



Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

2025-2026

ANNUAL REPORT

Conflict of Interest Act

Honourable Konrad von Finckenstein, C.M., K.C.

Conflict of Interest and Ethics Commissioner



Conflict of Interest and Ethics Commissioner – Annual Report 2025-2026, in respect of the
CONFLICT OF INTEREST ACT

For more copies of this document, please contact:

Office of the Conflict of Interest and Ethics Commissioner
Parliament of Canada
Ottawa, Ontario K1A 0A6

[Email](#)

Telephone: 613-995-0721

Ce document est également publié en français.

This document is also [online](#).

© Office of the Conflict of Interest and Ethics Commissioner, Parliament of Canada, 2026

062026-126E



Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

June 2026

The Honourable Raymonde Gagné, C.M., O.M., Senator
Speaker of the Senate
Senate of Canada
2 Rideau Street, Room E64-A
Ottawa, Ontario K1A 0A4

Dear Madam Speaker:

I am pleased to submit to you my report on the performance of my duties and functions under the *Conflict of Interest Act* in relation to public office holders, for the fiscal year ending March 31, 2026, for tabling in the Senate.

This fulfills my obligations under paragraph 90(1)(b) of the *Parliament of Canada Act*.

Sincerely,

Hon. Konrad von Finckenstein, C.M., K.C.
Conflict of Interest and Ethics Commissioner



Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

June 2026

The Honourable Francis Scarpaleggia, M.P.
Speaker of the House of Commons
House of Commons
West Block, Room 233-C
Ottawa, Ontario K1A 0A6

Dear Mr. Speaker:

I am pleased to submit to you the report on the performance of my duties and functions under the *Conflict of Interest Act* in relation to public office holders for the fiscal year ending March 31, 2026, for tabling in the House of Commons. The report is deemed permanently referred to the House of Commons Standing Committee on Access to Information, Privacy and Ethics, under Standing Order 108(3)(h)(v).

This fulfills my obligations under paragraph 90(1)(b) of the *Parliament of Canada Act*.

Sincerely,

Hon. Konrad von Finckenstein, C.M., K.C.
Conflict of Interest and Ethics Commissioner

Table of contents

1	Commissioner's message
3	Vision, mission, and mandate
4	Helping appointed officials manage conflicts of interest
15	Reviewing and reporting on alleged conflicts of interest
19	Fostering public confidence
26	Managing the Commissioner's Office
30	Legal developments
31	Appendix: Financial resources summary

Commissioner's message



I am pleased to submit to Parliament my annual report on the administration of the *Conflict of Interest Act*, as required by paragraph 90(1)(b) of the *Parliament of Canada Act*.

In 2025-2026, the Commissioner's Office continued to follow a mandate-focused approach that supports three key objectives, within the framework of its five-year strategic plan.

The first is to help elected and appointed officials manage their conflicts of interest so competent and qualified people can move in and out of public service without difficulty.

We offer training and educational resources to help them understand and follow the rules, and give them confidential advice.

People with experience outside of the public sector may face potential conflicts of interest because of their business relationships. In addition, anyone may have personal relationships, social connections or investments that could create conflicts of interest. We identify such conflicts by reviewing public office holders' personal and financial information.

Where needed, we work with them to implement conflict of interest screens so they can avoid dealing with files that could put them in a conflict of interest. The Act also requires recusal: public office holders must leave the room, physically or virtually, if there's a discussion, decision, debate or vote in which they have a conflict of interest.

A second objective is to review and report on allegations of conflict of interest. When we receive information that someone may have contravened the Act, we may open a case file to review it. If there are reasonable grounds to believe there was a contravention, we will investigate. While not all case files result in investigations, and not all investigations result in reports, enforcing the Act is a core part of our mandate.

Everything we do ultimately supports a third key objective: helping Canadians trust that the actions of elected and appointed federal officials are free from conflicts of interest. The Act includes transparency requirements, and the Commissioner's Office reports to Parliament and releases public reports. We also share as much information as we can through our website and when responding to requests for information.

The April 2025 general election resulted in high turnover among elected and appointed officials, and more compliance work for the Commissioner's Office. We supported hundreds of Members of the House of Commons, ministers, parliamentary secretaries, and others in meeting their initial compliance requirements.

