

The Corporation of the Township of Howick

By-law No. 31-2026

**Being A By-Law to adopt a Use of Corporate Resources During an Election Policy
for the Corporation of the Township of Howick**

WHEREAS pursuant to Section 5(3) of the *Municipal Act, 2001*, S.O. 2001, c.25, as amended, provides that municipal power shall be exercised by by-law;

AND WHEREAS Section 88.18 of the *Municipal Elections Act, 1996*, as amended, states that before May 1 in the year of a regular election, municipalities and local boards shall establish rules and procedures with respect to the use of municipal or board resources, as the case may be, during an election campaign period;

AND WHEREAS the Council of the Corporation of the Township of Howick is desirous of adopting a Use of Corporate Resources During an Election Policy for the Corporation of the Township of Howick

NOW THEREFORE IT BE ENACTED by the Council of the Corporation of the Township of Howick as follows:

1. That the "Use of Corporate Resources During an Election Policy" attached hereto as Schedule 'A' is hereby adopted and shall form part of this by-law.
2. That this By-law shall come into force and take effect upon its final passage.

Read a first and second time this 21st day of April, 2026.

Read a third time and finally passed this 21st day of April, 2026.

Reeve Doug Harding

CAO/Clerk Caitlin Gillis



Use of Corporate Resources During an Election Policy

Policy Number:

Approved by: Council Resolution passed _____, 2026

Administered by: Clerk's Department

Effective Date: _____, 2026

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1. Definitions

- 1.1 “Campaign”** means any activity performed with the intention to solicit or influence votes in support or opposition of a candidate in a federal, provincial, or municipal election or by-election, or a question on a ballot.
- 1.2 “Campaign Material”** means material in any media (i.e. print, radio, television, websites, digital and social media) used to promote or oppose a candidate, political party, or question on the ballot. Campaign material includes, but is not limited to, pamphlets, brochures, cards, posters, buttons, clothing, and car wraps.
- 1.3 “Campaign Period”** means:
- a. For Candidates, the date on which their Nomination Form is filed until December 31 in the year of an election (unless a request for extension of campaign period has been filed).
 - b. For Registered Third Parties, the date on which the Notice of Registration as a third-party advertiser is filed until December 31 in the year of an election (unless a request for extension of Campaign Period has been filed).
 - c. For a provincial or federal election, the date on which the writ of election is issued or a by-election is called and ending on Voting Day. Voting day for a provincial or federal election or by-election is the day set out in the *Elections Act* (provincial) or *Canada Elections Act* (federal).
- 1.4 “Candidate”** means a person who has filed a Nomination Form as a Candidate in the Township’s municipal or local board election or by-election, or a person who is a Candidate or who is seeking a nomination in a provincial or federal election or by-election, including acclaimed Candidates.
- 1.5 “Township Clerk”** means the clerk of The Corporation of the Township of Howick, an election official in accordance with the *Municipal Elections Act, 1996*, and the position responsible for conducting municipal elections within the municipality.
- 1.6 “Township-organized Event(s)”** means events organized or funded solely or jointly by the Township.
- 1.7 “Township Property”** means all Township-owned, leased, operated and/or controlled properties and facilities, including but not limited to indoor and outdoor recreation fields; parks and parkland; gardens; open space and boulevards; buildings and rooms; furniture; equipment and fixtures; vehicles; transit and fleet vehicles; and parking lots.
- 1.8 “Corporate”** means The Corporation of the Township of Howick.

- 1.9 “Elected Official”** means a person elected to an office of municipal, provincial, or federal government, or a local board.
- 1.10 “Member of Council”** means a person elected to an office of the Council of The Corporation of the Township of Howick.
- 1.11 “Municipal Publications”** means any Township publication.
- 1.12 “Nomination Day”** means the third Friday in August in the year of the election, as prescribed in the *Municipal Elections Act, 1996* (MEA). Nomination Day ends at 2 pm local time.
- 1.13 “Nomination Form”** means the prescribed form and declaration of qualification, executed and filed by the Candidate.
- 1.14 “Registered Third Party”** 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.
- 1.15 “Senior Management Team”** consists of the CAO/Clerk, the Manager of Development and Protective Services/Fire Chief, the Manager of Public Works, the Manager of Recreation and Facilities, and the Treasurer/Manager of Finance.
- 1.16 “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, Threads and LinkedIn.
- 1.17 “Staff”** means all full-time, part-time, volunteer, and contract employees of the Corporation.
- 1.18 “Voting Day”** means the fourth Monday in October in the year of the election, as prescribed in the *Municipal Elections Act, 1996* (MEA). In the case of a provincial election, Voting Day is referred to as Polling Day and occurs on the fifth Thursday after the date of the writ. For federal elections, Voting Day is also referred to as Polling Day and generally occurs on the third Monday of October in the fourth calendar year following polling day for the last general election.

