



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

AUDITOR GENERAL COMPLAINT INVESTIGATION REPORT

Parking Ticket Administration and System

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Executive Summary

Background

A complaint was received regarding the use of the City's mobile parking application and the subsequent issuance of a parking ticket.

The complainant raised concerns that:

1. The mobile parking application may not clearly communicate parking restrictions, particularly when rate periods change or when "maximum time" selections do not align with the actual allowable parking duration.
2. The information presented within the application may not align with posted signage or by-law requirements, creating the potential for misunderstanding by users.
3. A parking ticket was issued shortly after the recorded expiry time, raising questions regarding whether the application provides sufficient clarity to support user compliance.
4. The timing and application of enforcement may not align with user expectations where payment has been made through the application.

These matters are significant because they relate to users' understanding of parking rules, the consistency of information across City systems, and enforcement practices. Where system design, communication, or presentation does not clearly reflect actual restrictions, there is a risk that users may rely on incomplete or misunderstood information, which can impact fairness and public confidence.

The purpose of this investigation is to assess whether the application, signage, and enforcement practices align with City by-laws and provide sufficient clarity to support user understanding and compliance.

Investigation Approach

To assess the allegations, the Office of the Auditor General:

- Reviewed the mobile parking application interface, including rate selection, time presentation, and user prompts.
- Conducted independent field testing of the application under conditions similar to those described in the complaint.
- Reviewed applicable by-laws, posted signage, and enforcement practices.
- Compared application behaviour with observed parking restrictions and time limits.

- Considered the user experience from the perspective of a reasonable user relying on the application to guide compliance.
- Obtained and reviewed information from Administration regarding system configuration and enforcement practices.

Scope Limitation

The role of the Auditor General is to evaluate governance, transparency, and control processes.

This investigation does not assess legal enforceability of parking tickets or adjudicate individual offences. Findings are based on whether City systems and practices provide sufficient clarity and alignment to support informed user compliance.

Summary of Procedures and Findings

To assess the allegations, the Auditor General reviewed the mobile parking application interface, conducted field testing to observe application behaviour under actual conditions, and examined posted signage, applicable by-laws, and enforcement practices.

The investigation did not assess legal liability or adjudicate individual parking offences. Instead, the review considered whether the City's application, signage, and enforcement practices are aligned and whether the presentation of information reasonably supports user understanding and compliance. Particular attention was given to whether application design and communication could contribute to user misunderstanding where parking sessions are affected by rate period boundaries.

Allegation 1: The mobile parking application does not clearly communicate parking duration and restrictions was **Partially Warranted**. While the application functions in accordance with the configured parking rules, key elements that affect actual parking duration—particularly rate period boundaries—are not clearly presented at the point of selection, increasing the risk of user misunderstanding.

Allegation 2: The application does not align with posted signage or by-law requirements was **Not Warranted**. Parking rules are established through signage and by-law, and the application operates in alignment with those rules. Digital messaging may be enhanced but is currently aligned.

Allegation 3: A parking ticket was issued improperly shortly after expiry was **Not Warranted**. The investigation confirmed that enforcement was applied in accordance with recorded expiry time and applicable parking rules, with no evidence of inconsistency or error.

Allegation 4: Enforcement practices are misaligned with user expectations was **Not Warranted**. Enforcement practices were found to be consistent with by-law requirements; however, user expectations may be influenced by application design where restrictions are not clearly communicated.

In summary, while enforcement practices and system configuration were found to be appropriate, limitations in how parking restrictions are communicated within the application may reasonably contribute to user misunderstanding and impact public confidence.

Key Reader Context While the investigation identifies a clarity gap between application presentation and parking restrictions, it is important to note that:

- Parking rules are established through by-law and communicated through posted signage.
- The mobile application functions as a payment tool and reflects configured rate structures.
- Administration has indicated that the application is not intended to replace signage as the authoritative source of parking restrictions.

As a result, the issue identified is not one of system failure or improper enforcement, but rather **how information is communicated and interpreted by users in practice**.

From a governance perspective, where a City-endorsed application is used as part of the parking process, users may reasonably rely on it as a primary source of information. Where that reliance is not fully supported by the application's design, a gap in clarity may arise.

Recommendations: The investigation identified opportunities to improve clarity in how parking duration and restrictions are communicated within the mobile application.

