



The Corporation of the Town of Milton

Report To: Council

From: Meaghen Reid, Director, Legislative & Legal Services/Town Clerk

Date: January 26, 2026

Report No: CORS-003-26

Subject: Revised Policy - Use of Town Corporate Resources During an Election

Recommendation: **THAT the revised Use of Corporate Resources During an Election Policy, attached to this report, be approved.**

EXECUTIVE SUMMARY

- In preparation for the 2026 Municipal Election and to ensure compliance with the requirements under the Municipal Elections Act, staff has conducted a review and made updates to the Use of Corporate Resources during an Election Period policy.
- Various revisions to the policy are recommended to clarify definitions, set out roles and responsibilities and provide enhanced direction and clarity on Town resources that are restricted from use to support an election campaign.
- The Town's Integrity Commissioner has reviewed the revisions and provided comments on this policy, which forms part of the Town's accountability framework.

REPORT

Background

In advance of the 2018 Municipal Election, changes to the Municipal Elections Act, 1996 (MEA) in section 88.18 were made that required municipalities and local boards to establish rules and procedures with respect to the use of municipal or board resources during the election campaign period. In response to this requirement, staff developed the Use of Corporate Resources During an Election Policy, which was last approved by Council on April 24, 2017.

In preparation for the 2026 Municipal Election and to ensure compliance with the requirements under the Municipal Elections Act, 2018, staff has conducted a review and made updates to the Use of Corporate Resources during an Election Period policy.

It is important to note that this policy ensures that the Town is complying with relevant federal, provincial and municipal election legislation. There are regulations within the Elections Finances Act, 1990, the Canada Elections Act, 2000, and the MEA that prohibit a

Background

municipality or local board from making a campaign contribution to a candidate, political parties or registered third-party advertisers.

Discussion

A detailed summary of the revisions to this policy are provided below:

Definitions

Definitions for terms within the policy have been added to this policy to provide better clarity and to assist with interpretation of the policy requirements.

Town facilities

According to the current policy, Town facilities are not permitted to be used for election purposes unless a room is booked through the Town's regular booking process and is rented at fair market value (ie. the approved user fee).

In addition to this regulation, the revised policy has been updated to require that no posting or distribution of campaign materials is permitted at Town facilities and candidates/third parties must identify to Town staff that the rental is for election purposes at the time of the booking. The revised policy also requires that meeting rooms in Town Hall may not be used for election campaign purposes.

Technology

The revised policy clarifies that Town-owned or Town-managed technology (IT) assets, infrastructure, or data (e.g., computers, wireless devices, portals, corporate email, web pages, blogs, telephone) shall not be used to communicate election-related messages or be used for election-related purposes.

Communications and Social Media

The revised policy has re-organized but not changed the existing requirements for communications and social media:

- No use of brand, logos, photo, logo, crest, coat of arms, slogan, or identifier for which the Town has proprietary rights
- Photos of exterior of Town facilities is permitted, interior not permitted
- Member of Council uses social media account for campaigning - such account must not be created or supported by Town resources. Social media accounts used for campaign purposes must be administered using personal cell phones, computers and/or devices.
- Clear statement differentiating Council member social media accounts and election accounts



Discussion

Access to information

The revised policy clarifies that candidates, including Members of Council, political parties and registered third parties have the same right of access to information as a member of the public. Requests for information that is not typically publicly available or may contain sensitive corporate or personal information should be coordinated through the office of the Town Clerk. As with previous elections, staff will work to ensure that any information shared with one candidate, political party or registered third party will be shared with all other parties to ensure equal and fair access to information.

Town events

The revised policy clarifies that campaign activity is not permitted at Town-organized events. In addition, no election signs or campaign materials, including clothing, may be publicized at the event.

The revised policy also recognizes that Members of Council attending Town-organized events, or events held at a Town facility may act as a representative participant in their capacity as an elected official, including speaking and offering greetings

Members of Council

Further clarification has been provided for activities that are permitted and not permitted for Members of Council during an election period. This section has been reviewed by the Town's Integrity Commissioner and resulting recommendations have been included within this revised policy.

Town employees

According to the current policy, Town employees are not permitted to canvass or perform election work during hours being paid by the Town or distribute campaign materials on Town property and facilities at any time. This is intended to ensure that Town staff remain impartial, fair and unbiased during elections.

The revised policy also requires that Town employees not engage in election activity while in a Town uniform or identifier or use their title or position to endorse a candidate, registered third party, or political party.

Roles and Responsibilities

The revised policy clarifies the roles and responsibilities of Town staff, Council members, candidates, registered third parties, and the Integrity Commissioner regarding compliance with this policy.



Financial Impact

No financial impacts are anticipated if the revised policy is approved.

