

Staff Report



To **Committee of the Whole**
Service Area Corporate Services
Date Tuesday, May 7, 2024
Subject **2026 Municipal Election Alternative Voting Methods and Accessible Voting Service Enhancements**

Recommendation

1. That Council approve free Guelph Transit service and free parking at Market Parkade on Election Day to support access and remove barriers to voting for the 2026 municipal and school board election.
 2. That Council approve the use of vote tabulators in the 2026 municipal and school board election.
 3. That Council approve the use of vote by mail and vote from home as the alternative voting methods for the 2026 municipal and school board election.
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Executive Summary

Purpose of Report

The purpose of this report is to inform Council on accessible service enhancements and seek Council direction on vote tabulators and alternative voting methods for the 2026 municipal and school board election. This report follows Council direction in [November 2021](#) to report back on these topics by quarter 2 (Q2) 2024.

Key Findings

Accessible voting service enhancements are a decision of the City Clerk and staff are planning to provide all options identified in 2026.

Staff recommend adopting free Guelph Transit and free parking at Market Parkade on Election Day to reduce transportation barriers to voting.

Staff recommend the continued use of vote tabulators with paper ballots at in-person voting locations. This supports offering accessible voting equipment at locations.

Vote by mail and a vote from home service are recommended as alternative voting methods in 2026. Vote by mail supports remote voting for eligible voters who can't make it to a voting location. A vote from home service would be expanded from a 2022 pilot to support voters who are unable to leave their home due to injury, illness or disability. These alternative methods would be offered during the voting period at the discretion of the City Clerk.

Strategic Plan Alignment

This report aligns with the Future Guelph Strategic Plan Foundations theme and the objective of providing excellent service. It outlines and seeks approval for voting options and service enhancements that will improve customer service and remove barriers to voting.

Future Guelph Theme

Foundations

Future Guelph Objectives

Foundations: Provide excellent service

Financial Implications

Following the 2022 municipal and school board election, election reserve funding was increased through the multi-year budget process to address the impacts of inflation, sustain existing service levels and ensure enough funds were available after the election to support any post-election processes such as recounts, compliance audits, and by-elections. The total election budget for 2026 is currently estimated at \$850,000.

All costs associated with accessible voting service enhancements, vote tabulators (\$75,100), vote by mail (\$21,700) and vote from home (\$5,500) can be funded through the current estimated budget and reserve transfer. Similarly, offering free Transit and free parking at Market Parkade on Election Day estimated at \$20,700 can be funded through the election reserve. No additional funds are required.

Should Council decide to offer other alternative voting method options instead of or in addition to the staff recommended options, financial impacts are listed in Attachment-3. Should Council approve all alternative voting method options, additional staffing will be required to be resourced to hire an additional one and a half (1.5) staff at an anticipated cost of \$165,000. Additional options would require Council to approve budget increases in line with what is identified in Attachment-3 and staffing costs above in order for them to be offered.

Report

Background

The City of Guelph is committed to providing accessible and barrier free election services.

During the 2022 planning process, City Council passed a resolution "that staff be directed to research and investigate further accessible voting service enhancements, including the Remote Accessible Vote by Mail (RAVBM) method, in consultation with the Accessibility Advisory Committee (AAC), in advance of the 2026 municipal and school board election and report back to Council by Q2 2024 for implementation during the 2026 municipal election." [This resolution](#) was passed on November 22, 2021.

Prior to each municipal election, [Section 42 \(1\)](#) of the Municipal Elections Act, 1996 (MEA) requires that:

42 (1) The council of a local municipality may pass by-laws,

(a) authorizing the use of voting and vote-counting equipment such as voting machines, voting recorders or optical scanning vote tabulators;

(b) authorizing electors to use an alternative voting method, such as voting by mail or by telephone, that does not require electors to attend at a voting place in order to vote. 1996, c. 32, Sched., s. 42 (1).

A by-law must be passed by May 1 in the year of a regular election under [Section 42 \(2\)](#) of the Municipal Election Act (MEA). While this is the legislated deadline, procurement and planning require more lead time than provided by the MEA. A decision should be made, and by-law(s) should be passed no later than February, the year before the regular election. Staff support Council's previous direction to report back and seek approval from Council at this early juncture because it sets up the City to make early decisions. This mitigates risk associated with competition in securing supplies and resources from the market and allows staff to plan and implement robust communication initiatives. A draft by-law has not been included as part of this report. A by-law will be brought forward at a later date based on Council's direction.

Council direction through a by-law is only legislatively required regarding voting or vote-counting equipment and alternative voting methods. A decision regarding accessible voting service enhancements is at the discretion of the City Clerk under [Sections 12 \(1\) and \(2\)](#) of the MEA which speaks to the City Clerk's responsibility to ensure an accessible election and planning to ensure the identification, removal and prevention of barriers that affect voters and candidates with disabilities. Information and the intention of the City Clerk is included for Council and the public's awareness.