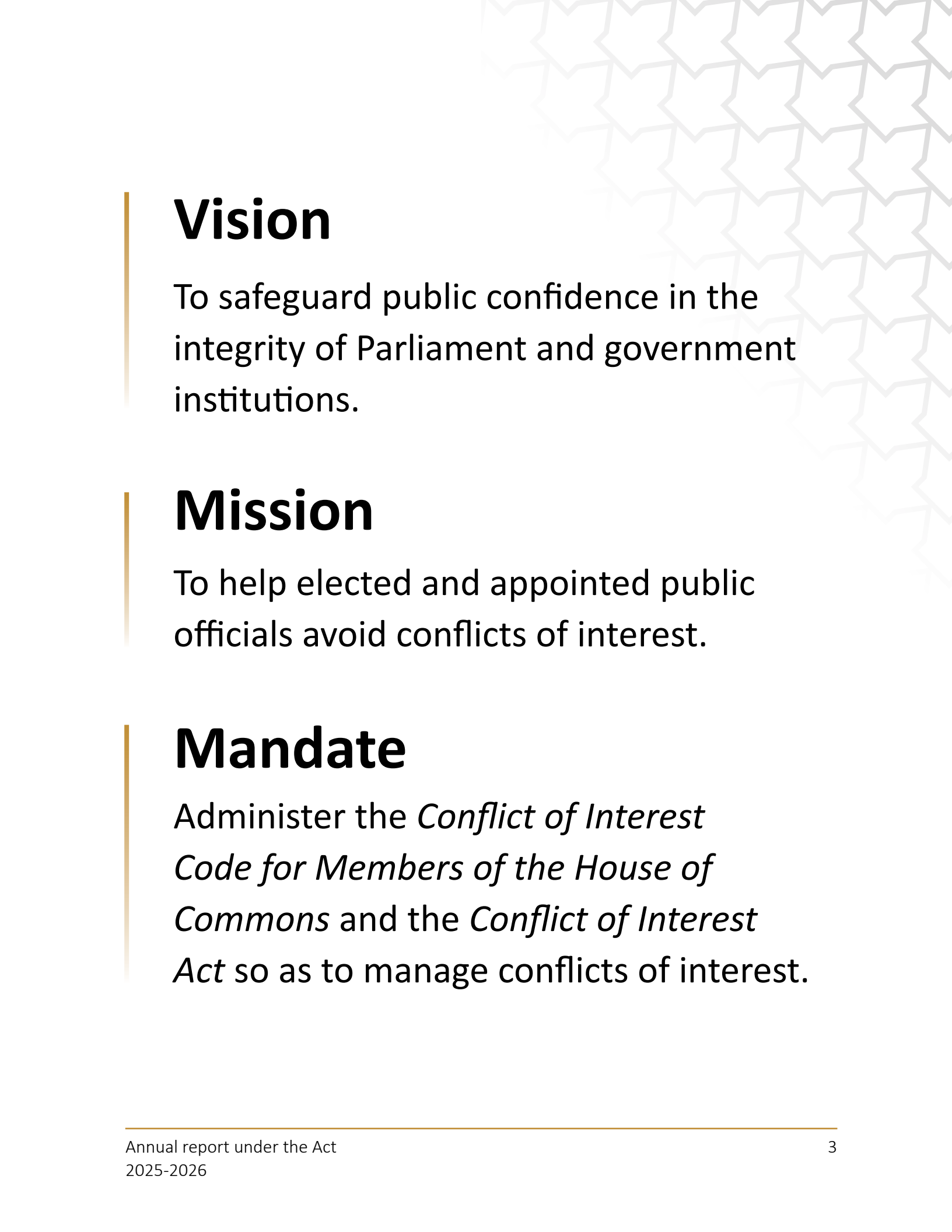
I participated in a review of the Act conducted by the House of Commons Standing Committee on Access to Information, Privacy and Ethics, and pointed out the need to update the Act.

Going forward, we will continue to follow our mandate-focused approach. We remain flexible and ready to respond to new challenges.



Hon. Konrad von Finckenstein, C.M., K.C.

Conflict of Interest and Ethics Commissioner



Vision

To safeguard public confidence in the integrity of Parliament and government institutions.

Mission

To help elected and appointed public officials avoid conflicts of interest.

Mandate

Administer the *Conflict of Interest Code for Members of the House of Commons* and the *Conflict of Interest Act* so as to manage conflicts of interest.

Helping appointed officials manage conflicts of interest

A key objective of the Commissioner's Office is to help people appointed to federal positions manage potential conflicts between their public duties and private interests, so the most competent and qualified people can move in and out of public service without conflicts of interest.

Avoiding conflicts of interest is one of four focus areas in its 2025-2030 strategic plan. Each focus area is a framework for purposeful projects and initiatives, and the plan itself is reviewed every year. Activities in this focus area include simplifying compliance processes, giving public office holders clear and consistent advice, and offering education and training that meets their specific needs.

When a public official has competing interests that could interfere with their ability to be fair and objective when doing their job, their judgment could be affected by the possibility of benefitting themselves or someone they know.

The *Conflict of Interest Act* aims to prevent that from happening. Under the Act, public officials are in a conflict of interest when they exercise an official power, duty or function that provides an opportunity to further their private (mostly financial) interests or those of their relatives or friends, or to improperly further another person's private interests.

The Commissioner's Office helps public office holders ensure their actions, while performing their official duties and functions, are free from conflicts of interest. This makes it easier for experienced and competent people to move in and out of public office, in keeping with two of the Act's purposes:

- To encourage experienced and competent people to seek and accept public office
- To facilitate interchange between the private and public sectors

Who is subject to the Act

The Commissioner’s Office helps appointed public officials avoid conflicts of interest by administering the *Conflict of Interest Act*.

The Act applies mainly to federal officials appointed to their positions by the Governor in Council (the Governor General acting on the advice of Cabinet) or a minister. They are referred to collectively as “public office holders.”

Some of them must follow only the Act’s general conflict of interest rules and some of its post-employment rules. These **public office holders without reporting obligations** are mostly part-time members of federal boards, commissions and tribunals, and ministerial staff who work on average less than 15 hours a week.

The rest must also follow the Act’s additional reporting and public disclosure rules, and its prohibitions against engaging in outside activities and holding what the Act calls “controlled assets.” These **reporting public office holders** are mostly full-time. They include ministers, ministers of state (who may be called “secretaries of state”), parliamentary secretaries, ministerial staff who work on average 15 hours or more a week, and some senior public servants.

Compliance with the Act is a condition of someone’s appointment or employment as a public office holder ([section 19](#)). The Commissioner’s Office helps them comply with the Act so they can more easily move in and out of public office.

Figure 1: Snapshot of public office holders on March 31, 2026

Reporting public office holders	Public office holders without reporting obligations
38 ministers 39 parliamentary secretaries 10 secretaries of state 683 ministerial staff 564 people appointed to other positions	1,512 part-time members of federal boards, commissions and tribunals, and some part-time ministerial staff
1,334	1,512

The number of public office holders goes up and down during the year when new appointments are made and others end. Turnover may be especially high in an election year among ministers, parliamentary secretaries, and ministerial staff.

