



Hamilton

OFFICE OF THE
AUDITOR GENERAL

Elections Administration Audit

Recommendations

and

Management Response

May 31, 2023

Office of the Auditor General
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Introduction

As a result of the audit completed by the Office of the Auditor General (OAG) with support from Valencia Risk (Valencia) and our Elections Expert (Kris Fletcher, Consultant), many significant opportunities for improvement were identified and a total of 50 recommendations were made.

The Office of the Auditor General requested one high-level management response from management in the Office of the City Clerk. They will be providing the OAG with a detailed response to each individual recommendation within the next few months after they consult with Legal and Risk Management Services, Information Technology, Procurement, Human Resource, and Communications.

Election Preparation and Readiness

Recommendation 1

That consistent with the authority granted to the City Clerk in the *Municipal Election Act*, the City Clerk be granted enhanced corporate signing authority for election related expenditures for a specified time period leading up to and after municipal elections and by-elections.

Recommendation 2

Consider regularly reviewing staffing standards with respect to the number of staff needed at poll locations as informed by consultations with the Province.

Recommendation 3

Consider rationalizing the staffing levels and evaluating the opportunities for savings and reduction of resources through consolidation of poll locations for the next election in response to the persistent challenges of obtaining a sufficient number of staff that arise during each election and with a voter turnout that is consistently 40% or lower.

Recommendation 4

In assessing the future use of online voting, ensure that the costs, benefits and risks are thoroughly evaluated.

Recommendation 5

Improve the training provided to election staff and involve the HR Division in the development and delivery of this training, so that staff adhere to SOP's (standard operating procedures) and are able to effectively activate contingency procedures.

Recommendation 6

Ensure the Communications Division (web strategy and user experience team) are engaged to provide timely advice regarding the layout and organization of the candidate's portal and by completing user experience testing prior to launch.

Recommendation 7

Initiate the procurement process earlier in the election cycle (e.g. early June 2026 at the latest for the October 2026 election).

Recommendation 8

Consider cooperative contracting of elections technology vendors with other municipalities.

Recommendation 9

Consider whether it is feasible in a municipal context to follow the process of Elections Ontario in authenticating Vote by Mail applicants.

Recommendation 10

Consider enhancing selection and suitability criteria for polling locations so that they are clear and transparent to the public and informed by Provincial standards and any available guidance and/or standards from the AMCTO (Association of Municipal Manager, Clerks and Treasurers of Ontario) Elections Working Group.

Recommendation 11

Consider adding dedicated, professional communications resources for a longer period of time before Voting Day.

Recommendation 12

Evaluate and identify election office staffing resources that need to be ramped up sooner, with a particular emphasis on logistics expertise.

Recommendation 13

Working with City management, ensure that the use of internal City resources continues in future elections, and involves appropriate professional support, particularly HR (recruiting and training), and communications (web strategy and user experience).

Technology

Recommendation 14

Ensure IT staff conduct site visits for all polling locations as part of the planning and logistics process for the 2026 municipal election.

Recommendation 15

Until such time as Canadian guidance is available, elections management should adopt the principles outlined in Draft NIST IR 8310 and engage the IT department to ensure the expertise needed to address IT Security and Cybersecurity relevant to the Elections process.

Recommendation 16

In preparation for the next election, it is recommended that the IT Division review the findings from the Elections Technology Report (Appendix “B” to Report AUD23008), and subsequently collaborate with the Office of the City Clerk to begin planning for the next municipal election.

Recommendation 17

When procuring technology services for the delivery of elections, Elections management should ensure that IT security prepares and reviews the technical specifications and IT security/cybersecurity requirements. A lawyer that is experienced in IT contracts should also review the contracts.

Recommendation 18

Elections management should make all team meetings and training sessions mandatory for all staff involved in the Elections process. The IT department should be invited to all training sessions. Training for moving to backup

processes should be improved as well as adherence to standard operating procedures (SOP’s).

Recommendation 19

Elections management should complete a plan for IT Security Vulnerability Assessment and Management. An IT Vulnerability Assessment that is scoped to deal with controls that could be compromised by the most significant Election day threats should then be completed.

Recommendation 20

Elections management should seek professional advice to determine what additional testing of tabulators and other technologies would be prudent to adopt in consideration of that which is already being done by the Elections Team and by Elections Ontario.

Recommendation 21

Elections management should consider improving password security for their electronic technologies by requiring at least one capital, number and character, making passwords more difficult to guess. Municipal credentials would be stronger when paired with a password manager.

Recommendation 22

IT security should assess and enable detection technologies specific to the Elections process and increase monitoring on election day.

Recommendation 23

To protect confidentiality and privacy, Elections management should consider use of a technology appropriate for controlling distribution lists in the Election team’s communications instead of relying on the “bcc” function. This type of technology includes email marketing software tools. Existing solutions may already be in use in other areas of the City of Hamilton and these should be considered first prior to procuring another solution.

Recommendation 24

IT incident response scenarios should be developed and tested in a tabletop exercise. This should be researched and implemented for the 2026 municipal election.