Key definitions

Accessible voting service enhancements - Options that support a voter with a disability to mark and cast their ballot as independently as possible at an in-person voting location. For example, accessible audio-tactile voting equipment, braille sleeves, masked and scent-free locations, City Hall as a central hub for accessible enhancements, American Sign Language (ASL) translation or magnifying sheets.

Alternative voting methods - Ways that a voter can mark and cast their ballot as an alternative to in-person voting at a physical voting location. For example, internet voting, vote from home, vote by mail, vote by phone or remote accessible vote by mail (RAVBM).

Disenfranchisement - Means to deprive someone of the right to vote when they are legally eligible. For example, someone who is unable to access any voting method available could be said to be disenfranchised.

Evaluation criteria - The principles, requirements and guidelines that are used to make a decision.

Accessibility and human rights considerations

The City is committed to proactively planning for accessible election services that are designed to be inclusive. It is paramount that voters have the ability to mark their ballot independently and ensure the confidentiality of a vote.

Staff also understand the duty to accommodate. If established service options do not support a voter, accommodations are offered in line with the principles of

respect for dignity, individualization, integration and full participation. Due to the principle of individualization, each person's unique needs are considered on a case-by-case basis when an accommodation request is made. City staff have, in the past, supported case-by-case needs in past election cycles and will continue to make such support available through individual discussions.

Engagement process

Following Council's direction, City Clerk's Office, Accessibility Services and Community Engagement staff prepared a [one year engagement plan](#) and presented it to the Accessibility Advisory Committee (AAC) on April 18, 2023. The final engagement plan was delivered with minor updates to timelines due to quorum and deferrals to later agendas by the Committee. The City Clerk's Office prepared for a total of seven (7) engagements with the AAC including:

- April 18, 2023 ([video](#) starts at 5:48)
 - Topic - Discussion and feedback on what voting methods and accessible voting service enhancements to include in the research phase.
 - [Minutes](#)
 - [Materials Presentation](#)
- August 15, 2023 ([video](#) starts at 3:03)
 - Topic - Presentation of research findings; as well as discussion and feedback on decision-making criteria.
 - [Minutes](#)
 - [Materials](#)
- October 3, 2023 (no video posted)
 - Topic - First attempt at a facilitated workshop to document member feedback and priorities on all options. Moved to November due to lack of quorum.
 - [Minutes](#)
 - [Materials Appendices](#)
- November 14, 2023 ([video](#) entire video)
 - Topic - Second and delivered facilitated workshop to document member feedback and priorities on all options.
 - [Minutes](#)
 - [Materials Appendices Presentation](#)
- December 19, 2023 ([video](#) starts at 2:39)
 - Topic - Presentation summarizing AAC feedback to date and seeking a resolution on the AACs recommendations.
 - [Minutes](#)
 - [Materials](#)
- February 20, 2024 ([video](#) starts at 1:39:19)
 - Topic - Presentation and discussion of the final staff recommendation that will be presented to Council by Q2 2024. Deferred by the Committee to the April agenda.
 - [Minutes](#)
 - [Materials](#)
- April 16, 2024 ([video](#) starts at 4:36)
 - Topic - Presentation and discussion of the final staff recommendation that will be presented to Council by Q2 2024.
 - Minutes to be posted.
 - [Materials Presentation](#)

This engagement has involved comparator and larger municipal service benchmarking, research on options available in the market, engaging with community stakeholders and service providers. Staff have engaged, heard and integrated feedback from the AAC at each of these stages.

A facilitated workshop was scheduled with the AAC in October 2023, although conducted in November 2023, to hear feedback on all options and a Committee motion was received at the December 2023 meeting. A complete summary of feedback received from the AAC during this engagement process, including the AAC motion outlining the Committee's recommendations for 2026, is provided in Attachment-1.

A summary of municipal benchmarking findings and what we heard from stakeholders is also provided in Attachment-2.

Engagement feedback and findings are noted throughout the related sections of this report with complete information available in the noted attachment above.

As accessibility is the focus of this work, additional public engagement was not conducted beyond that which was already conducted in the lead up to and immediately following the 2022 municipal and school board election. This additional and recent public engagement data on alternative voting methods is available within a [pre-election engagement summary](#) and post-election [OraclePoll](#) and [Have Your Say Guelph](#) surveys related to the 2022 regular election.

Accessible voting service enhancements

A range of ongoing and new accessible voting service enhancements are planned for the 2026 election. Options considered would support a voter with a disability to mark and cast their ballot as independently as possible at an in-person voting location.

