

Program/Service Information Report  
**Annual Privacy Program Update**  
**2025**

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**To:** Board of Health

**Meeting Date:** March 4, 2026

**Report No.:** **BH.01.MAR0426.C04**

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## Key Points

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- All requests for information received by WDG Public Health in 2025 were completed by the Privacy Team within 30 days as required by legislation.
- A total of 5 privacy breaches were experienced in 2025. This is a small decrease from 2024 (6 breaches) and remains below pre-pandemic numbers.
- The Privacy Team works closely with managers and staff to ensure that everyone is aware of their responsibilities related to protecting privacy at the Agency.

## Program Requirements

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### Compliance with OPHS and Accountability Indicators:

In compliance

Not in compliance. If not in compliance, provide additional information about the variance and how it will be addressed.

## Highlights

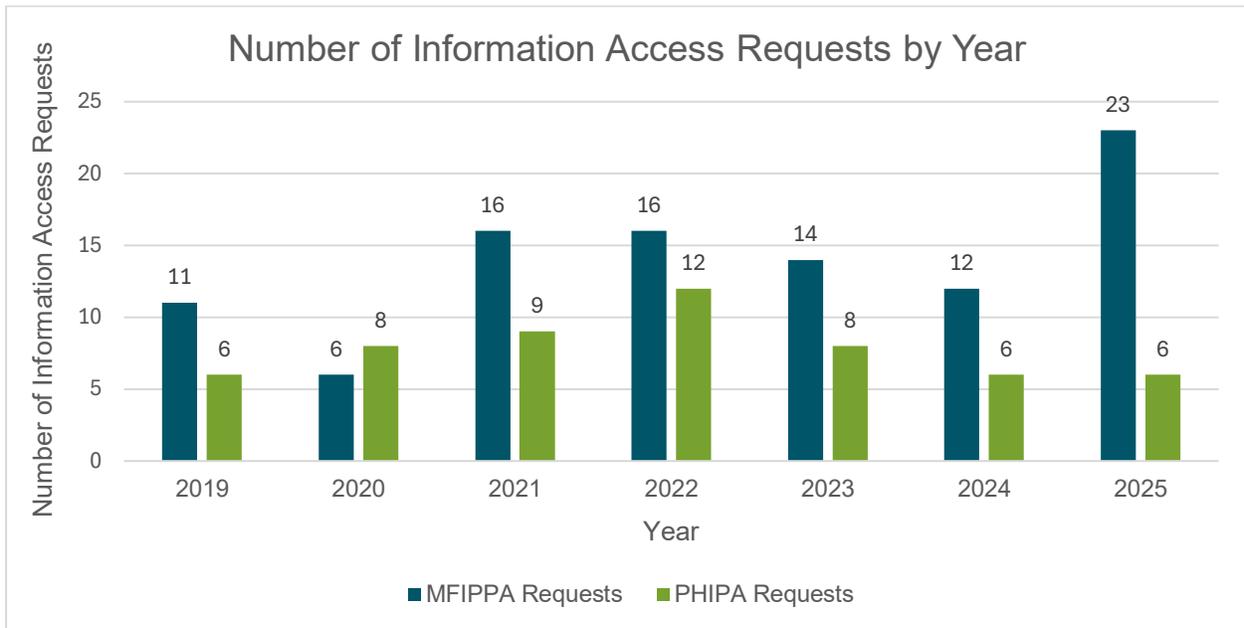
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### Access Requests

Under the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* and the *Personal Health Information Protection Act (PHIPA)*, WDG Public Health is required to provide individuals with access to certain general records and to their own personal and personal health information, with limited exceptions.<sup>1,2</sup> In 2025, WDG Public Health received 23 requests for information under MFIPPA and 6 under PHIPA (Figure 1).

Typically, the Agency receives more MFIPPA-related requests than PHIPA-related requests each year. In 2025, all requests were responded to within 30 days, as required by legislation. The average time required to complete a request was seven days.

