

<b>POLICY TITLE</b>	Use of Corporate Resources During an Election
<b>CATEGORY</b>	Governance
<b>POLICY NUMBER</b>	A09 ADM 039
<b>DEPARTMENT</b>	Corporate Services
<b>POLICY AUTHOR</b>	City Clerk
<b>POLICY TYPE</b>	Administrative Policy
<b>APPROVED BY</b>	City Manager/CLT
<b>EFFECTIVE DATE</b>	(03/03/2026)
<b>REVIEW DATE</b>	(12/31/2029)

---

## **POLICY STATEMENT**

To uphold public trust and comply with the *Municipal Elections Act, 1996*, this Policy sets clear standards for ethical conduct and the proper use of City resources during municipal election periods.

This Policy aims to:

- Ensure the City meets all legislative requirements prohibiting municipal contributions to election campaigns;
- Promote fairness and consistency for all candidates and registered third-party advertisers; and
- Safeguard the integrity of the election process.

## **PURPOSE**

This Policy establishes a consistent framework for the proper use of the City of Cambridge's (herein the City) facilities, resources, and staff during election periods. It provides clear guidance to employees, candidates, registered third parties, and elected officials, and ensures the City fulfills its obligations under the *Municipal Elections Act*, the *Election Finances Act*, and the *Canada Elections Act*. By defining how corporate resources may and may not be used, the Policy supports legislative compliance and upholds fairness, neutrality, and integrity throughout the election process.

## **AUTHORITY**

The *Municipal Elections Act, 1996* authorizes the City Clerk to administer municipal elections and establish procedures that ensure fairness, accessibility, and integrity. It also requires municipalities to set rules governing the use of corporate resources during the campaign period.

Provincial and federal legislation, including the *Election Finances Act* and the *Canada Elections Act*, prohibits municipalities from contributing to any candidate, political party, or campaign organization.

Together, these laws mandate neutrality during election periods and empower the City Clerk, or their designate, to develop policies, ensure compliance, and investigate any misuse of City resources.

## **SCOPE**

This Policy applies to anyone who may participate in or influence the electoral process. It ensures that City resources are not used for campaign purposes and that neutrality is maintained throughout the campaign period. The Policy applies to:

- Members of Council, including those not seeking re-election;
- Members of local boards;
- Candidates and Registered Third Parties in a municipal election or by-election;
- Campaigns related to a question on the ballot;
- All City staff, unionized, non-union, volunteers, contractors, and staff in elected officials' offices, during a campaign period;
- Members of the public (where applicable);
- Candidates and Registered Third Parties in provincial or federal elections; and
- All City-operated facilities and services, such as community centers, recreation facilities, and libraries.

## **POLICY**

### **1. Core Principle**

This Policy is based on the principle that corporate resources may only be used for official City business in a neutral and non-partisan manner. Any activity that uses City resources to support or oppose a candidate, registered third-party advertiser, or campaign is strictly prohibited. Official City business refers to work required by legislation or essential to municipal operations. By maintaining neutrality and preventing the use of City resources for campaigning, this Policy protects public trust, ensures fairness, and

upholds the integrity of the electoral process. Specific permitted and prohibited uses are outlined throughout this Policy to support clarity and consistent application.

