City of Burlington

SUBJECT: Voting options for 2022 and ranked ballots

TO: Corporate Services, Strategy, Risk & Accountability Cttee.

FROM: Clerks Department

Report Number: CL-06-20

Wards Affected: All

File Numbers: 165-01

Date to Committee: August 13, 2020

Date to Council: August 24, 2020

Recommendation:

Direct the City Clerk to prepare and issue a request for proposals for a vote tabulation system for the 2022 municipal election, and any by-elections leading up to 2026, with an option to extend for the 2026 municipal election accordingly, with the following vote options:

a) optical scan tabulators for in person advance voting and on election day;

b) internet voting for advance voting opportunities only; and

Direct the City Clerk to consult with members of Council, and the public with respect to the municipal elections and any potential policies or enhancements to be considered when preparing for the 2022 City of Burlington election and report back to a future Corporate Services, Strategy, Risk & Accountability Committee meeting with a summary and potential policy options; and

Direct the City Clerk to proceed with option _____ regarding the use of ranked ballots as outlined in clerks department report CL-06-20.

PURPOSE:

Vision to Focus Alignment:

- Building more citizen engagement, community health and culture
- Deliver customer centric services with a focus on efficiency and technology transformation

Executive Summary:

This report is seeking direction to inform the RFP process to obtain a vote tabulation system for the 2022 municipal election. In November 2016, staff committed to provide an overview of ranked ballot activities that occurred during the 2018 Ontario municipal election, the summary contained in this report satisfies that commitment. Staff are also seeking direction on ranked ballots, as there is a legislated public consultation process with a deadline of May 1, 2021.

Background and Discussion:

The next municipal election will be held on October 24, 2022. In preparation, the City must prepare a Request for Proposals (RFP) to retain a vendor to provide vote tabulation services for the 2022 election. Staff are seeking direction on the use of internet voting, and tabulators to help inform drafting the RFP. The last RFP requesting vote tabulation services was issued in 2009. The procurement process may take some time, staff anticipate securing a vendor by the end of Q1 2021.

As 2022 approaches, the clerks department has expressed an interest in conducting public consultation to help inform its election planning. In comparison to other municipalities, there are potential elections policies such as contribution rebate programs, different representation models, and other options for residents which should be taken into consideration.

Ranked ballots were introduced by way of Bill 181*, the Municipal Elections Modernization Act 2016*, (MEMA) with its processes further outlined in Ontario Regulation 310/16. Through this report, staff are providing an update on how ranked ballots were used during the 2018 Ontario municipal election and seeking direction on ranked ballots for the 2022 election. Should Council choose to pursue ranked ballots, a public consultation process (as per legislation) will be initiated, staff will also work on preparing technical criteria that may be included in the RFP.

Internet Voting and Optical Scan Tabulators

Internet Voting

Internet voting has been used by the City of Burlington since 2010. The last municipal election was held on Monday October 22, 2018, had 51,021 electors casting a ballot, with a participation rate of 39%. The 2018 City of Burlington municipal election used a combination of internet advance voting, and optical scanning tabulators for in person voting during advance and election day polls. For the 2018 election, internet voting was

available for advanced voting purposes only. The official results indicate that 13,123 electors cast a ballot using this method which equates to about 37% of participants in the election.

In 2018, some Ontario municipalities chose to offer internet voting until the close of polls on Election Day. Many of those municipalities (51) experienced technical difficulties, slow traffic which resulted in an approximate 90-minute slowdown. The diminished quality of the bandwidth caused a varying number of voters to experience slow response time, and system timeouts. Effected municipalities chose to extend their voting period for several hours, with some extending the close of the alternative voting polls until the next day. Based on what had occurred during the 2018 municipal election, staff are recommending the use of internet voting for advance purposes only. The customary by-law approvals for internet voting will be attained closer to the election, which must occur before May 1, 2021.

In addition, there have been some concerns raised about security and internet voting. Through the RFP (as detailed further in this report) staff will ensure that the technical requirements are updated. The Information Security Manager for the City of Burlington will be part of the procurement team. In addition, it is customary for the City to do a third-party risk assessment which will help to ensure that the system is sound. The firm employed to do the risk-assessment will conduct tests and provide the results with recommendations. Staff review the report and work with the vendor to ensure that the recommendations are actioned.

