spring 2021.

**7. Date of Next Meeting**

The next meeting will be at the call of the Co-Chairs.

**8. Adjournment**

There being no further business, the meeting is adjourned at 12:03 o'clock p.m.

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**Sally Bennett Olczak, Co-Chair**

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**Committee Coordinator**

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# ADVISORY BULLETIN

## REGARDING CONFLICT OF INTEREST

Bruce P. Elman LL.D.  
Integrity Commissioner  
15 May 2021

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### PURPOSE OF THE BULLETIN

- [1] This Bulletin is intended to assist Members of Council, Local Boards, and Committees (“Members”) in understanding their obligations regarding conflicts of interest under the **Code of Conduct for Members of Council and Local Boards** (hereinafter “**Code of Conduct**”), the City’s **By-Law to Provide Rules Governing the Proceedings of Windsor City Council Meetings and its Committees and the Conduct of its Members** (hereinafter “**Procedure By-Law**”), and the **Municipal Conflict of Interest Act** (hereinafter “**MCI**A”).
- [2] The Integrity Commissioner is a confidential resource available for clarification and advice on conflicts of interest. Pursuant to sections 6.2 of the **Code of Conduct**, the Integrity Commissioner may provide oral and written advice to Members concerning the interpretation of, and compliance with, the **Code of Conduct** and the *MCI*A as well as other ethical questions facing Members.

### THE CODE OF CONDUCT

- [3] Members must always adhere to the entire **Code of Conduct**. However, the following part is particularly relevant to the rules surrounding conflict of interest:
- a. Rule No. 6 (Conflict of Interest)

### PROCEDURE BY-LAW

- [4] Members must always adhere to the entire *Procedure By-Law* (By-law No. 98-2011). However, the following parts are particularly relevant to the rules surrounding conflict of interest:
- a. Part 1 (Interpretation/Definition)
  - b. Part 4.1 (Order of Business)

- c. Part 5 (Disclosure of Pecuniary Interest)

## MUNICIPAL CONFLICT OF INTEREST ACT

- [5] Members must always adhere to the entire *MCIA*. Members should read and become familiar with the provisions of the *MCIA* in their entirety in order to better understand issues surrounding Conflict of Interest.

## RELEVANT LEGISLATION & POLICIES

- [6] In addition to the **Code of Conduct**, the *City's Procedure By-law*, and the *MCIA*, the Members are governed by the *Municipal Act 2001*, the *Municipal Elections Act*, the *Municipal Freedom of Information and Protection of Privacy Act*, and the *Criminal Code of Canada*.

## CONFLICT OF INTEREST

- [7] Generally, a conflict of interest exists when a Member participates in activities that grant, or appear to grant, any special consideration, treatment, or advantage to an individual which is not applicable to every other individual member of the public (See **Code of Conduct**, Rule 6.1).
- [8] The general guidelines on Conflict of Interest are found in Rule No. 6 of the **Code of Conduct**. It states that when a Member has a direct or indirect pecuniary interest in a matter, the Member "shall not use their positions to further their private interests, nor shall they vote on any issue at Council or committee that puts them in a real or apparent conflict with their personal finances."
- [9] The *MCIA* endorses the following principles in relation to the duties of Members of Councils, Local Boards, and Committees:
1. The importance of integrity, independence, and accountability in local government decision-making.
  2. The importance of certainty in reconciling the public duties and pecuniary interests of Members.
  3. Members are expected to perform their duties of office with integrity and impartiality in a manner that will bear the closest scrutiny.
  4. There is a benefit to municipalities and local boards when Members have a broad range of knowledge and continue to be active in their own communities, whether in business, in the practice of a profession, in community associations, and otherwise. (See *MCIA*, section 1.1).

[10] Pecuniary interests can be direct or indirect (See *MCIA*, section 5(1) and *Procedure By-Law*, Part 1).

[11] Indirect pecuniary interests can occur in three instances:

- a. If the Member (or his or her nominee)
  - i. Is a shareholder in, or a director or senior officer of, a corporation that does not offer its securities to the public (See *MCIA*, section 2(a)(i));
  - ii. Has a controlling interest in or is a director or senior officer of, a corporation that offers its securities to the public (See *MCIA*, section 2(a)(ii)); or
  - iii. Is a Member of a body that has a pecuniary interest in the matter (See *MCIA*, section 2(a)(iii));
- b. The Member is a partner of a person or is in the employment of a person that has a pecuniary interest in the matter (See *MCIA*, section 2(b)); or
- c. The Member has an interest via their family, if a parent, spouse or child of the Member has a pecuniary interest which is known to the Member, (See *MCIA*, section 3).

[12] There are a number of very specific exceptions in section 4 of the *MCIA* which will permit a Member to participate in decisions even though he or she may have a pecuniary interest. In these instances, the Member is not deemed to have a pecuniary interest. Before determining whether any of these exceptions apply, the Member should consult the Integrity Commissioner.

[13] There are two exceptions of which Members should take note. A Member may be deemed not to have a pecuniary interest in these instances:

- a. by reason of the Member having a pecuniary interest which is an interest in common with electors generally (See *MCIA*, section 4(j)) or
- b. by reason only of an interest of the Member which is so remote or insignificant in its nature that it cannot reasonably be regarded as likely to influence the Member (See *MCIA*, section 4(k)).