Recommendations focus on enhancing users' understanding at the point of decision-making, particularly when parking sessions are affected by rate-period boundaries.

1. **Clarity – Parking Duration at Point of Decision**
Improve the application interface to ensure that actual parking duration and expiry time are clearly visible at the time of selection, including when “maximum time” options are presented.
2. **Communication – Rate Period Boundaries**
Enhance application messaging to clearly indicate when a rate period transition limits a selected parking duration and that a new parking session is required to extend coverage.

**Assessment of
Administration's
Proposed Actions:**

Management has advised that existing application functionality and parking lot signage already provide users with information regarding parking duration, rate periods, and session expiry. Administration considers the current controls sufficient to support reasonable user awareness of parking requirements and has indicated that it will continue to monitor user feedback and system performance for potential future enhancements.

Based on the information reviewed during the investigation, the Auditor General considers Administration's position to represent acceptance of the residual risk associated with potential user misunderstanding of parking session expiry and rate period transitions. Given the nature of the issue, the availability of information through both the application and parking lot signage, and the costs associated with system modifications, this approach is considered reasonable. Accordingly, no further follow-up is currently proposed beyond Administration's ongoing monitoring activities.

**Complaint
Disposition:**

The complaint is minimally substantiated.

The investigation found that enforcement practices were applied in accordance with by-law requirements and that no improper enforcement occurred.

However, the investigation identified a clarity gap in how parking restrictions are communicated within the mobile application, which may lead to user misunderstandings and undermine transparency and public confidence.

Corrective action should be considered to improve alignment, clarity, and user understanding of parking rules.

Given that the digital solution is a third-party application, the cost of customization and improvements should be weighed against the benefits they provide.

Background Information

The complaint relates to the use of the City's parking payment application and the subsequent issuance of a parking ticket.

The complainant indicated that:

- Payment was made through the mobile parking application using the “maximum time” option
- The expectation was that the selected option represented the maximum allowable parking duration
- A ticket was issued shortly after the recorded expiry time

The complaint raises broader concerns regarding:

- Whether the application accurately and clearly communicates the duration of valid parking, particularly where rate periods change
- Whether users are required to re-initiate payment at rate boundaries without this being clearly communicated
- Whether the combination of application behaviour and enforcement timing may create outcomes that appear inconsistent or unfair from a user perspective

The complaint also includes allegations that:

- Enforcement timing, particularly where tickets are issued immediately following expiry, may create the perception of targeted or opportunistic enforcement
- Parking enforcement activity may be influenced by revenue considerations, including potential increases in activity at month-end or other periods

As a result, the matter raises questions regarding:

- The alignment between application behaviour, posted restrictions, and enforcement practices
- The clarity of information presented to users within both the application and the physical signage
- Whether enforcement reflects a system that users can reasonably understand and comply with
- Whether there is any evidence to support allegations of intentional or revenue-driven behaviour

The complaint reflects both a specific incident and broader concerns regarding how the system operates in practice.

Scope & Limitations

Scope of Review

The investigation included:

- Review of the parking application functionality, including time selection, expiry calculation, and user interface behaviour
- Field validation of application behaviour, including real-time testing of the user experience and notification handling
- Review of posted signage at the relevant parking location and comparable locations
- Assessment of enforcement practices, including timing of ticket issuance relative to payment expiry
- Review of available ticket data and enforcement activity summaries
- Consideration of the issue from a user perspective, including how information is presented and interpreted

Limitations

- The Auditor General does not assess legal liability or adjudicate individual parking disputes
- Findings are based on available documentation, system behaviour, and observed conditions at the time of review
- User intent and individual decision-making cannot be definitively determined
- Analysis of enforcement data was conducted on a sample basis and is not intended to represent all enforcement activity

Contextual Information

Discussion with Administration indicated that:

- While Parking Enforcement may receive this type of complaint, there is not a high volume of such complaints.
- The digital solution is designed to enable those who wish to pay digitally. Other payment methods for parking remain available: cash, debit, and credit cards.
- The digital solution is a 3rd-party solution with limited customer (City) customization.