Recommendation 25

Develop more robust contingency plans and processes for the loss or interruption of ePoll book functionality, particularly with respect to when and how to switch to manual backup procedures. Training exercises need to be conducted to ensure the effectiveness of these contingency plans, including a tabletop exercise and easy to understand tools to support staff in the field.

Recommendation 26

Stipulate in contracts with election technology vendors, more stringently, the technical and capacity requirements with a mind to ensuring availability of service and minimization of disruption on Voting Day.

Candidate experience**Recommendation 27**

In order to facilitate their post-election needs, consider consultations with Legal Services regarding recent amendments to the Municipal Elections Act with a view to determining if the Voters List can be made available electronically to candidates after Voting Day, and if not whether the City should advocate to the Province to put such access into effect.

Recommendation 28

Consider a service model that offers more dedicated resources to candidates in order to achieve a higher degree of responsiveness to candidate questions and concerns. Features to consider include a dedicated email address, setting and tracking of service standards, and self-help functionality.

Recommendation 29

Consider a dedicated team, well versed and trained in requirements, to service the needs of candidates.

Recommendation 30

Develop guidelines and information tools to assist candidates in understanding the application of the requirement that they may not use City facilities or property for campaign events unless rented or booked.

Recommendation 31

Consider the development of a process for the e-filing of nominations, third party registration, and financial filings of candidates and third-party advertisers.

Recommendation 32

Consider implementing an electronic appointment management system for booking appointments with the Elections Office for candidate nominations, candidate consultations, vote by mail, proxies, changes to the voters list, etc.

Recommendation 33

With respect to the Sign By-law, provide more communication content to candidates regarding how enforcement is administered, retrieval of removed signs is carried out, and the most common enforcement issues during an election.

Recommendation 34

With respect to the Sign By-law, develop a policy and standard operating procedure(s) for communicating sign removal to candidates and for handling any requests for sign placement guidance at specific locations or addresses.

Recommendation 35

Following on the recommendations of this report, consider a fulsome review of how to improve the entire candidate experience.

Voter/Resident Experience

Recommendation 36

Consider the development of standards for voting hours at retirement and long-term care facilities based on research of other jurisdictions and implement them for the next municipal election in Hamilton. Research should give consideration to Provincial standards and be informed by the AMCTO (Association of Municipal Manager, Clerks and Treasurers of Ontario) Elections Working Group from Elections Ontario in the development of standards for Hamilton.

Recommendation 37

Establish and abide by a service standard for the response time in turning around Vote by Mail applications to vote by mail packages being mailed out.

Recommendation 38

Develop a clear communication procedure to ensure that on election day, poll locations are positively confirmed to be open.

Recommendation 39

Consider a home visit vote program for accessibility purposes.

Recommendation 40

Consider implementing a voters-in-training program (for youth).

Recommendation 41

To improve transparency and accountability to the public, financial information regarding the cost of administering municipal elections and how these costs are broken down and compared to budget should be posted on the City’s website (in an easy to understand format, not only a PDF report) and be more broadly shared with the public. Information from prior elections should also be retained and shared on the website.

Advocacy to the Province of Ontario

Recommendation 42

Advocate to the Province to amend the legislation requiring that polls that open late must automatically remain open past 8:00 pm to make up for the equivalent time lost.

Recommendation 43

Advocate to the Province for clarity regarding the objectives, roles and enforcement of third-party advertisers.

Recommendation 44

Advocate to the Province that Voting Day be held on a day when schools are not in session in order to address concerns about public entry into schools when students are in attendance.

Recommendation 45

Advocate to the Province to increase the amount of time between Nomination Day and Voting Day. One way to accomplish this is to return Nomination Day to the end of July as had been done previously.

Recommendation 46

Advocate to the Province that they be more assistive with legal interpretations of the *Municipal Elections Act*, and procedural requirements, including issuance of guidelines and interpretation notes.

Recommendation 47

Advocate to the Province of Ontario about the need for clarity regarding the responsibility for regulatory oversight of third-party advertisers. Following the determination of a process, ensure that it is communicated so that third-party advertisers and the public understand the roles and procedures for cases of potential non-compliance.

Recommendation 48

Advocate to the Province and/or work with municipal partners toward the development of criteria for assessment of poll location accessibility and general suitability.

Recommendation 49

Advocate to the Province that the endorsement form, Form 2, for candidates obtaining nomination signatures be amended to accommodate collection of more than 25 nominations.

Recommendation 50

Advocate to the Province to provide clarity and guidance regarding when declarations of emergency should be made by a Clerk during municipal elections.

Management Response (Office of the City Clerk, Information Technology, Corporate Services)

Management is largely agreeable with the Office of the Auditor General's audit findings and recommendations. Management requires additional time to review the recommendations, including further discussion with the Office of the Auditor General, in order to coordinate complete management action plans. During this period, Management will assess and identify the potential need for additional resources and efforts, including, staffing, IT security, funding requirements, vendor procurement and contracts, and staff training. Management will provide Management Action Plans to the OAG for review and reporting to Committee and Council on the status of the audit results. In that way, any additional financial commitments, staffing resources, by-law amendments or corporate policy changes in relation to the Municipal Election will come before Committee and Council for consideration as per its authority under the Municipal Elections Act.