
Policy Title: Use of City Resources During an Election Campaign

Policy Number: 02-04-01

Section: Municipal Government

Effective Date: April 1, 2026

Approved by:

Council

Subsection: Elections

Last Review Date: April, 2026

Owner Division/Contact:

Legislative Services Division

Policy Statement

City Resources must not be used to promote or benefit a Candidate or political party campaigning for election or any Registered Third Party seeking to influence the outcome of an election.

Purpose

Elected Officials who are Candidates for election or re-election may perform the duties of their office, but a clear separation must exist between performing those duties and Campaigning. The purpose of this policy is to provide clear direction to all Candidates, Elected Officials, Registered Third Parties and City Employees to ensure a fair and transparent electoral process, while also ensuring compliance with all applicable legislation, including the *Municipal Elections Act, 1996* (the "MEA").

Scope

This policy applies to all:

- Candidates
- Elected Officials of the City, including those not seeking re-election
- All City Employees, specifically including Employees in the offices of Elected Officials, members of local boards and citizen members of committees, and
- Registered Third Parties

Exclusion

This policy does not include guidance on election signs. Consult the Sign By-law and/or contact the Sign Unit for information.

Legislative Requirements

This policy complies with the MEA. The 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. Any use of City Resources by or on behalf of a Candidate or Registered Third Party during an Election Campaign Period would be considered a contribution by the City. The *Election Finances Act* and the *Canada Elections Act* impose similar prohibitions for provincial and federal election campaigns.

Elected Officials are also governed by the Council Code of Conduct, as amended. Elected Officials may seek confidential advice from the Integrity Commissioner with respect to interpretation of the Council Code of Conduct, the *Municipal Conflict of Interest Act* and any policy of the municipality (including this policy) that governs the ethical behaviour of Elected Officials.

Definitions

For the purposes of this policy:

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

“Campaigning” means any activity by, on behalf of, in support of, or in opposition to a Candidate, political party or ballot question during an Election Campaign Period that is meant to elicit support or opposition. Campaigning includes but is not limited to the distribution and display of Campaign Material.

“Candidate” means a person who has been nominated for an election or by-election at the municipal, provincial or federal level in accordance with applicable legislation and includes any individual acting on behalf of or under the supervision of a Candidate.

“City” means The Corporation of the City of Mississauga.

“City Facility” means any building or land/property that is either owned or occupied by the City, including but not limited to recreation centres, the Civic Centre, parks, transit terminals, libraries, sports fields, marinas, golf courses and cemeteries.

“City Resources” means real property, goods and/or services owned, controlled, acquired and/or operated by the City including, but not limited to, City staff (during their working hours), materials, equipment, City Facilities, Information Technology (IT) Resources, intellectual property, display areas (e.g. cases, walls), digital signage, logos/brands, supplies and the office budgets of Elected Officials’ or staff.

“Elected Official” means any individual elected to City Council or a school board.

“Election Campaign Period” means:

- For a municipal election or by-election, the period that commences on the date a Candidate's nomination paper is filed or a Registered Third Party registers with the City as a Registered Third Party advertiser. The Election Campaign Period concludes on December 31 of the election year for a regular election and 45 days after voting in the case of a by-election, or otherwise in accordance with applicable legislation.
- Any restrictions for a provincial or federal election commence on the day the writ for the election is issued or a by-election is called and ends on Voting Day, or otherwise in accordance with applicable legislation.

"Election Recess Period" means the time period immediately preceding and following a municipal election where Council suspends meetings and/or meets less frequently.

"Employee" means all union and non-union employees, contract employees, interns and volunteers acting on behalf of the City of Mississauga.

"Information Technology (IT) Resources" means City owned or issued IT Resources including, but not limited to:

- Hardware, such as computer desktops, laptops, tablets, portable and computing devices and related peripherals (e.g. printers, scanners, etc.) and wireless communication devices (e.g. smart phones, cell phones, etc.)
 - All internet and e-mail systems
 - Electronic data transmission equipment, devices and networks
 - Business systems and servers and all City managed data and software
 - All types of telephone, radio and other audio/voice or audio/visual communication equipment, devices and networks, including voicemail
 - Local and network storage media used in the operation of these resources including, but not limited to USB, flash memory, flash drives, external hard drive, cloud storage, etc., and
 - Data, information and other work products, such as computer programs, databases (unless publicly available), spreadsheets, etc., created by and/or maintained using these resources
- In addition, any City data and information that is accessed, stored, created, processed, transmitted or filed in a personal electronic device is included in this definition.

"Official City Openings/Events" are events that celebrate moments and/or achievements that are important to the City as a whole. Refer to Corporate Policy and Procedure – 06-02-04 – Official City Openings/Events for details.

