

# Elections Policy

**Version:** 3.0

**Policy Owner:** Strategic Planning and Communications (SPC)

**Approval:** Board of Directors (BOD)

**Effective Date:** June 23, 2026

## 1. Purpose

The purpose of this policy is to clarify employee and corporate responsibilities during election periods that ensure Toronto Community Housing Corporation (TCHC) maintains its integrity, complies with legal and policy obligations and protects its reputation from any actual or perceived political bias.

This policy guides the conduct of TCHC employees and Board members both in maintaining political neutrality as representatives of TCHC, and when seeking political office as private citizens.

## 2. Scope

The Elections Policy governs election-related activities on TCHC property, and the actions of employees, authorized representatives and Board members related to elections.

- The policy applies to all TCHC employees, Board members and tenants, including those running for political office.
- The policy applies to municipal (including school board), provincial and federal elections or by-elections and to questions on the ballot.
- The policy applies to TCHC resources, including, but not limited to employees, events, facilities, funds, information and infrastructure.



### 3. Definitions

**Campaign/Campaigning:** any activity by or on behalf of a candidate, political party, registered third party or in support or opposition to a question on a ballot, meant to elicit support during the election period. Campaigning does not include the appearance of elected officials, other candidates or registered third parties at an event in their personal capacity without the display of any signage or branding which identifies the individual as a candidate or registered third party and without the solicitation of votes.

**Campaign Materials:** Any advertising or promotional materials intended to influence a person's vote for or against a candidate, political party or a question on a ballot. Materials may include literature, banners, posters, pictures, buttons, clothing, etc. Election materials also include materials in all media, including websites or social media.

**Elected Official:** An individual elected to the House of Commons, the Legislative Assembly of Ontario, Toronto City Council or a school board.

**Election:** An election or by-election at the municipal, provincial or federal level, or the submission of a question on a ballot to the electors.

**Election Officials:** Employees of Elections Canada, Elections Ontario, Toronto Elections or their agents.

**Election Period:** The official campaign period of an election.

- 1) For municipal elections, the election period commences on May 1st of an election year and ends on voting day.
- 2) For provincial and federal elections, the election period commences the day that the election writ is issued and ends on voting day.
- 3) For by-elections, the election period commences when the by-election is called and ends on voting day.
- 4) For a question on a ballot, the election period commences when the respective level of government passes legislation or a by-law to put a question to the electorate. It ends on voting day.

**Employees:** Includes a part-time, full-time, permanent, fixed term, seasonal, or intern person who performs work or services for TCHC under an employment contract and/or collective bargaining agreement.



**Executive Leadership Team (ELT):** Team of TCHC senior executives and officers responsible for the strategic management of the corporate and operational functions of TCHC and its subsidiaries. The current members are listed here: <https://www.torontohousing.ca/ELT>.

**Official Election Materials:** Any materials provided to voters by Elections Canada, Elections Ontario, Toronto Elections or their agents to facilitate voting.

**Personal Information:** As defined in the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), includes recorded information about an identifiable individual which is collected, used, or disclosed by TCHC. Please refer to the [Privacy Policy](#) for more details.

**Political Activity:** Includes supporting or opposing a political party and/or candidate before or during an election; seeking nomination or being a candidate in an election; seeking appointment to a municipal council or school board; canvassing or campaigning for a political party and/or candidate or on a Toronto municipal referendum question.

**Political Office:** The elected offices of municipal, provincial or federal government.

**Question on a Ballot:** Any question submitted to electors by the municipal, provincial or federal government.

**Registered Third Party:** In relation to a municipal election, an individual, corporation or trade union that is registered with the City Clerk, in accordance with section 88.6 of the Municipal Elections Act, whose purpose is to promote, support or oppose a candidate for office, or an issue on a question on a ballot, and is not under the direction of a candidate.