Parking within the City is governed through a combination of:

- Posted signage indicating time restrictions and applicable conditions
- Digital payment systems, including mobile applications
- Enforcement practices based on compliance with both

Parking zones may include rate period structures, where:

- Parking conditions and pricing change at defined times (e.g., transition from daytime hourly rates to evening flat rates)
- Payment for one period does not automatically extend into a subsequent period
- In observed scenarios, the resulting payment amount for a selected duration may be relatively low when a rate-period boundary limits a session. However, this alone would not necessarily indicate to a user that parking coverage is restricted to the current period, particularly where the application presents a “maximum time” option.

A key principle in parking systems is that users must be able to reasonably understand the conditions under which parking is permitted.

Where digital systems are used:

- The application interface forms part of the communication framework
- Users may rely on the application as a primary source of information regarding parking validity

As a result, the clarity, timing, and presentation of information within the application can directly impact user understanding and compliance.

Where third-party systems are used to facilitate City services, the City remains responsible for ensuring that those systems clearly communicate applicable conditions to users.

Investigation Procedures

The Office of the Auditor General undertook the following procedures:

- Reviewed the parking application interface, including:
 - Time selection process
 - Display of “maximum time,” selected duration, and expiry time
 - Payment confirmation screens
- Conducted field validation, including:
 - On-site observation at the relevant parking location and comparable locations
 - Real-time testing of application behaviour at different times of day
 - Review of user interaction across the full payment process
 - Assessment of notification behaviour and dependency on user settings
- Reviewed posted signage, including:
 - Time restrictions
 - Rate structures
 - Visibility and clarity of information presented to users
- Reconstructed the complainant scenario, including:
 - Time of payment
 - Expiry time generated by the system
 - Timing of ticket issuance
- Assessed enforcement practices, including:
 - Timing of ticket issuance relative to expiry
 - Applicability of grace periods
 - Operational practices of enforcement staff
- Reviewed available enforcement data, including:
 - Sample ticket logs
 - Officer productivity summaries
 - Distribution of ticket issuance over time
- Considered management representations regarding:
 - Application configuration
 - Enforcement practices
 - Operational controls and monitoring

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 – Clarity of Application / User Interface

It was alleged that the parking application did not clearly communicate applicable time limits, resulting in a user reasonably believing that valid payment remained in effect.

Evidence Reviewed

- Parking application interface, including full user flow from entry to payment confirmation
- Display of:
 - “Maximum time” option
 - Selected duration
 - Expiry time
- Field validation testing, including:
 - Real-time use of the application at relevant locations and times of day
 - Observation of user interaction across multiple screens
- Application behaviour in relation to rate period transitions
- Notification functionality and dependency on user device settings

Investigator’s Understanding and Assessment

The parking application allows users to select a parking duration using either a custom time or a “maximum time” option.

Testing and reconstruction of the complainant scenario identified that:

- The “maximum time” option reflects the maximum duration within the current pricing period only, rather than the total allowable parking duration across all applicable periods
- The actual expiry time is not clearly displayed at the point of time selection, and becomes visible only after progressing through multiple steps in the application
- The application does not explicitly indicate:
 - that a rate period boundary (e.g., transition to evening rates) will limit the selected duration
 - that payment must be re-initiated for a subsequent period

Field validation confirmed that:

- Users must progress through multiple screens and actively interpret information to determine the actual parking duration
- Key timing information is present within the application, but is not consistently prominent at the point of decision-making
- Notification functionality may provide additional prompts; however:

- it is dependent on the user device settings
- it is not guaranteed to function in all cases

From a user perspective:

- The term “maximum time” may reasonably be interpreted by a user as representing the maximum allowable parking duration overall
- Where this differs from the actual system behaviour, a user may believe they have valid parking when coverage has expired

From a governance perspective:

- Systems that rely on user interpretation across multiple steps, without clear and timely prompts, increase the risk of unintended non-compliance

Allegation Rating

Partially Warranted (Clarity / User Interface Limitation)

The application functions in accordance with configured parking rules and presents the relevant information within the user flow. However, key elements affecting actual parking duration—particularly the impact of rate-period boundaries—are not prominently communicated at the point of decision-making.

While posted signage establishes the governing conditions, the application design requires users to interpret information across multiple steps, increasing the risk of misunderstanding. This represents a limitation in the clarity of how information is presented, rather than a failure of system configuration.

This limitation concerns how information is presented in the application interface. The relationship between the application and posted restrictions is considered separately under Allegation #2.

ALLEGATION #2– Alignment Between Application and Posted Restrictions

Allegation

It was alleged that the parking application does not clearly align with posted parking restrictions, resulting in users to rely on it in ways inconsistent with actual parking rules.