**Figure 1:** Number of MFIPPA and PHIPA requests received by WDGPH from 2019 to 2025



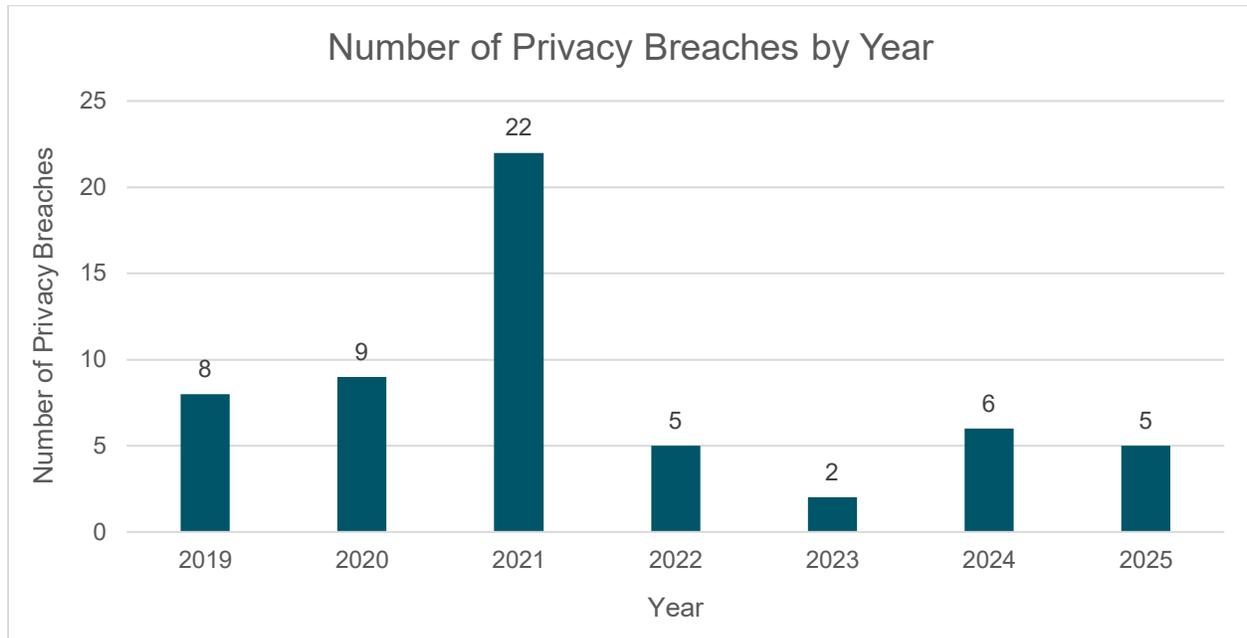
## Privacy Breaches

In 2025, WDG Public Health had five documented privacy breaches (Figure 2). Privacy breaches in 2025 occurred due to misdirected emails or individuals accidentally opening mail not intended for them.

The number of breaches experienced in 2025 was slightly lower than in non-pandemic years. The Agency's Privacy Team works closely with managers and teams who experience a breach to ensure that they are provided with additional training and support. The team also works to develop mitigation strategies to reduce the likelihood of similar breaches occurring in the future.

In 2025, the Privacy Team developed training to help staff better identify and report breaches. This was presented at an all-staff lunch-and-learn. It was also tailored to specific teams and presented at team meetings to allow for more in-depth discussions about specific situations encountered by different teams.

**Figure 2:** Number of documented privacy breaches experienced by WDG Public Health from 2019 to 2025



There were also no major breaches that occurred in 2025. This means that no ‘point-in-time’ reporting to the Information and Privacy Commissioner of Ontario (IPC) was necessary and only the standard annual report submission was required.