Accessible voting equipment

This is equipment that plugs into the tabulator at in-person voting locations. This includes the audio-tactile interface (ATI) with sip and puff and paddle attachments. This option is offered each regular election and would continue to be offered in 2026.

Benchmarking data showed that all 13 municipalities that were engaged offered this.

This option allows individuals with various disabilities to independently mark a ballot in person.

Magnifying sheets

A magnifying sheet is supplied to people that require magnification to read. This option is offered each regular election and would continue to be offered in 2026.

Benchmarking data showed that all 13 municipalities that were engaged offered this.

This option allows individuals with visual limitations and disabilities to independently mark a ballot in person.

Braille sleeves

The City is planning to offer custom braille sleeves with each candidates' name on the ballot. This allows for a more independent ballot marking experience compared to alternatives with numbers only on the sleeve with an Election Official reading out candidate names in order to the voter. This was going to be piloted in 2022, however, timelines for ordering, receiving and reviewing the sleeves ahead of voting days was not possible and will be planned for earlier in the election planning process for 2026.

Benchmarking data showed that this is offered by the Cities of Toronto, Ottawa and Barrie.

Masked/scent-free locations

A separate location is offered for individuals to vote where all individuals are masked, and no scents are worn or used in the room. This option was piloted at City Hall in 2022 in consideration of the pandemic and public comfort attending in-person voting. Based on AAC engagement feedback, staff understand that this has ongoing benefits to support barrier reduction for individuals with scent sensitivities or who may be immunocompromised.

Benchmarking data showed that a masked option was also offered by the Cities of Hamilton, Toronto and Barrie. None of the 13 municipalities that were engaged offered a scent-free location.

This option would likely be offered at City Hall as a central location in 2026 during advanced voting and on Election Day. This allows for preparation and cleaning of the space ahead of voting and affords staff greater control of the area, which would not be possible in other rented spaces like schools or independent facilities.

City Hall as a central hub for accessible enhancements

A new option for 2026 would be to open City Hall as a vote anywhere location during advanced voting and on Election Day. This would provide a central place with all enhancements in one (1) location. Many options, such as accessible voting equipment and magnifying sheets, can and would be offered at locations in each ward. However, some options may be logistically challenging to offer in facilities that are not operated by the City, such as a masked/scent free location. Offering a central hub would allow the City to communicate that anyone facing a barrier to access can come to City Hall and will be supported by City Clerk's Office and Accessibility Services staff directly to find the right option for them.

Benchmarking data showed that this option has not been offered by other comparator municipalities or other large municipalities like Toronto, Vaughan or Ottawa. This would be offered as a new approach in 2026 for the first time by the City of Guelph.

American Sign Language translation

This option was offered in 2022 as an option to be booked in advance by contacting the City Clerk's Office. Costs for this were covered by the election budget.

Following engagement with the Canadian Hearing Society, staff understand that an on-demand ASL translation service may be available for 2026 and is being piloted by other levels of government. This would allow people to access ASL interpretation

without needing to book anything in advance or to go to a central location. ASL interpretation may also be provided for digital content on various websites.

Benchmarking data showed that this option was also offered by the Cities of Kingston and Kitchener.

Providing ASL translation of digital content will provide a better understanding of the election process for members of the community. Providing an on-demand ASL translation service at voting locations will assist voters in marking a ballot.

Decision

A decision regarding accessible voting service enhancements is at the discretion of the City Clerk in line with the requirement, under the MEA, to plan for the identification, removal and prevention of barriers that affect electors and candidates with disabilities under [Section 12.1 \(1\) and \(2\)](#). The above is provided for information purposes. While the details and costs of these options will be finalized closer to 2026, staff are planning to offer all options identified.

Transit and parking considerations

Two additional options have been explored by staff that could support increased community access to voting in-person.

The first is to offer free Guelph Transit on Election Day, Monday, October 26, 2026. The City Clerk's Office works closely with colleagues at Guelph Transit on voting signage on buses and bus shelters and ensures that all voting locations are on Transit routes. This service could be enhanced to remove fares on Election Day to encourage civic participation, accessibility and engagement. The option of offering free fares to riders with a voter card was considered; however, the option to cover a flat rate day value of the fares was determined to be operationally easier than having different systems of payment and non-payment. Voter cards may not be received by all eligible voters and are not required to vote, so they may be left at home. A free fare day would most support the reduction of barriers or transportation friction to get to a voting location. The cost to offer this is estimated to be \$20,000 and can be funded from the existing election reserve. Should Council wish to pursue this as an option, the staff recommendation to accomplish this is noted as part of this staff report.