Optical Scan Tabulators

Optical scan tabulators have been used in some form in Burlington since the mid-1990s. They are a quick way to tabulate ballots. Staff are recommending the use of tabulators for the 2022 and 2026 elections. During the 2018 election the City of Burlington piloted a vote anywhere within the ward option, which used a live electronic Voters' List to strike off electors at voting places. Electors were able to choose any voting place within their ward to cast their ballot. The vote anywhere within each ward option was a pilot project and is currently being reviewed for 2022.

As with internet voting, there are also security issues with the use of tabulators. Many of these concerns are associated with touch screens not being properly calibrated or secure. At present, the City of Burlington does not use this technology. Other concerns are with respect to tampering done on machines. In the City of Burlington, city staff are at the voting stations and have custody over the tabulator. Along with rigorous logic and accuracy testing, there is training on use and the importance of ensuring that the tabulator is monitored and secure throughout the operation of a voting location.

In addition, there are other ways in which municipalities use optical scan technology when administering elections, and the clerks department is currently conducting a

survey of other municipalities to ascertain jurisdictional insight into how the technology was used. It is anticipated that some of the findings from this survey may be incorporated into the RFP.

The Request for Proposal Process

The current contract for vote tabulation services awarded for the 2010 election is concluding. Staff are initiating a process to review requirements and issue an RFP to select a vendor for the 2022 and 2026 elections. Staff are proposing to shorten the period in between procurements for vote tabulation systems, from two election cycles and the option to renew for a third, to one election cycle and the option to extend for a second election. Shortening the period will allow for technical requirements to be refreshed, and account for any changes in technology or the market. The review process has begun, with staff recently completing a lessons learnt exercise for the 2018 election, and issuing a survey to a group of Ontario municipalities to gather jurisdictional data and uncover best practices, technologies, and methods used in other election areas.

The RFP process has many steps and is guided by the City of Burlington's Procurement By-law and a staff team will be engaged including representatives from the clerks department, procurement, and ITS. The RFP will take some time, providing staff with the necessary direction on a method preference in advance and will assist in the drafting process. When building the technology requirements, staff will endeavor to include sections to ascertain the proposed system's capability. That security, and the protection of personal information, will be major themes that will be throughout the document. Through the RFP submission, each proponent will be required to review the technical requirements, indicate compliance and provide comment. Most technical requirements will be mandatory.

For ranked ballots, a decision to proceed with the consultation with respect to Ontario Reg. 310/16 or not, will also be helpful in drafting the RFP. Should Council choose to proceed with consultation, staff will begin to work on gathering the technical requirements that may be incorporated into the RFP. Further, staff will be proposing to include a dynamic pricing sheet which will require proponents to provide pricing for all types and iterations of elections using multiple methods. This pricing sheet will ensure that in 2025, if Council requests a change the way it provides election services, staff can ensure that the selected vendor can provide the service and that advantageous pricing is secured. Staff anticipate that the RFP will be released during the before the end of this year.

Election Preparedness Public Consultation

The clerks department is also seeking to consult with Council and the public on ideas on potential new policies for the 2022 election. The clerks department will work with the communications department to build an engagement plan. Questions will lean to more open ended to ensure that residents are able to provide their ideas. A summary of all submissions will be provided in a report back to Council. It is anticipated that some ideas may form recommendations on new initiatives or policies for the 2022 election.

Ranked Ballots

On June 9, 2016 the Province of Ontario passed legislative amendments to the *Municipal Elections Act* by way of the MEMA. The MEMA set forth several substantive amendments to the Act, one of which was to provide municipalities the option to offer ranked ballots to electors, which would allow an elector to rank the candidates in their preference. September 16, 2016 Ontario Reg. 310/16 was introduced which provides further guidance on how ranked ballot elections are to be introduced, approved by local councils and administered throughout the electoral process.

On November 28, 2016 Burlington City Council received clerks department report CL-20-16, which provided an overview on the changes made by MEMA and introduced ranked ballots. This report provided a cautious analysis on running a ranked ballot election. Based on a review of the City of London case study (provided later in this report) staff are confident that most concerns raised in 2016 have been addressed. A ranked ballot election may take additional resources and time but can be completed. In response to the report, on November 28, 2016 Council resolved the following:

> "Direct the City Clerk to monitor ranked ballot elections in Ontario and report back to Council with a comprehensive report following the 2018 Municipal Election."

