

Report to Council



Date: February 9, 2026
To: Council
From: City Manager
Subject: Code of Conduct and Lobbyist Registry Annual Report
Department: Office of the City Clerk

Recommendation:

THAT Council receives, for information, the report from the Office of the City Clerk dated February 9, 2026, with respect to the Code of Conduct and Lobbyist Registry annual report;

AND THAT Council Policy No. 388, being Code of Conduct, be revised as outlined in the report from the Office of the City Clerk dated February 9, 2026.

Purpose:

To receive the annual report on the Code of Conduct and Lobbyist Registry Council policies and amend the Code of Conduct.

Background:

The Code of Conduct and Lobbyist Registry were established on September 11, 2023, and each have been reviewed and amended since. This report covers activity regarding the Code of Conduct Policy (the Code) for Q4 2024 and all of 2025 and the Lobbyist Registry Policy for 2025. The most recent policy reviews and amendments are available as follows:

- Code of Conduct reviewed [November 18, 2024](#) and amended [April 7, 2025](#)
- Lobbyist Registry reviewed [December 2, 2024](#) and amended [January 13, 2025](#)

Discussion:

Code of Conduct Summary

In Q4 2024 and 2025, one complaint was submitted by a member of Council. One allegation in the complaint was dismissed at preliminary assessment, and the others were accepted through preliminary assessment and advanced to investigation in accordance with s. 30 of the Code. A neutral, independent, and qualified third party completed the investigation following the procedures established in the Code.

The investigation concluded the evidence did not support a finding that a breach of the Code of Conduct had occurred. A summary is provided below.

Complaint	Section cited	Result	Reason
#1	s. 1.a) (Comply with All Laws – Community Charter)	<u>Closed</u>	Preliminary assessment found that s. 29(g) applies – there were no possible grounds on which to conclude that a violation of the Policy occurred.
	s. 1.a) (Comply with All Laws – Community Charter)	<u>Investigated</u> Evidence did not find a breach occurred	Accepted for investigation. The investigation report concluded the evidence does not support a finding of a breach of s. 1.a) of the Code.

The investigation report was provided, in confidence, to the complainant, respondent Council member, and Council, in accordance with s. 40, marking the conclusion of the process for this complaint.

When a complaint is not accepted or is closed at preliminary assessment, or an investigation determines a breach did not occur, further information about the complaint or investigation is not released. Should a future complaint and investigation determine the occurrence of a breach, the City will follow the process established in the Code of Conduct, including release of Council’s decision about an investigation, in accordance with s. 45 of the Code.

Code of Conduct Recommended Amendment

Council previously discussed limiting the use of technology during Council meetings to only a City-issued device stationed at each Council member’s space, with exceptions for emergency situations. Although the Code amendment was not advanced at the time, Council requested new devices be installed. The devices will be in use as of February 2, providing secure access to Council agendas and other information Council members need during meetings. An amendment to the Code reinforces the purpose and expectation of using only the City-issued devices and systems to support good governance.

Section #	Current Text	Proposed Change	Rationale
Section 12	Council Members will not interact or communicate with members of the public during open or closed Council meetings about matters being considered at that meeting via email, text or other social media applications.	Limit use of electronic devices and systems during Council meetings to only the City-issued device stationed at each Council member’s space, except for emergency situations.	Council makes decisions collectively after all members have had the same information presented to them. The device stationed at each Council member’s seat in Chambers provide access to the Council agenda and other systems needed for a Council meeting, meets the intent of the existing Code provision, and aligns with records management and information security practices.

Lobbyist Registry

Council made two main changes to the Lobbyist Registry in January 2025:

- Amended the definition of a lobbyist to those lobbying on behalf of a business or organization, or lobbying about a matter in which they have a financial interest; and

- Changed registrations to be active for one year instead of six months.

A total of 13 new Lobbyist Registry registrations were received in 2025, with a general breakdown of those lobbying as follows:

Developer	7
Advocacy Organization or Neighbourhood Association	4
Individual Resident	1
Prospective Vendor	1

Staff advise individuals whose activity may fall under the Lobbyist Registry to familiarize themselves with the Policy and register if required. This is accomplished primarily through the Mayor and Council correspondence system and interactions with the development community.

Surrey continues to be the only other BC municipality to have a lobbyist registry, as far as staff are aware. City of Victoria Council directed staff to explore lobbyist registry authorities in 2025. UBCM has considered several resolutions regarding lobbyist registries since 2017, the most recent of which in 2025 called for the Province to establish and administer an opt-in municipal lobbyist registration and regulation system. A response to the resolution is pending.

Staff do not recommend amendments to the Lobbyist Registry at this time.

Conclusion:

The annual report provides a summary of activity under the Code of Conduct and Lobbyist Registry. One amendment to the Code of Conduct is proposed to reflect use of the new devices for Council members during Council meetings. The iPads improve functionality and access to the systems and information needed during Council meetings. No amendments to the Lobbyist Registry Policy are proposed.

Internal Circulation:

Communications

Considerations applicable to this report:

Legal/Statutory Authority: [Community Charter s. 113.1 Code of Conduct](#)

Existing Policy: [Council Policy No. 388 – Code of Conduct](#) and [Council Policy No. 390 – Lobbyist Registry](#)

Considerations not applicable to this report:

Legal/Statutory Procedural Requirements:

Financial/Budgetary Considerations:

Consultation and Engagement:

Communications Comments:

Submitted by:

L. Bentley, City Clerk

Approved for inclusion: D. Gilchrist, City Manager