

Compliance Checklist – In-House Lobbyists (Persons and Partnerships)

This Compliance Checklist was developed by the Office of the Integrity Commissioner to assist Senior Officers and In-house Lobbyists for Persons and Partnerships in Ontario to comply with the requirements of the *Lobbyists Registration Act, 1998*.

Initial Filing Requirements

- The senior officer of a person and partnership (a for-profit entity) must submit an initial registration form when the entity employs an in-house lobbyist(s).
- The initial registration must be submitted within two months of the employee(s) or paid director(s) becoming in-house lobbyists under the Act.
- An in-house lobbyist is a paid employee or paid director of an entity who either individually or collectively with other paid employees or paid directors spends 50 hours a year or more lobbying on behalf of the entity.

Six-Month Renewal Requirements

- A semi-annual renewal must be submitted either 30 days before or 30 days after the anniversary date of the initial filing of the registration. The senior officer and the primary contact, if applicable, will receive email reminders to this effect.

Changes to Registration Outside of Renewal Period

- New information or changes to a previously submitted registration must be submitted no later than 30 days after the change occurs or the senior officer acquires knowledge of the change occurring.

Ceasing duties or employment

- Information that an employee or paid director has ceased to be an in-house lobbyist or is no longer employed by the entity must be submitted within 30 days.

- A change to the senior officer of an entity must be reported within 30 days.

Conflict of Interest

- While lobbying a public office holder, an in-house lobbyist cannot knowingly place the public office holder in a position of real or potential conflict of interest. Section 3.4 of the *Lobbyists Registration Act*, 1998 defines a conflict of interest as "a public office holder is a position of conflict of interest if he or she engages in an activity that is prohibited by section 2, 3, or 4 of subsection 6 (1) of the *Members' Integrity Act*, 1994 or that would be so prohibited if the public office holder were a member of the Legislative Assembly". This includes the use of the member's position to further his or her private interests, the use of insider information to further a member's private interests or a member accepting a fee, gift or personal benefit that is not connected directly or indirectly with the performance of his or her duties.

Contents of Registration

- The senior officer is required to complete the contents of the registration in full, answering all of the questions that may apply.

Certification

- Confirmation is required during the initial application process and before submitting the registration for review, stating that all information submitted to the registry, including changes to registration, is true to the best of the knowledge and belief of the senior officer and/or in-house lobbyist submitting the information. This includes, but is not limited to, the understanding that it is an offence to knowingly provide false or misleading information through the registry.

Verification of registration information

The Integrity Commissioner, as Lobbyists Registrar, has the authority to identify omissions and inconsistencies and verify information contained in a registration form. The registrar may refuse to accept a new registration submitted by a senior officer or remove an existing registration if the requested information is not provided within the prescribed timelines.

- If a registration is not complete it will be refused and reset to draft. An email will be sent to the senior officer and your primary contact, if applicable, outlining the deficiencies. The senior officer is required to amend and resubmit the registration within the timeline provided by the registrar.

For assistance in completing a registration form, please see the Registration Checklist – In-house Lobbyists (Persons and Partnerships).

The Integrity Commissioner is an independent officer of the Legislative Assembly of Ontario. The Commissioner has responsibilities related to MPP integrity, ministers' staff ethical conduct, disclosure of wrongdoing, lobbyist registration and expenses review.