The second is to offer free parking at the Market Parkade on Election Day. As part of a pre-election audit, each voting location must have dedicated parking, including accessible parking spaces. In previous elections, free two (2) hour public parking has been available downtown for voters coming to cast their ballot at City Hall. However, with City Hall transitioning to become a central hub with all accessible enhancements, this location will be offered as a vote anywhere location that can accept voters from any of the City's six (6) wards. Offering the Market Parkade for free on Election Day would help ensure dedicated and accessible parking on the busiest day of voting. The cost to offer this is estimated to be \$700 and can be funded from the existing election reserve.

Similar options are offered by at least seven (7) other municipalities in Ontario. Comparator municipalities include the City of Greater Sudbury, City of Kingston and the City of Oakville. A motion was also passed by the City of Waterloo and City of Cambridge Council's ahead of the 2022 municipal election to encourage the Region to offer free transit; however; this was not approved ahead of the last regular

election. Non-comparators who offer similar services include the City of Windsor, City of North Bay, City of Sarnia, and Town of Collingwood. More detailed benchmarking information is available in Attachment-4.

These options are being recommended for the municipal and school board election. Civic participation is important at all levels of government and each election authority is responsible for supporting voter engagement and removing barriers to voting. It is recommended that these options be offered for the municipal election as transit and parking are municipal services. A local election subsidized by local funding is being proposed. No request has been received by the City to offer these options for other elections at higher levels of government and there is no indication from Elections Canada or Elections Ontario that this is something they would pursue. Funding from other levels of government would be necessary if similar services were to be offered for Federal or Provincial elections in the future. Should Council approve these options at the municipal level, staff could reach out to Elections Ontario and Elections Canada to identify if there is interest and funding available. This is consistent with benchmarked data. Seven (7) other municipalities offer similar services with only one, Kingston, voluntarily offering free transit service for Federal and Provincial elections as well.

These options may have an effect on voter turnout but it will be challenging to attribute an increase in turnout to any one specific aspect of the election. When asked, none of the municipalities who offer similar services could quantify a specific impact this has had on their voter turnout. However, they are small but important ways to support civic participation, accessibility and engagement for the municipal election to help connect voters to the in-person voting experience.

Vote tabulators

The City began using vote tabulators in 2006 for all voting locations and has continued to use them in 2010, 2014, 2018 and 2022. The use of vote-counting equipment allows for increased consistency in vote counting over a manual counting process and supports the reporting of unofficial election results on election night. In addition and due to the complexity of municipal and school board election ballots with multiple contests and selection requirements, vote tabulators reduce human error in tabulating.

The use of vote tabulators upholds all principles of the MEA. It offers a consistent foundational technology. Thorough logic and accuracy procedures are established to ensure that vote tabulators are scanning and recording vote counts accurately prior to use at a voting location. Additional procedures are in place to ensure that the machines or results cannot be tampered with, including preventing the machine from being connected or transmitting results and ensuring that an Election Official is always present and monitoring the machines at voting locations.

Vote tabulators support accessibility and barrier reduction and are necessary to offer accessible voting equipment outlined in the enhancements section of this report. Accessible voting equipment is connected to a vote tabulator at a voting location to enable independent ballot marking and printing on request.

It is also supported by public engagement data showing that in-person voting remains the most used voting method with post-election [OraclePoll](#) and [Have Your Say Guelph](#) survey respondents indicating that in-person voting remains likely to be used in future elections. The province-wide use of vote tabulators by Elections

Ontario since 2018 has increased familiarity with this equipment which will continue around June 2026 with a provincial election ahead of the next regular municipal election.

The City Clerk is confident in the ability to administer future elections using vote tabulators. It is recommended that Council approve the use of vote tabulators for the 2026 municipal and school board election.

Alternative voting methods

A range of alternative voting methods were considered including vote from home, internet voting, vote by mail, vote by phone and RAVBM. The AAC was asked as part of the engagement process if they were aware of any additional alternative voting methods that should be included as part of the research phase of this work. No new or alternative methods were identified to staff.

Evaluation criteria

The following criteria were established following engagement and discussion with the AAC:

- Is the option secure?
- Have there been any enhancements or improvements in the technology since past elections?
- What did we hear during our community and stakeholder engagement?
- Are there administrative considerations to be aware of? For example:
 - Is support offered by vendors sufficient to support this option?
 - How many alternative voting methods can we support with the resources we have?
 - Are there system integration or privacy considerations?
 - Are there workload or capacity levels needed for different options?
- Have there been any challenges experienced by other Ontario municipalities that have used the option in past elections?
 - If so, which municipalities and how do they compare to Guelph in terms of complexity of election, size, number of electors, etc.?
- Does the option support accessibility/barrier reduction?
- Does it meet the principles of the MEA:
 - the secrecy and confidentiality of the voting process is paramount;
 - the election shall be fair and non-biased;
 - the election shall be accessible to the voters;
 - the integrity of the voting process shall be maintained throughout the election;
 - there is to be a certainty that the results of the election reflect the votes cast;
 - voters and candidates shall be treated fairly and consistently; and
 - the proper majority vote governs by ensuring that valid votes are counted and invalid votes are rejected so far as reasonably possible.

