



County Council

Meeting Date: April 14, 2026

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Subject: MLPS Creation By-law Review

BACKGROUND:

On February 17, 2026, the Middlesex-London Paramedic Service ('MLPS') Authority Board received a [MLPS By-law Review report](#) regarding a holistic review of the current MLPS governance framework, including the creation by-law, terms of reference, meeting structure, delegated authorities, financial governance, and the relationship between the MLPS Authority Board and Middlesex County. The MLPS By-law Review report identified several areas where the governing documents could be simplified, clarified, and better aligned with municipal governance best practices and the County's broader corporate administrative model.

As outlined in the February 17, 2026, MLPS Authority Board report, the review was undertaken in advance of the new term of Council and as part of the [County's broader governance review of advisory committees, boards, and third-party appointments](#).

The current MLPS governance model is principally established through [County By-law No. 7293](#), being the existing creation by-law, and [County By-law No. 7294](#), which approves a separate Terms of Reference document for the MLPS Authority Board. Under that framework, the current by-law and terms of reference contain overlapping provisions regarding delegated authority, Board composition, meeting procedures, officer roles, emergency authorities, reporting, procurement, and governance relationships.

Staff have now completed the next phase of that review and are presenting an updated MLPS By-law for County Council consideration, attached hereto as Appendix 'A'. The proposed by-law would repeal the current suite of MLPS governance by-laws and replace them with one consolidated governing by-law intended to simplify the legislative framework, clarify the respective roles of County Council, the MLPS Board, and MLPS

administration, and better align MLPS with Middlesex County's corporate governance, financial, administrative, and oversight practices.

ANALYSIS:

The proposed by-law represents a substantial restructuring and modernization of the current MLPS governance framework. While the existing by-laws established a legally sufficient municipal service board model, the structure evolved incrementally over time and now contains duplication, complexity, and provisions that are more difficult to interpret than necessary. The new by-law is intended to preserve the municipal service board model while making the governance framework clearer, more practical, and more directly aligned with the County's administrative structure and oversight responsibilities.

1. Consolidation of the Governance Framework

The most significant change is the move from a multi-document structure to a single consolidated governing by-law. Under the current framework, the creation by-law and separate terms of reference both contain substantive governance provisions, including overlapping language related to delegated authority, Board composition, meeting procedures, reporting, procurement compliance, officers, and conflict provisions.

The proposed by-law consolidates these matters into one County by-law. It reduces duplication, improves ease of interpretation, and makes it more straightforward for County Council, MLPS Authority Board members, administration, auditors, legal counsel, and interested parties to understand the governing framework in a single document.

2. Corporate Continuance and Naming Clarity

The current by-law continues the board body corporate under the corporate name 'Middlesex-London Emergency Medical Services Authority, operating as the Middlesex-London Paramedic Service.'

The proposed by-law continues the municipal service board under the simpler corporate name 'Middlesex-London Paramedic Service'. It also expressly provides that MLPS assumes all rights, obligations, contracts, and liabilities of both the former Authority and the existing operating name structure.

This change improves clarity and modernizes the organization's legal identity so that the public-facing name and the corporate name are aligned. It removes unnecessary complexity arising from use of an older corporate name plus an operating name, while preserving legal continuity.

3. Statement of Purpose and Relationship to County Council

The proposed by-law contains a clearer purpose clause stating that MLPS exists to operate, manage, and deliver paramedic services on behalf of Middlesex County, subject to the terms and limitations of the by-law. It also expressly provides that MLPS may exercise delegated powers and, where decision-making authority has not been delegated, may make recommendations to County Council.

This is an enhancement over the current model, where the delegation framework is legally present but more diffuse and dependent upon cross-reading multiple provisions in the creation by-law and terms of reference.

The proposed language distinguishes between:

- a. matters that are delegated to MLPS for governance and operational administration; and
- b. matters that remain with County Council as the designated delivery agent and ultimate approving authority.

That distinction is important for sound municipal governance, particularly in financial, property, staffing, and policy matters.

The proposed by-law also strengthens and clarifies formal reporting to County Council by requiring:

- a. an annual report to County Council on the Board's activities and MLPS operations;
- b. placement of Board minutes on the next regular County Council agenda as an information item; and
- c. written reports to County Council for recommendations on matters not delegated.

This is a more direct and transparent reporting model than the current framework, which requires representation before Council when requested but is otherwise more general in its reporting provisions.

