



# CITY OF THOROLD POLICY AND PROCEDURE MANUAL

## Use of Corporate Resources for Election Purposes

<b>Policy Owner</b>	City Council
<b>Policy Number</b>	100A-01
<b>Approval Body</b>	City Council
<b>Effective Date</b>	November 18, 2025
<b>Review Date</b>	November 2029

### 1. Policy Statement

This policy serves to notify all registered candidates, including Elected Officials, City employees and third-party advertisers on how City resources can and cannot be used for election-related purposes. In accordance with the provisions of the *Municipal Elections Act, 1996*, the Municipal Clerk is authorized and directed to take the necessary action to give effect to this policy.

### 2. Purpose

The purpose of this policy is to ensure that Elected Officials, registered candidates and staff adhere to the provisions of the *Act* regarding the use of City resources during an Election Period.

### 3. Scope

This policy is applicable to all registered candidates, including sitting Elected Officials and municipal staff. This policy also applies to volunteers or campaign staff acting on behalf of a candidate when interacting with City Corporate Resources and facilities, and any agency, board, or commission funded or supported by the City of Thorold.

**Limitation:** This policy does not preclude an Elected Official from performing their duties, nor inhibit them from representing the interests of the constituents who elected them. The City recognizes that Elected Officials are responsible to serve their constituents and fulfil their responsibilities until the end of their term, but that clear separation must exist between the Elected Official's role as a Candidate and their role as an Elected Official.

**Rationale and Legislative Authority:** It is necessary to establish the appropriate use of Corporate Resources during an election period to protect the interests of both Elected Officials and the Corporation. The *Act* prohibits a municipality from contributing to a candidate. The *Act* also prohibits a candidate, or someone acting on the candidate's behalf, from accepting a contribution from a person who is not entitled to make a contribution.

As a contribution may take the form of money, goods or services, any use by an Elected Official of Corporate Resources for their election campaign would be viewed as a



contribution by the municipality to the member, which is a violation of the *Act*.

#### 4. Definitions

**“The Act”** means the *Municipal Elections Act, 1996*, as amended from time to time, and includes any regulation made thereunder.

**“Blackout Period”** means the temporary period from the day prior to Nomination Day in a municipal election year to Voting Day in which certain privileges are discontinued for Elected Officials.

**“Candidate”** means a person who has filed a nomination to run in a municipal, provincial or federal election, and shall be deemed to include third-party advertisers and any person seeking to influence other persons to vote for or against any candidate or any question or by-law submitted to the electors under section 8 of the *Act*.

**“Campaign”** means any work, effort, activity or thing intending to influence persons to vote for or against any Candidate or any question or by-law submitted to the electors in an election.

**“Campaign Material”** means material in any media (i.e. print, radio, websites and social media) used to promote or oppose a candidate or ballot question. Campaign Material also includes but is not limited to banners, literature (pamphlets, brochures, cards), posters, placards/signs, buttons/pins, clothing and car wraps.

**“Campaign Period”** means the date a candidate files their nomination through to December 31 in the case of a regular municipal election and 45 days after voting day in the case of a municipal by-election. For federal and provincial elections, the campaign period begins with the issuance of the writ and ends as determined by Elections Canada and Elections Ontario.

**“City Facility”** means any property under the care and control of the Corporation of the City of Thorold, including property owned, leased, occupied or used by the City, which can include but is not limited to libraries, community centres, meeting rooms, lobbies, sports fields, parks, pools, arenas, museums and ferry.

**“City of Thorold”** means the Corporation of the City of Thorold and may alternatively be referred to as the “City” or the “municipality” herein.

**“Corporate Resources”** means City of Thorold’s assets, including, but not limited to, its employees, events, funds and information.

**“Elected Official”** means a sitting member of Thorold City Council and may include sitting members of Niagara Regional Council and sitting school board trustees.

**“Election Year”** or **“Election Period”** means the official campaign period of a Municipal, Provincial or Federal Election, By-election, referendum or political party contest as outlined below:



<b>Regular Municipal Election</b> (includes members of City Council, Regional Councillors, and School Board Trustees)	The Election Period commences on the first day nominations may be filed and ends on Voting Day.
<b>Municipal By-Election</b> (includes members of City Council, Regional Councillors, and School Board Trustees)	The Election Period commences on the first day nominations may be filed and ends on Voting Day.
<b>Provincial or Federal Elections</b>	The Election Period commences the day the writ for the Election is issued and ends on Voting Day.
<b>Provincial party leadership and nomination contests</b>	The Election Period commences and ends as determined by Elections Ontario.
<b>Federal party leadership and nomination contests</b>	The Election Period commences and ends as determined by Elections Canada.

**“Employees”** or **“Staff”** means any full-time, part-time, and contract employees, paid by The Corporation of the City of Thorold, as well as volunteers with the City.

**“Nomination Day”** means the last day a candidate may file their nomination as outlined in the *Act* for a municipal election.