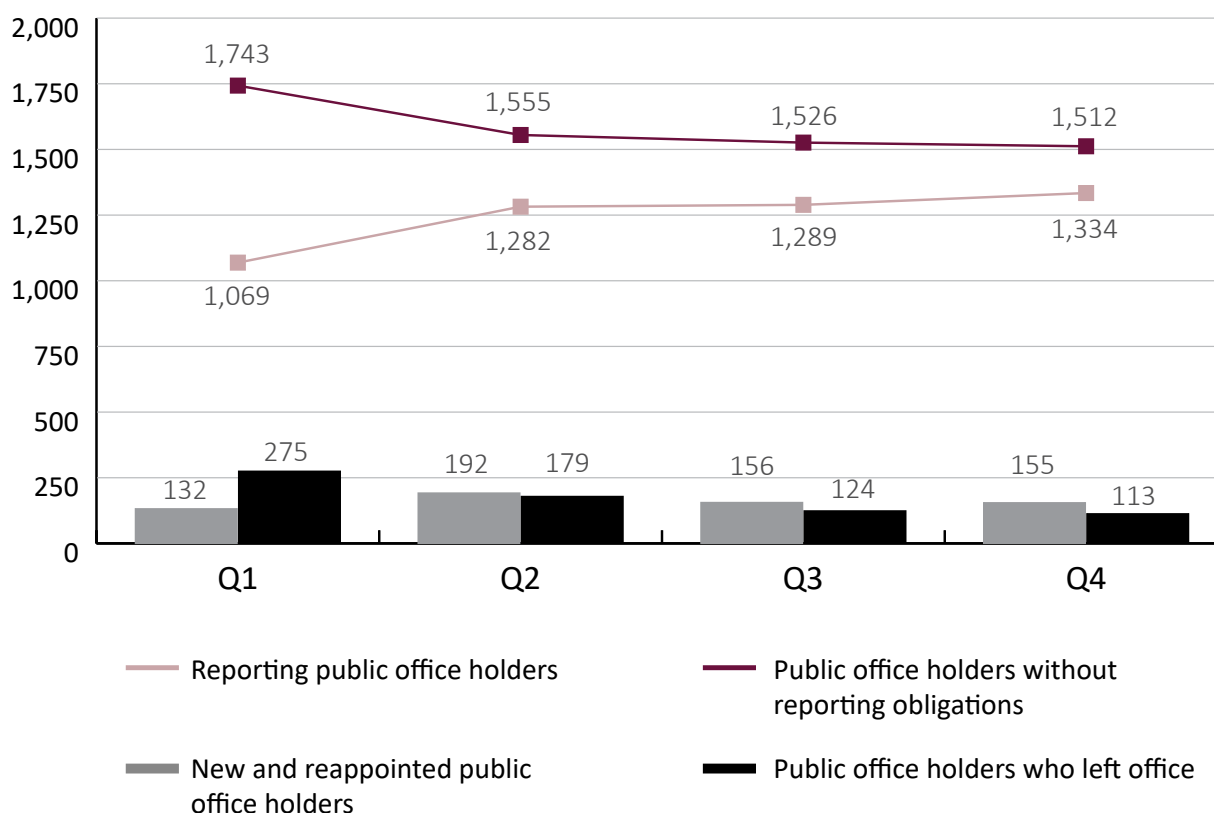
The Commissioner's Office tracks these changes in its [quarterly statistical reports](#).

Figure 2: Turnover among public office holders in 2025-2026

	Newly appointed or reappointed	Left office
Reporting public office holders	326	518
Public office holders without reporting obligations	309	173
Total	635	691

There was a high turnover among appointed officials, including ministerial staff, after the April 2025 election. Although the number of ministerial staff ended at about the same level as the previous fiscal year, it rose by 50% between the first and last quarters of 2025-2026.

Figure 3: Turnover by quarter in 2025-2026



Anyone appointed to public office may face potential conflicts of interest because of their family and social connections, business and professional relationships, and financial investments. Their private interests and those of their friends or family could be affected by decisions they might be called on to make or participate in. The more experience people have outside of government, the more likely they will have such conflicts.

The Commissioner's Office helps public office holders identify and manage potential conflicts of interest by making sure they understand the Act's rules, guiding them on how to submit required information, and advising them on how to follow the rules. It also helps them put in place measures to avoid conflicts of interest if needed.

Personal confidential advice

The Commissioner's Office assigns each reporting public office holder an advisor to help them understand and follow the rules, and to guide them on meeting the *Conflict of Interest Act's* reporting requirements. They can at any time ask their advisor for confidential advice tailored to their personal situation.

Public office holders without reporting obligations are not assigned their own advisor, but are encouraged to reach out to the Office to speak to an advisor at any time and get confidential, personalized advice.

When asked, the Commissioner's Office explains the Act's requirements to candidates for federal appointments. It helps them better understand, before their appointment, the Act's restrictions on assets and outside activities and its post-employment rules.

Figure 4: Advice by topic in 2025-2026

Gifts or other advantages	239
Outside activities	282
Material changes	386
Post-employment	506
General obligations	638
Total	2,051

The Commissioner's Office tracks the topics public office holders ask about every quarter (three-month period) and updates its training and communications to focus on those topics. Requests for advice often reflect what is being talked about in the news. For example, in the lead-up to an election, the Commissioner's Office receives more requests for advice about post-employment. After an election, it gets more questions about general obligations and disclosures.

The advice the Commissioner's Office gives individual public office holders is confidential. It will not share that advice with anyone else or make it public unless the public office holder formally asks it to. The public office holder is not bound by the same confidentiality requirements. They are free to share information about any advice they receive from the Commissioner's Office.

Compliance measures

There are some things the *Conflict of Interest Act* does not allow reporting public office holders to do, because of the potential for conflicts of interest.

They include holding what it calls "controlled assets." However, the Commissioner may allow reporting public office holders who are not ministers or parliamentary secretaries to keep some controlled assets. These must be of such minimal value (up to \$60,000) that they do not pose any risk of conflict of interest in relation to their official duties and responsibilities.

The Commissioner's Office works with public office holders to implement what the Act (part II) calls compliance measures. These are preventive mechanisms that can help them avoid conflicts of interest.

Compliance measures include recusals, conflict of interest screens, and blind trusts.

What are controlled assets?

Assets whose value could be directly or indirectly affected by government decisions or policy, like publicly traded securities (investments that are bought and sold on a public stock exchange).

