



Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

Policy Number: 2026-002-CL

Department: Clerks

Effective Date: April 13, 2026

Approval: C-2026-068

Attachments:

Related Documents / Legislation: Municipal Elections Act, 1996 | Election Act, 1990 | Election Finances Act, 1990 | Canada Elections Act, 2000 | Council Code of Conduct | Staff Code of Conduct | Election Sign By-law

A. Policy Statement

This policy is intended to balance the rights to freedom of expression and assembly of Candidates with the Municipality's obligation to maintain neutrality and fairness during Election Campaigns.

It ensures that no Candidate, Registered Third Party Advertiser, or Political Party is provided with an unfair advantage through the use of Municipal Resources.

The policy also recognizes the continued fulfillment of official duties by Elected Officials. Elected Officials who are also Candidates are required to clearly distinguish between their roles as Officeholders and Campaign participants. Any conflicts between these roles shall be resolved in a manner that prioritizes the public interest.

B. Purpose

This policy is established in accordance with Section 88.18 of the Municipal Elections Act, 1996 (MEA), which requires municipalities to establish rules and procedures governing the use of Municipal Resources during an Election Campaign period.

Its purpose is to ensure transparency, fairness, and compliance with legislative requirements by regulating the use of Municipal Resources during Election Campaigns.

While the primary legislative authority for this policy is the MEA, this policy also provides guidance for the use of Municipal Resources during Campaign Periods for Provincial and Federal Elections to ensure consistent and

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

equitable treatment of all Candidates, Registered Third Party Advertisers, and political entities.

This policy applies to the use of Municipal Resources during Campaign Periods for:

- Municipal Elections, including School Board Elections;
- Provincial and Federal Elections; and
- Questions on a ballot.

The provisions of this policy may be subject to additional municipal by-laws and policies and are in effect for Municipal Elections throughout the Campaign Period as defined in the MEA, and for Provincial and Federal Elections from the issuance of the writ to Voting Day.

This policy applies to:

- All Candidates for Municipal and School Board Elections;
- All Candidates for Provincial or Federal Elections;
- All Elected Officials of the Municipality, including those not seeking re-election;
- All municipal staff; and
- All Registered Third Party Advertisers.

References to Political Parties within this policy apply only to Provincial and Federal Elections and do not pertain to Municipal Elections.

C. Definitions

Campaign Activity (Campaigning) means any action undertaken to promote or oppose a Candidate or a response to a question on a ballot, including the distribution or display of Campaign Material. Attendance at events in a personal capacity without Campaign Material or solicitation of votes is not considered Campaigning.

Campaign Material means any material, regardless of format, used to promote or oppose a Candidate or ballot question, including printed or digital content.

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

Campaign Period means (for Municipal Elections), the period from the date a Candidate files their nomination until Voting Day. For Provincial and Federal Elections, the period from the issuance of the writ until Voting Day.

Candidate means any individual (or their agent) who has filed and not withdrawn a nomination for elected office at the municipal (including school board), provincial, or federal level in an Election.

Chief Administrative Officer means the individual (or designate) appointed by By-law in accordance with s.229 of the Act.

Clerk means the appointed by By-law in accordance with s.228 of the Act, or their delegate in accordance with s.228(4) of the Act.

Council or Council Member means the elected or appointed Members of Council of the Municipality.

Election means an Election or By-Election at the municipal (including school board), provincial, or federal level, or the submission of a question or by-law to the electors.

Elected Official means an individual elected or appointed at the municipal (including school board), provincial, or federal level.

Employee means any individual employed by the Municipality on a full-time, part-time, seasonal, or contract basis, including volunteers and members of municipal services such as fire departments.

Municipal Elections Act (MEA) means the Municipal Elections Act, 1996, S.O. 1996, c. 32, Sched., as amended.

Municipality means The Corporation of the Township of Georgian Bay.

Municipal Facilities means all lands (including parks and other open spaces), buildings, and structures owned, leased, operated, or otherwise controlled by or under the jurisdiction of the Municipality.

Municipal Identifiers means any branding elements, chain of office, crests, indicia, logos, slogans, symbols, uniforms, and similar identifiers.

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

Municipal Information means source of information, including but not limited to databases, emails, files, records, social media content, and websites.

Municipal Resources means any resource owned, leased, or controlled by the Municipality, including, but not limited to, employees, equipment, Municipal Facilities, Municipal Information, Municipal Technology, vehicles, supplies, and services.

Municipal Technology means any technology or equipment owned, leased, controlled, or funded by the Municipality, including, but not limited to, email accounts, computers, copiers, domains, hardware, mobile devices, scanners, social media platforms and their elements (i.e., hashtags), software, systems, telephony, voicemail, and websites.