## 2. Responsibilities

Position	Responsibility
<b>City Clerk</b>	<ul style="list-style-type: none"> <li>• Communicating this Policy to all Candidates and Registered Third Parties.</li> <li>• Reviewing and updating the Policy before each election or when legislation changes.</li> <li>• Ensuring all Candidates and Registered Third Parties are treated fairly.</li> <li>• Receiving and investigating possible violations of this Policy or the <i>Municipal Elections Act, 1996</i>.</li> <li>• Taking any actions needed to ensure compliance with this Policy.</li> </ul>
<b>Current Members of Council</b>	<ul style="list-style-type: none"> <li>• Complying with this Policy and seeking clarification from the City Clerk when needed.</li> <li>• Ensuring participation in City-led events and Council meetings remains non-partisan.</li> <li>• Not using information or materials obtained through their Council role for campaign purposes.</li> <li>• Using the same public booking and service-access procedures as all other Candidates.</li> <li>• Reporting any suspected violations of this Policy to the City Clerk.</li> </ul>
<b>City Manager, General Managers, Directors, Managers and Supervisors</b>	<ul style="list-style-type: none"> <li>• Communicating this Policy to their staff.</li> <li>• Ensuring compliance within their areas.</li> <li>• Reporting violations to the City Clerk and assisting in investigations.</li> </ul>
<b>All City staff, union and non-union, volunteers and contractors</b>	<ul style="list-style-type: none"> <li>• Complying with this Policy.</li> <li>• Seeking clarification from their supervisor when needed.</li> <li>• Reporting violations to supervisor and assisting in investigations.</li> </ul>

## 3. City Property, Facilities and Equipment

City-owned properties, facilities, and equipment include all buildings, lands, and physical assets the City owns or controls. This covers places like City Hall, operations centres, community centres, libraries, parks, trails, sports fields, arenas, sidewalks, and roads. It also includes City-owned equipment, office furniture, supplies, tools, and other resources used to support City operations.

- 3.1 Campaigning is not allowed in any City spaces that cannot be rented by the public.
- 3.2 Candidates and Registered Third-Party Advertisers may rent City facilities (such as community centers, arenas, libraries, parks, and sports fields) for campaign events if:
  - The booking requests is reviewed and approved by the City Clerk;
  - The booking does not conflict with a space being used, or possibly used, for voting or election education; and
  - All regular rental procedures and fees are followed, with no discounts or special access.
- 3.3 During a rental, the following rules apply. Non-compliance may result in the booking being cancelled:
  - All campaign materials (e.g., signs, posters) must be set up and removed within the rental period, and City staff will not assist with campaign set-up or promotion; and
  - Campaign materials may only appear inside the rented room or area, not in hallways, common spaces, building exteriors, parking lots, or nearby outdoor areas.
- 3.4 For all campaign events in a City facility, staff must display the required Non-Affiliation Sign, Appendix A, at each entrance and entry points to the event.
- 3.5 City staff and City representatives may not host, organize, or support campaign-related events during work hours or in connection with their City roles.
- 3.6 City-owned equipment must only be used for official City business and kept strictly neutral. The following are not permitted:
  - Using City equipment, supplies, or tools for campaign purposes (unless specifically included in a rental agreement);
  - Removing or borrowing City items for personal or campaign use; and
  - Using City physical equipment in any way that could appear to support or oppose a candidate, third party, or campaign.

#### **4. Meetings and Special Events**

Public meetings and special events include any gathering the City organizes, hosts, or supports as part of its official business or community engagement. This includes Council and Committee meetings, local board meetings, public consultations, festivals, parades, markets, community celebrations, and official ceremonies.

- 4.1 Candidates and Registered Third-Party Advertisers may attend these meetings and events as members of the public but must not engage in any campaign activity.
- 4.2 Current Members of Council must remain impartial and non-partisan at all meetings and events. They may not use their role or influence to promote, support, or oppose any candidate, Third-Party Advertiser, or campaign.
- 4.3 Campaigning of any kind at City meetings or events is prohibited for everyone covered by this Policy, including members of the public. Individuals engaging in campaign activity may be asked to leave or removed. This includes, but is not limited to:
  - Announcing or indicating candidacy or campaign affiliation in any way (spoken, written, or visual);
  - Using speaking opportunities to endorse or oppose candidates, Third Parties, or ballot questions;
  - Leveraging meeting recordings, livestreams, or minutes for campaign purposes;
  - Wearing campaign-branded clothing, buttons, or accessories;
  - Handing out flyers, brochures, or other promotional items;
  - Sponsoring or promoting a campaign through event materials (e.g., banners, programs, social media posts);
  - Registering a booth, parade float, or participating in an event for campaign purposes; and
  - Walking in parades or attending events while displaying campaign materials, wearing campaign-branded apparel, carrying signs, or soliciting support.