Recusals

Recusal—leaving the room, physically or virtually, when there is a discussion, decision, debate or vote on a matter in which a public office holder has a conflict of interest—is the best way to manage and resolve such conflicts when they arise.

Ministers and parliamentary secretaries may abstain instead of recusing in the House of Commons. This means they do not have to leave the Chamber or committee room. Instead, they may stay and simply observe.

When a public office holder has recused to avoid a conflict of interest, the Commissioner’s Office posts the recusal in the public registry.

Figure 5: Recusals in 2025-2026

Recusals	23
Individuals who declared a recusal	15

Conflict of interest screens

If a public office holder is highly likely to be involved in discussions or decisions on a matter in which they would have a conflict of interest, the Commissioner’s Office can help set up a conflict of interest screen.

Figure 6: Conflict of interest screens for public office holders

Existing screens on March 31, 2026	59
New screens implemented in 2025-2026	23

A conflict of interest screen is a formal plan that is set up ahead of time to help a public office holder avoid handling files that could put them in a conflict of interest.

The screen administrator (someone from their department or organization who is tasked with managing the screen) will make sure that matters related to the conflict of interest described in the screen are not brought to their attention. They will also be kept out of any discussions or decisions about those files. The screen administrator will give the files to other people to handle instead. Where possible, those people should be at the same level as the public office holder.

If a matter that should have been caught by the screen—or any other matter in which they have a conflict of interest—does come before the public office holder, they must recuse.

The screen administrator's job is to prevent conflicts of interest, and they can ask the Commissioner for confidential advice if needed.

The Commissioner's Office posts conflict of interest screens in the public registry.

Blind trusts

If a reporting public office holder owns any controlled assets when they are appointed, they must divest (get rid of) them within 120 days by:

- selling them in an arm's-length transaction (where there is no special or close connection between them and the buyer), or
- putting them in a blind trust (transferring them to someone to hold and manage so they do not know how their money is being invested).

The public registry includes a description of each controlled asset divested and the method used to divest it (sale or blind trust).

A **blind trust** is a type of trust (a property interest held by one person for the benefit of another) in which the trustee manages the assets for the benefit of the reporting public office holder. The trustee is empowered to administer those assets without any input from the reporting public office holder, and may not give them any information about the trust's day-to-day operations. The terms and conditions of the blind trust agreement must meet the requirements set out in the Act.

Trustees may be public trustees, public institutions like trust and investment companies and banks. That is the case for 55% of current blind trusts set up under the Act. Or, trustees may be individuals like lawyers and chartered accountants. That is the case for 45% of current blind trusts under the Act. The Commissioner must be satisfied that there is an arm's-length relationship between a reporting public office holder and their trustee.

In 2025-2026, the Commissioner's Office oversaw 58 divestments by sale or blind trust.

The Commissioner's Office can help reporting public office holders get reimbursed (paid back) for the costs of setting up, administering and dismantling a trust, selling their assets, or withdrawing from activities. In 2025-2026, it issued 182 reimbursement orders totalling \$1,681,187.

The number of blind trusts has remained steady over the past three years with an average of 81 active blind trusts a year. Over 75% of blind trusts were created for Governor-in-Council appointees. About 12% were for ministers and parliamentary secretaries, and 13% were for ministerial staff.

Compliance measures help public office holders avoid conflicts of interest.

The table below identifies how some of these mechanisms work together.

Compliance mechanism	Description
Recusal	The public office holder leaves the room and withdraws from discussions, decisions, or meetings where they have a conflict of interest.
Conflict of interest screen	An administrative process, managed through staff or senior officials, that prevents officials from being aware of files in which they have a conflict.
Blind trust	A public office holder places their assets under the control of an independent trustee and has no knowledge of or involvement in how the trustee manages those assets.

Figure 7: Annual average of compliance measures over the past five years

	Five-year yearly average
Blind trusts established	16
Screens established	21
Recusals	31

Education and training

The Commissioner's Office offers public office holders and the staff who support them flexible and accessible learning opportunities to help them understand the *Conflict of Interest Act's* rules and other requirements.

These include live online and in-person training, interactive learning tools, and targeted educational sessions for groups of public office holders and their support staff. They are part of an outreach strategy that the Commissioner's Office continually updates to reflect current information needs and emerging trends.

When public office holders are first appointed and during their time in office, the Commissioner's Office sends them information that explains the rules they must follow. In 2025-2026, it explained the rules to 247 public office holders. It also invites them to attend educational sessions focused on their obligations under the Act.

When they are getting ready to leave public office, the Commissioner's Office gives them information about the Act's post-employment rules.

Educational sessions

In 2025-2026, the Commissioner's Office held 39 educational sessions on the Act. Some were regularly scheduled sessions, including several for newly appointed public office holders. Others were delivered in response to requests from government agencies, boards or tribunals whose members are subject to the Act.

To meet participants' learning needs, the Commissioner's Office refines the content to address popular questions about specific issues. To accommodate their schedules, it delivers sessions at different times of day. In 2025-2026, for example, it offered some during evening hours.

Training modules

The Commissioner's Office developed [two training modules on the Act](#) in 2025-2026:

- one is for public office holders without reporting obligations,
- the other is for reporting public office holders.

Both are online, self-directed courses that include real-life scenarios and interactive elements. They help participants understand their obligations and reporting requirements, how to manage potential conflicts of interest, and when to seek guidance. The modules are publicly available and can be accessed through the Office's website.

Guidance on reporting requirements

Under the *Conflict of Interest Act*, reporting public office holders must give the Commissioner's Office a lot of personal and financial information for themselves and their family members. Most of it is kept private, but some is posted in the public registry as required by the Act.

The Act's initial and ongoing reporting requirements support transparency—a key objective of the Act. It also ensures the Commissioner's Office gets the information it needs to help reporting public office holders avoid conflicts of interest.

When a reporting public office holder is appointed or reappointed, the Commissioner's Office guides them on what they need to report and when.