This report will include an update on ranked ballot activities during the 2018 election and is seeking direction on ranked ballots for the 2022 municipal election. Should Council choose to pursue ranked ballots, a public consultation process, in accordance with Reg. 310/16 must be completed by May 1, 2021. Direction provided by Council will allow for the necessary research and planning on ranked ballots to occur to support the public consultation process, and data required to compile the technical requirements that form part of the RFP. Additional analysis on the use of internet voting would be required to ensure the use of both ballots types (physical and internet) voting would be included as part of the report back to Council and the public.

What are Ranked Ballots?

Most municipal elections employ a first past the post methodology when tabulating ballots and declaring an elected candidate. In **first past the post** elections, customarily,

a voter can select one choice per matter. When tabulating the votes, the candidate with the most votes is elected.

In a **ranked ballot system**, voters have the option of selecting up to three candidates, ranking them by preference of their first, second, and third choice. The candidate who achieves the threshold of 50 percent plus one vote is elected. After tabulating the votes, if there is no candidate who meets the determined threshold, then the candidate with the fewest votes is eliminated. The ballots that selected the eliminated candidate as the first choice are now redistributed to the remaining candidates, this time using those voters' second choice candidate. This process is repeated until a candidate who achieves the 50 percent plus one threshold is determined. Legislation dictates that if a council passes a by-law it must pertain to both Mayor and Council seats. There cannot be a difference in voting method between the Mayor and Council.

Benefits of Ranked Balloting

Based on researching electoral reform organizations such as FairVote, an American nonprofit, and election reform advocate, Dave Meslin, author of Teardown: Rebuilding Democracy from the Ground Up, the following are benefits to offering ranked ballots:

- May minimize strategic voting. Voters may be more comfortable voting with their conscious, and not pressured to vote for a particular candidate as to not split the vote.
- Provides more choice for voters, as they can support several candidates who represent their political ideology or beliefs.
- Encourages more candidates. Some candidates may be discouraged to run as they have similar ideologies as a more prominent candidate and therefore may believe they will split the vote. These candidates may add more to the conversation during the election period, however, are often discouraged from running. This often affects minority candidates such as persons of colour and women.
- May discourage negative campaigning as candidates may be required to appeal to a wider electorate as to secure their second or third ranked selections.
- Ranked ballot voting has been linked to more positive campaigning, to the greater satisfaction of electors.

FairVote's website has a listing of American cities that have use ranked ballot voting. Most notably the following:

Berkley, California, total population: 121,000, adopted ranked ballots in 2004 and used in elections since 2010 to elect Mayor and Council.

Cambridge, Massachusetts, total population: 118,000, have had ranked ballots in use since the 1940's, to elect City Council and used for nine-seat city council and six-seat school board.

Minneapolis, Minnesota, total population: 425,000, ranked ballots adopted in 2006 and in use since 2009, used in Mayor and City Council and for various city offices.

Oakland, California, total population: 429,000, ranked ballots adopted in 2006 and in use since 2010 for a total of 18 city offices including mayor and city council.

San Francisco, California, total population: 883,000, ranked ballots adopted in 2002 and in use since 2004 to elect Mayor, City Attorney, Board of Supervisors and five additional citywide offices.

St. Paul, Minnesota, total population, 307 ,000, ranked ballots adopted in 2009, and in use since 2011 to elect the Mayor and City Council.

In addition to municipalities, some organizations such as the Academy of Motion Picture Arts and Sciences (Academy) uses ranked ballot voting to determine its best picture winner. Most Oscar voting (23 categories) implement the first past the post method. In 2009, the Academy doubled the number of best picture contenders, hoping to include a wider variety of nominated films. In addition to increasing the amount of nominated films, the Academy implemented a ranked ballot system.

In a Canadian context, most political party leadership races implement ranked ballots. In addition, at the local level when selecting a representative, most political parties use a ranked ballot system to determine a winner.

The Ontario Municipal Experience

During the 2018 municipal election in Ontario there was low uptake on ranked ballot elections. Two municipalities, the City of Kingston and the City of Cambridge, included questions on their ballots. In 2018, the City of London in Ontario was the only municipality that used ranked ballots, and their experience is used as a case study on the ranked ballot method.