These principles, while not established as part of legislation, are generally recognized based on case law.

In considering each alternative voting method, the City Clerk's Office conducted a SWOT analysis, prepared a risk assessment and evaluated the financial and staffing resources needed for each option individually and paired with other options. A

summary of reasons why each method is or is not recommended by staff is provided below. Detailed information, including resource needs for individual or combinations of methods can be found in Attachment-3.

Vote from home

A vote from home pilot was offered for the first time in 2022. An overview of how the pilot was set up is included in the [Vote from Home Service Pilot for the 2022 Municipal Election information report](#) on June 4, 2021. This service would be offered in a similar way removing the limit on the number of appointments.

Municipal benchmarking showed that this option is also offered by the Cities of Oakville, Toronto, Cambridge and Vaughan.

Strengths

- Low cost.
- Upholds all principles of the MEA.
- Supports the removal of barriers related to in-person voting access.
- Easily implemented after 2022 pilot.

Weaknesses

- Some voters may not be comfortable with allowing access to their home.
- Limited scalability.
- Not available to all voters – only those that identify themselves as having an injury, illness or disability that prevents access to in-person voting.

Opportunities

- Low risk of voter fraud.
- Familiarity from previous municipal, provincial and federal elections.

Threats

- Potential safety risk with Election Officials entering someone's home.

This alternative method is recommended as it is considered low risk, meets all principles of the MEA, and can be easily offered with existing resources and procedures in place. Feedback from the previous 2022 pilot indicated that this option supports voters with disabilities and offers added barrier reduction for people with limited transportation and no access to online services that could impact access to voting.

Internet voting

An internet voting option would allow a voter to securely login to an online platform to access, mark and cast their ballot. Step-by-step information on how this alternative voting method works can be found in [Attachment-5](#) of the Voting Systems and Alternative Voting Methods for the 2022 Municipal Election, 2021-30. This method was offered by the City of Guelph for the first and only time in 2014.

Municipal benchmarking showed that this option is also offered by the Cities of Kingston, Sudbury, Cambridge, Vaughan, Barrie, Burlington and Chatham-Kent.

Strengths

- Supports independent ballot marking with the ability to customize and use personal assistive technology.
- Convenient online 24/7 access.

- Public engagement feedback from 2022 indicates this is the most preferred alternative voting method.

Weaknesses

- Variance in public technology literacy and access.
- Voters' list data accuracy important to prevent issues accessing.
- Need to receive voter notification card as part of secure login.

Opportunities

- Potential to increase voter turnout through barrier reduction and based on engagement survey data.
- Move to the Elections Ontario voters' list for 2026 will improve data accuracy.
- Potential to pilot draft standards.

Threats

- Potential security risk due to malicious actors.
- Potential for voter fraud with fully remote method.
- Technical dependencies on platforms and systems outside of the City's control.
- Potential for technical dependencies to impact reliability of service and public trust in election process.
- Inability to determine results or conduct a physical recount in any other way which compromises MEA principles related to ensuring results reflect the proper majority of votes cast, votes are counted accurately and only valid votes are counted and upheld.

Staff acknowledge that this is the most accessible option and is the alternative voting method most preferred based on public engagement feedback. Staff have noted positive progress in areas previously stated as a concern. Voters' list data quality is likely to improve in 2026 with the change to use the Elections Ontario list. This will give a more accurate list based off of drivers' license and health card information rather than home ownership information used by the Municipal Property Assessment Corporation (MPAC). It will also be recently updated with a June provincial election likely ahead of an October municipal and school board election. There has also been positive movement towards the development of independent standards for online voting. The Digital Governance Standards Institute has drafted and posted standard [CAN/DGSI 111-1 Online Electoral Voting – Part 1: Implementation of Online Voting in Canadian Municipal Elections](#). The draft was available for comment until February 28, 2024 and is now in review. A final publication date for complete standards is not yet known and may not be available ahead of 2026.

Despite the above, this alternative voting method is not recommended for 2026 for several reasons. First, while there are no proven instances of an internet voting system being hacked or tampered with, municipalities are increasingly targets for malicious actors looking to hold information for ransom. Recent incidences include the [Toronto Public Library](#), the [City of Hamilton](#) and the [City of Huntsville](#). If staff are directed to offer this method, technical security testing including penetration testing leading up to threat risk assessment may be required. The cost of testing is estimated to range from \$20,000 to \$40,000. This presents a moderate risk based on the City's emergency risk management framework. Despite testing, the City may remain a target of interest and it should be acknowledged that any online voting

platform operates outside of the City's network and relies on subcontracted services and systems outside of the City's control.