Each reporting public office holder must complete an **initial compliance process** within 120 days after they are appointed. It includes one-on-one meetings with their assigned advisor at the Commissioner's Office that are an opportunity to:

- walk through the Act's rules in detail
- understand how the requirements apply to their specific duties
- explore the nuances of their file or circumstances
- clarify expectations and reporting timelines
- ask questions in a confidential environment.

The initial compliance process starts with each reporting public office holder filling out a Confidential Report. The Commissioner's Office reviews it and advises them on how to organize their affairs to comply with the Act and avoid conflicts of interest. It then prepares all required public declarations for them to review, approve, and return. Approved declarations are posted in the public registry.

While in public office, reporting public office holders must meet **ongoing reporting requirements**, within certain deadlines. They must tell the Commissioner's Office about the following things, some of which are made public:

- Material changes (any change to the information in their Confidential Report).
- Gifts or other advantages with a value of \$200 or more that they or their family members accept, and multiple gifts received from one source in a 12-month period with a total value of \$200 or more.
- Travel on non-commercial chartered or private aircraft accepted by ministers, ministers of state or parliamentary secretaries for themselves, members of their family, or ministerial staff or advisers.
- Recusals (when they stepped away from a discussion, decision, debate or vote on any matter in which they might have a conflict of interest).
- Firm offers of outside employment (does not include jobs or contracts with federal government entities or federal parliamentary entities).
- Acceptance of offers of outside employment.

Figure 8: Public declarations by reporting public office holders added to the public registry in 2025-2026

Agreed compliance measures*	23
Declarable assets	143
Gifts or other advantages	221
Liabilities	94
Outside activities	99
Recusals	23
Summary statements for initial compliance	323
Travel	2
Post-employment exemptions, waivers or reductions	3
Other	1
Total	932

**Agreed compliance measures are mostly comprised of conflict of interest screens.*

There was an 11% increase in public declarations from the year before. That is because more initial compliance processes, which include public declarations, were completed.

Each year, reporting public office holders must go over their information with the Commissioner's Office, and update it as needed. It completed over 650 annual reviews in 2025-2026.

Figure 9: Compliance processes completed in 2025-2026

Initial compliance processes	327
Annual reviews	658

Reviewing and reporting on alleged conflicts of interest

Enforcing the *Conflict of Interest Act* is a core part of the Commissioner's mandate.

It is captured in one of the key objectives of the Commissioner's Office: to review and report on allegations of conflict of interest involving elected and appointed officials. It also relates to a focus area of the Commissioner's Office strategic plan: avoiding conflicts of interest.

Enforcing the Act provides transparency and accountability. It includes investigating possible conflicts of interest, addressing non-compliance with reporting deadlines, and reporting on matters referred by the Public Sector Integrity Commissioner.

Penalties

The Commissioner can impose administrative monetary penalties of up to \$500 on reporting public office holders who fail to meet certain reporting deadlines in the *Conflict of Interest Act*. Penalties are posted in the public registry.

The aim is to encourage compliance rather than to punish. Penalties underscore the importance of meeting the Act's reporting requirements. Timely and accurate filing of information helps the Commissioner's Office identify potential conflicts of interest and advise public office holders on how to avoid them. It also supports transparency.

There are penalties for missing reporting deadlines. The Commissioner issues a penalty when a reporting public office holder fails to respond to repeated communications and appears to be generally uncooperative. Non-compliance is rarely deliberate, and the involvement of the Commissioner's Office usually solves the issue.

In 2025-2026, the Commissioner issued eight penalties.

Administrative monetary penalties

- One \$200 penalty for failing to submit a Confidential Report within 60 days of appointment.
- One \$200 penalty for failing to provide, within 60 days of appointment, as part of the Confidential Report, all information that the Commissioner considers necessary to ensure compliance with the Act.
- One \$200 penalty for failing to provide a confirmation of sale or a copy of a contract or other instrument establishing a trust in respect of divestment of controlled assets.
- Two \$200 penalties for failing to sign a Summary Statement within 120 days of appointment.
- Three \$200 penalties for failing to disclose a material change relating to assets.

Compliance orders

Under [section 30](#) of the Act, the Commissioner may order public office holders to do or stop doing something in order to comply with the Act, like submit documents for an annual review, divest controlled assets, or quit prohibited activities. Compliance orders are posted in the public registry.

The Commissioner did not issue any compliance orders in 2025-2026.

Investigations

The Commissioner can investigate public office holders when he has reasonable grounds to believe they may have contravened the *Conflict of Interest Act*.

He can start an investigation (called an examination) under the Act in one of two ways:

- When asked to investigate by a Senator or a Member of the House of Commons. They must provide reasonable grounds to believe that someone has contravened the Act. The Commissioner's Office received 4 examination requests from Members in 2025-2026.
- On his own initiative if he has reason to believe that someone may have contravened the Act. Decisions to investigate may be based on information from media reports or complaints from members of the public, among other sources. The Commissioner's Office received 26 examination requests from members of the public in 2025-2026.

The Commissioner reports publicly on investigations. This supports transparency and accountability. Examination reports are also educational tools that can help prevent future contraventions of the Act.

No examination reports were issued in 2025-2026. The Commissioner discontinued one examination without publishing a report. The allegation was that a former ministerial staffer had communicated with their former minister about a client's application for funding from their department. The evidence gathered during the examination from the subject and other witnesses did not support the allegation.

Case files

The Commissioner's Office opens a case file if it becomes aware of a concern or an allegation that someone may have contravened the Act. This does not mean it is investigating, but is simply reviewing the matter to determine if there are grounds to investigate. Most case files result from communications from members of the public, often on the basis of information from news articles. Concerns sometimes originate within the Office.

In addition to considering the information provided by the complainant, if there is one, it gathers and reviews all relevant information from public sources, and information from its confidential disclosure files that could relate to the matter. This is called an initial review.

The Commissioner does not have powers to compel testimony or documents from witnesses during an initial review. These powers apply only when an examination has been launched.

Not all case files result in examinations. The Commissioner will investigate only if he finds that an examination is warranted. If he finds an examination is not warranted, the case file is closed.