2. Background

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.

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 Township’s resources for an election campaign by Staff, 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 Township 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.

Federal and Provincial Elections

The Township continues to emphasize the importance of strengthening relationships with all levels of government and actively engages in political advocacy campaigns, including during federal and provincial elections, to promote the interests of the Township.

To avoid the appearance of Township support for partisan political activities, discretion will be used in considering requests for government events leading up to and during the period when the writ of election (dissolution of parliament [federal] or legislature [provincial]) is issued.

3. Purpose

The purpose of this Policy is to provide a consistent approach and clear direction regarding the use of corporate resources during a Campaign Period. This Policy should be interpreted as a general prohibition against the use of corporate resources for any election-related purpose.

It is recognized that subject to the provisions of the *Municipal Act, 2001*, persons elected to an office on Township Council (“Member of Council”) are holders of their office until the end of their term and until their successors are elected and the newly elected Council is organized. Nothing in this Policy shall preclude an Elected Official or member of a local board from performing their job responsibilities, nor inhibit them from representing the interests of their constituents.

4. Application and Scope

This Policy applies to:

- All Members of Council (including those not seeking re-election).
- Members of local boards.
- Candidates and Registered Third Parties in a municipal and school board trustee election, or by-election.
- A campaign related to a question on the ballot.
- All Staff during a Campaign Period.
- Candidates and Registered Third Parties for a provincial or federal election or by-election.

Exceptions:

- 4.1** Municipal information prepared, posted and maintained by the Township, names and photographs of Elected Officials, their contact information, and a list of current representation on committees that is prepared, posted and maintained by the Township.
- 4.2** Agendas and minutes of Council and Committee meetings.
- 4.3** Media releases and Township materials that describe inter-governmental activities of the Reeve in the capacity as Head of Council and Chief Executive Officer of the Township.
- 4.4** A provincial or federal announcement in which one government is in a writ period may be permitted if directly related to government business.
- 4.5** A town hall event or debate, involving Candidates in a provincial or federal election or by-election, that is Township-organized or an event organized by non-partisan individuals or organizations, may be held at a Township Property, provided that necessary rental agreements have been secured by the event organizer.
- 4.6** A town hall event or debate, involving Candidates in a municipal election or by-election for one or more specific office(s), that is organized by non-partisan, individuals or organizations, as long as no particular candidate is promoted or opposed at the event, may be held at a Township Property, subject to the consent of the Township Clerk, and provided that the necessary rental agreements have been secured by the event organizer. The Township will not host or organize any town hall events or debates for municipal election candidates. Registered third parties are not permitted to hold town hall events or debates on Township Property.

4.7 Municipal election-related education meetings that are organized by Township Staff may be held at any Township Property.

Note: certain provisions of this Policy may be subject to additional Township by-laws, policies and procedures (see Section 9 – References and Resources).

Guidance should be sought from the Township Clerk or designate if clarification or interpretation is required.

5. Outcomes

This Policy is intended to:

- a) Ensure compliance with the *Municipal Elections Act, 1996*, in regards to the prohibitions against the Township contributing to a municipal, trustee, or a registered third-party election campaign.
- b) Ensure Candidates and Registered Third Parties are treated fairly and consistently within the municipality.
- c) Ensure that the integrity of the election process is maintained at all times.
- d) Establish the appropriate use of Corporate resources during an election period, in order to:
 - I. protect the interests of Elected Officials, Candidates, Registered Third Parties, Staff and the Corporation, and
 - II. ensure accountable and transparent election practices.
- e) Maintain non-partisanship and demonstrate impartiality towards provincial and federal partisan political activities during the Campaign Period.

6. Policy Statements

The statements contained herein provide a consistent approach to the use of Township Corporate resources during a Campaign Period, and expressly prohibit contributions and the use of Corporate resources for campaign purposes. The following applies to Elected Officials, Candidates, Registered Third Parties, and Township Staff.

6.1 Activities

The following activities are not permitted during an election campaign period:

- (a) Use of Township Property, whether directly or indirectly booked, for any election purpose(s) not provided for in subsections 3.5, 3.6, or 3.7.

