



## Committee of the Whole

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**Meeting Date:** April 14, 2026

**Submitted by:** Marci Ivanic, Director of Legislative Services / County Clerk

**Subject:** Use of Corporate Resources During an Election Campaign Policy

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### **BACKGROUND:**

The 2026 Municipal Election will be held on October 26, 2026. The nomination period for candidates opens on May 1, 2026.

The *Municipal Elections Act, 1996* (MEA) prohibits a municipality from making a contribution to a candidate or a registered third party in a municipal election during an election campaign period. The Act further requires a municipality, before May 1 in the year of a regular election, to establish rules and procedures with respect to the use of municipal or board resources, as the case may be, during the election campaign period.

Sections 12.1 to 12.4 of the [Middlesex County's Code of Conduct for Members of Council and Local Boards](#) further acknowledge the requirements of the MEA with respect to Municipal Election Campaigns:

- 12.1 *Members of Council are required to comply with the Municipal Elections Act, 1996.*
- 12.2 *No Member shall use County property, including the County's logo, for any election campaign or campaign related activities.*
- 12.3 *No Member shall undertake campaign related activities on County owned lands, with the exception of the permissible use of campaign signs along road allowances, and in compliance with any local sign By-Laws, as applicable.*
- 12.4 *No Member shall use the services of Employees in work for his or her (re)election during hours in which those Employees are being paid by the County. The participation of County staff with respect to municipal elections is generally discouraged.*

The *Election Finances Act* and the *Canada Elections Act* impose similar prohibitions on municipalities for provincial and federal election campaigns. Specifically, section 29 of

the *Election Finances Act, 1990* prohibits contributions from corporations, which includes municipal corporations. Section 363 of the *Canada Elections Act, 2000* provides that only individuals may make campaign contributions.

To ensure that all legislative requirements are met with respect to not only municipal elections, but also provincial and federal election campaigns, staff have prepared Legislative Services Policy 11.01 – Use of Corporate Resources During an Election Campaign, attached hereto as *Appendix A*, for Council consideration.

This policy establishes rules and procedures for the use of County of Middlesex resources during municipal, school board, provincial, and federal election campaign periods and expressly prohibits the use of County Resources for campaign purposes.

### **ANALYSIS:**

Any use of County Resources by or on behalf of a candidate, third party advertiser or political party during an election would be considered a contribution by the County in direct contravention of applicable municipal, provincial and/or federal legislation. Legislative Services Policy 11.01 – Use of Corporate Resources During an Election Campaign expressly prohibits such use. The policy applies to Members of Council, Members of Local Boards, Citizen Appointees and all County and Local Board employees. It includes provisions related to the use of social media during a campaign period by Members of Council, Local Boards and citizen appointees; prohibits the use of the County logo or other copyright materials owned by the County in campaign signs or materials; and provides guidance for County and local board employees participating in campaign-related activities outside of work hours.

The policy also governs the use of County Resources, facilities, property, and services by candidates, third party advertisers, and political parties. In addition to a general prohibition against the use of County facilities for election purposes, including meetings and the display of election signs or materials, the policy expressly prohibits the solicitation of members of the public on Middlesex County Connect buses.

The policy further provides that any alleged contravention of the policy by a Member of Council, Local Board Member or Citizen Appointee shall be addressed in accordance with the Middlesex County Code of Conduct and may be referred to the Integrity Commissioner for review and investigation. Failure of County or Local Board employees to comply with the policy may result in disciplinary action, up to and including termination, in accordance with applicable employment policies, procedures, and collective agreements.

The County's authority over candidates, third party advertisers and political parties is limited to regulating access to and use of County Resources. In the event of a contravention of the policy by such persons, the County may take action such as

removing campaign signs or materials; denying, restricting or revoking access to County Resources or facilities; and/or recovering any costs incurred by the County associated with the contravention.


**FINANCIAL IMPLICATIONS:**

There are no direct financial impacts associated with the adoption of this policy. The policy formalizes existing legislative requirements and administrative practices, and can be implemented within existing staff resources and approved operating budgets.

Indirectly, the policy mitigates potential financial risk to the County by reducing the likelihood of non-compliance with the *Municipal Elections Act, 1996* and related legislation, which could otherwise result in legal costs, reputational impacts, or the recovery of improperly used municipal resources.

**ALIGNMENT WITH STRATEGIC FOCUS:**

This report aligns with the following Strategic Focus, Goals, or Objectives:

Strategic Priority	Goal	Objectives
Adaptability and Agility  	Modernize the County’s administrative capabilities to strengthen decision-making, improve service delivery, and achieve better community outcomes	<ul style="list-style-type: none"> <li>• Transform, modernize and continuously improve administrative systems and processes to increase efficiency and enhance the experience of residents and partners.</li> <li>• Strengthen internal administrative capabilities to ensure key support services have the necessary resources to meet community needs and support organizational growth.</li> </ul>

**RECOMMENDATION:**

**THAT** the Use of Corporate Resources During an Election Campaign Policy report be received for information;

**AND THAT** Legislative Policy 11.01 – Use of Corporate Resources During an Election Campaign, attached as *Appendix A*, be approved.