Respectfully submitted,

Kristene Scott
Commissioner, Corporate Services

For questions, please contact: Meaghen Reid, Director, Phone: Ext. 2132
Legislative & Legal Services,
Town Clerk

Attachments

Appendix A - Draft Revised Policy - Use of Corporate Resources During an Election

Approved by CAO
Andrew M. Siltala
Chief Administrative Officer

Recognition of Traditional Lands

The Town of Milton resides on the Treaty Lands and Territory of the Mississaugas of the Credit First Nation. We also recognize the traditional territory of the Huron-Wendat and Haudenosaunee people. The Town of Milton shares this land and the responsibility for the water, food and resources. We stand as allies with the First Nations as stewards of these lands.

POLICY: No. 171 – Use of Corporate Resources for Elections	NO. OF PAGES:
EFFECTIVE DATE: April 24, 2017	REVISED: January 26, 2026

1. Purpose

- 1.1 This policy establishes guidelines for the appropriate use of municipal corporate resources during election campaign periods to ensure compliance with the Municipal Elections Act and to maintain fairness, trust, transparency and public trust in the electoral process.

This policy supports legislated requirements and Town-established by-laws, policies and procedures that set out the governance and accountability framework for Town.

2. Scope

- 2.1 This policy applies to Members of Council, candidates, registered third parties, those acting on behalf of a member, candidate or registered third party and Town employees.

3. Background

- 3.1 Section 88.18 of the *Municipal Elections Act, 1996* (MEA) requires municipalities and local boards, before May 1 of an election year, to establish rules and procedures with respect to the use of municipal or board resources during an election campaign period.
- 3.2 The MEA specifies that a municipality or local board cannot make a contribution to or for a municipal election Candidate (Section 88.8 (4)) or a Registered Third Party (Section 88.12 (4)).

A “contribution” includes:

- a) money, goods and services given to and accepted by or on behalf and under the direction of a person for his or her election campaign (Section 88.15 (1))
- b) money, goods and services given to and accepted by or on behalf of an individual, corporation or trade union in relation to third party advertisements (Section 88.15 (2)).

Since a “contribution” may take the form of money, goods, or services, any use of the Town’s resources for an election campaign by employees, a Member of Council who is a candidate, or by any other candidate or any registered third



party, would be considered a contribution by the Town for the purposes of the MEA. The *Election Finances Act, 1990*, and the *Canada Elections Act, 2000*, impose similar prohibitions for provincial and federal election campaigns in that a contribution can only be made by an individual.

4. Definitions

- 4.1 “Campaign activity” means any activity intended to promote or oppose a candidate, political party or a third party advertiser.
- 4.2 “Campaign period” or “election period” means the date a candidate files their nomination through to Voting Day in a municipal election year or in the event of a by-election. For a federal or provincial election, this means the date the writ is dropped until Voting Day.
- 4.3 “Candidate” means any individual who has filed and not withdrawn a nomination for an elected office, including Mayor, Councillor, School Board Trustee, Member of Provincial Parliament and/or Member of Parliament or anyone acting on their behalf.
- 4.4 “Corporate resources” means the following resources of the Corporation of the Town of Milton (including but not limited to):
- facilities, buildings and property;
 - office equipment, supplies and materials;
 - newsletters, design or printing services;
 - computers, phones, photocopiers and other technology;
 - employee time during working hours;
 - email accounts and communication systems;
 - databases and contact lists; and
 - social media accounts, domains, and website(s)
 - Town of Milton logo and/or crest.
- 4.5 “Election” means any municipal, federal or provincial election including by-elections.
- 4.6 “Election purposes” means any participation in an election that seeks to promote or oppose the candidacy of an individual seeking office or support or oppose a question on a ballot.
- 4.7 “Employee” means any individual working for, and receiving compensation from, the Town of Milton, including but not limited to those in full-time, part-time,

seasonal or contract positions, in addition to volunteers and individuals acting on behalf of the Town of Milton.

4.8 “Member” means a Member of Council, the Mayor, or anyone acting on behalf of a Town Councillor or the Mayor.

4.9 “Registered Third Parties” means an individual, corporation or trade union that has filed a Notice of Registration as a third party advertiser in the federal, provincial, or municipal election.

4.10 “Social Media” means online technologies and practices used to share opinions, insights, experiences, and perspectives through words, pictures, music, videos and audio. Social media can take many different forms, including but not limited to internet forums, web logs (blogs), social blogs, messaging, wikis, podcasts, pictures, video, music sharing, rating and bookmarking. A non-exhaustive list of examples of social media include Facebook, X, Instagram, Snapchat, YouTube, Bluesky, Threads and LinkedIn.

4.11 “Town” means the Corporation of the Town of Milton.

4.12 “Town facilities” means any facility that is owned or leased by the Town of Milton from which Town programs and services are provided.

5. Members of Council, Candidates and Registered Third Parties

The following sections apply to Members of Council, candidates, registered third parties, and those acting on behalf of a member, candidate or registered third party.