Second, there is a higher risk of service interruptions that could impact public trust in the electoral process and the integrity of the election. During the last two (2) election cycles, issues related to technical dependencies have impacted municipalities offering internet voting on Election Day. In 2018, a vendor experienced bandwidth throttling by a sub-contracted service provider and in 2022 a vendor experienced a server failure that paused voting for a period of time. These issues are not security related and highlight the increasing number of dependencies that technical options rely upon. Despite security testing, these issues can and do impact election service levels and can result in larger questions about the integrity of the election process overall.

Third, this option has limited verifiability with digital count, audit and recount using the same system. There is no external way to verify whether results reflect the proper majority of votes cast, votes are counted accurately and only valid votes are counted and upheld. Should trust in the system be called into question, there would be no paper ballot to verify results and there could not be a recount in any other way if ordered by the Courts. This challenges principles of the MEA and an inability to verify using any other means could raise larger questions about election trustworthiness and the validity of the outcome. Considerations of reliability and verifiability present as high risk on the City's emergency risk management framework.

Fourth, it has come to staff's attention that Dominion Voting Systems, the largest vendor in the municipal election space and the City's vendor since at least 2010, will no longer be offering internet or telephone voting services. When asked about this transition away from digital voting methods, they indicated that "Dominion has decided to focus primarily on paper ballot tabulation systems. It is our opinion that paper ballots represent the "gold standard" for voting and elections to preserve complete transparency, security, and auditability in elections." While there are other vendors in the market that offer internet and telephone voting, this transition is notable.

Finally, staff's recommendation and rationale is in line with higher level election administrators that have come to similar conclusions. In 2012, Elections Ontario submitted their [Alternative Voting Technologies Report](#) to the Legislative Assembly. The report acknowledges that, with online methods, "voting is more accessible to electors with disabilities."¹ Eight (8) implementation criteria are outlined with the requirement that all are met before a technology could be used. The first implementation criteria is accessibility, highlighting the importance of an independent voting process for voters with disabilities without any assistance.² The implementation criteria also includes system availability, requiring that "the election process and any of its critical components (e.g. voters' list information, cast votes, voting channel, etc.) will be available as required..."³ The latter is what staff are indicating they have seen compromised over the last two election cycles with technical dependencies and issues that have impacted service reliability and

¹ Page 12.

² Page 10.

³ Page 11.

availability. In its analysis of the municipal experience, the report notes an over reliance on vendors and technology which can heighten risks to the electoral process if appropriate standards, testing and mitigation strategies are not in place.⁴ Based on what staff have seen in 2018 and 2022, there is an acknowledgment of higher risk in that, even with external testing, the points of failure would have been outside of a municipalities control or ability to prevent and standards are not yet in place or tested with vendors in the market as we approach 2026. The report concludes that there were no online voting solutions that met their criteria. Since 2012, Elections Ontario continues to monitor voting technologies, including surveys asking about public support for online voting as recent as the [2022 Post-Election Event Report](#)⁵, but has made no indication that internet voting or similar technologies are being considered for upcoming elections.

At the federal level, the Special Committee on Electoral Reform released their [Report](#) in 2016. The Committee acknowledges that Canadians are open to the idea of online voting and that technology plays an important role for Canadians with disabilities in allowing independent ballot marking and upholding ballot secrecy. The Committee felt that “any technology developed to make voting more accessible should be of comparable security and integrity to that of the current voting process.” It concluded that, “The Committee heard significant testimony (and received submissions), particularly from experts in technology, that the secrecy and integrity of an online ballot cannot be guaranteed to a sufficient degree to warrant widespread implementation in federal elections. The Committee agrees.”⁶

More recently, Élections Québec has put an end to its [Internet voting pilot project](#), planned for the 2025 general municipal election. Following extensive public consultation and studies in 2019 and 2020, a call for tenders in October 2023 resulted in three submitted bids with none of the suppliers meeting Élections Québec’s requirements.

If directed by Council, internet voting costs could be covered with existing resources instead of a vote by mail option. However, additional financial and staffing resources will be needed if it is approved in addition to a vote by mail, vote by phone or RAVBM option.

Vote by mail

A vote by mail option would allow a voter to request a vote by mail kit, receive, mark and return a paper ballot by mail before Election Day. Step-by-step information on how this alternative voting method works can be found in [Attachment-5](#) of the Voting Systems and Alternative Voting Methods for the 2022 Municipal Election, 2021-30 staff report. This method was offered by the City of Guelph for the first and only time in 2022.

Municipal benchmarking showed that this option is also offered by the Cities of Hamilton, Toronto and Ottawa.