**TCHC Resources:** Including, but not limited to, employees, funds, events, facilities, information and infrastructure, as defined below:

- **“Events”** means events funded or organized by TCHC, including events that may be jointly organized with tenants, community organizations and/or external sponsors.
- **“Facilities”** means common areas or grounds of any facility which is owned or leased by TCHC.
- **“Infrastructure”** means any physical or technological systems and equipment that support the operation of TCHC, including, but not limited to,

fleet vehicles, computer networks, telecommunications systems, wireless equipment, mobile phones, computer hardware, software and peripherals, internet and intranet.

**Voting Day:** the day the final vote is to be taken in an election.

## 4. Policy Details

The Elections Policy provides detailed information in the following areas during an Election Period:

- election activities on TCHC property;
- placement of election signs;
- protection of tenant privacy;
- election-related inquiries;
- use of TCHC resources during an election campaign;
- workplace conduct in election campaign; and
- employees seeking political office.

### 4.1 Election Activities on TCHC Property

TCHC employees must ensure that:

- election officials, candidates and their agents have reasonable access to TCHC property to perform their duties in accordance with the Residential Tenancies Act. Authorized third parties acting on behalf of TCHC will ensure they do not prevent election officials, candidates and their agents from having reasonable access; and
- election officials, candidates and their agents provide proper identification and display that identification to gain access to TCHC property for election-related work.

TCHC employees and/or third parties acting on behalf of TCHC will not:

- discard or tamper with official election materials (i.e. voter registration, voter identification cards; polling location information; etc.) delivered to tenants by election officials or their agents; and,



- discard or tamper with campaign materials (i.e. pamphlets, flyers, letters, etc.) delivered to tenants by candidates, political parties, registered third parties or their agents.

## 4.2 Election Signs

The City of Toronto's Municipal Code provides rules and regulations regarding election signage that candidates must observe for any election in the City of Toronto.

- Signs cannot be illuminated or attached to trees.
- Signs cannot be placed between the curb and the sidewalk.
- Signs cannot interfere with safe operation of vehicular traffic or with the safety of pedestrians.
- Signs cannot be located adjacent to a voting place.
- Signs may be higher than two (2) meters above ground level provided they are displayed indoors.
- No person is allowed to deface or willfully cause damage to a lawfully erected election sign.

Election signs may be erected on TCHC property subject to compliance with the City's rules and the following conditions:

- Tenants can only post election signs within their residential unit, including the interior of windows. Where applicable, this also includes fenced off yards and ground-level fences attached to their unit.
- To post an election sign within a tenant's unit, candidates and/or other third parties must have the express consent of that tenant.
- Election signs cannot be posted in common areas.

TCHC employees are required to remove election signs from common or prohibited areas, or signs that contravene City rules. If requested by a tenant, authorized TCHC employees may remove signs from a tenant's unit at a tenant's request.



### **4.3 Protection of Tenant Privacy**

TCHC is committed to protecting Personal Information consistent with the principles outlined in the Municipal Freedom and Information and Protection of Privacy Act and the Housing Services Act.

- TCHC employees and/or third parties acting on behalf of TCHC must not provide tenant lists or other Personal Information about tenants to election officials, candidates, political parties, registered third parties or their agents.

### **4.4 Election-Related Inquiries**

- All election-related inquiries to employees or Board members from political parties, candidates, registered third parties and/or their agents must immediately be directed to the Manager, Stakeholder Relations. Employees should also inform their managers of the inquiry.
- Wherever possible, TCHC will respond to inquiries from candidates, political parties and/or their agents by directing them to publicly available information on our website and elsewhere. In all cases, section 4.3 applies.
- Requests made by a candidate, political party or registered third party for a personal meeting or tour with an ELT member, Board member or other TCHC employee during an official election period will not be accommodated.

### **4.5 Use of TCHC Resources**

- Elected Officials may attend TCHC events or events held at TCHC facilities in their capacity as elected officials; however, they may not solicit votes, display election signs or distribute campaign material.
- Candidates, representatives of political parties and registered third parties may attend TCHC events and/or events held at TCHC facilities as private citizens but may not campaign while in attendance. They may not solicit votes, display election signs or distribute campaign material.
- TCHC cannot make a contribution including money, goods and services to any candidate, political party or registered third party.
- Photographic or video materials created by TCHC employees or with TCHC resources cannot be used in any campaign materials.