5.1 Town Facilities

5.1.1 No Members, candidates or registered third parties shall be permitted to conduct campaign activities or distribute or post campaign materials or advertisements on or at Town facilities, except where otherwise permitted in this policy. This provision does not apply to public right of way sidewalks and thoroughfares, except where prohibited in accordance with Halton Region or Town of Milton sign by-laws.

5.1.2 Members, candidates and registered third parties may not use the interior of any Town-owned or run facilities for any election campaign purposes unless rented in accordance with standard Town rental procedures and full market rate is paid.



- 5.1.3 Permitting of Town Facilities of all-candidates meetings or debates are permissible, provided that the rental fee is paid and all Candidates for an office are invited to attend and participate.
- 5.1.4 Members, candidates, registered third parties or campaign staff working on their behalf, must clearly identify to Town staff if the booking is for a campaign-related event at the time of booking.
- 5.1.5 Town of Milton Town Hall may not be rented or used for election campaign purposes, including meeting rooms, at any time.

5.2 Technology

- 5.2.1 Town-owned or -managed technology (IT) assets, infrastructure, or data (e.g., computers, wireless devices, portals, corporate email, web pages, blogs, telephone) shall not be used to communicate election-related messages or used for election-related purposes.

5.3 Communications and Social Media

- 5.3.1 The Town's brand, logos and identifiers are registered trademarks and owned by the Town of Milton. Use of a video, photo, logo, crest, coat of arms, slogan, or identifier for which the Town has proprietary rights, including municipal election logos, in any capacity, is strictly prohibited.
- 5.3.2 Photographs produced for and owned by the Town of Milton or any photos taken of Town fleet or equipment or sent through Town email accounts shall not be used for any election-related purposes.
- 5.3.3 Photos and/or images of the exterior of Town facilities are permitted for election campaign-related purposes. Photos and/or images of the interior (inside) of Town facilities are not permitted for election purposes.
- 5.3.4 Content that is created and shared by the Town on the Town's social media channels may be re-shared within the social platform on which it was posted.
- 5.3.5 If a Member of Council uses any social media account for campaigning, such account must not be created or supported by Town resources. Social media

accounts used for campaign purposes must administered using personal cell phones, computers and/or devices.

- 5.3.6 Members of Council who choose to create or use social media accounts for campaigning must include, for the duration of the election period, a clear statement on each campaign website or social media account's home page (or profile) indicating that the account is being used for election campaign purposes and is not related to their duties as a Member of Council. Members of Council (and Local Board Members) must include an "opt out" option for individuals who have subscribed to their social media accounts when the accounts were related to their duties as a Member of Council. Links to Member's social media accounts from Town-owned assets shall be removed.

5.4 Access to information

- 5.4.1 Candidates, including Members of Council, political parties and registered third parties have the same right of access to information as a member of the public. Requests for information that is not typically publicly available or may contain sensitive corporate or personal information should be coordinated through the office of the Town Clerk.

5.5 Town Events

- 5.5.1 Campaign activity is not permitted at Town-organized events. No election signs or campaign materials, including clothing, may be publicized at the event.
- 5.5.2 Members of Council attending Town-organized events, or events held at a Town facility, may act as a representative participant in their capacity as an elected official, including speaking and offering greetings.

6. Members of Council

The following section applies to Members of Council.

6.1 Members of Council shall not:

- 6.1.1 Print or distribute any material paid for by municipal funds that illustrates that a member of Council or any other individual is registered in any election or where they will be running for office.
- 6.1.2 Use or reference the name or photograph of any candidate in any election in materials paid for by municipal funds.



- 6.1.3 Use municipal funds to print or distribute any material that references or contains candidate names, photographs, or other identifying details for election purposes.
- 6.1.4 Use corporate resources for campaign activities or distribute newsletters or flyers from Nomination Day until Voting Day (inclusive) of the municipal election year or for the 60 days before and including Voting Day of a municipal by-election
- 6.1.5 Use the Town's voicemail system to record election messages;
- 6.1.6 Use the Town's computer network (including the Town's email system) for election correspondence;
- 6.1.7 Benefit from the use of any corporate pricing established under the Town's purchasing policy;
- 6.1.8 Use of Council or Councillor budgets and/or expenses for election purposes.
- 6.1.9 Use of any Town facility meeting room or Councillor office rooms for election-related purposes.
- 6.1.10 Order personalized stationary containing the name and/or likeness of the Member for election purposes.
- 6.1.11 Order or move office furniture and furnishings, except in the case of operational necessity where to do otherwise would prevent the Member from carrying out the duties of their office during the election period.
- 6.1.12 Advertise by or on behalf of a Member; including but not limited to radio, newspaper and social media advertisements during the election period.
- 6.1.13 Print and distribute of newsletters on behalf of a Member, candidate or third party advertiser during the election period.
- 6.1.14 Organize and host an event such as a barbeque, movie night or concert using Town resources during the election period.
- 6.1.15 Purchase tickets to attend an event or making a contribution towards an event during the election period.