Strengths

- Established remote voting method used at all levels of government.
- Enhances access to voting by removing barrier of coming to an in-person poll.

⁴ Page 18.

⁵ Page 88.

⁶ Page 115-116.

- Familiarity from previous municipal, provincial and federal elections.
- Upholds all principles of the MEA.

Weaknesses

- Prolonged time to receive and return kit by mail.
- Limited time frame that it can be offered due to nomination, ballot printing and mail timelines.
- Does not offer a fully independent voting experience as some voters with disabilities may require assistance marking their ballot.
- Voters with physical disabilities that limit mobility may require assistance to drop off a marked ballot in the mailbox for return.
- Marked ballots may be received after the deadline to be counted.

Opportunities

- Potential to continue use from 2022.

Threats

- Third party dependency on Canada Post.
- Potential for voter fraud with fully remote method.
- Separate ballot casting process without verification at the time of casting.

This alternative method is recommended as it is considered low risk on the City's risk register, meets all principles of the MEA, is familiar to the public and can be offered with existing resources and procedures in place.

Vote by phone

A vote by phone option would allow a voter to call into a digital platform to make selections using an automated voice system. The ballot would be recorded and cast using the digital platform the same as online voting. Step by step information on how this alternative voting methods works can be found in [Attachment-5](#) of the Voting Systems and Alternative Voting Methods for the 2022 Municipal Election, 2021-30 staff report. This method has never been offered by the City of Guelph before.

Municipal benchmarking showed that this option is offered by the Cities of Kingston and Barrie.

Strengths

- Easily accessible and familiar phone technology.

Weaknesses

- Slow ballot reading takes time to complete.
- Limited accessible features in that call speed cannot be adjusted.
- Automated call features may be irritating and provide poor customer experience.

Opportunities

- N/A.

Threats

- Potential security risk due to malicious actors.
- Potential for voter fraud with fully remote method.
- Technical dependencies on platforms and systems outside of the City's control.

- Potential for technical dependencies to impact reliability of service and public trust in election process.
- Inability to determine results or conduct a recount in any other way. This compromises MEA principles related to ensuring results reflect the proper majority of votes cast, votes are counted accurately and only valid votes are counted and upheld.

This alternative method is not recommended by staff for several reasons. It has not been offered by the City before and offers limited barrier reduction. Because this option records and counts ballots using the same online platform as internet voting, this option has the same security risk and technical dependencies with the inability to audit or recount any other way. It would require the same level of technical testing and would carry the same risks as that method with less ability to customize to meet accessibility requirements and ensure a good customer experience.

If directed by Council, vote by phone costs could be covered with existing resources instead of a vote by mail option. However, additional financial and staffing resources will be needed if it is approved in addition to a vote by mail, internet voting or RAVBM option.

Remote accessible vote by mail

A RAVBM option would allow a voter to securely login to an online platform to access and mark their ballot. Once marked, the voter would then print their ballot at home, prepare the return envelope and mail the paper ballot back to be counted before Election Day. An overview of how this method works can be found in the [Remote Accessible Vote by Mail as a Voting Method for the 2022 Municipal Election staff report](#) on November 1, 2021. This method has never been tested or offered by the City of Guelph before.

Benchmarking showed that this option has not been used to administer any election in Canada at the municipal, provincial or federal levels of government.

Strengths

- Supports independent ballot marking with the ability to customize and use personal assistive technology.
- Physical ballot allows for verification and recount in other ways if needed.

Weaknesses

- Never tested or used in any Canadian election before.
- Dependent on voter access to printer.
- Potential for significant variance in quality of ballot printed and the need to re-mark ballots if they cannot be read by the vote tabulator to be counted.
- Legislative compliance unclear.
- Lack of integration with digital voters' list platform for real time voter strike-off.
- Limited market with only one vendor identified.

Opportunities

- Potential to offer as the first election authority in Canada.

Threats

- Third party dependency on Canada Post.
- Potential for voter fraud with fully remote method.

- Separate ballot casting process without verification at the time of casting.
- Potential security risk due to malicious actors.
- Technical dependencies on platforms and systems outside of the City's control.
- Potential for technical dependencies to impact reliability of service and public trust in election process.
- Unknown outcome if challenged in court as a new voting method in Canada.

This alternative method is not recommended for several reasons. First, this method has not been tested in any Canadian context and has not been verified to uphold all principles of the MEA. Should this method be challenged through the Courts, the outcome or direction is unknown. Second, the level of review and testing for this new method could not be supported with existing City Clerk's Office staffing levels and would require additional resources to support. Third, because the voter accesses and marks their ballot using an online platform, this option has the same security risks and technical dependencies as internet voting with the same potential impacts on reliability and dependability. Verifiability is possible with this method as a paper ballot is mailed and counted using the same procedures as vote by mail.