Referendums on Ranked Ballots in 2018

In 2018, the cities of Kingston and Cambridge placed questions on their ballot asking electors if they were in favour of ranked choice voting for Mayor and Councillors. During the election, an extensive education campaign was completed to ensure that the electorate understood the concept of ranked ballots.

After the results were tallied, both municipalities did not achieve the required threshold of a 50% participation required to bind a municipality to a question on the ballot.

However, these cities may choose to take the results under advisement and proceed on the matter as it chooses.

Results			
Municipality	**Yes**	**No**	**Turnout**
City of Cambridge	13,488	10,449	32 %
City of Kingston	20,642	12,161	41%

Although these results were non-binding, staff will monitor these municipalities as the election approaches to determine whether either city has decided to offer ranked ballots.

The City of London Experience

In 2018, London Ontario was the first (and only) municipality in Ontario to use ranked ballots. The municipality offered ranked ballots to 248,212 eligible electors, with 97,947 electors voting, which resulted in a 39% turnout rate (2014 turnout rate was 43%). In addition, about 2/3 of voters chose to use some form of ranking when completing their ballot. The unofficial results were tabulated by the next day, at 3:00 pm, as there were several races that required additional tabulation. Administrators indicated that the results took time as they intentionally slowed down the tallying process on election night into the next day to ensure that validation could occur.

Voting tabulators were driven to the election office and the cards were uploaded at elections central. London used a single elimination method and paused in between each iteration of transfer results to ensure that multiple staff could double check the calculations before uploading each round of results. The mayoral race took time to calculate, as there were 14 rounds of vote tallying, and wards 8 and 13 required seven rounds of run-off votes to determine an elected candidate. In discussion with the administrator, the results could have been more efficient if a batch elimination method had been selected. The batch elimination method means a candidate who has no mathematical chance of being elected during a round is eliminated from the next round, and the subsequent-choice (if any) votes on those ballots are then redistributed. Reg. 310/16 provides the Clerk with the ability to make the determination, on either a single elimination or a batch elimination process, by December 31st in the year before a regular election.

City of London Financial Information

City of London report dated March 19, 2019, indicated that approximately $515,000 in extra costs were attributed to ranked ballots. Their total election spending for 2018 was approximately $ 1.8 M. In discussion with the administrator some of the cost increases could have been attributed to growth.

Auditor: Reviewing the costs attributed to ranked ballots, $150,000 was spent on retaining the expertise of an independent auditor. London's auditor was selected from the United States, where ranked ballots are more common, and the successful firm had direct experience in auditing ranked ballot elections. The auditors were retained by the City of London to review processes and procedures, evaluate the vendor ranked choice voting tabulation set up in accordance with the Ontario legislation, and to assist with acceptance and logic accuracy testing of tabulators and software. During the election period they observed the process and assisted in a post-election evaluation. The City of London administrator commented that the auditor contributions during the electoral process were invaluable and recommended that a municipality should consider an auditor when using ranked ballots for their first time. The use of an auditor is currently under review for the 2022 London municipal election. To offset costs staff would investigate the feasibility of initiating a cooperative group buy with other municipalities using ranked ballots for their first time. This approach may help reduce costs and pool resources from across municipalities.

Public Education Campaign: For the 2018 election, the City of London created a public education campaign which cost about $200,000. The London administrators indicated that using a public education campaign was key in the success of their election. The campaign began in January 2017 and the elections team completed over 160 presentations and demonstrations in the community. Their team took every opportunity to get out in front of the public to explain to the community how the new system worked. In the end these efforts paid off as electors at the polls came prepared with approximately 90% of them knowing of the new system and how to mark the ballot. In addition, the success of the campaign could also be attributed to the low number of spoiled ballots.

The 2017 phase one campaign when London City Council was determining whether to pursue ranked ballots cost approximately $60,000. The 2018 phase two occurred during the election campaign and cost approximately $140,000. Should Council choose to pursue public consultation for ranked ballot elections, a full review of the costs would be conducted. A cost estimate for ranked ballots is a requirement in the Regulation and will be provided to Council and the public through a report.

What about the Regional Chair and School Board elections?

