



CITY OF EDMONTON

BYLAW 18483

COUNCIL CODE OF CONDUCT

(CONSOLIDATED ON NOVEMBER 13, 2024)

**THE CITY OF EDMONTON
BYLAW 18483
COUNCIL CODE OF CONDUCT**

WHEREAS:

The Municipal Government Act requires councils of all municipalities in Alberta to adopt a code of conduct by bylaw;

Committing to a code of conduct provides Councillors with shared accountability and a framework to guide ethical conduct in a way that upholds the integrity of the City and the high standards of professional conduct the public expects from elected officials;

A code of conduct is one aspect of accountability and transparency both internally, as between Councillors and City employees, as well as externally, with other levels of government, the media, and the public;

Council recognizes that Edmontonians expect the highest standards of ethical conduct from their elected officials and that public interest is best served when Councillors perform their functions of office and manage their private interests with integrity, accountability, transparency, and respect;

Deleted

(S.2, Bylaw 20781, November 13, 2024)

Considering the City’s municipal purposes and the duties of Councillors, Council desires to demonstrate and promote the principles of integrity, accountability, transparency, and respect through its actions and behaviours;

While carrying out their governance functions, Councillors must act in the best interest of the City as a whole, and be open to persuasion and differing perspectives;

(S.3, Bylaw 20781, November 13, 2024)

Edmonton City Council enacts:

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| PURPOSE | 1 | The purpose of this bylaw is to adopt a code of conduct for Councillors. |
| DEFINITIONS | 2 | (1) Unless otherwise specified, words used in this bylaw have the same meaning as defined in the Municipal Government Act or the <i>Local Authorities Election Act</i> , RSA 2000, c L-21. |
| | (2) | In this bylaw: |
| | (a) | “ City ” means The City of Edmonton; |
| | (b) | “ City employee ” means an individual that reports to |

the City Manager or City Auditor and provides services to the City under an employment agreement, personal services agreement, or in the capacity of agent, student, or volunteer;

- (c) **“City Manager”** means the chief administrative officer of the City;
- (d) **“Council”** means the City’s council;
- (e) **“Councillor”** means the City’s councillors and includes the Mayor;
- (f) **“Councillor’s employee”** means an individual that provides services to a Councillor under an employment agreement, personal services agreement, or in the capacity of agent, student, or volunteer;
- (g) **“Councillor’s family”** means a Councillor’s spouse or adult interdependent partner, a Councillor’s children, the parents of a Councillor, and the parents of a Councillor’s spouse or adult interdependent partner;
 - (g.1) **“Ethics Advisor”** means the individual appointed as Ethics Advisor by Council;
(S14(a), Bylaw 18567, September 5, 2018)
- (h) **“Freedom of Information and Protection of Privacy Act”** means the *Freedom of Information and Protection of Privacy Act*, RSA 2000, c F-2;
 - (h.1) **“Integrity Commissioner”** means the individual appointed as Integrity Commissioner pursuant to the Integrity Commissioner Bylaw, Bylaw 18567;
(S14(b), Bylaw 18567, September 5, 2018)
- (i) **“Mayor”** means the City’s chief elected official;
- (j) **“Municipal Government Act”** means the *Municipal Government Act*, RSA 2000, c M-26; and
- (k) **“spouse”** means the spouse of a married person but does not include a spouse who is living separate and apart from the person if the person and spouse have separated pursuant to a written separation agreement or if their support obligations and family property have been dealt with by a court order.

RULES FOR INTERPRETATION	3	<p>This code of conduct is intended to supplement any other legal duties imposed on a Councillor by an enactment, bylaw, or Council approved policy, including:</p> <ul style="list-style-type: none"> (a) <i>Alberta Human Rights Act</i>; RSA 2000, c A-25.5; (b) <i>Freedom of Information and Protection of Privacy Act</i>; (c) <i>Local Authorities Election Act</i>, RSA 2000, c L-21; (d) <i>Municipal Government Act</i>; (e) <i>Occupational Health and Safety Act</i>, SA 2017, c O-2.1; and (f) <i>Council Procedures Bylaw</i>, Bylaw 18155.
CODE OF CONDUCT	4	<p>The code of conduct contained in Schedule A of this bylaw is adopted by Council to apply to all Councillors in their capacity as elected officials.</p>
COMPLAINTS	5	<p>If any person believes that a Councillor has contravened the code of conduct adopted by this bylaw, the person may make a written complaint in accordance with Schedule B - Complaints.</p>
SANCTIONS	6	<ul style="list-style-type: none"> (1) If Council determines it appropriate to do so, Council may, by motion passed by special resolution, impose sanctions on a Councillor who contravenes the code of conduct adopted by this bylaw in accordance with Schedule C - Sanctions. (2) Notwithstanding anything in this bylaw, Council may not impose any sanction that has the effect of preventing the Councillor from fulfilling their legislated duties. (3) Nothing in this bylaw requires Council to impose a sanction for any complaint or contravention.