"Paid Campaign Ad" means any commercial advertising in a City Facility, at City programs and in City media that is approved in accordance with the criteria outlined in Corporate Policy and Procedure - 03-09-01 - Advertising and Sponsorship With the City. For greater clarity, Election Signs as defined in the Sign by-law, are not considered Paid Campaign Ads.

“Registered Third Party” means, in relation to an election in a municipality, an individual, corporation or trade union that is registered in accordance with the *Municipal Election Act, 1996*, as amended.

“Voting Day” means:

- For a municipal election - the day on which the final vote is taken (the fourth Monday in October in the year of the election; or in the case of a by-election, the 45th day after nomination day), as set out in the *Municipal Elections Act, 1996*, or otherwise in accordance with applicable legislation, and
- For a provincial or federal election or by-election – the day set out according to the *Elections Act* (provincial) and *Canada Elections Act* (federal), or otherwise in accordance with applicable legislation.

“Ward-specific Business” means activities and/or communications related to a ward that advance the business of that ward or relay urgent information to residents in formats such as town hall meetings, community consultations and other public meetings. Ward-specific Business is not celebratory or social in nature.

“Ward-specific Events” are discretionary activities that are celebratory or social in nature that are intended for residents of a specific ward(s) that are organized and managed by the applicable ward councillor(s). They may include, but are not limited to, ward barbecues and other community celebrations.

Roles and Responsibilities

Managers/Supervisors

Applicable managers/supervisors are accountable for:

- Ensuring applicable staff in their respective work units are aware of this policy and any subsequent revisions
- Ensuring applicable staff are trained on this policy and any subsequent revisions with respect to their specific job function
- Ensuring staff comply with this policy, and
- Seeking clarification of any aspect of this policy from the Elections Office, as required

Employees

Employees are responsible for:

- Seeking clarification from their manager/supervisor of any aspect of this policy that is not understood, and
- Implementing, enforcing and complying with the provisions of this policy

City Clerk

The City Clerk is accountable for:

- Ensuring all Candidates and Registered Third Parties for an election are aware of this policy

- Ensuring this policy is reviewed and updated as required, prior to a municipal election or by-election, or as required by changes to legislation
- Ensuring all Candidates and Registered Third Parties are treated equitably, and
- Forwarding any complaints or concerns received by the City Clerk regarding Candidates or Registered Third Parties to the 311 Citizen Contact Centre, the appropriate business unit and/or external enforcement agency, as applicable, for investigation and if necessary, enforcement

Note: The City Clerk has not been delegated enforcement powers; enforcement is undertaken by the Election Campaign Finances Committee, the Sign Unit, the Works Operations and Maintenance Division, Security Services and Peel Police, as applicable.

Activities

Use of City Facilities for Campaign Purposes

During an Election Campaign Period, Candidates and Registered Third Parties are not permitted to Campaign:

- At or in any City Facility (directly or indirectly booking a City Facility for Campaign purposes is prohibited), or
- On City Transit (i.e. MiWay)

Notes:

1. Candidates and Registered Third Parties are permitted to take photographs or video recordings at or in City Facilities, subject to obtaining all applicable permits
2. Paid advertising at or in City Facilities is permitted, subject to the City's usual terms and conditions
3. Candidates and Registered Third Parties may accept an invitation to address a private event booked at a City Facility by an unaffiliated organization (e.g. clubs who meet on a regular basis or ratepayers' groups who have organized an all-Candidates meeting) but cannot solicit outside the event (e.g. in a lobby or in common areas of the applicable City Facility)

Campaign Material

The following restrictions apply to Campaign Material:

- At no time shall City Resources and/or Elected Officials' budgets be used to sponsor or produce any Campaign Material
- Photographic or video materials that are copyright of the City cannot be used in Campaign Material or when Campaigning
- With the exception of Paid Campaign Ads, Campaign Material cannot be posted, distributed or otherwise made available in City Facilities
 - Complaints related to Campaign Materials at a City Facility must be directed to the applicable facility or the 311 Citizen Contact Centre

- When Employees become aware of Campaign Material at a City Facility, they must remove and discard it (unless the Campaign Material is made available at a private event booked at a City Facility and the material is visible only to those in attendance and removed promptly at the conclusion of the event)
- Posted Campaign Material outside of a City facility must comply with the requirements of the Sign By-law
 - Complaints related to Campaign Material posted outside of and around voting places should be referred to the Sign Unit through the 311 Citizen Contact Centre
- On Voting Days, Campaign Material is not permitted in or at any voting place including surrounding public property in compliance with Section 21 of the Sign By-law
- In accordance with Corporate Policy and Procedure - 04-05-04 - Elected Officials' Expenses, promotional items that carry an Elected Official's contact information and/or identify the Elected Official that are purchased through their expense account must not be distributed or used after June 30 of an election year or, for an Elected Official who is a Candidate in a by-election, after the date that Council passes a by-law requiring a by-election
- Elected Officials may not display Campaign Material during Official City Openings/Events, Ward-specific Events, Ward-specific Business activities or when carrying out the duties of their office, and
- City staff are not permitted to wear or display any Campaign Material during working hours

Paid Campaign Ads

Paid Campaign Ads are considered commercial advertising. Commercial advertising is permitted if in compliance with Corporate Policy and Procedure - 03-09-01 - Advertising and Sponsorship With the City. Note that Paid Campaign Ads are only permitted in existing commercial advertising spaces within City Facilities and on City assets (such as buses and bus shelters).