## **5.Campaign Signs and Vehicles**

Campaign signs include any sign, poster, placard, vehicle magnet, sticker, wrap, or similar display that promotes, supports, or opposes a candidate, registered third-party advertiser, or a ballot question during the campaign period.

- 5.1 All temporary election signs are not allowed on City property or inside City facilities. Any sign placed on private property must follow the City's Sign By-law.

- 5.2 Vehicles or trailers displaying campaign material may park on City roadways if they comply with the City's Traffic and Parking By-law and Sign By-law. However, they are not permitted to:
- Park or idle in any City-owned or City-operated parking lot or property;
  - Park or idle within view of any City-owned property; and
  - Park or idle within view of a polling location on designated voting days.
- 5.3 City-owned vehicles shall not be used for any campaign purpose, including transporting campaign materials or displaying campaign signs.

## **6. Technology**

Technology includes all hardware and software the City owns, leases, or manages. This covers devices like computers, laptops, phones, tablets, printers, servers, and network equipment, as well as City-approved software, databases, and online systems used for City operations.

- 6.1 City-owned technology must be used only for official City business in a neutral, non-partisan way. The following activities are not permitted:
- Using City hardware or software to create, store, or distribute campaign materials;
  - Accessing City networks or systems to send campaign-related messages or manage campaign activities
  - Installing, downloading, or using campaign-related apps or tools on a City device;
  - Storing campaign files on City servers, shared drives, or devices; and
  - Using City-issued technology (e.g., laptops, phones, printers) outside of work for campaign purposes.

## **7. Electronic Communications and Social Media**

Electronic communications and social media include all digital tools, platforms, and online systems the City owns, operates, or manages. This includes the City's website, intranet pages, SharePoint sites, email systems, messaging tools, and official social media accounts such as Facebook, Bluesky, Instagram, LinkedIn, YouTube, and similar platforms.

- 7.1 City-owned electronic communications and social media may be used for business purposes, as required by legislation, operations or educational purposes, including but not limited to:
- Election information prepared and approved by the City Clerk (e.g., voting days, registration details);

- Designated staff responding to inquiries from the public, candidates, and third-party advertisers;
- Posting legally required notices (e.g., Municipal Elections Act, Municipal Act);
- Posting agendas, minutes, and records of Council and Committee meetings;
- Maintaining standardized, neutral webpages for current Members of Council (images, descriptions, committee assignments); and
- Maintaining the official webpage listing all registered candidates and third-party advertisers.

7.2 City-owned electronic communications and social media cannot be used for:

- Sending campaign-related messages through email or other electronic tools;
- Posting or sharing any campaign-related content, including endorsements or opposition;
- Altering official City pages or accounts to include campaign messaging, imagery, or slogans;
- Storing or distributing campaign materials through City systems (e.g., SharePoint, email attachments, intranet).

## **8. Print and Mail Services and Departmental Equipment**

City's Print and Mail department, which manages all corporate printing, photocopying, scanning, document production, mail handling, postage, and courier functions, along with the staff, systems, supplies, and budget that support these activities. This also includes departmental equipment used across the organization, such as printers, scanners, copiers, and related devices, whether located in City facilities or issued to staff or Council members for work purposes.

8.2 Print and Mail Services and Departmental Equipment cannot be used for any campaign-related activity, including:

- Printing, photocopying, scanning, collating, packaging, or distributing campaign materials of any kind;
- Sending or directing campaign-related mail through City postage accounts, courier services, or internal mail systems;
- Asking Print and Mail staff to print, prepare, assemble, or deliver campaign-related items (e.g., letters, flyers, posters);
- Using City-funded supplies, such as paper, envelopes, toner, labels, or postage, for campaign purposes;

- Requesting design, formatting, or technical help from Print and Mail staff for campaign materials; and
- Using City interoffice mail to circulate campaign information to staff, volunteers, or contractors.