Political Party means a political organization registered under the Election Finances Act (Ontario) or listed in the registry of parties under Section 374 of the Canada Elections Act.

Registered Third Party Advertiser means an individual, corporation, or trade union (or their agent) registered in accordance with Section 88.6 of the MEA or equivalent provisions under provincial or federal legislation.

Returning Officer means an individual appointed to administer federal or provincial Elections in a riding or district.

Voter Help Centre means a physical location designated to assist electors with voting, including providing access to voting devices, voter information, education and communications, and support with updating elector information.

Voting Day means the final day on which electors may cast their vote in an Election.

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

D. General Terms and Procedures

1. Conduct of the Election:

- 1.1. The Clerk or Returning Officer may utilize Municipal Facilities and Resources for the administration of an Election or as a Voter Help Centre, subject to availability and applicable conditions.

2. Campaign Activities:

- 2.1. Campaign Activities are prohibited on or within Municipal Facilities.
- 2.2. The Municipality shall not issue permits, agreements, or approvals for the use of Municipal Facilities for Campaign Activities during the Campaign Period.
- 2.3. Election signs are regulated under the Township's Election Signs By-law.

3. Campaign Activities – Exemptions:

- 3.1. The Municipality will not organize or host All-Candidates meetings or debates. However, the Clerk may authorize, in writing, the use of a Municipal Facility for such events, provided that:
 - a) All Candidates or Political Parties are invited;
 - b) The Municipal Facility is rented in accordance with applicable rental agreements;
 - c) Full-market rental fees are paid;
 - d) Campaign Materials are displayed only during the approved rental period and within the designated area specified in the rental agreement;
 - e) Rentals are not permitted during advance voting days or within fourteen (14) days before Voting Day;

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

f) The Municipality reserves the right to refuse or cancel any rental agreement at its sole discretion.

3.2. The Clerk may authorize exemptions where no reasonable alternative venue exists, subject to the same conditions.

4. Municipal Identifiers and Resources:

4.1. Municipal Identifiers shall not be used, printed, posted, or distributed on Campaign Materials, or included on any Election-related websites, domains, or social media platforms, except when linking to the Municipality's official website(s).

4.2. Candidates shall not use photographs that depict municipal employees wearing uniforms or operating equipment displaying municipal identifiers.

4.3. The use of photographs or videos not produced by the Municipality and taken from publicly accessible locations is permitted in Campaign Activities, provided they do not incorporate Municipal Identifiers in a manner that contravenes this policy.

4.4. Municipal Resources shall not be used for any element of Campaign Materials or Campaign Activities in relation to Candidates, Registered Third Party Advertisers or those intending to become a Candidate or Registered Third Party Advertiser.

5. Municipal Information, Technology and Equipment:

5.1. All Candidates and Registered Third Party Advertisers shall have equal access to publicly available Municipal Information.

5.2. General information provided to a Candidate or Registered Third Party Advertiser that may be of value to others will be shared with all Candidates and Registered Third Party Advertisers through the Clerk's office, either by posting to the Municipality's voting webpage or through other appropriate channels to ensure equal access.

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

- a) Requests for information not publicly available will be processed through the Freedom of Information (FOI) process, facilitated by the Clerk's office.
 - b) Personal meetings between Candidates or Registered Third Party Advertisers and employees will not be accommodated.
- 5.3. Municipal databases may not be used for Campaign purposes unless:
- a) The database has been specifically created for use by Candidates or Registered Third Party Advertisers; or
 - b) The database is publicly available.
- 5.4. Municipal Technology shall not be used for any Campaign Activity or include any Campaign Material or links to sites that feature Campaign Material and may not be re-designated for Campaign purposes or provide a link to a Campaign site. This includes, but is not limited to, municipal voicemail systems, email accounts, and websites.

6. Attendance at Municipal Events and Activities:

- 6.1. Candidates, Political Parties or Registered Third Party Advertisers are permitted to attend municipal events or activities as private citizens but may not conduct any Campaign Activity while in attendance.
- 6.2. Upon the issuance of the writ, Members of Parliament or Provincial Parliament respectively, are no longer Elected Officials and shall not be invited to municipal events in any official capacity.

