OFFICE OF THE INTEGRITY COMMISSIONER TORONTO

Interpretation Bulletin: **2026 Municipal Election Requirements**

Purpose

1. This Interpretation Bulletin reminds Members of Council of their obligations under the Code of Conduct for Members of Council (the "Code of Conduct") and how to separate their work as Members from their political activities in the 2026 municipal election.

2. In addition to referring to this bulletin, Members should consult the Integrity Commissioner for confidential advice when they have specific questions about the Code of Conduct.

Application of the Code of Conduct and MCIA

3. Voting Day in the municipal election is **October 26, 2026.**

4. Nomination papers in the municipal election must be filed between **May 1, 2026** and **August 21, 2026.**

5. Unless they resign, current office-holders remain Members until **November 14, 2026.** Until then, the Code of Conduct and the *Municipal Conflict of Interest Act* (MCIA) apply to their activities as Members.

6. **Between August 21, 2026 and October 26, 2026:**

   - While the requirements in the Code of Conduct and MCIA still apply to Members, the Integrity Commissioner cannot receive new Code of Conduct complaints or MCIA applications in this period. As the requirements in the Code of Conduct and MCIA still apply to Members, the Integrity Commissioner will continue to provide confidential advice and answer inquiries.

   - All investigations are terminated. After Voting Day, the Integrity Commissioner can receive and investigate Code of Conduct complaints and MCIA applications about a Member's activity during this period. The Integrity Commissioner may also resume investigations that were terminated.

     Legislative Change Notice: Bill 9 (the *Municipal Accountability Act, 2025*) will apply to the 2026–2030 Council term, but details remain unknown, including whether the new framework will permit the Integrity Commissioner to conduct retroactive investigations after Voting Day.

7. In addition to Article 7 (Election Campaign Work), the Code of Conduct requires Members to comply with election laws, City policies and the other requirements in the Code of Conduct that include rules concerning how their work as Members is separated from their political activity.

Legislation, Policies and Guides

8. Members should review *the Municipal Elections Act, 1996*, the Use of City Resources during an Election Period Policy and the guides and resources provided by Toronto Elections.

9. Additionally, Members need to be aware of the rules regarding election-related activity in the following City policies:

   - Members of Council Operations Policy
   - Human Resources Management and Ethical Framework for Members' Staff
   - Council Member-Organized Community Events Policy
   - Corporate Facilities Display and Fundraising Policy
   - Corporate Identity Program (intranet only)

10. The Council Member Knowledge Base provides detailed information about the requirements in these materials.

Key Reminders

11. As the Code of Conduct's Preamble advises, Members must arrange their private affairs in a manner that promotes public confidence and will bear close public scrutiny. An election year is a time of heightened public scrutiny. Accordingly, Members and their staff need to establish a clear separation between their election-related activities and their official duties.

12. To maintain this clear separation, Members need to follow the election-related rules about:

    - Using City Resources and Other Restrictions
    - Organizing Community Events
    - Communicating with the Public
    - Managing Members' Staff
    - Working with City Staff
    - Using Social Media and Updating Webpages
    - Interacting with Lobbyists

Reminder #1: Using City Resources and Other Restrictions

1. Members must not use City resources to support election-related activities whether for their own campaign, the campaign of another candidate or a campaign for a third-party advertiser. A comprehensive set of requirements describe the limits on what their offices can do and what they can spend their office budgets on. These rules are found in:

   - Article 7 (Election Campaign Work), Code of Conduct
   - Use of City Resources during an Election Period Policy
   - Members of Council Operations Policy
   - Corporate Facilities Display and Fundraising Policy

2. The term "City resources" has a broad meaning. Under the Use of City Resources during an Election Period Policy, it includes the defined terms "City employees," "City events," "City facilities," "City funds," "City information," and "City infrastructure." City resources also include:

   - the use of City email accounts (e.g. “@toronto.ca” email addresses);
   - the City-paid work of Members' staff;
   - websites funded by the Constituency Services and Office Budget (“CSOB”);
   - publications or online content produced using the CSOB;
   - City-issued computers, mobile devices, smartphones or tablets;
   - City-funded mobile devices or smartphones;
   - Members' office space at City Hall, a civic centre or a constituency office; or,
   - any privilege or benefit available to a Member owing to their status as a Member of Council.