- TCHC's logo cannot be used in any campaign material.
- TCHC resources cannot be used to promote one candidate, political party or registered third party over another during an election period.
- TCHC communications materials, including websites or domain names funded or administered by TCHC, and social media, blogs or other new media created and managed by TCHC employees, whether for internal or public distribution, must not:
  - profile (name or photograph), refer to and/or identify any individual as a candidate, or any individual or entity as registered third party, in any election;
  - profile any slogan or symbol associated with a candidate, political party, or registered third party during the election period; or advocate for or against a particular candidate, political party or ballot question position during an Election Period.

### *All Candidates Meetings*

- TCHC supports tenant engagement in elections. To facilitate this engagement, all-candidate meetings may be held at TCHC facilities, where practicable, provided that all registered candidates are invited to attend. These requests for candidate meetings should be forwarded to the Manager, Stakeholder Relations, to ensure the event complies with TCHC's Election Policy.
- TCHC can decline requests from candidates, parties, or groups where there is a reasonable concern that their participation may promote hatred, violence, discrimination, or undermine fundamental human rights. TCHC reserves the right to remove any candidates, campaign staff and/or volunteers from TCHC property that engage in hateful behavior, incite violence or violate TCHC policies.

### *Provincial and Federal Elections*

- Once the writ is issued for Provincial or Federal elections, MPs and MPPs are no longer elected officials and should not be invited to attend TCHC events in their capacity as elected officials.



### *Municipal Elections*

- In accordance with the City's Election Policy, after August 1st in a municipal election year, TCHC will not reference the name of Members of Council in:
  - advertising and other communications materials paid for or distributed by TCHC;
  - event signage, including banners and posters; and/or
  - media releases issued by Strategic Communications.
- If it is necessary to reference a specific Member of Council or the Mayor in TCHC communications or media materials after August 1<sup>st</sup> in a municipal election year, the generic term "Councillor Ward XX" or "Mayor of Toronto" must be used.

### **4.6 Workplace Conduct during an Election Campaign**

TCHC recognizes the right of employees to participate in political and election activities. At the same time, TCHC has a responsibility to ensure that employees do not engage in political activity during working hours or while representing TCHC.

TCHC employees are not permitted to:

- use or allow the use of TCHC resources while engaging in political activity;
- engage in political activity during working hours (does not include vacation time or time on leaves of absence);
- engage in political activity while wearing a TCHC uniform;
- wear clothing or buttons that advertise any candidate, political party or referendum issue while at work or while wearing a TCHC uniform;
- solicit funds from co-workers for a candidate, political party or referendum issue, either at work or outside of work;
- use their title or position within TCHC in a way that would lead a member of the public to infer that TCHC is endorsing a candidate, political party or a particular response to a referendum question.

Employees must ensure that any views they express in the context of their political participation are clearly stated to be their personal views and not the





views of TCHC. Employees engaging in such political activity should take care to separate their personal activities from their association with TCHC. Please refer to the [Conflict of Interest Policy](#) for further guidance.

Executive Leadership Team (ELT) members are permitted to run for elected office, seek appointment to a municipal council or school board, be a member of a political party, and contribute to a candidate (except in a Toronto municipal election). ELT members are restricted from campaigning or canvassing for a political party or candidate before or during municipal, provincial and federal elections or related to a Toronto referendum question.

#### **4.7 Seeking Political Office**

TCHC employees seeking to run political office must first declare a potential conflict in writing to their Divisional Head or the General Counsel and receive authorization prior to filing their candidacy. It is at the discretion of the Divisional Head or the General Counsel to determine whether the campaign activities will affect the employee's ability to perform their regular job duties.

Where an employee intends to apply to take unpaid leave to run for political office, the employee must provide written notice to their manager at least two (2) weeks in advance of their intention to take unpaid leave.