- (b) Campaigning or solicitation (including display or distribution of Campaign material, wearing Campaign buttons or clothing) within any Township Property.
- (c) Campaigning or solicitation (including display or distribution of Campaign material, wearing Campaign buttons or clothing, etc.) at a Township-organized Event (e.g. Canada Day, flag raisings, etc.).
- (d) Use of equipment, supplies, services, Staff, technology, infrastructure, data or other resources of the municipality for any Campaign or Campaign-related activities.
- (e) Use of Township funds to acquire or produce any resources for any Campaign or Campaign-related activities, including ordering of stationary, print and office supplies.

Note: Campaigning on Township Property, whether it is during or outside of an election campaign period, is not permitted at any time.

Note: Candidates may accept an invitation to address a group that has booked a Township Property, or an organized group that regularly meets at a park or open space (e.g. clubs or ratepayer groups), but they are not permitted to wear any campaign clothing during the address/meeting. Campaign material must be confined to the meeting the candidate is attending. Campaigning must not disrupt the enjoyment or use of the space by others.

Note: It is recommended that current Council members include an auto-reply email message and voicemail message such as *“As a sitting Council member, I must ensure that my actions as a candidate are kept separate from any actions related to the upcoming municipal election. As such, I will not be reading or responding to any campaign-related communications from you to this email address. Election campaign inquiries should be directed to my personal/campaign email and voicemail”*.

6.2 Campaign Material

The following restrictions apply to campaign-related material:

- (a) Use of Member of Council office budgets to sponsor or produce any campaign material (should also be read in accordance with the Employee Business Expense Policy).
- (b) Use of Township funds or resources to print or distribute any material that makes reference to, or contains the names or photographs of, or identifies Candidates or Registered Third Parties.

- (c) Use of lists, data and files produced using Township resources, with the exception of lists to which a particular Candidate is entitled, pursuant to the *Municipal Elections Act*, for the current election (e.g. permitted use of Voters' List for election purposes only).
- (d) No photographic or video material created or funded by the Township shall be used in political advertising, or election-related campaign material.
- (e) Display of Campaign material, including clothing, in or on any Township Property.
- (f) Display of Campaign material at any voting location, including the voting location's parking lot.
- (g) Display of Campaign material, including clothing, by any Township Staff, during working hours.

6.3 Election Signs

Election signs, including "wrapped" cars cannot be posted or displayed on Township property or at voting locations. Placement of election signs for municipal, provincial and federal elections must be in accordance with the current Township Sign By-law and any related election sign by-law.

6.4 Photography at Voting Locations

Election procedures prohibit the use of cameras inside a voting location. Candidates or Registered Third Parties are permitted to be photographed outside a voting location, provided there are no Township identifiers in the photograph.

6.5 Information Technology Resources and Social Media

The following restrictions apply to the use of information technology resources and social media during a Campaign Period:

- (a) Make reference to and/or identify any individual as a Candidate, political party, Registered Third Party or a supporter or opposer of a question on a ballot during an election, on any social media sites, blogs, and other new media created and/or managed by the Township and/or Township staff.
- (b) Use Township owned or managed Technology (IT) assets, infrastructure, or data (e.g. computers, wireless devices, portals, corporate email, web pages, blogs, telephone) to communicate election-related messages.

Note: The Township's online list of Candidates and Registered Third Parties shall be the only area of the Township of Howick's website where a link to external election campaign contacts, websites and/or social media may be posted during the Campaign Period.

6.6 Member of Council Use of Social Media

The following restrictions apply to Member of Council use of social media during a Campaign Period:

- (a) All links to social media accounts and personal external websites shall be removed from Township websites and domains during a municipal election period.
- (b) Members are not permitted to use electronic materials paid for by the Township for municipal election campaign purposes.
- (c) Councillors and candidates may not include election related material on websites or domain names paid for or maintained by the Township.

Note: Members of Council must ensure that their use of social media is consistent with the Council Policy and all other relevant Township policies.

Social media use is not completely “cost-free.” Township images and logos, staff, and volunteers working in council offices and using Township computers, smart phones, services and email accounts are Township resources and shall not be used for campaign purposes.

6.7 Use of Township Logo and Identifiers

The Township’s brand, logos and identifiers are registered trademarks and owned by the Township of Howick. Use of a video, photo, logo, crest, coat of arms, slogan, or identifier for which the Township has proprietary rights, including municipal election logos, in any capacity, are strictly prohibited.

6.8 Member of Council Advertising and Publications

The following services will be discontinued for Members of Council who are a Candidate as of the end of Nomination Day:

- (a) All forms of advertising and communication, including Municipal Publications (e.g. paper or web-based).
- (b) All printing services, including distribution, photocopying and printing of publications, such as newsletters, business cards, with the exception of communications specifically related to an authorized or scheduled Township-organized Event (e.g. Public Meeting).
- (c) Links to Member of Council related websites or social media platforms, unless those platforms are clearly marked as an official Member of Council site and are not used for election Campaign purposes.