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

7. Council Members:

- 7.1. If a Council Member receives communications related to Campaign Activities through the Municipality's voicemail, email system, or computer network, they must respond using their Campaign-specific voicemail or email. The response should inform the sender that the use of Municipal Resources for Campaign purposes is strictly prohibited.
- 7.2. Any technology or equipment used by a Council Member for Campaign purposes must be personally owned and not created, maintained, or supported by Municipal Resources. Websites and social media accounts used for Campaigning must clearly state that they are intended solely for Campaign Activities and are not affiliated with the Council Member's official duties.
- 7.3. Council Members continue to serve in their official capacity until the start of the new Council term. During the Campaign Period, they may attend municipally organized events and participate in ceremonial roles, including speaking and engaging in official activities. However, they must not engage in Campaign Activities or distribute Campaign Materials at these events.
- 7.4. Council Members, in their Capacity as Private Citizens, may choose to support Political Parties, Candidates, or Registered Third Parties. Any such support must be clearly identified as personal and not representative of their Official Role. Council Members shall not use, or appear to use, their Office or Municipal Resources to promote Political Parties, Candidates, or Registered Third Parties. Council Members are expected to clearly distinguish between their Official Duties and any involvement in Municipal, Provincial, or Federal Election Campaigns in order to maintain Public Trust and the Integrity of the Electoral Process.

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

- 7.5. Council Members shall not use Municipal Resources to host, promote, sponsor, or assist in organizing any event that includes direct participation by Candidates from other levels of government. Such involvement may give rise to actual or perceived partisanship and shall be avoided in both the planning and execution of such events
- 7.6. Council Members may engage with constituents on federal or provincial matters that affect their ward or the municipality at large, including issues that directly impact Municipal affairs. Such communications shall remain strictly non-partisan.
- 7.7. Council budgets in an election year shall be restricted in accordance with municipal practices to prevent the use of public funds for election-related purposes.

8. Employees:

- 8.1. Employees engaged in Campaign Activities must take care to separate those personal activities from their employment relationship with the Municipality. Employees may participate in Campaign Activities in support of a Candidate(s) provided that such activity does not:
 - a) Occur during their scheduled working hours unless they are on an approved leave (i.e. vacation, lieu time, flex time, etc.);
 - b) Occur when representing the Municipality at an event or activity;
 - c) Occur when wearing, carrying or otherwise displaying any Municipal Identifiers; and,
 - d) Involve the use of any Municipal Resources.
- 8.2. Employees shall not use their title, position or employment with the Municipality in any way that would lead any person to infer that the Municipality is endorsing a Candidate, Political Party, Registered Third Party Advertiser, or a particular response to a question on a ballot.

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

8.3. While actively at work, employees shall not produce, display, or distribute Campaign Material at Municipal Facilities or otherwise promote, endorse or provide information solely for the use of any Candidate, Political Party or Registered Third Party Advertiser.

9. Responsibility:

9.1. Clerk shall:

- a) Administer and provide advice and clarification on the application of this policy.
- b) Receive and investigate any written complaint regarding the alleged use of Municipal Resources in contravention of this policy.

9.2. Chief Administrative Officer shall:

- a) Ensure consistent compliance with this policy by all employees across all service areas.
- b) Ensure that any employees who support Council Members in the performance of their duties, or any employees whose work is directed by Council Members, are complying with this policy.

9.3. Directors, Managers and Supervisors shall:

- a) Ensure that this policy is applied and followed with respect to the use of Municipal Resources and Employees managed by their department or division.

9.4. Employees shall:

- a) Understand and apply this policy in carrying out their duties.
- b) Seek clarification and advice on this policy from their Supervisor, Manager, Director or Clerk.

9.5. Elected Officials, Candidates, Political Parties and Registered Third Party Advertisers shall:

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

- a) Understand, support, and comply with this policy and any related procedures.
- b) Seek clarification on any aspect of this policy, as required, and seek independent legal advice, where appropriate.

9.6. Individuals shall:

- a) Pursue one or more of the following options when submitting complaints related to this policy:

- i. Submit a Written Complaint

Written complaints may be submitted to the Clerk via email. Complaints must include specific examples and relevant details outlining how the alleged use of Municipal Resources may have violated this policy.

- ii. Contact the Ontario Ombudsman

Individuals may contact the Office of the Ontario Ombudsman for further assistance.

- iii. Pursue Legal Remedies

Complainants may seek private legal remedies, including court action.

- iv. Campaign Finance Complaints

Concerns related to Campaign Finances may be addressed through the compliance audit process outlined in Section 88.33 of the MEA.

- v. Election Sign Complaints

Complaints regarding election signs may be submitted to the Municipality's By-law Enforcement Department.

- vi. Serious or Criminal Complaints

Township of Georgian Bay

Policy: Use of Municipal Resources During an Election Campaign

Complaints involving egregious conduct or potential hate crimes shall be referred to the local detachment of the Ontario Provincial Police.

10. Limitations:

10.1. Nothing in this policy shall prohibit:

- a) The Clerk from performing their statutory duties or providing or using Municipal Resources in the conduct of an Election;
- b) An Elected Official from performing their official duties, nor impede them from representing the interests of their constituents.

E. Supported By

Strategic Plan

Fiscal Responsibilities and Technology Efficiencies
Customer Experience and Community Engagement