Referrals from the Public Sector Integrity Commissioner

The Public Sector Integrity Commissioner may refer matters to the Commissioner under subsection 24(2.1) of the [Public Servants Disclosure Protection Act](#).

Under section 68 of the *Conflict of Interest Act*, the Commissioner must issue a public report on each referral, whether he decides to investigate or not.

The Commissioner received one referral from the Public Sector Integrity Commissioner in 2025-2026.

Case files (a case file is a concern or allegation reviewed by the Commissioner's Office)

- **Total case files: 24**
 - o Ongoing: 4
 - o Closed without an examination: 20
 - o Closed with publication of report: 0

Figure 10: Breakdown of case files in 2025-2026

Subject of each case file	Total
Current or former minister or parliamentary secretary	4
Current or former public office holder	20
Source of these case files	Total
Member of the House of Commons	1
Office of the Public Sector Integrity Commissioner	1
Media	0
Member of the general public	21
Within the Office	1
Nature of the concern*	Total
Furthering a private interest (subsection 6(1) of the Act)	12
Duty to recuse (section 21)	1
Post-employment rules (sections 33 to 35)	5
Influence (section 9)	8
Preferential treatment (section 7)	5
Prohibited activities (section 15)	14

*A case file can have more than one concern

Fostering public confidence

Helping Canadians trust that the actions of elected and appointed federal officials are free from conflicts of interest is a key objective of the Commissioner's Office.

In fact, everything it does ultimately supports this objective, including projects and activities in three focus areas identified in its strategic plan:

- **Avoiding conflicts of interest** – Communicating clearly and accessibly about the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons* to support transparency and accountability.
- **User-friendly experience** – Ensuring that public office holders have positive interactions with the Commissioner's Office so they feel comfortable asking for advice when faced with potential conflicts of interest.
- **Tools, knowledge and skills** – Making sure employees have what they need to fulfill the Commissioner's mandate effectively.

As an independent, non-partisan entity, the Commissioner's Office is well placed to ensure impartial oversight, prevent political interference, and promote accountability.

Supporting transparency

The Commissioner's Office is as open as possible with Parliament and Canadians.

That is because transparency is key to public trust. When information is shared, people can see that the rules are being followed.

Transparency is built into the *Conflict of Interest Act* through its public declaration requirements. Some of the information that reporting public office holders must give the Commissioner's Office is posted in the public registry.

Transparency is balanced by the Act's confidentiality provisions, which encourage public officials to communicate freely and openly with the Commissioner's Office.

The Commissioner's Office respects this balance. When asked to share or comment on confidential matters, it directs those who ask to the public registry.

Public registry

A searchable database that can be accessed through the Office’s website, the [public registry](#) contains all the information about current Members that the Commissioner is allowed to share.

Figure 11: Public registry postings and views

	Postings	Views
2025-2026	1,248	190,000
Five-year average	1,260	126,900

Reporting public office holders’ information stays in the registry until the end of their post-employment cooling-off period.

The public registry was accessed 520 times a day on average in 2025-2026. It tends to get more visitors when an issue about someone’s disclosures comes up in the media, or if the Commissioner’s Office has posted information in the registry about a high-profile official.

Reporting to Parliament

The Commissioner has a duty to report to Parliament, testify before parliamentary committees, and answer questions from Parliament. As an independent Officer of the House of Commons, he reports to Parliament directly, not through a minister.

By June 30 each year, the Commissioner sends a report on the administration of the *Conflict of Interest Act* to the Speakers of the Senate and the House of Commons for tabling.

The Commissioner’s Office sends communiqués to parliamentarians about its reports and other activities. It sent seven of these in 2025-2026.

The House of Commons [Standing Committee on Access to Information, Privacy and Ethics](#) has oversight responsibility for the Commissioner’s Office. The Committee reviews its annual spending estimates, and matters related to the Commissioner’s reports under the Act.

Figure 12: Committee appearances in 2025-2026

September 15, 2025	House of Commons Standing Committee on Access to Information, Privacy and Ethics Briefing session with the Conflict of Interest and Ethics Commissioner Commissioner von Finckenstein appeared with Lyne Robinson-Dalpe, Director, Advisory and Compliance Melanie Rushworth, Director, Communications, Outreach and Planning
October 30, 2025	House of Commons Standing Committee on Procedure and House Affairs (<i>in camera</i>) Forms and guidelines under the <i>Conflict of Interest Code for Members of the House of Commons</i> Commissioner von Finckenstein appeared with Lyne Robinson-Dalpe, Director, Advisory and Compliance Michael Aquilino, Legal Counsel
December 8, 2025	House of Commons Standing Committee on Access to Information, Privacy and Ethics Review of the <i>Conflict of Interest Act</i> Commissioner von Finckenstein appeared with Lyne Robinson-Dalpe, Director, Advisory and Compliance Michael Aquilino, Legal Counsel

The Commissioner participated in a review of the *Conflict of Interest Act* conducted by the Standing Committee on Access to Information, Privacy and Ethics.

In public hearings held from September 24 to December 8, 2025, the Committee heard from 23 expert witnesses from the academic community, business, and government, including representatives of the Commissioner's Office. While many pointed to the strengths of the Act, which has been held up as a model internationally, some also identified possible improvements.

The Committee presented an [interim report](#) to the House of Commons on November 28, 2025.

The Commissioner appeared before it to discuss related matters before the review started, and again as the hearings ended. He noted that the Act has been working well since it took effect in 2007 and has met the purposes set out in [section 3](#), but said its administration could be made more efficient.

The Commissioner proposed five amendments that reflect the experience of the Commissioner's Office in administering the Act for almost two decades. They are described in the [2024-2025 Annual Report](#) under the Act.

Public communications

The Commissioner’s Office shares as much information as it can, and in different ways, with the public under the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*.

It posts information on its website and on social media and responds to information requests from the media and members of the public.