3. Members may attend City events, and may act as ceremonial participants, but may not campaign or disseminate election materials under the Use of City Resources during an Election Period Policy.

4. **Between August 1, 2026 and October 26, 2026**:

   - There are a number of restrictions on what Members are normally able to do, spend money on, or request help with from City staff. For example, this includes:
     - ordering any new stationery, including business cards, envelopes or letterhead for their office in large quantities;
     - purchasing any gifts or promotional items for constituents, including greeting cards; and,
     - ordering any congratulatory scrolls from the Strategic Protocol and External Relations Unit.

   For a complete list of these items, see section 6(b) Member Expenses and Elections: Specific Limitations in the Members of Council Operations Policy.

- The City of Toronto suspends City-funded communications and services for Members of Council after August 1 in a municipal election year. During this period, Members' names and images cannot be used in City advertising, publications, media materials, or event signage; instead, they are referred to generically as "Councillor, Ward XX." Ceremonial documents normally signed by Members will instead be signed and issued through the Mayor, and Members must ensure any City-funded communications from their offices are not election-related. (Use of City Resources during an Election Period Policy s. 5.1.3 - 5.1.4)

- The Mayor must follow the same election-period restrictions as Councillors and will only be named in City communications when acting in their official role as Chief Executive Officer of the City. (Use of City Resources during an Election Period Policy s. 5.2)

5. Additional restrictions to the use of City resources apply:

   - **after August 21, 2026** to Members who are not seeking re-election; and,

   - **after October 26, 2026** to Members who are not re-elected.

6. For the details of these restrictions, Members should consult section 6(b) Member Expenses and Elections: Specific Limitations in the Members of Council Operations Policy.

   Note: *FIFA World Cup 2026 will take place in Toronto during part of the election campaign period. This event raises additional considerations for Members under the Code of Conduct. These will be addressed in a separate communication.*

Reminder #2: Organizing Community Events

7. In a municipal election year, a Member of Council must not seek donations and sponsorships for any community event that has not been staged in the previous two years (Council Member-Organized Community Events Policy).

8. On the day a Member files their nomination papers, they can no longer accept donations for or stage any Member-Organized Community Event supported by donations and sponsorships (Council Member-Organized Community Events Policy).

9. **Between August 1, 2026 and October 26, 2026**, Members will only be allowed to use their CSOB for community events or community expenses in response to an emergency.

10. An emergency could be a storm, flood, power blackout, public health emergency or similar event in a Ward that requires an emergency response on the part of City of Toronto. Before using their CSOB in response to an emergency, Members should consult the Integrity Commissioner.

Reminder #3: Communicating with the Public

11. Members' offices should not be answering election-specific inquiries (e.g. "where do I vote?" or "where can I get a lawn sign?") and, depending on the question, may in response refer the question to either Toronto Elections or the contact information for their re-election campaign.

⚠ Compliance Alert: Use of Confidential Constituent Contact Information

12. The requirements in Article 5 (Confidential Information) of the Code of Conduct require Members to not use contact information obtained in their official role dealing with constituents, for election-related activities.

13. Complaints about the misuse of constituent information for election purposes triggered investigations in 2022 and 2023. Those investigations found Code of Conduct violations and noted:

    - Members must take steps to ensure their campaign team does not gain access to constituent contact information.

    - Members who maintain contact lists from previous election campaigns, or private activities outside their office, must keep the collection and storage systems separate from City resources.

14. **Between August 1, 2026 and October 26, 2026**, Members may not use their CSOB for:

    - placing any advertisement in newspapers, magazines, other publications or websites that have a publication date after August 1, 2026, even though the ad purchase itself may have been made prior to August 1, 2026;

    - distributing electronic newsletters including mass e-mails;

    - conducting or authorizing any automated phone campaigns, such as robocalls or any similar automated virtual townhalls;

    - printing and distributing any newsletter to constituents; or,

    - printing and distributing any flyers to constituents, except in the case of emergencies. As noted above, before doing so, Members should consult the Integrity Commissioner.

Reminder #4: Managing Members' Staff

15. Members are strongly advised to provide this Interpretation Bulletin to their staff and review its guidance with them. Members' staff are not subject to the Toronto Public Service By-law; rather, they are subject to the requirements of the Human Resources Management and Ethical Framework for Members' Staff and other applicable City policies.

16. Members' staff should not engage in election-related activities:

    - at any time using City resources (e.g. using smartphones, computers or office supplies);

    - during their working hours ; or,

    - at any time from the Member's office at City Hall, a civic centre or from a constituency office.