4. Delegated Authority

Under the current framework, MLPS is delegated broad authority to exercise general control and management of the affairs of service delivery, exercise natural person powers, perform administrative functions, and exercise legislative powers of a minor nature, all subject to County direction and the approved annual budget.

The proposed by-law preserves the substance of delegated operational authority, but structures it more practically. It expressly authorizes MLPS to:

- a. establish an organizational structure and enter into employment contracts;
- b. adopt by-laws, policies, and procedures necessary for service delivery;
- c. enter into contracts within the approved annual budget; and
- d. carry out those responsibilities subject to County by-laws, policies, procedures, and budget limitations.

This is a more operationally understandable delegation model. It is less reliant on abstract references to general natural person powers and legislative powers of a minor nature, and instead focuses on the concrete authorities required to run the service. This should improve interpretation and practical administration without changing the core governance relationship.

5. Shared Services Integration

A central issue identified was the need to better define the relationship between MLPS operational leadership and County corporate administrative functions, including finance, human resources, information technology, procurement, legal, legislative services, communications, and advocacy.

The proposed by-law responds directly to that issue by expressly providing that Middlesex County will provide specified corporate and administrative support services and by listing those services in a schedule. The new approach makes the County-MLPS relationship clearer, reinforces corporate accountability, and better supports integrated administration, risk management, and service consistency across the organization.

Further, the proposed by-law expressly identifies the County by-laws, policies, and procedures that apply to MLPS through a schedule to the by-law, including the Procurement By-law, Code of Conduct, Rules of Procedure, Remuneration By-law, Records Retention By-law, Delegation of Duties By-law, privacy and confidentiality policy, accessibility policies, ITS policies, and a range of finance policies.

The by-law also delegates limited authority to the County Clerk to update the applicable schedule when policies are amended or replaced, which will help keep the framework current without requiring a full by-law amendment for each administrative policy change.

6. Procurement and Financial Authority

The February 17, 2026, report specifically identified the need to clarify procurement thresholds, decision-making responsibilities, multi-year commitments, and major capital procurements.

The proposed by-law addresses this by expressly providing that MLPS may enter into contracts within the approved annual budget and must follow the County's Procurement By-law, but that where the Procurement By-law would otherwise require County Council approval, the MLPS Board may approve the procurement if it is within MLPS' approved Annual Budget. County Council approval remains required for expenditures in excess of the approved annual budget.

This is a practical refinement. It preserves Council's ultimate fiscal control while reducing duplication where Council has already approved the expenditure through the annual budget. It should improve administrative efficiency and strengthen the distinction between budget approval authority and procurement execution authority.

7. Budget Process

The Board report recommended changing the annual budget schedule so that the draft MLPS budget would be presented to the MLPS Board in June, then to County Council in July, then submitted to the City of London in September, ensuring Council approval occurs before external submission.

The proposed by-law implements the core of this change by requiring MLPS to recommend a draft Annual Budget to Middlesex County by June 30 of the preceding fiscal year and requiring County Council approval by August 31, following which the approved Annual Budget is provided to the City of London.

This is one of the most important governance changes in the proposed by-law. Under the current by-law, budget estimates are submitted by November 30 as part of the County's regular budget review process. The new model provides a more logical sequence that places County Council's review and approval earlier and before external submission. This more directly reflects Middlesex County's role as designated delivery agent and ensures that Council has a meaningful opportunity to review, amend, and approve the MLPS budget in advance.

8. Administrative Structure - Director of Paramedic Services, CAO, County Clerk

The proposed by-law further strengthens integration with Middlesex County's corporate administrative structure by formalizing the roles of senior County administration within the MLPS framework. Specifically, it provides that the County Clerk serves as Secretary to the Board as a non-voting member, and that

the Middlesex County Chief Administrative Officer (CAO) serves as a non-voting member who does not count toward quorum. This approach reinforces a more integrated model and formalizes the corporate oversight and administrative relationship between the Board and the County's senior leadership team.

Building on this integration, the proposed by-law also modernizes the senior leadership structure of MLPS by clarifying the role of the Director of Paramedic Services and eliminating the separate Chief Executive Officer layer. Under the current framework, both a Chief Executive Officer and a Chief of Paramedic Services exist, with overlapping responsibilities and shared authorities. As identified through the review, this structure has the ability to introduce complexity and duplication.