## **9. Branding, Intellectual Property, and Confidential Information**

Branding, Intellectual Property, and Confidential Information includes all official City identifiers and creative assets, such as the City's name, logo, wordmarks, slogans, taglines, photographs, graphics, and templates. as well as any other design materials created for City business. It also includes internal and confidential information, including reports, studies, data sets, strategic plans, and documents or discussions from closed Council meetings.

9.1 The following actions are not permitted to ensure neutrality and protect confidential information:

- Using City logos, templates, or branding in any campaign materials;
- Referring to or disclosing internal reports, plans, or closed-meeting discussions in campaign messaging;
- Sharing confidential or internal information outside authorized channels or for campaign purposes;
- Reusing City-owned photos or graphics for campaign or advertising purposes, including official Council member photographs;
- Altering any City branding to include campaign slogans, imagery, or partisan message

## **10. Financial and Procurement Resources**

Financial and Procurement Resources include all City funds, budgets, accounts, financial systems, and purchasing processes. This covers things like grant programs, payment systems, procurement cards, purchase orders, contracts, and vendor agreements.

10.1 City funds, budgets, and procurement resources must be used only for authorized City business. This includes processing purchase orders and contracts for legitimate municipal needs, following standard procurement procedures, and using procurement cards solely for approved operational expenses.

10.2 This section does not restrict any refunds of nomination filing fees issued by the City Clerk, as per the MEA.

10.2 To ensure neutrality and compliance, the following actions are not permitted:

- Using City funds or accounts to pay for campaign-related expenses (e.g., printing flyers, renting campaign venues);

- Processing purchase orders or contracts for goods or services intended to support a candidate or third-party advertiser;
- Using procurement cards to buy campaign materials, advertisements, or event supplies;
- Contributing to a candidate or third-party advertiser using City funds; and
- Entering into agreements with vendors or using existing vendor contracts for campaign purposes under the guise of City business

## **11. Current Members of Council and Affiliated Staff**

This section applies specifically to current Members of Council, Mayor and Ward Councillors, and any staff directly supporting them. These individuals are required to comply with all provisions outlined in this section, as well as all other rules and restrictions contained throughout this policy.

11.1 All office space, furniture, supplies, electronic devices, phones, computers, printers, and equipment within Mayor and Council office or provided to members, City-owned vehicles, staff, and the Mayor's or Council's budgets are considered corporate resources;

11.2 Mayor and Council staff shall not:

- Use City email, voicemail, or messaging platforms to send or coordinate campaign communications;
- Schedule campaign-related meetings or events using City calendars, Teams, or other City scheduling tools;
- Access or use City contact lists, databases, or constituent information for campaign purposes;
- Use City printers, copiers, or office supplies to produce campaign materials;
- Store campaign materials in City offices or any City-owned space;
- Use City meeting rooms or facilities for campaign activities unless they are publicly rented, approved by the City Clerk, and take place outside working hours;
- Prepare, edit, or review campaign materials during paid work hours;
- Request or direct staff, including their own or from other departments, to assist with campaign activities during working hours;
- Use or share confidential information, internal reports, or knowledge gained through their City role for any campaign advantage; and

- Engage in any activities prohibited elsewhere in this policy.

## **12. City Staff, Volunteers, and Contractors**

This section applies to all City staff, volunteers, and contractors. This includes full-time, part-time, temporary, seasonal, and contract employees; students and co-op placements; unionized and non-union staff; volunteers; and external service providers or consultants working under formal agreements.