Evidence Reviewed

- Posted signage at location (time limits, restrictions)
- Application time selection vs allowed duration
- Any system constraints (e.g., max time enforcement)
- Field validation, including real-time observation at the location:
 - Real-time use at the location
 - Comparison between signage and app behaviour

Investigator's Understanding and Assessment

Parking rules are governed by posted signage, which establishes:

- applicable time limits
- rate structures
- conditions under which parking is permitted

The parking application functions as a payment mechanism within those rules, and does not override or replace posted restrictions.

Testing confirmed that:

- Application behaviour is configured in accordance with parking rules, including rate period transitions.
- Payment for one rate period does not extend into a subsequent period and requires re-initiation.

However, field validation identified that:

- The application does not consistently reinforce posted restrictions at the point of user decision-making
- Rate transitions are not explicitly highlighted within the time selection process
- Users are required to interpret:
 - application outputs
 - posted signage
 - rate structurestogether in order to determine a valid parking duration

As a result:

- Users may rely on the application as the primary source of information
- Where the application does not clearly reflect or reinforce posted conditions, a disconnect may occur between:
 - user understanding
 - actual parking rules

From a governance perspective, digital systems that facilitate compliance should reinforce, rather than rely on, external interpretation of governing conditions.

Allegation Rating

Not Warranted (System Alignment / Communication Gap)

Parking rules are clearly established through posted signage, and the application operates in alignment with those rules. There may be an opportunity to improve the digital customer messaging; however no evidence of misalignment was noted.

Allegation 3 – Enforcement Application

Framed Allegation

It was alleged that enforcement was applied despite valid payment having been made, raising concerns regarding fairness and consistency.

Evidence Reviewed

- Payment record and reconstructed timing of the complainant scenario
- Ticket issuance timing relative to recorded expiry
- Applicable parking rules and rate period structure
- Management representations regarding enforcement practices
- Sample enforcement data, including:
 - ticket logs
 - officer productivity reports

Investigator's Understanding and Assessment

Enforcement actions are based on:

- posted restrictions
- observed vehicle presence
- system-recorded payment expiry

Reconstruction of the complainant scenario identified that:

- Payment expired at approximately 6:03 PM
- A ticket was issued shortly after expiry

Evidence confirms that:

- In lot-based parking environments, no grace period applies
- Enforcement officers:
 - do not receive alerts for expiring vehicles
 - must manually check zones and vehicle status

Review of enforcement data indicates that:

- Tickets are issued continuously throughout enforcement shifts
- Multiple tickets may be issued within short time intervals across locations
- This reflects a patrol-based enforcement model, rather than targeted activity

From an operational perspective:

- A ticket issued shortly after expiry reflects:
 - an officer encountering a vehicle during routine patrol
 - enforcement at the point at which the vehicle becomes non-compliant

From a user perspective:

- Immediate enforcement may appear precise or targeted
- However, this perception does not reflect the underlying enforcement process

Allegation Rating

Not Warranted (Procedurally Consistent Enforcement)

Enforcement was applied in accordance with posted rules and system-recorded expiry. No evidence was identified to suggest selective or improper enforcement.

ALLEGATION #4 – Revenue / Quota-Based Enforcement

Allegation

It was alleged that parking enforcement practices may be influenced by revenue considerations, including potential quotas, targeting of expiring vehicles, or increased enforcement activity at month-end.

Evidence Reviewed

- Management representations regarding enforcement practices and performance monitoring
- Enforcement system capabilities
- Sample enforcement data, including:
 - ticket volumes
 - timing and distribution of ticket issuance
- Complaint assertions regarding the timing of the ticket

Investigator's Understanding and Assessment

Management confirmed that:

- Enforcement officers are not subject to quotas or ticket-based performance targets
- Performance monitoring is based on:
 - productivity and use of time
 - not ticket volume

System capabilities were reviewed and indicate that:

- Enforcement officers do not receive alerts for expiring vehicles
- Officers must manually check zones and vehicle status

This limits the ability to:

- systematically identify imminent expiries
- target specific vehicles or timing events

Review of enforcement data identified that:

- Ticket issuance is distributed across time and locations

- Activity reflects continuous patrol-based enforcement
- No evidence of:
 - clustering at specific thresholds
 - patterns consistent with month-end targeting

The allegation appears to be based on:

- the timing of the ticket relative to expiry
- the timing of the event within the calendar period

However, no evidence was identified to support the presence of:

- quotas
- revenue-driven enforcement behaviour
- month-end enforcement practices

Allegation Rating

Not Warranted (No Evidence of Revenue-Driven Enforcement)

No evidence was identified to support the allegation that quotas, revenue targets, or month-end considerations influence enforcement practices.