(NOTE: Consolidation made under Section 69 of the *Municipal Government Act*, R.S.A. 2000, c.M-26 and Bylaw 16620 Section 16, and printed under the City Manager's authority)

Bylaw 18483, passed by Council June 26, 2018

Amendments:

Bylaw 18567, September 5, 2018

Bylaw 18827, April 2, 2019

Bylaw 18861, May 14, 2019
Bylaw 19142, February 3, 2020
Bylaw 19578, February 22, 2021
Bylaw 20781, November 13, 2024

SCHEDULE A
COUNCIL CODE OF CONDUCT

Part A: Representing the Municipality

1. While carrying out their duties, Councillors must:
 - a) *Deleted;*
 - b) *Deleted;*
 - c) attend and vote at all meetings as empowered by and in accordance with the Municipal Government Act, unless prohibited by an enactment from doing so;
 - d) accurately represent and respect decisions made by Council while preserving the value of fair comment and differences of opinion; and
 - e) communicate respectfully with members of the public, Councillors and City employees, including employees providing services to a Councillor's office.
(S.4-5, Bylaw 20781, November 13, 2024)

Part B: Communications

1. Without limiting the ability of a Councillor to hold a position on an issue and respectfully express their opinions, Councillors will:
 - a) ensure their communications accurately reflect the facts of Council's decisions;
 - b) refer inquiries regarding Council's position on an initiative to Council's representative for that initiative;
 - c) ensure that all communications are accurate and not issue any communication that the Councillor knows, or ought to have known, to be false;
 - d) ensure that all communications issued by, or on behalf of, the Councillor, including social media, are respectful and do not discriminate, harass, or demonstrate disrespect toward any person; and
 - e) not issue any communications that mislead Council or the public about any matter relating to the decisions of Council or the business of the City.
(S2. Bylaw 19142, February 3, 2020)
(S.6, Bylaw 20781, November 13, 2024)
2. No Councillor may engage in negotiations or make representations or commitments on behalf of the City unless authorized to do so by Council, but may advocate for the City's interests to any level of government or non-governmental body as opportunities arise.
3. If a Councillor becomes aware of or receives correspondence through a City-issued account or address that is a ward-specific constituency issue relating to another Councillor's ward, the Councillor will offer to refer the matter to the ward Councillor, or alternatively, the Mayor.
(S.7, Bylaw 20781, November 13, 2024)

Part C: Decision-making Processes

1. Councillors will exercise their authority to make decisions in a manner that demonstrates fairness, respect for differences, and an intention to work together for the common good and in the public interest.
2. Councillors will prepare for meetings by reviewing materials in advance and will be respectful and attentive to the public and City employees providing information at a meeting.
3. If a Councillor provides information contained in records or documents at a meeting that was not provided in advance and is not available to all members of Council, the Councillor must not refuse a request to provide the information to all members of Council.
4. Councillors will obtain all necessary information about the operations and administration of the City from the City Manager using processes developed by the City Manager.
(S.8-10, Bylaw 20781, November 13, 2024)

Part D: Adherence to Rules

1. *Deleted.*
2. Councillors will comply with Council approved policies, and will support City employees, including employees providing services to a Councillor's office, to do the same on behalf of the City.
(S.11-12, Bylaw 20781, November 13, 2024)

