



Office of the Municipal Auditor General,
The Corporation of the City of Windsor

AUDITOR GENERAL COMPLAINT INVESTIGATION REPORT

Hiring Practices

February 6, 2026

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Executive Summary

Background

The Office of the Auditor General (AG) received a complaint regarding potential bias and favouritism in the City of Windsor's hiring process. The complainant alleged that qualified external job applicants were not fairly considered for certain positions, and that internal applicants were unfairly prioritized. Concerns were raised about the transparency and fairness of recruitment. The complainant also alleged that acquaintances who had applied for positions with the City experienced similar challenges. The complainant requested a review of the City's general hiring practices to ensure equitable opportunities and effective accountability.

Investigation Approach

The review focused on evaluating whether appropriate recruitment controls, fairness oversight practices, and open communication processes were in place.

As part of this review, the Office analyzed job postings, external recruitment channels, application questionnaires, interview protocols, scoring rubrics, panel composition, and communication with applicants. The assessment emphasized fairness in candidate evaluation and considered potential bias toward internal applicants.

Scope Limitation

The Office was provided limited details by the complainant such as the related concerns pertaining to the complainant's acquaintances. Since it was unclear which stage of the recruitment process the alleged unfair practices relate, the review was conducted on the end-to-end recruitment process.

Additionally, the specific position/posting referenced in the complaint was intentionally not sampled. The outcome of that recruitment effort was not pursued by the Office to preserve complainant anonymity.

No other material limitations prevented the Office from reaching a conclusion regarding the complaint based on the evidence available.

**Summary of
Procedures and
Findings**

The Office of the Auditor General conducted an investigation into allegations of bias and unfairness in the City of Windsor's hiring practices. The investigation focused on whether the City's recruitment and selection processes were designed and operating in a manner that promotes fairness, transparency, and compliance with applicable policies, collective bargaining agreements, and legislative requirements.

The Office reviewed recruitment documentation, job postings, application materials, interview protocols, scoring rubrics, interview packages, and relevant correspondence. Interviews were conducted with Human Resources personnel, and evidence was assessed against established governance and control expectations.

Based on the evidence reviewed, the Office found that the City's hiring processes are structured, consistently applied, and supported by documented controls designed to mitigate bias and ensure fairness. The investigation confirmed that internal applicants are prioritized for certain positions; however, this practice is required under applicable collective bargaining agreements and does not, in itself, constitute unfair treatment or a breach of policy.

While no evidence was identified to substantiate the allegations of improper bias or favouritism, the investigation did identify areas where improved documentation, data consolidation, and communication could further strengthen transparency and reduce perception risks.

Recommendations

No formal recommendations are issued; however, considerations were identified to further strengthen transparency and documentation.

**Complaint
Disposition**

Based on the evidence reviewed, the complaint is not substantiated with respect to improper bias or favouritism; internal candidate prioritization was confirmed as a contractual requirement in certain hiring processes.

**Administration
Comments**

Administration is committed to upholding a fair, rigorous, and equitable hiring process that reflects our Corporate Values of transparency and accountability. We are pleased that the review has confirmed the strength and consistency of our recruitment practices, which are designed to ensure all applicants receive fair consideration and that all processes comply with both internal policies and legislative requirements.

Background Information

The complaint relates to the City of Windsor's municipal hiring process. The high-level flow of this process is noted below:

- Recruitment for City positions follows a structured sequence, beginning with job postings distributed concurrently through internal portals and external job boards to ensure broad visibility. Specific requirements for internal candidate selection vary by position / applicable collective bargaining agreement. The City manages six collective bargaining agreements for unionized employees as well as terms and conditions for non-unionized employees. The agreements vary in job posting process requirements.
- Applicants are required to submit a resume and cover letter, and respond to a standardized questionnaire designed to assess key skills, education, and experience relevant to the position.
- Applications are reviewed by a HRBP and hiring managers, who conduct a shortlisting process based on established criteria.
- Shortlisted candidates are invited to interviews conducted by a panel of two-to-three evaluators, each of whom uses a documented scoring rubric to independently assess candidates on education, experience, and interview performance.
- The assessment typically consists of an objective component (education/experience), along with interview performance.
 - For certain non-union positions, a presentation component may also be present.
 - For union positions, applicants who meet minimum qualifications may also go through a testing process, per collective agreements.
- Interview scores are compiled and tallied by the HRBP, and the results inform the final hiring decision.
- Successful candidates receive a formal offer, while other shortlisted applicants are notified of the outcome.