The proposed by-law implements a streamlined and practical model by establishing the Director of Paramedic Services as the single operational leader. The Board will facilitate recruitment and recommend a preferred candidate to County Council. The Director remains an employee of MLPS, appointed by County Council. The Director of Paramedic Services shall report administratively to Council through the County CAO.

Together, these changes provide a clear and modernized governance structure that distinctly separates roles and responsibilities: the Board focuses on governance and service oversight, the Director is responsible for operational leadership and service delivery, and the County CAO provides administrative supervision and ensures alignment with the County's broader corporate framework. This clarification represents an improvement in accountability, efficiency, and organizational alignment.

9. Repeal and Administrative Cleanup

The proposed by-law repeals a number of prior by-laws, including:

- By-law No. 7236 - Being a By-law to Appoint Board Members and Officers to the MLPS Authority Board
- By-law No. 7293 - Being a By-law to Authorize the Creation of the MLPS Authority Board
- By-law No. 7294 - Being a By-law to Approve the Terms of Reference for the MLPS Board
- By-law No. 7298 - Being a By-law to Appoint Board Members and Officers to the MLPS Authority Board

- By-law No. 7358 - Being a By-law to Authorize the Creation of the MLPS Authority Board

This is appropriate and consistent with the objective of replacing the fragmented framework with a consolidated by-law¹.

FINANCIAL IMPLICATIONS:

There are no direct one-time capital costs associated with adoption of the proposed by-law itself. The proposed by-law primarily modernizes and clarifies governance, oversight, administrative, and reporting relationships within the existing municipal service board model.

The proposed by-law does, however, formalize several existing and evolving administrative practices that have operating budget implications within the normal course, including:



- a. earlier preparation and approval of the MLPS annual budget;
- b. continued provision of County corporate and administrative support services to MLPS on a cost-recovery basis; and
- c. ongoing Board remuneration and meeting administration costs in accordance with County policy and by-law.

These costs are not new in substance, but the proposed by-law provides clearer authority and structure for them. Any costs associated with Board remuneration, mileage, meeting administration, corporate support services, and service operations will continue to be reflected within the MLPS operating budget and brought forward through the annual budget process for County Council approval, consistent with Middlesex County's retained authority over expenditures and reserves.

ALIGNMENT WITH STRATEGIC FOCUS:

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

¹ In addition to consolidating and repealing the existing MLPS governance by-laws, staff note that prior by-law authority contemplated the registration of trademarks associated with the service. Specifically, By-law No. 6869, *A By-law to Authorize the Middlesex-London Emergency Medical Services Authority to Use Certain Trademarks owned by The Corporation of the County of Middlesex*, authorized the County to take steps to register such trademarks; however, no trademarks were formally registered. As part of this governance modernization, staff will initiate a coordinated corporate workplan to review, formalize, and register key Middlesex County intellectual property assets, including but not limited to the County name and logo, "Invest in Middlesex," Middlesex-London Paramedic Service branding, Strathmere Lodge, and other applicable service areas. This work will ensure that the County's branding and associated marks are appropriately protected, consistently managed, and aligned with current corporate practices moving forward.

Strategic Priority	Goal	Objectives
<p>Collaboration & Partnerships</p> 	<p>Strengthen collaboration with local municipalities and regional partners to improve economic efficiency, enhance service delivery, and support regional development in alignment with community priorities</p>	<ul style="list-style-type: none"> • Optimize service delivery through inter-municipal collaboration and shared services to improve efficiency and seamless operations. • Build and enhance relationships with municipal, regional, First Nations, community, and private sector partners to align priorities, share resources, and implement joint initiatives that improve community well-being and economic growth. • Improve communication and transparency through open engagement, accessible information, and informed decision-making.
<p>Adaptability and Agility</p> 	<p>Modernize the County's administrative capabilities to strengthen decision-making, improve service delivery, and achieve better community outcomes</p>	<ul style="list-style-type: none"> • Transform, modernize and continuously improve administrative systems and processes to increase efficiency and enhance the experience of residents and partners. • Strengthen internal administrative capabilities to ensure key support services have the necessary resources to meet community needs and support organizational growth. • Enhance the County employee value proposition to attract, retain, and support a talented workforce through competitive benefits, professional growth opportunities, and a positive workplace culture.

RECOMMENDATION:

THAT the MLPS Creation By-law Review Report be received;

AND THAT staff be directed to bring forward a MLPS Creation By-law and a By-law to amend By-law #7203 to appoint Members to Committees and Boards for the 2022-2026 term of Council at the April 28, 2026 meeting of Council.