The Regional Chair for the Region of Halton Council is directly elected. In accordance with legislation, ranked ballots must be selected by all lower tier municipalities in order for the Regional Chair to be placed on the ballot as a ranked choice. At this time, none of the lower tier municipal units in Halton Region have resolved to implement ranked ballots for the 2022 election. Both Oakville and Milton have confirmed that they will be using the first past the post method. School boards are out of scope from the legislation, and these matters must be counted as first past the post. Implementing ranked choice voting for Mayor and Council on a composite ballot (all matters on one ballot) while maintaining first past the post for the Regional Chair and school board may present as cumbersome or confusing ballot to an elector at the ballot box, although the London case study indicates otherwise. It may also cause slowdowns at the voting booth at physical in person polling places.

Ranked Ballot Options

In order to assist in the decision-making process, the following options on ranked ballots have been presented. In addition, staff have included a rationale piece for each option that provides some preliminary cost estimates and potential next steps.

Option 1 – Status Quo

Direct the City Clerk to monitor the 2022 Ontario municipal elections, and report back on ranked ballots election experiences.

Rationale: This option allows for staff to observe the actions of the 2022 municipal election to better understand how other municipalities are configuring their ranked ballot elections, and to learn from their experiences. The process is relatively new, with only one Ontario comparator. Staff will endeavor to return to Council with a review on what has occurred, and the lessons learnt by connecting with election administrators after the 2022 election.

Option 2 – Ranked Ballots

Direct the City Clerk to initiate the process as outlined in Ontario Reg. 310/16 with respect to consultation on ranked ballots, and

Return to the Corporate Services, Strategy, Risk & Accountability Committee with a supplemental report outlining an engagement plan, a proposed timeline, and a consultation budget with an accompanying request for withdrawal from the Elections Reserve.

Rationale: This option allows Council to further explore the concept without committing to holding a ranked ballot election. The public consultation process involves staff gathering additional supporting information, holding an open house, a public meeting,

and the approval of a by-law. In addition, there is an extensive public notice process that must be adhered to. A detailed account on the public consultation process is outlined in the next section.

This option would require the clerks department to develop a public awareness campaign. The City of London reported spending approximately $60,000 on the 2017 consultation phase. It is estimated that the City of Burlington may be required to spend approximately $30,000 during the consultation. These costs will be further refined in the supplemental report back to Council.

Option 3 – Place a Question on the Ballot

Direct the City Clerk to initiate the process to place a question on the ballot with respect to ranked ballot voting.

Rationale: This option allows for Council to gauge electors on the option of ranked ballots. For a referendum to be binding it would require a voter turn-out of 50% or more of the eligible electors, with a majority of the respondents voting for one option or the other. This process would require the clerks department to create a public education campaign during the 2022 election. Staff estimate that it may cost approximately $30,000 which will require an increase to the election communications budget. Should council approve this recommendation a detailed report will be provided through the question on the ballot process along with a by-law to authorize staff.

Public Consultation

Ontario Regulation 310/16 sets up a minimum threshold for public consultation. The following summary provides an overview of the consultation that must occur. Should Council approve to proceed with consultation, staff will work on preparing a supplementary report outlining an engagement plan, a proposed timeline and a proposed budget with necessary election reserve withdrawals.

In preparation, staff will work with the communications department to ensure that a strategic engagement plan is developed, to ensure that the stipulations of the Regulation are met. It is anticipated that a Get Involved Burlington page will be created to help manage the project and serve as a resource to residents seeking information on the concepts, status updates and contact information. In addition, staff will monitor other municipalities that are conducting similar engagement to ensure that they are taking a best practice approach.

The City of London spent approximately $60,000 on engagement materials during the consultation phase. Being roughly half the size in population as London, it is reasonable to estimate that a similar engagement campaign could cost the municipality $30,000.

Information Required

The Regulation outlines the information that should be provided to the public in advance of the public open house and the public meeting.

- A detailed description of how the elections would be conducted, including a description of how votes would be distributed to candidates based on the rankings marked on ballots.
- An estimate of the costs of conducting the elections.
- A proposed by-law of a description of the voting equipment and vote-counting equipment, if any, that is being considered.
- A proposed by-law of a single-tier or lower-tier municipality, a description of any alternative voting method being considered.

Open House Required

Before passing a by-law with respect to ranked ballot elections, the Council shall ensure that at least one open house is held on ranked ballots, for the purpose of providing the public an opportunity to review the information and the ability to ask questions in advance of the public meeting. The open house shall be held at least 15 days before the public meeting required by section is held. In addition, the Regulation provides extensive notice provisions which will be adhered to. In accordance, staff will ensure that the information is available at the open house. We are currently working through COVID-19, staff will work with legal services to ensure that what is proposed meets the spirit of the Regulation.