Part E: Respectful Interactions

1. Councillors will conduct themselves with decorum at all times, including while attending meetings, interacting with City employees and Councillor's employees, and engaging with the public.
2. Councillors who act as chair of a meeting will, throughout a meeting, set expectations for appropriate decorum and conduct for all in attendance.
3. Councillors must not use any harassing, offensive, discriminatory, disrespectful, or unparliamentary language about Council, a Councillor, City employees, Councillor's employees, or the public.
4. A Councillor must not demand a City employee to engage in partisan or political activities at any level of government, or subject any City employee to reprisal for a refusal to engage in such activities. A Councillor must also not subject any City employee to reprisal for any engagement in partisan or political activities at any level of government that is done in their personal capacity.
5. If a Councillor makes an inquiry to a City employee when the inquiry is not made in their capacity as Councillor, the Councillor must inform the City employee that they are acting in

a personal capacity and not as a Councillor.
(S.13-14, Bylaw 20781, November 13, 2024)

Part F: Confidential Information

1. Councillors must keep confidential all information received during a Council or council committee meeting held in private in accordance with the Municipal Government Act, information that would be exempt from disclosure under the Freedom of Information and Protection of Privacy Act, or otherwise received in confidence or marked as confidential.
2. If a Councillor receives confidential information, they must use the information only for the purpose for which the information is intended and to fulfill the duties of their office, and must not seek to access confidential information for any other purpose.
3. A Councillor must not use confidential information for personal or private interests, including interests of the Councillor's family, or in any way that may cause harm or detriment to any person.
4. Councillors must respect the right of access to City records under the Freedom of Information and Protection of Privacy Act and the obligation to protect privacy, and will:
 - a) provide any records subject to an access request under the Freedom of Information and Protection of Privacy Act to the City employee appointed as head for the purposes of that Act;
 - b) not interfere with the access request processes set out in the Freedom of Information and Protection of Privacy Act and implemented by the head;
 - c) after receiving notice of an access request, not alter, destroy, or withhold any record that is subject to the request; and
 - d) safeguard personal information.

Part G: Conflicts of Interest

1. Councillors will adhere to the pecuniary and other conflict of interest obligations prescribed by the Municipal Government Act, and will obtain advice whenever a potential conflict of interest may exist to preserve the integrity of Council's decisions.
2. When exercising official duties, a Councillor must not give preferential treatment to any person or organization with the intent of advancing the Councillor's private interests or for their personal benefit.
3. A Councillor must not act as an advocate before Council on behalf of any person or organization for compensation.
4. Councillors must not use information received as an elected official that is not available to the public or the rest of Council, for a purpose other than carrying out the Councillor's duties.
5. Councillors should avoid carrying out their duties in any manner that may reasonably be perceived as being in conflict with any future endeavour that may be undertaken by the

Councillor.

6. Councillors have a right to freely and fully participate in the political process in their personal capacity, including contributing personal money or real property, volunteering, or offering financial support of partisan political activity, provided that, when doing so, they disclose that such participation is not in their capacity as elected officials.
7. While acting in their capacity as elected officials, Councillors will not:
 - a) attend partisan political events; or
 - b) contribute money or real or City property for the benefit of a political party, constituency association, or candidate, or in support of partisan political activities that involve direct or indirect support of, or opposition to, any political party or candidate for public office.
8. Council may, by motion, direct a Councillor or the Mayor to participate in the political process as Council determines appropriate. Whenever such direction is given, the provisions in this part must be applied in a manner that supports participation to the extent that is reasonable and in accordance with applicable laws and Council's direction.
(S.15, Bylaw 20781, November 13, 2024)

Part H: Use of Influence

1. *Deleted.*
2. If serving as a reference or recommending an individual for employment with the City, a Councillor must comply with the City's hiring practices and must not use their role as an elected official to unfairly influence any hiring decisions.
3. Councillors must not contact or attempt in any way to influence any member of a judicial, quasi-judicial, or regulatory body before which the City may be a party regarding a matter before that body.
(S.16, Bylaw 20781, November 13, 2024)

Part I: City Assets

1. Councillors will only use City assets to assist them in carrying out their duties, but may use City assets that are generally available to the public on the same terms and conditions offered to the public, including complying with booking procedures and paying applicable fees, and may be provided with surplus City promotional items and/or passes to City attractions and facilities for the purpose of donating them to community organizations.
(S.2, Bylaw 18861, May 14, 2019)
2. A Councillor may use communication facilities, such as computers, telephones, electronic mail, and mobile devices, provided by the City for personal use provided that such use is not offensive or inappropriate, or would not cause harm to any person.
3. Councillors will comply with all information security procedures applicable to City

employees and will not take any actions that may compromise the integrity or security of the City's information systems.