If directed by Council, RAVBM costs would require additional staffing resources to offer if approved instead of vote by mail. Additional financial and staffing resources will be needed if it is approved in addition to a vote by mail, internet voting or vote by phone option.

Recommendation

The City Clerk's Office recommends that vote by mail and vote from home be approved as alternative voting methods for use in the 2026 municipal election based on the following:

- Ability to uphold the principles of the MEA.
- In line with existing financial and staffing resources.
- Offers dependability and reliability.
- Ensures verifiability and ability to recount in other ways if needed.
- Supports remote voting options for voters who cannot make it to in-person voting.

Staff have listened to, learned from, and used the AAC's feedback and recommendations to help guide the development of the staff recommendations to Council. Though the AAC and staff recommendations may differ, they share the same goal to provide accessible voting methods to the Guelph community so all voters have the means to participate in the democratic process. All perspectives have been shared through this report in the interest of transparency and for Council consideration.

Decision

In line with [Section 42 \(1\)](#) of the MEA, alternative voting methods are a decision of Council. Through the detailed research, engagement and consideration, our goal is to seek one (1) comprehensive Council decision on alternative voting methods.

Should Council wish to pursue alternative or additional methods the added financial resources required have been identified in Attachment-3 and the staffing resources outlined in the Financial Implications sections of this report. Should Council approve additional alternative methods without the required resourcing, the City Clerk will

be required to evaluate and reduce in-person voting services, including fewer locations, staffing and equipment, to stay within budget.

Financial Implications

Following the 2022 municipal and school board election, election reserve funding was increased through the multi-year budget process to address the impacts of inflation, sustain existing service levels and ensure enough funds were available after the election to support any post-election processes such as recounts, compliance audits, and by-elections. The total election budget for 2026 is currently estimated at \$850,000.

For accessible voting service enhancements, costs are anticipated to be minimal and already within the scope of the current election budget. No additional funding is needed to deliver these enhancements.

Free Guelph Transit service is estimated to cost \$20,000 and free parking at the Market Parkade is estimated to cost \$700 for Election Day 2026. This can be offered within the existing election budget.

Offering vote tabulators technology is estimated to cost \$75,100. This can be offered within the existing election budget.

Offering a vote from home service as an alternative voting method for 2026 is estimated to cost \$5,500. This service can be offered within the existing election budget.

An estimate of vendor supported alternative voting methods has been provided in detail in Attachment-3. A baseline of 10,000 votes cast has been used for vote by mail, internet voting, vote by phone and RAVBM. Staff are not saying that 10,000 votes will be cast using each of those methods. The baseline is there to create a standard point of comparison and show the high end of potential costs.

Offering vote by mail as an alternative voting method for 2026 is estimated to cost \$51,000 for 10,000 votes cast. Based on level of use in 2022, vote by mail use is anticipated to be closer to 1,000 votes cast at a cost of \$21,700. This service can be offered within the existing election budget.

Should Council decide to offer other alternative voting method options instead of or in addition to the staff recommended options, financial impacts are listed in Attachment-3. Should Council approve all alternative voting method options, additional staffing must be resourced to hire an additional one and a half (1.5) staff at an anticipated cost of \$165,000. Additional options would require Council to approve budget increases in line with what is identified in Attachment-3 and staffing costs above in order for them to be offered.

Consultations and Engagement

Public engagement on alternative voting methods are included as part of routine pre and post-election surveys public surveys and engagements. Additional public engagement was not conducted ahead of this report in part due to the recency of election survey data from before and after the 2022 municipal election and due to the accessibility focus of this engagement. The AAC and community service groups that support individuals who would most directly be impacted and have feedback specific to accessible services were worked with.

During the research phase of this work comparator municipalities were benchmarked and consulted including Oakville, Chatham-Kent, Hamilton, Kingston, Kitchener, Mississauga, Greater Sudbury, Cambridge, Barrie and Burlington. We also reached out to three cities that have a larger population than Guelph; Vaughan, Ottawa and Toronto.

Eight broader community stakeholders were consulted including Canadian Hearing Services, Community Living Guelph Wellington, Guelph Independent Living, Canadian National Institute for the Blind, Immigration Services Guelph Wellington, T2ACOI, Guelph Wellington Senior Association and a First Nations group (who asked not to be named) were engaged for this project. City staff attempted but were unable to engage with the Disability Justice Network of Ontario, Canadian Abilities Foundation, Kerry's Place and the ADHD and Spectrum Center.

Attachments

Attachment-1 AAC engagement feedback and motion

Attachment-2 Municipal benchmarking and stakeholder engagement summary

Attachment-3 Alternative voting method evaluation and resourcing information

Attachment-4 Transit and parking benchmarking

Attachment-5 Presentation

Departmental Approval

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