


INFORMATION REPORT

TO:	Chair and Members Audit, Finance and Administration Committee
COMMITTEE DATE:	Thursday September 22, 2022
SUBJECT/REPORT NO:	Corporate Privacy Program Update FCS22078
WARD(S) AFFECTED:	City Wide
PREPARED BY:	Frances Ruffolo (905) 546-2424 Ext. 6370
SUBMITTED BY:	Andrea Holland City Clerk
SIGNATURE:	

COUNCIL DIRECTION

In January 2021, Council adopted item 4 of the Audit, Finance and Administration Committee Report 21-001:

- (a) That Report FCS21003, respecting the Protection of Privacy Policy, be received;
- (b) That the Protection of Privacy Policy, attached as Appendix “B” to Audit, Finance & Administration Committee Report 21-001, be approved; and,
- (c) That the request for 1 FTE to support the administration of the privacy policy, be referred to 2021 budget deliberations for consideration

The addition of a Corporate Privacy Specialist was subsequently approved by Council to support and educate staff on the City’s legislated requirements to protect the privacy of individuals whose personal information we collect and to maintain the confidentiality of that information in accordance with MFIPPA. This primarily entails disseminating the City’s privacy policy in addition to strengthening and improving privacy practices and procedures currently in place.

INFORMATION

The addition of a Corporate Privacy Specialist has enabled a formal education and training program to be developed for staff about Ontario’s privacy laws in general and the City’s privacy policy and practices more specifically, the following is a non-

exhaustive high-level list of information privacy initiatives completed or currently underway:

- Corporate Privacy Program - Drafted a robust Corporate Privacy Program designed to foster a culture of privacy throughout the City. The Corporate Privacy Program ensures adherence to legislative obligations and requirements and empowers staff to confidently and effectively handle confidential information on a day to day basis, see Appendix A.
- Privacy Committee - Convening a Privacy Committee responsible for overseeing compliance with the Corporate Privacy Program. The Committee is comprised of management level staff who will support the work of the Privacy Program and champion the implementation and maintenance of privacy practices.
- Training / Awareness – Developing a privacy training module to be added to the City's new Learning Management System. The module will be rolled out in a phased approach to designated positions at staff orientation and then annually thereafter. As part of Privacy Awareness Day (January 28th) a tip sheet was created and disseminated to staff highlighting essential privacy practices when working remotely.
- Policies/guidelines – Email Guidelines document created and implemented to provide staff with guidance on protecting the privacy, confidentiality and security of personal information, personal health information, and sensitive organizational information when using email. Currently, drafting a procedure outlining the circumstances and procedures for releasing personal information to law enforcement agencies. The procedure will balance the need to protect the personal information in our custody and control with the need to cooperate with law enforcement agencies as authorized or required by law.
- Data sharing/vendor agreements – developed and embedded Privacy clauses within data sharing agreements thereby standardizing the process of ensuring legislated privacy requirements and best practices are baked into agreements which the City can then hold the service providers/vendors and or partners accountable.
- Privacy Impact Assessments (PIAs) – PIAs are regularly conducted before introducing or changing technologies, information systems, and processes to ensure privacy risks are identified and addressed. Included a requirement for a prospective bidder to submit a completed PIA as part of the Request for Proposal evaluation process when bids involve handling personal information, personal health information and other confidential information. PIAs are also embedded in data sharing agreements and contracts.

OUR Vision: To be the best place to raise a child and age successfully.

OUR Mission: To provide high quality cost conscious public services that contribute to a healthy, safe and prosperous community, in a sustainable manner.

OUR Culture: Collective Ownership, Steadfast Integrity, Courageous Change, Sensational Service, Engaged Empowered Employees.

- Project Management – revised the ‘business request’ process to ensure Privacy is involved right at the start to the completion of any initiative involving information privacy.

APPENDICES AND SCHEDULES ATTACHED

Appendix A to Report FCS22078 – Corporate Privacy Program