Figure 13: Website users and page views in 2025-2026

	2025-2026
Website users	218,700
Website page views	366,500

In 2025-2026, the website attracted 70% more users and 30% more page views than the year before. The Commissioner’s Office also continued to work with House of Commons IT Services on the development of a redesigned website.

Figure 14: Social media presence in 2025-2026

	X @EthicsCanada	LinkedIn @ethics-ethique-Canada
Posts	42	44
Followers	4,445	1,262

The Commissioner's Office uses social media to share information about its activities and updates from the public registry that may be of interest to journalists, academics, Canadian and international ethics practitioners, and others.

Media inquiries in 2025-2026

- **Emails and phone calls from the media: 147**
 - o Over 80% were questions about a specific elected or appointed official, including questions about their public disclosures and compliance measures
 - o About 20% were general inquiries about the Office's role and mandate and activities

It responds to journalists and members of the public who seek information by explaining how the Act and the Code work, and by directing them to the public registry when appropriate.

Public inquiries related to the Office in 2025-2026

- **Emails, letters, and phone calls from members of the public: 1,668**
 - o 10% were general inquiries about the role of the Office.
 - o 75% were complaints about an elected or appointed official. Some were shared with the Investigations division for follow-up. Complaints are often based on observations made on the public registry or items that are discussed in the news. For example, this includes a coordinated email campaign describing an allegation against a minister. The Office responded to all 800+ emails by explaining that the minister's alleged behaviour was not covered by the Commissioner's mandate.
 - o 15% were general complaints about the activities of individuals that may not have been subject to the Act or the Code, about Members' floor crossings and behaviour in the House of Commons, and their use of social media.

The Commissioner's Office received three times more public inquiries than in the previous year. This increase is likely due to the email campaigns mentioned above. Most of these inquiries were not directly related to the Office's mandate and the senders are informed that their concerns will not be acted on. Nevertheless, responding to these inquiries allows the Office to further explain how the rules work and are applied.

The Commissioner's Office is transparent about what it does. For example, it publishes [quarterly statistical reports](#) that contain data on its activities, and tracks how it meets its service standards:

- Contact new or reappointed public office holders within 3 business days
- Respond to public office holders' requests for advice within 3 business days
- Answer media inquiries within 4 hours
- Answer inquiries from other members of the public within 10 business days

It met all these service standards for 2025-2026 as a whole.

Connecting with others

The Commissioner's Office works with other organizations to stay updated on and share best practices. This supports its objective of fostering public confidence that elected and appointed officials' actions are free from conflicts of interests. Participation in these networks helps it strengthen its internal expertise.

It continues to coordinate information sharing within the **Canadian Conflict of Interest Network** (CCOIN) of federal, provincial, and territorial conflict of interest commissioners.

In September 2025, the Commissioner, the Director of Communications, Outreach and Planning and another Office representative attended CCOIN's annual meeting, hosted by Conflict of Interest Commissioner Victoria Gray in Victoria, British Columbia.

Commissioner von Finckenstein and Senate Ethics Officer James O'Reilly will welcome CCOIN commissioners to Ottawa in September 2026.

The **Réseau francophone d'éthique et de déontologie parlementaires** (RFEDP) promotes exchanges between parliaments and entities in the [Organisation internationale de la Francophonie](#) [link in French only] that are interested in ethics and codes of conduct. The Commissioner's Office is a founding and active member.

RFEDP activities in 2025-2026:

- At the RFEDP's Annual General Assembly held in Paris in July 2025, the Commissioner's Office was appointed Vice-President of the RFEDP Bureau. Its representative for the post is the Director of Communications, Outreach and Planning.
- Throughout the year, the Commissioner's Office contributed to the Bureau's regular meetings and supported the integration of new members.

- It strengthened its leadership role in the RFEDP by creating a workshop called “Developing ethical and deontological reflexes.” This training supports member countries in addressing common parliamentary ethics challenges. It delivered the online workshop to Burundian parliamentarians in June 2025 and collaborated with several RFEDP partners—among them the School of Advanced Political and Legal Studies and Professor Charles Moumouni (Laval University)—to tailor the content to diverse national contexts.
- A second, more interactive version of the workshop was delivered to parliamentarians and academics in the Democratic Republic of Congo in February 2026.
- The Commissioner’s Office actively participated in RFEDP-led sessions on the exchange of best practices.

The Commissioner’s Office is part of the **Council on Governmental Ethics Law (COGEL)**, an international network of professionals working in government ethics, lobbying regulation, elections administration, campaign finance, and freedom of information. COGEL promotes integrity and transparency in government by supporting training, professional development, and the exchange of expertise among practitioners from different jurisdictions.

Representatives of the Commissioner’s Office attend COGEL’s annual conference and participate in virtual activities throughout the year. These events are opportunities to exchange knowledge and collaborate with counterparts working in conflict of interest and related fields.

In 2025-2026, the Commissioner’s Office shared its expertise when representatives participated as speakers on two panels at the COGEL conference.

Managing the Commissioner's Office

The administration of the *Conflict of Interest Act* is supported by the employees, policies and processes of the Commissioner's Office.

The need to continually maintain and strengthen this infrastructure is reflected in two focus areas of its strategic plan:

- **Healthy and fulfilling workplace** – Activities include keeping employees engaged and motivated, promoting inclusivity and equity, and respecting and supporting bilingualism.
- **Tools, knowledge and skills** – Activities include offering employees comprehensive training, implementing coherent information management practices, and facilitating the sharing of expertise.

A team of 51 employees supports the Commissioner. They have expertise in areas like compliance, law, communications, corporate management, investigations, and parliamentary relations.

The Commissioner provides overall direction and makes the decisions that need his input and approval. He works closely with other members of the Office's Senior Management Committee.



Commissioner Konrad von Finckenstein (centre) with (from left to right):

- *Martine Richard, Senior General Counsel, Investigations and Legal Services*
- *Sandy Tremblay, Director, Corporate Management*
- *Lyne Robinson-Dalpe, Director, Advisory and Compliance*
- *Melanie Rushworth, Director, Communications, Outreach and Planning*

Lyne Robinson-Dalpe retired in the last quarter of 2025-2026 after more than 20 years of dedicated service to the Commissioner's Office in a 35-year career of public service. Lisa DeMoor has now joined the Office as Director, Advisory and Compliance.