Note: If a compelling Corporate need arises between Nomination Day and Voting Day, a Member of Council who is a Candidate may use Corporate Resources to advise or contact their constituents, in keeping with this Policy and subject to the consent of the Township Clerk.

6.9 Candidate and Registered Third-Party Conduct

(a) Candidates and Registered Third Parties who attend Township-organized Events are not permitted to campaign, including without limitation, distribute campaign material, or wear campaign buttons or clothing. The Township's Staff supervising a Township-organized Event may request that a Candidate or Registered Third Party leave the event if campaigning is reported or suspected.

(b) Members of Council attending Township-organized Events, or events held at a Township Property may act as a representative participant in their capacity as an elected official, including speaking and offering greetings. Elected Officials and Members of Council who are also Candidates at the time of their attendance and participation at the Township-organized Event may not campaign. No election signs or Campaign materials, including clothing, may be publicized at the event.

(c) Candidates or Registered Third Parties are not permitted to engage in Campaign activities directed at Township employees while those employees are at their workplace or engaged in work for the Township.

Note: The above extends to registered Candidates and Registered Third Party advertisers for a provincial or federal election or by-election.

6.10 Township Staff Conduct

In recognizing the right of employees and volunteers to participate in political activity, the provisions set out below ensure the requirement for public service to be politically impartial. Township Staff, including volunteers, shall not:

- (a) 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 Township, except during scheduled time off (e.g. scheduled vacation time).
- (b) Distribute campaign material on behalf of a Candidate or Registered Third Party at Township facilities or on Township property including Township parks at any time.
- (c) Engage in any political activity while wearing a Township uniform or identifier (e.g. name badge, hat, lanyard).
- (d) Engage in any political activity while wearing clothing or buttons that advertise any Candidate, Registered Third Party or political party while wearing a Township uniform or identifier.

- (e) Use their title or position within the Township in a way that may lead a member of the public to infer that the Township is endorsing a Candidate, Registered Third Party or political party.

Note: The Township Clerk and Township Clerk's Office Election staff may not engage in political activity in any federal, provincial, or municipal election or by-election. Township staff that support the Township Clerk in the administration of a municipal election or by-election may not engage in political activity during such election.

7. Roles and Responsibilities

7.1 Township Clerk

The Township Clerk is responsible for:

- Communicating this Policy to municipal Candidates and Registered Third Parties.
- Ensuring this Policy is reviewed and updated as required, prior to municipal elections or by-elections, or as required by legislative change.
- Ensuring all municipal Candidates and Registered Third Parties are treated equally.

7.2 Senior Management Team

The Chief Administrative Officer/Clerk, and the Senior Management Team are responsible for:

- Communicating this Policy to their Staff.
- Ensuring compliance with this Policy.
- Investigating reported contraventions of the Policy and escalating as required.

7.3 Staff

Township Staff are responsible for:

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

7.4 Members of Council, Candidates and Registered Third Parties

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

7.5 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.

8. Monitoring and Compliance

The Township Clerk's Office shall ensure this Policy is reviewed on a regular basis (not to exceed four years) and remains relevant to the needs of the Corporation, in accordance with legislative requirements and good business practices.

8.1 Non-Compliance

Should a complaint arise regarding the alleged use of Corporate resources in contravention of this Policy, the Township Clerk or their designate shall have the authority to investigate and resolve the complaint.

For information regarding the application of this policy, please contact the Township of Howick, Clerk's Department by phone at 519-335-3208 or email clerk@howick.ca.

8.2 Consequences of non-compliance

Township staff who observe or are made aware of an apparent contravention of this Policy shall address the individual or shall report the apparent contravention to their direct report.

9. References and Resources

This Policy should be read and applied in conjunction with the following references and resources and updated from time to time. Please note that some of the following documents may not be publicly available.

9.1 External references

- [Municipal Elections Act, 1996](#)
- [Canada Elections Act, 2000](#)
- [Election Act, 1990](#)
- [Election Finances Act, 1990](#)

9.2 References to related by-laws, Council policies, and administrative directives

- Council Policy & Council-Staff Relations Policy
- Council Remuneration Policy
- Employment Policy
- Employee Business Expense Policy

10. Revision History

Date	Description
2026/04/11	Approved by Council By-law __-2026
2030/03/01	Next Scheduled Review (<i>typically four years after approval</i>)