Paid Campaign Ads are not permitted at voting places on advance voting days and/or Voting Day. Where applicable, Paid Campaign Ads must be removed or covered prior to the opening of the voting place.

City Employees – Campaigning and Use of City Resources

Employees are subject to the following:

- In accordance with Corporate Policy and Procedure - 01-03-02 - Conflict of Interest, an Employee may campaign for a Candidate provided that Campaigning:
 - Does not interfere with the Employee's normal duties
 - Takes place outside of the Employee's work hours, and
 - Is done without reference to the fact that the individual is a City Employee
- City uniforms, badges, crests or any other item that would identify the individual as City staff must not be worn while Campaigning

- City Resources must not be used for any purpose related to an election campaign, and
- Any communication received by staff concerning a Candidate must be referred to the Candidate's campaign office

Note: Elected Officials must not request City Employees, including staff working in a ward councillor's office, to perform any duties related to the election campaign during working hours. The City acknowledges that there may be some incidental use of City Resources during the regular course of an Employee's duties, such as coordinating the Elected Official's campaign schedule, providing publicly available information or redirecting citizens to the campaign office.

Use of Information Technology Resources and Social Media

The following applies to the use of Information Technology (IT) Resources:

- Candidates and Registered Third Parties are permitted to link to any City document available to the public or on a public City webpage from their campaign website
- Candidates and Registered Third Parties are not permitted to incorporate a video or other material (e.g. photos) for which the City has proprietary rights on their own webpage or social and digital media accounts; official photographs of Elected Officials may not be used for campaign purposes
- Elected Officials shall not use the City's IT Resources, including individual websites linked through the City's website and social media accounts used for ward communication, for any election campaign or campaign-related activities
- Elected officials shall not use the City's digital sign network, road signs (e.g. CurbEx), or the city's allocation of space on the Out of Home or Allvision platforms for Campaigning
 - When used for Ward-specific Business, messaging must not include any reference to (or image of) the Candidate
- If an Elected Official uses any social media account for Campaigning, such account must not be created or supported by City Resources; social media accounts used for campaign purposes must utilize personal cell phones, tablets and/or computers
- Elected Officials who choose to create or use social media accounts for Campaigning must include, from the time they file their nomination until after Voting Day, 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, and
- Elected Officials are allowed to place campaign phone numbers, websites and e-mail addresses on the election pages of the City's external website, which is available and authorized for use by all municipal Candidates

Note: Refer to Rule 6 of the Council Code of Conduct for more information on the use of websites and social media accounts.

Use of City Logo/Brand

The City's logos are registered trademarks, owned by the City of Mississauga. The use of the City brand is reserved exclusively by the City for its own use or when permission has been granted in accordance with Corporate Policy and Procedure - 03-01-01 - Mississauga Brand Visual Identity Program. Candidates and Registered Third Parties must not, under any circumstances, use a City logo or any variation of it on any Campaign Material, including on social media or a campaign website.

Elected Officials' Newsletters and Media

In accordance with Section 6 of the Council Code of Conduct and Corporate Policy and Procedure - 04-05-04 - Elected Officials' Expenses, commencing on July 2nd in a municipal election year until the date of the election, Elected Officials must not publish councillor newsletters, including e-newsletters/e-blasts or distribute them in City Facilities. All newsletters distributed through the mail must be post-marked by no later than June 30th in an election year. Ward councillor newsletters remaining in City Facilities on July 2nd of an election year will be removed by the applicable facility staff.

Notes: Elected Officials may, during the period outlined above, use City Resources such as email or councillor letterhead to communicate Ward-specific Business notifications to their ward residents if such communications are not election related.

In emergency circumstances that affect the entire City, the Mayor may communicate notifications to residents.

Communications must not include the Elected Official's likeness including their picture.

In the event of a by-election for Mayor, once the Mayor's seat has been declared vacant, councillor newsletters, including e-newsletters, may only be sent by councillors who have signed a declaration confirming they will not be running in the by-election, otherwise, newsletters, including e-newsletters, may not be sent until after Voting Day.