Regulatory Context:

The City of Windsor's recruitment and selection practices are governed by provincial legislation, including Bill 190, *Working for Workers Five Act, 2024*, which establishes requirements for transparency and timely communication in the hiring process. Beginning January 2026 when the bill came into effect, the City is required to notify all candidates of the outcome of their application or interview within 45 days, ensuring fairness and accountability. The City has updated its procedures to comply with these legislative changes in 2025. The City consistently exceeds legislative requirements by ensuring job postings provide applicants with clear, detailed, and transparent information beyond what is mandated.

At the time of the complaint in 2024, Bill 190 was not yet in effect, and there was no legislative requirement for municipalities to notify all candidates of application or interview outcomes within 45 days. However, clearly aligning policies towards compliance with Bill 190, the City can expect to build trust, reduce perceived bias, and demonstrate accountability in its recruitment practices going forward

Scope & Limitations

Scope of Review

The review focused on the City of Windsor's recruitment and selection process, and the circumstances described in the complaint regarding potential bias, favouritism, and fairness in hiring. The scope included:

- The City's communication practices for advertising job postings and informing candidates of application outcomes.
- The roles and responsibilities for candidate evaluation measures, such as application questionnaires, standardized interview protocols, and documented scoring rubrics.
- The interview process, including panel composition and panelist training.
- The interview assessment methods used to score and assess candidates based on education, experience, and interview performance, and the relative weightings of each portion.
- Internal correspondence among Human Resources (HR) and departmental hiring managers.
- Correspondence from the City to internal and external job applicants pertaining to recruitment decisions and inquiries.
- Human Resources Business Partners' (HRBP) involvement in enforcing policy and guiding hiring managers.
- The review assessed the current end-to-end recruitment process for fairness and transparency, along with seeking to understand the areas of stress and highlighting considerations for improvement.

Limitations

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Additionally, the specific position/posting was not provided by the complainant. To safeguard anonymity, the Office did not pursue the outcome of the recruitment process.

No other material limitations prevented the Office from reaching a conclusion regarding the complaint based on the evidence available.

Contextual Information

The complaint relates to the City of Windsor's municipal hiring process. The high-level flow of this process is noted below:

- Recruitment for City positions follows a structured sequence, beginning with job postings distributed internal portals before external job boards to ensure broad visibility. Specific requirements for internal candidate selection vary by position / applicable collective bargaining agreement. The City manages six collective bargaining agreements for unionized employees as well as terms and conditions for non-unionized employees. The agreements vary in job posting process requirements.
- Applicants are required to submit a resume and cover letter, and respond to a standardized questionnaire designed to assess key skills, education, and experience relevant to the position.
- Applications are reviewed by a HRBP and hiring managers, who conduct a shortlisting process based on established criteria.
- Shortlisted candidates are invited to interviews conducted by a panel of two-to-three evaluators, each of whom uses a documented scoring rubric to independently assess candidates on education, experience, and interview performance.
- The assessment typically consists of an objective component (education/experience), along with interview performance.
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Investigation Procedures

The Office of the Auditor General conducted this investigation to determine whether appropriate controls, oversight practices, and communication processes were in place for municipal hiring, and to assess whether the circumstances described in the complaint could occur under existing practices. Specifically, the Office examined the following:

1. **Communication procedures for job postings and candidate notifications:** Reviewed documents, timelines, and distribution channels used to inform applicants of opportunities and outcomes.
2. **Approval and distribution of job postings:** Assessed both internal and external visibility, as well as posting duration, to ensure broad and fair access.
3. **Controls for fair and unbiased candidate assessment:** Examined application questionnaires, scoring rubrics, and standardized interview protocols for consistency and equity.
4. **Clarity of roles and accountability:** Evaluated responsibilities of HRBPs, hiring managers, and interview panel members.
5. **Assessment and scoring methodology for candidates:** Reviewed how education, experience, and interview performance are weighted and documented.