4. A Councillor must not attempt to obtain financial gain from any of the City's intellectual property, and all Councillors acknowledge that the City's intellectual property is owned by the municipal corporation.
5. Councillors will maintain their constituency and City records in accordance with City policies and applicable laws.
6. Immediately prior to the end of their term of office, Councillors will return City assets, including City records, to the City Manager.

Part J: Orientation and Training

1. Councillors will attend all training required by the Municipal Government Act to be provided to Councillors, as well as any additional training directed by Council.

Part K: Elections and Campaigning

1. Events organized, sponsored, or advertised using City budgets specifically allocated for Council use (ward budgets or Council Contingency) must be completed by May 31 of a general election year and not scheduled until following the inaugural organizational meeting of Council.
2. Councillors must not issue City-funded ward newsletters and City-funded mass electronic mail distributions after May 31 of a general election year.
3. Councillors who are nominated to run for re-election must not perform official or ceremonial duties at any event organized or substantially sponsored by the City between nomination day and election day.
4. Councillors must not use their office, the services of City employees, or any City assets, including any of the City's intellectual property, communication facilities, or other facilities, for election- or campaign-related activities.
5. Councillors may only use the City's website, social media, and electronic mail only for official duties. Councillors will maintain separate websites, social media, and electronic mail accounts for all campaign activities and communications. City-funded website and electronic mail distribution lists that are used for official duties may not be used for campaign activities and communications. However, this does not prevent the returning officer from providing links to campaign websites for all candidates on the City's elections website.
6. Councillors must not use any City communications facilities or services for their campaign, including the use of media contacts, electronic mail addresses and distribution lists, the City

of Edmonton photo library, and website development, writing, or print material services provided by City employees.

7. Councillors must not seek individual advice from City employees regarding election rules and processes or their obligations as candidates, including any obligations as candidates that may apply while the Councillor holds office. However, nothing restricts a Councillor from receiving information available to all candidates for an election.
8. Councillors must not use their office to gain an unfair advantage over other candidates, or to provide an unfair advantage for a candidate.
9. Councillors must not use City assets to promote or oppose the candidacy of any person to elected office in any municipal, provincial, or federal campaign.
10. Councillors will respect the role of the returning officer, and will not seek to interfere with the returning officer's duties or any election process.
11. Nothing in this part restricts a Councillor from accepting services or support from City employees or Councillor's employees for election-related purposes, provided that the individual is acting in a personal capacity, on personal time, and not receiving remuneration from the City for the same services.
(S.17-19, Bylaw 20781, November 13, 2024)

Part L: Gifts and Benefits

In this part, "gift" means a fee or advance paid to or a gift or personal benefit provided with the Councillor's knowledge to a Councillor, the Councillor's family, or to a Councillor's employee, that is connected directly or indirectly to the performance of the Councillor's duties.

1. No Councillor will accept a gift, unless it is:
 - a) compensation authorized by legislation, including compensation for serving on external bodies as a Council-approved City representative;
 - b) suitable mementos (e.g. personal plaques, books, coffee mugs, pen and pencil sets, ties, and scarves) received as an incident of accepted protocol or normal expression of courtesy, or a reasonable memento of a function honouring the Councillor;
 - c) a political contribution otherwise authorized and reported by law, such as in the case of Councillors running for office;
 - d) services provided without compensation by persons volunteering their time to further the interests of the City or the Councillor's ward;
 - e) food, lodging, transportation, or entertainment provided by other levels of government or by the government of a foreign country, or by a conference, seminar, or event organizer where the Councillor is attending in an official capacity;
 - f) in-kind (non cash) sponsorships or donations for community events organized or run by a Councillor, or a third party on behalf of a Councillor, provided that the event will be held in accordance with the standards of conduct and decorum expressed or implied in this code of conduct;