12.1 Staff, volunteers, and contractors must remain politically neutral while performing their official duties.

12.2 While individuals may participate in political activities on their own time, the following actions are not permitted while working for the City or using City property:

- Canvassing, volunteering, or doing any work for a candidate or registered third party during paid or scheduled work hours;
- Distributing, displaying, or storing campaign materials in any City facility or on City property at any time;
- Engaging in political activity while wearing a City uniform or identifier (e.g., badge, hat, lanyard);
- Using their City title, position, access, or influence in a way that could imply City endorsement of any candidate or third-party advertiser;
- Wearing, displaying, or distributing campaign materials during work hours or in City workplaces;
- Discussing or promoting campaign activities with coworkers during work hours;
- Use insider knowledge of City election processes to benefit a candidate or third-party advertiser;
- Soliciting political support from the public while performing City duties or providing City services; and
- Hosting, organizing, or assisting with campaign-related activities in City spaces unless the space is publicly rented (per Section 3) and the activity occurs outside working hours.

12.3 Staff, volunteers, and contractors may:

- Canvass, volunteer, or work for a campaign during personal time (e.g., evenings, weekends, vacation, lieu time, leaves of absence);
- Attend campaign events as private individuals, separate from their City role;

- Display campaign materials (e.g., lawn signs, buttons, apparel) outside of work and off City property
- Express personal political views privately on their own time and personal platforms, without referencing their City role or using City systems; and
- Take a leave of absence, if eligible, to run as a candidate.

12.3 Unionized staff shall not:

- Use their union role to pressure or influence coworkers to support or oppose a candidate or third-party advertiser;
- Display union-endorsed or any campaign material or branded apparel in City facilities or vehicles, or while performing City duties;
- Distribute campaign materials during work hours or in City-owned spaces under the guise of union activity; and
- Distribute campaign materials or third-party advertising materials through or to city provided devices or email addresses.

12.4 Staff working in the City Clerk’s Office, or in any role supporting the planning or delivery of a municipal election, are not permitted to engage in any campaign activities for the same election they are administering. This includes volunteering, canvassing, fundraising, advising candidates, attending campaign events, or any activity that could support or appear to support a campaign. This requirement ensures neutrality, protects election integrity, and maintains public trust.

### **13. Integrity Commissioner**

This section applies to the use of the Integrity Commissioner appointed by the City of Cambridge. The Integrity Commissioner provides advice, guidance, and oversight on ethical conduct and compliance with the Council Code of Conduct.

13.1 The Integrity Commissioner is a corporate resource under contract with the City and may be compensated for the services they provide.

13.2 The Integrity Commissioner may give advice to Members of Council, proactively or upon request, about their official responsibilities as they relate to applicable legislation and the Council Code of Conduct.

13.3 Members of Council shall not use the Integrity Commissioner to seek advice related to their campaign, and must seek legal advice privately.

### **14. City Affiliated Trade Unions**

This section applies to all trade unions affiliated with the City of Cambridge that represent unionized City staff, including all bargaining units and their executives under collective agreements (e.g., CUPE Local 1882, CUPE Local 32, and CFFA Local 499).

**14.1** To maintain neutrality and comply with this policy, Union Locals and their executive members may only:

- Conduct all advertising, advocacy, or campaign-related activities independently of the city and its operations

**14.2** To ensure impartiality and compliance, the following actions are not permitted:

- Hold union meetings related to campaign planning during paid working hours or in City-controlled workspaces, even if those spaces are normally allowed for labour-management activities;
- Display union notices, posters, or campaign materials on City bulletin boards, in staff-only areas, or anywhere that could be interpreted as City property;
- Use union contact lists that include City-issued email addresses, phone numbers, or other City-provided contact information for election advertising or advocacy;
- Municipal uniforms, badges, or identification must not be worn in union election advertising, videos, or public advocacy materials; and
- Use union role, municipal job titles, departmental roles, or official authority when speaking on campaign-related matters.

## **15. Breach and Enforcement**

To protect the integrity of the electoral process, any breach of this policy, intentional or accidental, will be reviewed and may result in corrective action. The City Clerk, or their designate, is authorized to assess complaints, determine whether a violation has occurred, and take appropriate steps to address non-compliance, which may include reporting to oversight bodies or applying penalties allowed by law.