Public Meeting Required

In accordance with the regulation a public meeting is required. In addition, there are specific notice provisions that will be adhered to by the clerks department. Due to COVID-19, the clerks department will work with legal services to ensure that what is proposed maintains the spirit of the regulation.

Council to Pass a By-law

A report and by-law will be presented to a Council meeting for ratification. Staff will ensure that the by-law meets the criteria as set forth in the Regulation. The by-law must be approved by Council by May 1, 2021.

Strategy/process

Working through the report staff have taken the time to review the plan for the RFP process for the 2022 municipal election. A strategic decision has been made to reduce the time in between procurements to ensure that the technical requirements are up to date. In addition, the choice to include a dynamic pricing grid will help to ensure future councils can make changes to the 2026 election if they choose to, and that the

applicable pricing has been secured. The public consultation on future 2022 election policy will serve as a check-in with community. At the November 28, 2016 Council meeting the City was criticized for not consulting with community. It is anticipated that some input may form part of election planning for 2022 and may help to influence the RFP for the 2022 vote tabulation system.

Options Considered

A section on options considered for ranked ballots has been included in the body of this report. In addition, the recommendation does separate optical scanning technology and internet voting, which can allow Council to vote down either option if they choose to do so. Staff would not recommend voting against optical scanning technology, as it would require a hand counted system to be implemented.

Financial Matters:

Should Council direct staff to initiate the public consultation process with respect to ranked ballots, staff will return with a supplemental report which will provide a proposed budget for the consultation. In accordance with legislation, during the consultation staff will be required to provide a detailed breakdown of the costs of ranked ballots during an election.

Should Council direct staff to initiate the question on the ballot process, staff will return with a report and a detailed budget on a public education campaign, when the by-law is presented for consideration.

Through the current budget process, an annual contribution of $160,000 is deposited into the elections reserve and accessed during an election. Should Council approve ranked ballots, the additional costs as provided through the consultation process will be required to be factored into future election reserve contribution amounts to ensure that the 2022 municipal election is adequately funded.

Total Financial Impact

There are a number of costs associated with each ranked ballot option that Committee should be aware. To put these costs in perspective, the 2018 Burlington election cost was approximately $500,000.

Option 1: No cost associated.

Option 2: Estimated $30,000 for the public consultation phase. A preliminary review of the City of London expenses it is estimated that it may cost the City of Burlington about $175,000 to $200,000 extra for ranked ballot voting. A portion of the costs connected to

the auditor may be reduced should the municipality initiate a cooperative procurement to cost share.

Option 3: Estimated $30,000 for the public education campaign to ensure that electors are aware of the concept of ranked ballots.

Source of Funding

Election reserve is provided to support the election costs. Each year there is an annual contribution of $160,000. Should Council pass a by-law to proceed with ranked ballots, the funding model for the reserve will need to be revised to ensure that there are sufficient funds for the 2022 municipal election and any by-elections that may occur.

Other Resource Impacts

Recent re-organizations to the clerks department has reduced FTE resources. A manager position dedicated to committee and election services is no longer a resource in the clerks department. Therefore, should Council choose to pursue ranked ballots, previous Council requests and reviews may need to reprioritize for staff to meet the legislated May 1, 2021 deadline.

Climate Implications

Internet voting and online consultations may reduce the need for travel. Lowered travel rates may help to reduce the carbon footprint associated with voting or attending in-person meetings.

Engagement Matters:

No public consultation was provided in this report. Staff recommends that public consultation be conducted on potential election policy or directives that could be pursued by the clerks department for the 2022 election. Additional consultation may occur dependent on which ranked ballot option is selected, a detailed account is provided through the course of this report.

Conclusion:

Directions provided to staff on the 2022 election framework will assist when creating the RFP for vote tabulation services. By providing early decisions on whether Council wishes to pursue ranked ballots or place questions on the ballot will provide sufficient

time to ensure the public is properly consulted, and that legislative deadlines can be met.

Respectfully submitted,

Kevin Arjoon

City Clerk

905-335-7600 ext 7702

Report Approval:

All reports are reviewed and/or approved by Department Director, the Chief Financial Officer and the Executive Director of Legal Services & Corporation Counsel.