**“Official City Openings/Events”** means occasions that are held in Thorold and have a City wide impact; are identified as a project and endorsed by the Senior Leadership Team and/or Council. An Official City Opening/Event includes an opening ceremony component, followed by a main public program. The ceremony must include:

- An official invitation sent to a guest list and
- All or some of the following elements: attendance of the Mayor and/or City Councillors, agenda, speakers, plaque unveiling, ribbon cutting

**“Voting Day”** means the day on which the final vote is to be taken in an election.

## 5. Compliance

- a) Corporate resources, assets and funding may not be used for election related purposes.
- b) Elected Officials/candidates may not use any municipal facilities for any election-related purposes. Campaign-related signs or any other election-related material shall not be displayed in any municipally provided facilities.
- c) Candidates are not permitted to use a facility, or any part of a facility, that has been selected as a voting location, either on Voting Day or as an advanced voting location, on the day that the facility is being used as a voting location.
- d) The following corporate resources, during the Blackout Period, are to be discontinued for Elected Officials from the day prior to Nomination Day in a municipal election year to Voting Day:



- All forms of advertising, including in municipal publications
  - All printing, photocopying and distribution, including printing and general distribution of any newsletters unless so directed approved by Council. The Minutes of Municipal Council and Committee meetings are exempt from this policy
  - The ordering of office furniture and furnishings, except those of an emergency nature
  - The ordering of any stationery and business cards within reason
- e) Elected Officials may not deliver any unsolicited material where the printing and/or distribution costs are paid by the municipality.
- f) Elected Officials may not:
- Print or distribute any material using corporate resources that refer to, or contains the names or photographs, or identifies registered candidates for Municipal Elections
  - Enter joint ventures using municipal funds from Nomination Day to Voting Day, in the year of a municipal election, unless specifically approved by Council
- g) Elected Officials are responsible to ensure that the content of any communications, material, including printed material such as newsletters, advertising, City letterhead and business cards, etc. funded by the municipality, is not directly election related.
- h) Elected Officials, members of Local Boards, and Committee members shall ensure their backgrounds and attire during any virtual events and meetings, as well as in person events and meetings, held by the City are neutral without reference to the election campaign.
- i) No Elected Official/Candidate shall use the services of persons during hours in which those persons receive any compensation from the municipality. No photographic or video materials may be posted of themselves with City employees in uniform.

### Technology Provisions

- a) Candidates and Elected Officials shall not use Corporate Resources, for any election-related purposes, including computers, cell/smart phones, tablet, printers, scanners, or other services such as email, internet, and file storage.
- b) Websites or domain names that are owned and/or funded by the municipality may not include any election-related campaign material.
- c) Candidates are permitted to link to any City document available to the public or on a public City webpage from their campaign website.
- d) Candidates are not permitted to incorporate a video or other material (i.e. photos)



for which the City has proprietary rights on their own webpage.

- e) Candidates are not permitted to use social media handles (i.e. @Thorold) or “tag” City of Thorold in campaign related social media posts.
- f) Sitting Elected Officials shall not use the City’s IT resources, including individual websites linked through the City’s website and social media accounts for any election campaign and/or campaign-related activities.
- g) If an Elected Official uses any social media account for campaigning, such accounts must not be created or supported by Corporate Resources. Social media accounts used for campaign purposes must utilize personal cell phones, tablets and/or computers.
- h) Elected Officials who choose to create or use social media accounts for campaigning must include, for the duration of the Election Campaign period, a clear statement on each campaign website or social media account’s home page indicating that the account is being used for Election Campaign purposes and is not related to their duties as an Elected Official.
- i) The list of candidates on the election webpage shall be the only area of the City of Thorold website where links to external campaign websites will be permitted during the Election Period.
- j) Candidates must not, under any circumstances, use a City logo or any variation of it on any campaign material, election signs, social media or campaign websites.
- k) Elected Officials may not use the municipality’s voicemail system and/or cell phones to record election related messages.
- l) The above stipulations also apply to an acclaimed candidate or an Elected Official not seeking re-election.

#### Attendance at Official City Openings/Events

The following applies in relation to Official City Openings/Events that occur from the day prior to the start of the Election Period through to the day the election results have been certified by the City Clerk:

- Campaigning does not include the attendance of Candidates and/or Elected Officials or their supporters at Official City Openings/Events, such as City-sponsored festivals, in their capacity as a resident of the City but not as a Candidate. Candidates are responsible for ensuring that their staff and supporters are aware of this distinction.
- Elected Officials may participate in Official City Openings/Events in their current role (e.g. as Mayor, Deputy Mayor or Councillor). City events that are expected to occur annually, such as Canada Day, will take place in an election year.



- Elected Officials identified may be invited to speak at Official Openings/Events or external events, but election campaigning is not permitted (e.g. campaign related remarks).
- Campaigning and campaign materials are not permitted at Official City Openings/Events.
- Campaign booths are not permitted at Official City Openings/Events.
- Where campaign booths are permitted at events organized by an external group and taking place at a City facility, Candidates and/or their supporters/staff are not permitted to actively solicit attendees (e.g. may not approach attendees or hand them campaign material).

### Staff Provisions

- a) Staff will not canvass or actively work in support or opposition of a municipal, provincial or federal candidate or party during normal working hours unless they are on a leave of absence without pay, lieu time, float day, or vacation leave.
- b) Staff engaged in political activities must take care to separate those personal activities from their official positions. Staff may participate in political activity at the municipal, provincial and federal levels provided that such activity does not take place during work hours or use Corporate Resources.
- c) Staff shall not produce, display or distribute notices, posters or similar material in support or opposition of a Candidate at any City Facility or use any Corporate Resource.
- d) Staff shall not canvass or actively work in support or opposition of a Candidate or political party while wearing a uniform, badge, logo or any other item identifying them as an employee of the City of Thorold, or using a vehicle owned or leased by the municipality.
- e) The City Clerk, Deputy City Clerk and any other staff member involved in administering a municipal election shall:
  - a. Not be involved in political activity including, but not limited to, endorsing, supposing or opposing any candidate, attending campaign events, donating or soliciting donations for a campaign, and shall refrain from posting, liking, sharing, or commenting on content related to municipal election campaigns in a way that could compromise their perceived neutrality.
  - b. Disclose a personal, financial, or familial relationship with a candidate to the Chief Administrative Officer (CAO) or designate in writing, as soon as possible.

**Implementation:** This policy shall become effective immediately upon approval by City Council.



**6. References and Related Documents**

N/A

**7. Document History**

N/A

**Approval History**

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Council	November 18, 2025

**Revision History**

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