Recommendations

The recommendations below are intended to improve users' understanding and may be addressed through configuration, communication, or engagement with the system provider, as appropriate.

1. Clarity of Parking Duration at Point of Decision

The investigation identified that:

- The “maximum time” option reflects the current pricing period only, not the total allowable parking duration
- The actual expiry time is not clearly presented at the point of selection
- Users must proceed through multiple steps to confirm the end time

As a result:

A user may reasonably believe they have selected the maximum allowable parking duration when, in fact, coverage ends at a rate period boundary.

This represents a design-related clarity gap that increases the risk of unintended non-compliance.

Recommendation:

Enhance the parking application interface to ensure that the actual parking duration and expiry time are clearly visible at the point of time selection, including when the “maximum time” option is selected.

Administration Response:

The application interface is designed to display parking duration and expiry time details during the time selection process, including when the “maximum time” option is selected. This functionality is intended to support users in clearly understanding how long their parking session will remain valid.

In addition to the information presented within the application, rate periods and maximum parking durations are also communicated through signage in each parking lot to provide users with clear, on-site reference points.

Administration will continue to monitor user feedback and system performance to identify any opportunities to further improve clarity and enhance the overall user experience.

Responsible Party: Commissioner of Infrastructure Services

Due Date: NA

2. Communication of Rate Period Boundaries

The investigation identified that:

- Parking sessions do not extend across rate periods
- The application does not clearly indicate that:
 - a selected duration ends due to a rate transition
 - a new parking session is required

As a result:

Users may not be aware that payment must be reinitiated, contributing to misunderstandings about valid parking coverage.

This represents a communication control gap where system behaviour is not clearly conveyed at the point of decision-making.

Recommendation:

Enhance application messaging to clearly indicate when a rate period transition limits a selected parking duration and that a new parking session is required to extend coverage beyond that point.

Administration Response:

The application currently includes functionality to alert users when a selected parking duration is affected by a rate period transition, including when a new parking session may be required to extend coverage. These notifications are delivered through the app and rely on notification settings being enabled on the user's device.

To support a clear understanding of parking requirements, rate period information and applicable time restrictions are also posted on signage within each lot. This ensures that users have access to key information both within the application and on-site.

Administration will continue to monitor user experience and feedback to identify opportunities for further clarity or enhancements where feasible.

Responsible Party: Commissioner of Infrastructure Services

Due Date: NA

Considerations for Improvement

The following opportunities are broader considerations related to the system's overall user experience and communication. These items do not represent control deficiencies identified through audit procedures and are, in part, influenced by the capabilities and constraints of third-party software.

We provide them for Administration's awareness and consideration in any future discussions with the service provider or system enhancements. These opportunities do not require formal action plans or responses.

Opportunity 1 – Reinforcement of Parking Conditions Within the Application

The investigation identified that while parking conditions are established through posted signage, users may rely primarily on the application when making payment decisions.

Consideration may be given to enhancing how key parking conditions are reinforced within the application interface to improve alignment between:

- application behaviour
- posted restrictions

Opportunity 2 – User Experience and Information Prominence

Information about parking duration and expiry is available in the application; however, it is not consistently prominent throughout the user interaction.

Improving the prominence and consistency of key information may:

- reduce reliance on user interpretation
- support a clearer understanding of parking validity

Opportunity 3 – Notification Awareness

The application includes notification functionality intended to alert users to expiring sessions; however:

- This functionality is dependent on the user's device settings
- It may not be enabled or consistently relied upon

Consideration may be given to reinforcing user awareness of notification functionality and its role in managing parking sessions.

Opportunity 4 – Public Understanding of Enforcement Practices

While enforcement practices were found to be procedurally consistent, the timing of ticket issuance shortly after expiry may create a perception of precision or targeting.

Consideration may be given to:

- enhancing public communication regarding how enforcement is conducted
- clarifying the patrol-based nature of enforcement activities