Under the Commissioner's leadership, employees handle the daily tasks of administering the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*.

They make sure the processes and structures are in place to support their administration. These include strong internal controls to manage public money responsibly, protect public assets, and use resources in an effective and efficient way. An independent auditor reviews the Office's financial statements every year. [Financial information for 2025-2026](#) is outlined in the Appendix.

Accessibility

Office employees also work on other important files like compliance with the *Accessible Canada Act*.

In December 2025, the Commissioner's Office released its second accessibility plan, for the 2025 to 2028 period. The updated plan builds on its 2024 progress report and incorporates best practices from its 2023-2025 accessibility plan. It outlines commitments to remove barriers across all priority areas under the *Accessible Canada Act*, and introduces new elements like culture, SMART objectives, and enhanced consultation processes.

Supporting bilingualism

In 2025-2026, the Commissioner's Office reviewed and updated its Policy on Official Languages.

The language requirements assigned to positions reflect employees' duties and work units, and obligations under the *Official Languages Act* related to service to the public and language of work. All term and indeterminate positions designated as bilingual are staffed with individuals who have the required linguistic profile.

The Commissioner's Office actively offers communications and services in both English and French. In particular, it:

- gives members of the public a clear choice to communicate in their preferred official language when initiating contact with them, and
- continues communications in the language chosen by the member of the public.

The Commissioner's Office makes the English and French versions of all written communications to the public available at the same time, and ensures they are of equal quality, no matter what communication method it uses.

Information management

The Commissioner's Office follows information management practices that include destroying its files on former public office holders who have been in post-employment under the *Conflict of Interest Act* for more than 10 years.

It identifies all internally held files of individuals who have passed this 10-year limit. Then it deletes their electronic information from the Office's records management system. If there are physical files, it shreds them.

Training

The Commissioner's Office makes sure employees get the right training so they have the knowledge and skills to do their jobs and help fulfill its mandate.

In 2025-2026, it started refining its onboarding process, which is designed to welcome new employees and give them clear, practical guidance from the moment they join the Commissioner's Office. It brings together what they need to know about their role, the Commissioner's mandate, and how the Office works day-to-day, so they can contribute to a healthy, respectful and effective workplace. Step-by-step checklists, orientation activities and follow-up milestones help ensure each employee has the tools, knowledge and support they need to succeed in their new position, and feels part of the Office's mission from the start.

The Commissioner's Office offers employees ongoing training on systems and tools, and occasional training on policies and procedures. For example, in March 2026, harassment and violence prevention training was provided to all employees.

Each year, the Commissioner's Office identifies job-specific training opportunities in employees' individual learning and development plans. It also promotes the sharing of expertise, including soft skills, within the Office and through employees' active participation in external knowledge groups.

Crisis communications plan

In September 2025, the Senior Management Committee adopted a crisis communications plan. It identifies several scenarios that would require a crisis communications approach.

Staffing

To make sure it has the right positions and the right people in them to support its mandate, the Commissioner's Office ran seven staffing processes in 2025-2026.

In June, it submitted its first Pay Equity Annual Statement to the Office of the Pay Equity Commissioner.

Legal developments

The Commissioner's decisions on investigations are sometimes challenged in court. Dealing with these cases can help clarify the Commissioner's mandate and powers.

One court case was underway in 2025-2026.

Democracy Watch had asked the Federal Court of Appeal to review former Commissioner Mario Dion's findings in the 2021 *Trudeau III Report*. He had concluded that Prime Minister Justin Trudeau did not contravene the *Conflict of Interest Act* when the government chose WE Charity to run a COVID-19 program, even though some of his family members were closely involved in some of WE Charity's projects. The Commissioner determined that the Act only covers real or potential conflicts of interest, and a situation that simply appears to give rise to an appearance of conflict does not contravene the rules.

The Federal Court of Appeal heard the matter on March 24, 2024.

The Attorney General of Canada (it was named to respond to Democracy Watch's application for judicial review) argued that the application was based on grounds barred from judicial review by [section 66](#) of the *Conflict of Interest Act*. Section 66 is a partial privative clause, which prevents an applicant from bringing an application for judicial review on questions of law and fact.

On October 2, 2024, the Federal Court of Appeal dismissed Democracy Watch's application for judicial review.

In December 2024, Democracy Watch filed an application for leave to appeal to the Supreme Court of Canada. Leave was granted on May 1, 2025.

A full panel of the Supreme Court held hearings on January 14 and 15, 2026. The Court reserved judgment in the case and will publish its ruling later.

Appendix: Financial resources summary

	(thousands of dollars)				
Program Activities	2024-2025 Actual Spending	Main Estimates	2025-2026 Total Authorities	Actual Spending	Alignment to Government of Canada Outcomes
Administration of the <i>Conflict of Interest Act</i> and the <i>Conflict of Interest Code for Members of the House of Commons</i>	7,594	8,152	8,152	7,984	Government Affairs
Contributions to employee benefit plans	939	1,013	1,013	960	
Total spending	8,533	9,165	9,165	8,944	
Plus: cost of services received without charge	918	N/A	N/A	998	
Net cost of department	9,451	9,165	9,165	9,942	

The budget process for the Commissioner's Office is outlined in the *Parliament of Canada Act*. Each year, the Office estimates how much money it will need for the next fiscal year. The Speaker of the House of Commons reviews this estimate and sends it to the President of the Treasury Board, who presents it to the House along with the Main Estimates (the Government of Canada's budget) for that fiscal year. The Standing Committee on Access to Information, Privacy and Ethics reviews and reports on the Office's effectiveness, management and operations, and its spending plans.

The figures in this summary have not been audited. Complete audited [financial statements](#) will be posted on the Office's website.