City Resources, including newsletters and e-newsletters, cannot be used to endorse or campaign on behalf of a Candidate running in a municipal, provincial or federal election/by-election.

Attendance at Official City Openings/Events

Official City Openings/Events include, but are not limited to, facility openings, long service awards for staff and anniversary celebrations related to City Facilities, parks, monuments and programs. The following applies in relation to Official City Openings/Events that take place in an election year:

- City events that are expected to occur annually, such as Canada Day, will take place in an election year

- Candidates, Registered Third Parties and/or Elected Officials or their supporters may attend Official City Openings/Events (such as a City-sponsored festival) in their capacity as a resident of the City but not in their capacity as a Candidate or as a Registered Third Party

Note: Candidates and Registered Third Parties 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 or Acting Mayor)
- Elected Officials identified in Corporate Policy and Procedure - 06-02-04 - Official City Openings/ Events and Corporate Policy and Procedure - 06-02-01 - Civic Protocol may be invited to speak at Official City Openings/Events but Campaigning for election is not permitted (e.g. campaign-related remarks)
- Campaign booths are not permitted at Official City Openings/Events, and
- Where campaign booths are permitted at events organized by an external group and taking place at a City Facility, Candidates and Registered Third Parties and/or their supporters/staff are not permitted to actively solicit attendees (i.e. may not approach attendees or hand them Campaign Material)

Official City Openings/Events must not be scheduled between September 1st of a municipal election year and the day that successful Candidates take the oath of office. In the case of a by-election, no new Official City Openings/Events may be scheduled for the time between when a by-law requiring a by-election to fill a vacant seat on Council is passed until the successful Candidate(s) takes the oath of office. Official City Openings/Events that were scheduled prior to the by-law being passed are permitted. No Campaigning is allowed at Official City Openings/Events.

Ward-specific Events

Ward-specific Events are permitted after nominations open until 11:59pm on August 31 of the election year and again after election day; however, Campaigning is not permitted at these events. Elected Officials are responsible for ensuring that their staff, supporters and volunteers are aware of this restriction.

In the case of a by-election, Ward-specific Events are permitted from the time a by-law requiring a by-election is passed only for councillors who have signed a declaration they will not be running in the by-election. Councillors who have submitted a nomination or declared an intention to run in a by-election are not permitted to hold Ward-specific Events until after Voting Day.

Ward-specific Business

Ward Specific Business activities may be organized and/or facilitated by the applicable ward councillor until 11:59 pm on August 31 of an election year or until a by-law requiring a by-

election to fill a vacant seat is passed; however, no Campaigning is permitted during Ward-specific Business activities. Commencing at 12:00 am on September 1 of an election year Ward Specific Business activities must be organized and facilitated by staff from an applicable business unit. Councillors will be invited to attend such activities, and their presence will be acknowledged, but a formal opportunity to speak shall not be provided.

Requests for New Funding During a By-election

When a Mayoral seat is declared vacant, no new Council-led initiatives that require new funding may be initiated or approved until after Voting Day. The exception to this is if staff identify the need for emergency funding and the City Manager has approved that the request for funding be made to Council.

Decision-making During the Election Recess period

During the Election Recess period the Leadership Team (LT) makes decisions related to new funding, events, programming and any other matter that is not covered in the Council Procedure By-law, Part 9 – Delegation to Staff During Summer and Election Recess.

Photography and Videography at Voting Places

To maintain the secrecy of voting, as required by the MEA, the use of cameras and/or recording devices is prohibited inside a voting place during the time voting is taking place. However, a Candidate or a Registered Third Party is permitted to be photographed entering the voting place.

Business as usual during a by-election

Other than the restrictions identified in this policy, councillors who have signed a declaration confirming that they will not be running in a by-election are permitted to conduct business as usual.

Revision History

Reference	Description
GC-0742-2017 – 2017 11 22	Approved with exception of paid ads – staff to report back
GC-0177-2018 – 2018 03 28	Approved with inclusion of paid ads where commercial advertising allowed.
August 12, 2021	Scheduled review; added Registered Third Parties, other minor revisions for clarity.
January 17, 2022	Minor revision for clarity re: accepting a meeting at a City facility.

Policy Number: 02-04-01

Effective Date: April 1, 2026

Policy Title: Use of City Resources During an
Election Campaign

Last Review Date: April, 2026

11 of 11

GOV-0001-2022 – 2022 02 16	Clarified when Candidates can file their nomination papers and begin campaigning.
Resolution 0018-2024 – 2024 01 31	Revised to include requirements related to by-elections and to improve clarity.
Resolution 0040-2024 – 2024 02 28	Revised to clarify how ward-specific business may be communicated during a by-election.
GC-0151-2026 – 2026 04 01	Scheduled review. Substantial revision to update definitions and clarify requirements with respect to candidates, campaign materials and campaigning.