6.1.16 Purchase gifts and promotions such as flowers and awards during the election period.

6.1.17 The Council expense limit for Members for the period beginning on January 1 and ending on November 15 in the year of a municipal election shall be restricted to 88% of the approved annual Council expense limit. After Voting Day:

- the annual limit for Members that are re-elected for another term shall be increased by the remaining 12%, such that 100% of the approved annual Council expense limit is available for the year.
- the annual limit for newly elected Members shall be established at 12% of the approved annual Council expense limit, and shall be available for eligible expenses during the period November 16 to December 31.

7. Employees of the Town of Milton

7.1 In order for Town staff to conduct themselves in a manner that is impartial, fair and unbiased toward all registered candidates and third parties, Town of Milton employees shall not:

- Canvass or perform any work in support of a candidate or registered third party (e.g., campaign), during hours in which a person is working for and/or receiving any compensation from the Town of Milton, except during scheduled time off (e.g., scheduled vacation time).
- Distribute or post campaign material on behalf of a candidate or registered third party at Town facilities or on Town property, including Town parks, at any time.
- Engage in any political activity while wearing clothing or buttons that advertise any candidate, registered third party, or political party while wearing a Town uniform or identifier.
- Use their title or position within the Town in a way that may lead a member of the public to infer that the Town is endorsing a candidate, registered third party, or political party, including posts on social media channels where their account(s) identify them as a Town of Milton employee.

7.2 Town staff shall:

- Consult with their direct Supervisor before agreeing to perform any task requested by a Member of Council, candidate or registered third party that exceeds their normal duties or could be construed as making a contribution to an election campaign;

8. Policy Management



8.1 The Integrity Commissioner may at any time be consulted by Members of Council with regard to complying with any part of this policy and will be responsible for enforcement of this policy through Council's Code of Conduct.

8.2 The Town Clerk is delegated the authority to make administrative changes to this policy that may be required from time to time due to legislative changes or if, in the opinion of the Town Clerk, the amendments do not change the intent of the policy.

9. Roles and Responsibilities

9.1 The **Town Clerk** is responsible for:

- Communicating this policy to candidates and third parties
- Ensuring this policy is reviewed and updated as required, prior to municipal elections or by-elections, or as required by legislative change
- Interpreting and administering this policy.
- Take actions necessary to promote compliance with this policy.

9.2 The **Chief Administrative Officer, Commissioners, Directors, Managers and Supervisors** are responsible for:

- Communicating this Policy to their staff;
- Complying with this policy;
- Ensuring staff compliance with this Policy.

9.3 **Town employees** are responsible for:

- Complying with this policy;
- Seeking clarification from their supervisor if any aspect of this policy is not understood.

9.4 **Members of Council, Candidates and Registered Third Parties**

Without exception, all Members of Council, election Candidates, and Registered Third Parties must comply with this policy.

9.5 **Integrity Commissioner**

Subject to limitations set out in the *Municipal Act, 2001*, regarding inquiries, the Integrity Commissioner may provide guidance or advice to Members of Council, proactively or in response to requests from Members, regarding conduct in relation to their elected official responsibilities, as it relates to this Policy and the Council Code of Conduct.

10. Non-Compliance

Should a complaint arise regarding the alleged use of corporate resources in contravention of this Policy, the Town Clerk or their designate shall have the authority to investigate and will work to address the complaint.

11. Exceptions and Limitations

11.1 Nothing in this policy shall prevent the Town Clerk or Town staff from conducting regular business of the Town, which may include publication or release of the following:

- Municipal information prepared, posted and maintained by the Town, names and photographs of Members of Council, their contact information, and a list of current representation on committees that is prepared, posted and maintained by the Town.
- Agendas and minutes of Council and Committee meetings.
- Media releases and Town materials that describe inter-governmental activities of the Mayor in the capacity as Head of Council and Chief Executive Officer of the Town.
- A provincial or federal announcement in which one government is in a writ period may be permitted if directly related to government business.

11.2 Nothing in the Policy shall prevent the Town Clerk or Town staff from conducting an election in accordance with the *Municipal Elections Act*, or providing, using Town resources, non-partisan election information material on behalf of the Town Clerk or the Town so as to inform the public about a municipal election and municipal election process.

11.3 Nothing in this policy shall prohibit a Member from performing their job as a Member, nor impede them from representing the interests of their constituents.

11.4 Nothing in this policy shall preclude Town employees from exercising their civic right and duty to participate in an election process, including a municipal election process, as a private citizen, except as provided for in the Employee Code of Conduct.