**15.1** Any suspected breach of this policy must be reported promptly to the City Clerk or their designate. Reports may come from staff, Members of Council, candidates, or members of the public.

**15.2** The City Clerk, or their designate, will review all complaints and determine whether a violation has occurred. Investigations will be fair, impartial, timely, and confidential wherever possible.

**15.3** If a breach is confirmed, the City Clerk may implement corrective actions as outlined in “Possible Enforcement Actions”, Appendix B.

## **DEFINITIONS**

**Act or “MEA”** means the *Municipal Elections Act, 1996*, which is the provincial law that sets the rules for how municipal elections must be run in Ontario.

**Campaign Activity** means any action intended to gain support for a candidate or campaign. This includes creating, sharing, or using campaign materials.

**Campaign Materials** means anything used to promote or oppose a candidate, third-party advertiser, or a ballot question, such as signs, flyers, brochures, social media graphics, videos, or digital ads.

**Campaign Period** means the official time when campaigning is allowed, beginning the day the candidate files their nomination forms with the City Clerk and ending December 31 of the election year, during a regular election.

**Candidate** means anyone who has submitted a nomination to run in a municipal, provincial, or federal election.

**City** means the Corporation of the City of Cambridge

**City Clerk** means the Clerk of the City of Cambridge, who serves as the Returning Officer responsible for administering municipal elections under the Municipal Elections Act.

**City Facility** means any building, land, or space owned or operated by the City, including City Hall, offices, community centres, libraries, parks, sports fields, and similar public spaces.

**Committee** means any group formally established by Council or City staff, such as advisory committees, task forces, or working groups.

**Corporate Resources** means anything owned, paid for, or controlled by the City, such as property, equipment, vehicles, technology, funds, social media accounts, and intellectual property.

**Election** means any municipal, provincial, or federal election, by-election, political party leadership contest, or vote on a question or by-law.

**Election Day** means the official and last voting day for an election on fourth Monday in October of the election year

**Election Period** means the time when voting takes place, designated dates in September through October by the City Clerk, including advance voting days and Election Day.

**Members of Council** means the Mayor and Councillors of the City of Cambridge.

**Nomination Period** means the time when people can officially file to become candidates in a municipal election. For a regular election, it starts on May first of the election year and ends on Nomination Day, which is the third Friday in August, as required by the *Municipal Elections Act, 1996*.

**Policy** means this Use of Corporate Resources During an Election Policy.

**Registered Third Party** means an individual, corporation, or trade union that registers with the City Clerk to advertise during a municipal election.

**Social media** means online platforms used to communicate and share information, such as Facebook, Instagram, TikTok, LinkedIn, Bluesky, and YouTube.

**Staff** means all full-time, part-time, contract, student, co-operative education, union, and non-union employees hired by the City.

**Union** means any trade union representing City employees, including CUPE Local 1882, CUPE Local 32, and CPFFA Local 499

**Voting Place** means the entire property and all surrounding areas used as a voting location. This includes all common areas when the voting place is inside a private building.

## **POLICY COMMUNICATION**

The City will support awareness and compliance with this Policy through staff training, posting the Policy on internal and external platforms, and including it in candidate and third-party information packages and orientation sessions. Reminders will be issued throughout the campaign period to reinforce expectations.

## **RELATED PROCEDURES**

There are no related procedures.

## **RELATED DOCUMENTS/LEGISLATION**

Appendix A – Notice of Non-Affiliation

Appendix B – Possible Enforcement Measures

*Municipal Elections Act, 1996*

*Canada Election Act, 2000*

*Election Finances Act, 1990*

Signs By-law, 15-179

Traffic and Parking By-law, 22-044

Code of Conduct for Employees Policy

Council Code of Conduct

Employee Conflict of Interest Policy