17. Election-related activities include assisting with organizing campaign events, responding to campaign-related inquiries or developing election communications and other promotional content for use in the campaign.

18. Both Members and their staff are required to ensure that staff are not engaged in election-related activity during their working hours as Members' staff.

19. If a Member's staff person wishes to work or volunteer on a campaign, including a campaign for a registered third-party advertiser, the Member must document and monitor when the staff person is working on election-related activities and when they are performing their duties as a Members' staff.

20. During what would normally be their working hours, if a Member's staff person is working:

- on their own election as a candidate to become a Member of another municipal council or a school board; or,
- for any candidate or third-party advertiser in a municipal, provincial or federal election,

that person may only do so if their absence from work is approved by the Member as:

a) vacation time;
b) lieu time;
c) float days;
d) an unpaid leave of absence; or,
e) a combination of the above.

21. If a Member's staff person is a candidate for election to Toronto City Council, the Legislative Assembly of Ontario, or the House of Commons, that staff person must be approved by the Member to take an unpaid leave of absence or must resign from the Member's office.

Reminder #5: Working with City Staff

22. City and agency staff must comply with the political activity requirements in the Toronto Public Service By-law.

23. City staff continue to support Members in performing their official duties, including responding to and resolving constituent service issues, so long as a request is not for campaign purposes.

24. Requests made in a Member's capacity as candidates must not be made through special access to City channels or using City resources, including information requests to City staff. Any campaign-related information requests must be redirected to the candidate request email (candidaterequests@toronto.ca), and any information provided must be publicly posted so all candidates have equal access.

25. When the purpose of a request is unclear, City staff may ask the Member to clarify whether it relates to official duties or campaign activities.

26. For example, City and agency staff must not be asked to:

- Suggest timing for campaign announcements based on City operations;
- Give feedback on platform language;
- Compile lists of neighbourhood contacts for campaign outreach;
- Advise which community meetings will include key voter groups; or,
- Organize or appear in photo opportunities to be used in campaign materials.

27. Members may continue to attend and perform ceremonial or speaking roles at City-hosted events, but are not permitted to engage in campaign activities at these events.

Reminder #6: Using Social Media and Updating Webpages

28. Members should be familiar with the Integrity Commissioner's Use of Social Media by Members of Council Interpretation Bulletin.

29. A Member must not use a social media account that identifies them as “Councillor” or “Mayor,” or is supported by City resources, to post content promoting any candidate or political party in any municipal, provincial, or federal election, including nomination and leadership contests.

30. The Integrity Commissioner recommends Members seeking re-election maintain dedicated social media accounts for their re-election activities.

31. If a Member wishes to "convert" an official social media account into a re-election campaign account, they should first seek advice from the Integrity Commissioner. The Member must take specific actions before converting the account, such as providing advance notice to followers and removing their official title. The process for converting an account is set out in the Use of Social Media by Members of Council Interpretation Bulletin.

32. Members cannot convert an existing website, which has been registered, designed or maintained using City resources, to an election campaign website.

33. **Between August 1, 2026 and October 26, 2026,** Members may not use their office budget to update or maintain any City-supported websites, create or post new online content using external resources or purchase new website domains or design services.

Reminder #7: Interacting with Lobbyists

34. Members and their staff should review the Lobbying By-law and consult the Lobbyist Registrar if they have any questions.

35. Members may receive contributions to their campaigns in accordance with the *Municipal Elections Act,1996*, but receiving a contribution as a form of lobbying about an issue to be decided by City Council is contrary to Article 13 (Conduct Respecting Lobbyists) of the Code of Conduct.

36. Members should be aware that, if they receive a contribution not permitted by law under the *Municipal Elections Act,1996* or the Lobbying By-law, it may be deemed an impermissible gift and as a result, breach Article 4 (Gifts and Benefits) of the Code of Conduct.

Interpretation

37. This bulletin provides guidance with respect to the 2026 municipal election and the applicable legislation, City bylaws and policies and the Code of Conduct. In the event of any inconsistency, the requirements in legislation, City bylaws and policies and the Code of Conduct govern.

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Issue Date	August 7, 2026
Version	1.1
Notes	This bulletin replaces and supersedes interpretation bulletins previously issued to Members of Council on Municipal Election Requirements.