- g) admission to, and food and beverages consumed at, community events and widely-attended events such as conventions, conferences, sporting and arts events, banquets, or training and education programs, provided that:
 - i) the Councillor's attendance serves a legitimate purpose associated with the Councillor's duties;
 - ii) *Deleted* (S. 2, Bylaw 19578, February 22, 2021)
 - iii) the admission is unsolicited by the Councillor; and
 - iv) the value is reasonable and the invitations infrequent. (S.3, Bylaw 18861, May 14, 2019)
2. A Councillor will, as soon as practicable, return to the donor any gift that does not comply with this code of conduct, along with an explanation as to why the gift cannot be accepted.
 3. Official gifts received by Councillors on behalf of the City are considered City assets and are managed by the City Manager for public display and/or archiving.
 4. Councillors must disclose any single gift accepted by the Councillor with a fair market value in excess of \$300, as well as all gifts from a single donor in a calendar year that collectively exceed \$300, with the exception of gifts falling under sections 1(c) and 1(d) of this part. Each Councillor must file a quarterly disclosure statement with the Office of the City Clerk outlining all gifts exceeding \$300 received for the year to date, or stating that there is nothing to disclose. (S.4, Bylaw 18861, May 14, 2019)
 5. Disclosure statements will identify the:
 - a) nature and source of the gift;
 - b) date on which the gift was received; and
 - c) fair market value of the gift.
 6. Disclosure statements may be reviewed by the Ethics Advisor for compliance with this code of conduct and/or future guidance with respect to content.
 7. Disclosure statements will be a matter of public record, in the prescribed format determined by the City Clerk.

Part M: Retaliation, Interference, and Obstruction

1. Councillors must not retaliate against anyone, including another Councillor, who participates or provides information in good faith during an investigation by the Integrity Commissioner.
2. Interfering with or obstructing an Integrity Commissioner investigation is prohibited, and Councillors must cooperate with the Integrity Commissioner during all stages of such an investigation.

(S.3, Bylaw 19142, February 3, 2020)
 (S.20, Bylaw 20781, November 13, 2024)

Part N: Human Resources

1. In their capacity as supervisors of Councillor's employees, Councillors will fulfill all legislative requirements and comply with the City's policies and procedures regarding hiring, performance management, safety, and termination.
2. Any conduct of an employee providing services to a Councillor's office that may be the subject of a complaint or investigation under this Code of Conduct is deemed to be the conduct of the Councillor if the employee was acting under the direction of the Councillor.
(S.21, Bylaw 20781, November 13, 2024)

SCHEDULE B COMPLAINTS

Submission Process

If any person believes that a Councillor has contravened this code of conduct, that person may make a written complaint to the Integrity Commissioner. A sample complaint form will be made available on the City's website.

Written complaints must include the following:

- a) the provisions of the Council Code of Conduct allegedly contravened and the facts surrounding the allegation, including any witnesses;
- b) the name of the Councillor(s) alleged to have contravened the Council Code of Conduct; and
- c) the complainant's name and contact information,

and may be submitted by electronic mail or delivered to:

Office of the City Clerk
3rd Floor, City Hall
1 Sir Winston Churchill Square
Edmonton AB T5J 0R2

A complaint must be received by the Integrity Commissioner, not later than 60 days after the date the person became aware of the conduct giving rise to the complaint. The Integrity Commissioner may use their discretion to grant extensions if:

- a) the delay occurred in good faith;
- b) it is in the public interest to conduct an investigation or to give consideration whether to conduct an investigation; and
- c) no substantial prejudice will result to any person because of the delay.

On receipt of a complaint, an initial assessment will be completed. Complaints that:

- a) are not about a current Councillor;
- b) are about the conduct of a Councillor's employee;
- c) allege criminal activity;
- d) allege a violation of the Municipal Government Act or the Freedom of Information and Protection of Privacy Act; or
- e) are covered by other applicable legislative appeal, complaint, or court processes,

will be immediately refused and the complainant will be advised in writing, with reasons, and provided with information regarding other options, if applicable.

Investigation

Complaints accepted by the Integrity Commissioner will be investigated, however:

- a) complaints received or under investigation within 90 days prior to a municipal election may be suspended until after election day; and
- b) if the Integrity Commissioner determines that a complaint is frivolous, vexatious, or made in bad faith, the Integrity Commissioner will immediately dismiss the complaint.

If the Integrity Commissioner determines that informal resolution may be possible, they may, with written consent of both the complainant and respondent Councillor(s), refer the complaint to the Ethics Advisor or another third party for resolution.

If a complaint cannot be resolved informally, the Integrity Commissioner will conduct a formal investigation. Formal investigations must be conducted in a fair, timely, and confidential manner that respects the principles of procedural fairness and natural justice.