[14] The first of these exceptions – the Member having a pecuniary interest which is an interest in common with electors generally – is relatively straightforward. Here, the Member needs to simply show that his or her pecuniary interest is no different than other electors – not necessarily all electors but a significant number of them. For

example, a Member is not disqualified from voting merely because he or she possesses an interest in common with other ratepayers in the area. (See *Gammie v. Turner* 2013 ONSC 4563 (S.C.J.)).

- [15] The second exception – an interest of the Member is so remote or insignificant in its nature that it cannot reasonably be regarded as likely to influence the Member – is more complicated. For an interest to be remote or insignificant, the relationship between the Member and the subject matter must be so indirect or trivial that it leads to the conclusion that potential personal gain was not a motivating factor in the Member’s decision-making process.
- [16] The question of remoteness or insignificance does not relate to the amount of money at issue; the question relates to the importance of the matter to the Member. (See *D’Arcey v. Mino* (1991), 4 M.P.L.R. (2d) 26 (Ont. Gen. Div.) and *Magder v. Ford* (2012), 5 M.P.L.R. (5th) 1 (Ont. S.C.J.)).
- [17] The test for this exception (section 4(k) and for the exception under section 4(j)) was provided in *Whiteley v. Schnurr* (1999), 4 M.P.L.R. (2d) 26 (Ont. Gen. Div.): “Would a reasonable elector, being apprised of all the circumstances, be more likely than not to regard the interest of the Councillor as likely to influence the Councillor’s action and decision on the question.”
- [18] Both of these exemptions involve circumstances in which a reasonable person, fully informed of the facts, viewing the matter realistically and practically, and having given the matter thorough consideration, would conclude that the pecuniary interest would not have affected the Member’s ability to make an impartial decision. (See *Gammie v. Turner* as noted earlier).
- [19] **A further note here:** A Court or an Integrity Commissioner would have to look at all of the circumstances including such factors as good faith, motive, and so forth, in making a decision on a Complaint brought against a Member.

## DUTY OF MEMBER

- [20] Where a Member has any pecuniary interest, direct or indirect, in any matter and is present at a meeting of the Council or Local Board or Committee at which the matter is the subject of consideration, the Member

- a. shall, prior to any consideration of the matter at the meeting, disclose the interest and the general nature thereof (See *MCIA*, section 5(1)(a));
- b. shall not take part in the discussion of, or vote on any question in respect of the matter (See *MCIA*, section 5(1)(b)); and
- c. shall not attempt in any way whether before, during, or after the meeting to influence the voting on any such question (See *MCIA*, section 5(1)(c)).

[21] Where the above meeting is not open to the public, in addition to complying with the requirements above, the Member shall leave the meeting or the part of the meeting during which the matter is under consideration (See *MCIA*, section 5(2)).

[22] Absence from a public meeting where the matter is discussed does not relieve a Member from disclosing the interest. If absent from the meeting, the Member is required to disclose the pecuniary interest at the first meeting attended by the Member, after the meeting in which the matter is discussed (See *Procedure By-Law*, section 5.4 and *MCIA*, section 5(3)).

[23] It is important that Members refrain from declaring a pecuniary conflict where a conflict does not exist within the terms of the *MCIA*. Some measures have been instituted in an attempt to discourage improper declarations of pecuniary interest. First, the Clerk shall record the particulars of any disclosure of pecuniary interest made by Members of Council, Standing Committees or Committees of Council, as the case may be, and any such record shall appear in the minutes of that particular meeting. (See *Procedure By-Law*, section 5.5); and, second, each municipality is required to establish and maintain a registry of conflict of interest statements by Members, which will be available for public inspection (See *MCIA*, section 6.1).

## SANCTIONS

[24] Penalties for Contravention of the *MCIA* may be significant: A Member (or former Member) who has been found to have contravened the *MCIA* may have his or her seat vacated. This is automatic if breach of *MCIA* is found to have occurred without excuse. The Member can, also, be disqualified from holding office as a Councillor for up to 7 years. The Member may have to make restitution of financial gain, if applicable (See *MCIA*, section 9(1)).

[25] Under the **Code of Conduct**, the sanctions are the usual ones under Rule No. 20 of the **Code**: (i) A reprimand; and (ii) Suspension of the remuneration paid to the Member (where applicable) in respect of his or her services as a Member for a period of up to 90 days. Other actions may be taken for remedial purposes.

## DEFENCES/EXCUSES UNDER THE *M CIA*

[26] Under section 9(2) of the *M CIA*, a breach of the statute by a Member may be excused if the Member or former Member,

- a. took reasonable measures to prevent the contravention;
- b. disclosed the pecuniary interest and all relevant facts known to him or her to an Integrity Commissioner in a request for advice from the Commissioner under the *Municipal Act, 2001* and acted in accordance with the advice, if any, provided to the Member by the Commissioner; or
- c. committed the contravention through inadvertence or by reason of an error in judgment made in good faith.

These provisions may also be applied so that a Member's seat will not be vacated, and Member or former Member will not be disqualified.

## ROLE OF THE INTEGRITY COMMISSIONER

[27] Complaints may be brought to the Integrity Commissioner under the **Complaint Protocol**. Further, an elector may petition the Integrity Commissioner to apply to a judge for a determination of whether a Member has breached the *M CIA*.

## FURTHER INFORMATION

This Advisory Bulletin is intended to provide general information. To rely on the advice of the Integrity Commissioner with respect to specific situations, Members of Council must seek written advice consistent with the provisions of Rule 19 of the **Code of Conduct**. If you have any questions or wish to seek written advice on this matter, please contact:

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