### Privacy Impact Assessments

Any new projects or substantial changes to ongoing processes involving personal information or personal health information are subject to the privacy impact assessment (PIA) process. PIAs are a tool used to analyze projects from a privacy perspective and are an important part of ensuring WDG Public Health’s compliance with applicable legislation and privacy standards.

Seventeen PIAs were initiated in 2025. The increase seen between 2024 (7 PIAs) and 2025 reflects the efforts that the Agency has gone to in the past year to innovate our programs and services with new technology. The Privacy Team also worked with the Information Technology Team to ensure that all new software requests can now automatically trigger a PIA, if needed. The Privacy Team continues to ensure that managers and staff are aware of the Agency’s internal PIA process so that any new programming or significant changes to existing programming are thoroughly examined through a privacy lens.

The Privacy Team also worked with internal staff on 23 consultations in 2025. Consultations occurred for reasons such as answering staff questions about privacy legislation impacting

ongoing projects or whether or not it was appropriate to release client information in particular instances.

## Privacy Trends

Provincially, Bill 194, the *Strengthening Cyber Security and Building Trust in the Public Sector Act*, received royal assent on November 25, 2024.<sup>3</sup> This act is especially relevant to public sector entities and their use of AI technologies. Among other things, it requires organizations to inform the public about the use of AI, develop and implement an accountability framework related to the use of AI, and manage risks associated with AI. WDG Public Health has existing frameworks, policies and procedures that govern staff use of AI technology and all AI technology used by the agency has undergone the PIA process. The team also continues to work with staff to build capacity and understanding about how these technologies can be used appropriately.

As of July 1, 2025, Schedule 2 of Bill 194 introduced several requirements for agencies who are governed by the *Freedom of Information and Protection of Privacy Act* (FIPPA).<sup>4</sup> Equivalent updates were not made at the same time to MFIPPA (which would more directly impact WDG Public Health), however Ontario's Information and Privacy Commissioner (IPC) strongly recommended that MFIPPA institutions still take note of and integrate these requirements into their practices.<sup>4</sup> These requirements included steps that WDG Public Health is already taking, such as conducting PIAs before collecting personal information.

The Privacy Team will continue to monitor any new regulations issued under Bill 194 and integrate them into our practices.

## Health Equity Implications

Maintaining public trust is essential for WDG Public Health to effectively deliver its mandate and ensure equitable access to services. Privacy breaches can erode this trust, particularly among marginalized and vulnerable populations already facing barriers to care. When individuals fear their personal health information may not be secure, they may avoid seeking services, exacerbating health inequities.

To address this, WDG Public Health prioritizes a transparent and accountable privacy program. By maintaining a commitment to safeguarding personal information appropriately, the Agency can help ensure that all community members, especially those most vulnerable, feel safe when accessing WDG Public Health services. Protecting privacy is not just a legal obligation but a vital component of promoting health equity in the WDG community.

## References

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1. Ontario Government. Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56. Accessed: 2025-11-14. Available from: <https://www.ontario.ca/laws/statute/90m56>
2. Ontario Government. Personal Health Information Protection Act, 2004, S.O. 2004, c. 3, Sched. A. Accessed: 2025-11-14. Available from: <https://www.ontario.ca/laws/statute/04p03>
3. Legislative Assembly of Ontario. Bill 194, Strengthening Cyber Security and Building Trust in the Public Sector Act, 2024. Accessed: 2026-01-16. Available from: <https://www.ola.org/en/legislative-business/bills/parliament-43/session-1/bill-194>
4. Information and Privacy Commissioner of Ontario. Changes to FIPPA under Bill 194. Accessed: 2026-01-16. Available from : <https://www.ipc.on.ca/en/resources/bill-194-strengthening-cyber-security-and-building-trust-public-sector-act>

## Related Reports

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[BH.01.MAR0624.C05](#) - WDGPH Annual Privacy Program Update

[BH.01.MAR0525.C04](#) – Annual Privacy Program Update

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