The complainant and respondent Councillor will receive written notice of the investigation, and the respondent Councillor will receive a copy of the complaint. Names of complainants and witnesses may be provided to the respondent Councillor(s) if:

- a) the investigation cannot be completed without releasing the complainant's name; or
- b) the respondent Councillor(s) require the name(s) to properly respond to the allegations.
(S.4, Bylaw 19142, February 3, 2020)

During an investigation, a complainant or witness may be asked to provide additional information and may be asked to provide information through a statutory declaration. If a statutory declaration is requested, the Office of the City Clerk may provide a Commissioner for Oaths, free of charge. City employees or Councillor's employees may also be requested to provide information, and any person conducting an investigation on behalf of the Integrity Commissioner may look at any record or thing belonging to or used by the City, and enter any City facility for the purpose of completing the investigation. The respondent Councillor(s) is entitled to disclosure of all relevant information gathered during an investigation.

Once all relevant information has been provided to the respondent Councillor by the Integrity Commissioner, the respondent Councillor will have 10 days to respond to the complaint in writing and may provide any further information in support of their response. This deadline may be extended at the discretion of the Integrity Commissioner. (S. 5, Bylaw 19142, February 3, 2020)

The Integrity Commissioner will strive to complete investigations within 90 days of the date the complaint is accepted. This deadline may be extended at the discretion of the Integrity Commissioner.

Nothing in this bylaw restricts the Integrity Commissioner from providing interim reports to Council on any matter relevant to a complaint, including reports of any interference, obstruction, or retaliation with an ongoing investigation.

Reporting

Following the investigation, if the Integrity Commissioner believes the complaint is substantiated they must provide a report to Council. The report must contain:

- a) a summary of the complaint;
- b) a summary of information gathered and conclusions made; and
- c) a recommended resolution, including any recommended sanctions in accordance with Schedule C - Sanctions.

Reports to Council from the Integrity Commissioner will be discussed in private if permitted by the Municipal Government Act.

Once Council has received and considered the Integrity Commissioner's report, it will be reviewed in accordance with the Freedom of Information and Protection of Privacy Act and will be posted, to the extent possible, on the City's website.

(S14 C, Bylaw 18567, September 5, 2018)

SCHEDULE C SANCTIONS

On receipt of a substantiated complaint received from the Integrity Commissioner, Council must consider the complaint and results of the investigation, and may impose sanctions on the Councillor subject to the complaint. Council may accept, vary, replace, or reject the recommendations of the Integrity Commissioner.

The Councillor subject to the complaint will have regard to the public perception and appropriateness of participating in the meeting where the complaint is discussed by Council, but cannot be prevented from participating in debate and voting on the resolution should they wish to.

(S.2, Bylaw 18827, April 2, 2019)

Council may, by motion passed by special resolution, impose any of the following sanctions:

- a) issue a letter of reprimand addressed to the Councillor;
- b) require the Councillor to issue a letter of apology;
- c) direct the publication of a letter of reprimand or request for apology and the Councillor's response;
- d) pass a motion to censure;
- e) require the Councillor to attend specified training;
- f) suspend the Councillor from acting as deputy Mayor or acting Mayor, and assign those roles to another Councillor;
- g) suspend the Councillor's duties as chair of Council or council committee meetings and assign those duties to another Councillor;
- h) suspend the Councillor's membership on a council committee;
- i) restrict the Councillor's access to electronic confidential records and require the Councillor to return copies of Council records following each meeting; or
- j) any other sanction Council deems appropriate.

Council may not impose any sanction that has the effect of preventing the Councillor from fulfilling their legislated duties.

If Council imposes a sanction that involves a reduction or suspension of a Councillor's non-legislated duties, Council may also direct that the remuneration payable to the Councillor be reduced or suspended by a proportionate amount.

Council may, in accordance with the Freedom of Information and Protection of Privacy Act, direct that the details of the sanction imposed be released to the public or remain private.

When imposing a sanction, including deciding whether to release the details of the sanction to the public, Council must consider all of the following:

- a) the severity or consequences of the contravention;

- b) the consequences of the contravention;
- c) the principles and intent of this code of conduct;
- d) the public interest; and
- e) whether the Councillor has previously contravened this code of conduct.

Nothing in this bylaw requires Council to impose a sanction for every substantiated complaint. Contraventions that were inadvertent or made in good faith may result in no sanction being imposed.