

**COUNCIL MEETING**  
**OFFICE OF THE CITY CLERK**

**REPORT CLK-2025-06**  
**April 22, 2025**

**SUBJECT:** Direct Appointment – Integrity Commissioner

**AUTHOR:** Tara Stephens, Director of the Legislative Services/City Clerk

**APPROVING:** Rob Axiak, Chief Administrative Officer

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**RECOMMENDATION:**

THAT THE COUNCIL OF THE CITY OF WELLAND approves the direct appointment of Hunter Legal LLP, for Integrity Commissioner Services.

**RELATIONSHIP TO STRATEGIC PLAN**

The recommended appointment supports the City's commitment to openness, transparency, and accountability in local government. Maintaining an independent Integrity Commissioner reflects the City's dedication to ethical leadership and reinforces public confidence in the decision-making processes of Council and its local boards. This proactive step strengthens the City's framework for integrity and ensures that clear, accessible avenues for oversight and accountability remain in place.

**EXECUTIVE SUMMARY:**

The current contract for Integrity Commissioner services is coming to an end on April 30, 2025. The City issued a Request for Proposal (RFP) to solicit interest in the provision of Integrity Commissioner services, however, no proposals were received. Given the lack of response and urgency in maintaining continuity of service, staff are recommending a direct appointment in accordance with external legal advice received.

**BACKGROUND:**

The Municipal Act, 2001 requires municipalities to appoint an Integrity Commissioner who is responsible for providing advice and conducting investigations related to the Code of Conduct and other related matters. To comply with the legislative requirement, the City issued an RFP seeking qualified candidates to provide these services.

Despite promoting the opportunity, the RFP did not generate any submissions:

- No applications were received by the closing date.
- Few interested parties accessed the RFP document.
- ADR Chambers, a known provider of Integrity Commissioner services, did not retrieve the RFP.

## **DISCUSSION:**

In the absence of responses to the RFP, staff sought guidance and a recommendation from external legal counsel. External legal counsel recommended a potential appointee and confirmed that a direct appointment would be appropriate under the circumstances, provided the process is fair, transparent, and well-documented.

Staff reviewed the recommendation and held internal discussions with Rebecca Hines of Hunter Legal LLP. Based on this review, staff are recommending the direct appointment of Rebecca Hines, through Hunter Legal LLP, to serve as the City's Integrity Commissioner. This approach aligns with the advice received and ensures the City continues to meet its legislative obligations.

Since 2018, Ms. Hines has built a focused legal career in municipal law, beginning at a leading Bay Street firm and later working in-house at a large regional municipality. This trajectory has given her direct insight into the legal, procedural, and political complexities of municipal governance—knowledge that is essential to the Integrity Commissioner role.

She currently leads the Municipal Law practice at Hunter Legal LLP, providing expert advice on a wide range of legislation relevant to ethical and accountable governance, including:

- The Municipal Act, 2001
- The Municipal Conflict of Interest Act
- The Municipal Elections Act, 1996
- The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)
- Human rights and accessibility legislation

Her litigation and tribunal advocacy experience enhances her ability to conduct investigations with fairness, procedural rigour, and adherence to due process—core expectations for an Integrity Commissioner. She has authored and co-authored numerous professional publications analyzing complex topics such as bias, closed meetings, and remedial measures under codes of conduct.

Ms. Hines has also demonstrated thought leadership in the sector, including as a presenter at municipal conferences and as a guest lecturer on municipal accountability and transparency at Osgoode Hall Law School.

Her experience investigating sensitive matters, navigating complex ethical issues, and delivering well-reasoned, articulate findings makes her exceptionally qualified to fulfill the responsibilities of Integrity Commissioner with independence, clarity, and confidence.

**FINANCIAL:**

Budget provisions for Integrity Commissioner services are already allocated within the approved operating budget.

**ATTACHMENT:**

None.