- For municipal elections, the leave must start the next working day after the employee files their candidacy.
- For provincial and federal elections, the leave must start the next working day after the employee receives the nomination.

##### *(i) Conflict of Interest*

- Employees on approved leave of absence from TCHC remain employees of the Corporation and are bound by all TCHC policies.
- While campaigning, employees on political leave must clearly state that the views they express are personal views, and not those of TCHC and must equally comply with the terms of TCHC's Conflict of Interest Policy and Social Media Policy relating to personal use of social media.



### *(ii) Salary and Benefits*

- Political leave is unpaid, and benefits can be continued at the employee's expense.
- For management and exempt employees, continuous services and vacation entitlement are not affected by a leave without pay, where the leave is for twenty (20) business days or less.
- Bargaining unit employees are subject to the provisions in their existing collective agreement.

### *(iii) Election to Political Office*

- In accordance with the [Conflict of Interest Policy](#), an employee who is elected to political office within the geographical boundaries of the City of Toronto must resign from TCHC.
- An employee who is elected to political office outside of the geographical boundaries of the City of Toronto must resign from TCHC if the political office will interfere with their ability to perform their regular duties, as determined by their divisional head or the General Counsel.
- The resignation must take effect no more than two (2) weeks after the election and prior to the commencement of the term of office.

### *(iv) Re-Appointment*

- TCHC has no obligation to re-hire employees who have resigned their position to take political office. Re-hiring would be subject to TCHC's hiring policies.

## **4.8 Board Members Seeking Political Office**

TCHC Board Members seeking office should refer to the rules set out in the Code of Ethics and Conduct for Board of Directors as it relates to political participation.



#### 4.9 Roles and Responsibilities

- Stakeholder Relations is responsible for the administration of this policy. All questions and issues with respect to this policy and or compliance with this policy should be directed to the Manager, Stakeholder Relations.
- Divisional Heads are responsible for the application of the Elections Policy with respect to TCHC resources, facilities and employees managed by their divisions.
- TCHC employees are responsible for understanding and applying the Elections Policy and for seeking clarification and advice from Divisional Heads, if required.

### 5. Compliance and Monitoring

Violation of this policy may result in appropriate remedial action, legal action, or disciplinary action, up to and including immediate termination of employment for cause for TCHC employees. TCHC equally reserves the right to remove any individuals from TCHC property that engage in hateful behavior, incite violence or violate TCHC policies while engaging in election activities otherwise permitted by this policy.

### 6. Governing and Applicable Legislation

- *City of Toronto Municipal Code*
- *Election Act, R.S.O. 1990, c. E.6*
- *Federal Elections Act, 2000, S.C. 2000, c 9*
- *Municipal Elections Act, 1996, S.O. 1996, c. 32, Sched.*
- *Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56*
- *Personal Information Protection and Electronic Documents Act, S.C. 2000, c.5*
- *Residential Tenancies Act, 2006, S.O. 2006, c. 17, Section 28*
- *Use of City Resources during an Election Period Policy*



## 7. Related Policies and Procedures

- Code of Conduct
- Conflict of Interest Policy
- Code of Ethics and Conduct for Board of Directors
- Hiring Policy
- Media and Issues Protocol
- Social Media Policy
- Social Media Procedures
- Tenant Human Rights Policy
- Voluntary Leave without Pay Policy
- Workplace Harassment Policy
- Workplace Violence Policy

## 8. Commencement and Review

| Version | Date        | Description of changes                                                                                                                                                                                                                                                            | Approval             |
|---------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| 1.0     | August 2013 | New                                                                                                                                                                                                                                                                               | Board of Directors   |
| 2.0     | June 2018   | Merge document with former Elections Policy Guidelines; replaced term “resident” with “tenant”; replaced term “registrant” with “registered third party” to align with City’s terminology and revisions to the Municipal Elections Act; style, formatting and editing throughout. | Divisional Executive |
| 3.0     | June 2026   | Full policy revision.                                                                                                                                                                                                                                                             | Board of Directors   |