Findings by Allegation

The following assessment is made strictly from a governance, controls, and process perspective. The ratings (Warranted / Partially Warranted / Not Warranted) indicate whether the evidence available supports or contradicts the allegation. Some allegations may be true in part, yet not constitute a breach of City policy, depending on timing, disclosure, and available controls.

ALLEGATION #1 – Alleged Unfairness in Recruitment and Selection Practices

An applicant alleged that the City of Windsor shows bias and favouritism in the recruitment and hiring process.

Evidence

The investigation included a review of recruitment and selection documentation for a sample of three competitions (two permanent positions and one temporary position). This review included job postings and recruitment channels, applicant submission materials, interview documentation, scoring tools, and relevant training and guidance materials.

Across the samples reviewed, job postings were publicly advertised using both internal and external recruitment channels. Applicants completed standardized application questionnaires and submitted resumes and cover letters. Shortlisted candidates were assessed using documented scoring rubrics and multi-member interview panels. Human Resources Business Partner guidance and interview job aids were in place to support consistency and fairness in the interview process.

The investigation also reviewed available training records for interview panel members and documentation retained to support recruitment decisions.

Investigator's Understanding

The allegation of bias and favouritism in the City's recruitment and selection practices appears to arise primarily from perceptions of unfairness rather than from evidence of improper conduct or non-compliance with established procedures.

The investigation did not identify instances where recruitment controls were circumvented, scoring criteria were manipulated, or hiring decisions were influenced by undisclosed personal interests. Across the samples reviewed, job postings were publicly advertised, standardized application questionnaires were used, and candidates were assessed using documented scoring rubrics and multi-member interview panels.

The evidence demonstrates that the City employs a structured and repeatable assessment framework; however, certain design features may contribute to perception risk among external applicants. Specifically, the use of entirely closed-ended questionnaires does not provide a mechanism for candidates to articulate lived experience during shortlisting, and the significant weighting applied to interview performance—ranging from approximately 60% to 80% across sampled competitions—introduces a higher degree of subjectivity at later stages of the process.

While safeguards such as panel scoring, retained documentation, and HRBP guidance are in place, HRBP participation in interviews is not consistently applied due to operational constraints, and panel

training is not uniformly current. These factors do not undermine the overall fairness of the process, but they may reduce perceived transparency and contribute to ongoing perceptions of bias where applicants are unsuccessful.

From a governance and controls perspective, the City's recruitment framework is designed and operating in a manner that supports fairness and objectivity. The allegation is therefore not substantiated; however, considerations exist to further strengthen transparency, documentation, and applicant understanding of how selection decisions are made.

Allegation Rating

Not warranted (perception risks identified)

Based on the evidence reviewed, the City of Windsor's recruitment and selection processes are generally structured, consistently applied, and supported by documented controls designed to mitigate bias and promote fairness.

Across the sample of competitions examined, job postings were publicly advertised, standardized application questionnaires were used, and candidates were assessed using documented scoring rubrics and multi-member interview panels. No evidence was identified to indicate that recruitment controls were bypassed, scoring criteria were manipulated, or hiring decisions were influenced by improper considerations or undisclosed interests.

While the investigation did not substantiate the allegation of unfairness or favouritism, certain process design features may contribute to ongoing perception risks among unsuccessful applicants. These include the use of closed-ended questionnaires at the shortlisting stage, variability in interview weighting across competitions, and inconsistent participation of Human Resources Business Partners in interviews due to operational factors.

Accordingly, the allegation is not warranted from a governance and policy compliance perspective; however, administration may wish to review considerations that further enhance transparency, documentation, and applicant understanding of how recruitment decisions are made.

ALLEGATION #2 – Alleged Priority Given to Internal Applicants

An applicant alleged the City of Windsor unfairly favours internal applicants when filling vacant positions, thereby creating unfairness towards external candidates.

Evidence Reviewed

The investigation reviewed documentation and correspondence related to the City's recruitment and selection practices, including job posting and application materials, relevant collective agreement provisions, and interview guidance documentation.

The investigation also included interviews with Human Resources management to obtain an understanding of recruitment practices, as well as a review of completed interview packages, including shortlisting documentation, interview materials, and scoring records, to assess whether recruitment and selection processes were applied consistently across the samples reviewed.

Investigator's Understanding

The investigation confirms that the City of Windsor prioritizes internal applicants for certain positions, particularly within unionized roles, as required by applicable collective bargaining agreements. This practice limits external candidate consideration at specific stages of the recruitment process; however, it reflects a contractual requirement rather than discretionary or ad hoc decision-making.

The evidence reviewed demonstrates that once external candidates become eligible for consideration, they are assessed using the same standardized evaluation criteria, scoring rubrics, and interview processes as internal applicants. The use of documented scoring tools, multi-member interview panels, and Human Resources oversight provides safeguards against arbitrary or preferential decision-making.

From a governance and compliance perspective, the allegation is warranted insofar as internal applicants do receive preferential consideration; however, this preference is lawful, contractually mandated, and applied within an established control framework. No evidence was identified to suggest discriminatory, inconsistent, or improper application of these requirements.

Allegation Rating

Warranted (contractual preference confirmed; compliant with requirements)

Based on the evidence reviewed, the City of Windsor does prioritize internal applicants for certain positions, particularly within unionized roles, in accordance with applicable collective bargaining agreements. This prioritization limits external candidate consideration at specific stages of the recruitment process.

The investigation confirmed that this practice is explicitly required under negotiated agreements and is consistently applied. Internal candidate prioritization is therefore a contractual obligation rather than an ad hoc or discretionary practice, and does not constitute a breach of policy or improper conduct.

Once external candidates become eligible for consideration, the evidence demonstrates that they are assessed using the same standardized evaluation criteria, scoring rubrics, and interview processes as internal applicants. The use of documented scoring tools, multi-member interview panels, and Human Resources oversight provides safeguards against arbitrary or preferential decision-making.

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Accordingly, the allegation is warranted insofar as internal applicants do receive preferential consideration; however, this preference is lawful, contractually mandated, and supported by established recruitment controls. No evidence was identified to suggest discriminatory, inconsistent, or improper application of these requirements.

Considerations for Improvement

While current practices are sufficient to address known appearance risk in the hiring process and for achieving the City's talent management objectives, the following considerations support forward looking features common across leading organizations. Cost implications, future workforce needs, and implementation lead times were not assessed and would require consideration in any future evaluation of these features. The considerations provided below are for Administration and do not require action plans or responses.

Consideration 1: Standardize language for qualifications in job postings

Job postings define essential ("must have") qualifications and phrasing for preferred attributes can be standardized through templates and guidance (tiered as required / highly preferred / preferred), with an optional prompt inviting candidates to describe relevant lived experience, if required.

Standardizing this language and tiering—optionally including a brief lived-experience prompt—could clarify expectations for applicants, support consistent and automatable shortlisting, and help demonstrate alignment with collective agreements and documented criteria, while enhancing transparency and inclusivity in future postings.

Consideration 2: Document shortlisting evidence and criteria used

Shortlisting decisions are discussed in formal meetings between the HRBP and hiring manager; documentation of criteria and decision rationale can be captured within existing processes if required.

Implementing a simple, standardized record for each posting (eg. criteria applied, evidence considered, and decision rationale) could enhance transparency and accountability, provide a defensible record in the event of disputes, and support the City's talent attraction objectives in attracting a broader, well-qualified applicant pool.

Consideration 3: Leverage Artificial Intelligence (AI) for shortlisting

Shortlisting is conducted by HRBP and hiring managers and AI-assisted screening can be enabled within JazzHR or by other complementary tools if required to support the existing process.

Configuring criteria-based, AI-assisted initial screening and ranking could help apply standardized criteria consistently, handle high applicant volumes efficiently, surface top candidates for review, and align with established policies and collective agreements, freeing HR capacity for higher-value activities.

Legislation introduced in January 2026 will require employers to disclose use of AI in hiring and selection practices.

Consideration 4: Clarify prioritization of internal candidates for union positions

Collective agreements provide priority consideration for internal applicants in unionized positions; this information can be communicated to applicants in job postings, FAQs, and candidate communications if required.

Explicitly communicating this could set clear expectations, enhance transparency and perceived fairness, reduce follow-up inquiries, and help demonstrate alignment with collective agreements during recruitment.