Data and AI Governance at WDGPH

To:	Chair and Members of the Board of Health
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Recommendations

It is recommended that the Board of Health receive this report for information.

Key Points

- The new agency Survey Guide standardizes demographic questions to improve interoperability and consistency across programs.
- The data governance initiative has expanded to include AI governance
- In 2026 WDGPH will phase in the NIST AI Risk Management Framework to guide how the agency governs, maps, measures, and manages AI risks.

Background

The Data Governance Committee is a permanent internal group dedicated to overseeing agency data quality, security, and responsible usage. In 2025, the Data Governance Committee oversaw the revision of an agency survey guide. This guide serves to enhance consistency and provide clear guidance for the collection of demographic information across program areas, following evolving best practices.

In 2025, the work of the data governance committee also expanded. The Data Governance committee now covers how WDGPH governs artificial intelligence (AI) use, which includes addressing environmental impacts of AI usage, and managing other risks associated with its use of AI. This has resulted in policy development and selection of the NIST AI Risk Management Framework (RMF), for staged implementation starting in 2026.

Discussion

Updated Survey Guide

The updated Survey Guide sets a single, agency-wide standard for demographic questions in order for programs to collect the same concepts the same way. This guide supports layering of insights across surveys on consistently defined and collected demographic variables, and ensures that this data collection is respectful, and purpose driven.

The Survey Guide draws on Ontario Health, CIHI equity stratifiers, and Census structures to align with broader practice and strengthen equity analyses.

Furthermore, this Survey Guide enables expedited development and review of surveys in which demographic data are collected, and its guidance ensures that collected data can be analyzed easily, with greater reuse of analytical workflow across projects, including shared approaches to assessing data quality and target population representativeness of our surveys.

Differences in demographic data collection through time, even small wording changes, can pose challenges for accurately understanding trends through time on the insights the surveys are designed to collect. This task is harder when multiple standards for demographic data may be in use at a single time. The survey guide will be kept updated as best practices evolve and enables variable mapping across survey cycles to be a much more manageable undertaking.

AI Governance

In 2025, the Data Governance Committee broadened its scope to cover how WDGPH will govern AI uses, set expectations for documentation and oversight, and integrate these practices with existing data quality, privacy, and security work. This aligns with the committee's standing role to oversee agency data policy.

The expansion includes taking a position on and providing guidance for potential environmental harms associated with AI. WDGPH has developed a policy statement on the environmental impacts of AI that commits the agency to balance public-health benefit with energy, water, and hardware footprints. It sets expectations for proportional solutions, vendor transparency, and public communication, and it establishes a basis for delivering practical staff guidance in 2026.

WDGPH has selected the NIST AI Risk Management Framework for staged implementation beginning in 2026 as a playbook for governance of AI solutions. The framework's structure (govern, map, measure, manage) supports clear roles, documentation, and proportionate controls, and it emphasizes trustworthy characteristics such as safety, privacy enhancement, transparency, explainability, validity and reliability, and fairness in AI.

Implementation will focus on simple, high-value actions. Beginning with an agency AI register that records purpose, expected benefit, ownership, and contacts for each use of AI. Project intake can use the AI RMF functions to describe context and affected groups of new AI projects and apply controls matched to risk. The result is clearer accountability for AI, visible environmental commitments, and a repeatable review process that fits a public health setting.

Health Equity Implications

Standardized demographic measures improve WDGPH's ability to identify inequities and monitor change while protecting choice and privacy through respectful design.

AI Governance requires documentation of purpose, benefits, affected groups, and potential impacts for each AI use, aligning with transparency, privacy enhancement, and management of harmful bias in the AI RMF.

Conclusion

WDGPH has consolidated foundations for responsible data practice. The Survey Guide improves interoperability and consistency across programs. Environmental guidance for AI use ensures technology choices reflect public benefit and sustainability, and the adoption of the NIST AI RMF supports the staged expansion of Data Governance to AI Governance at WDGPH.

Ontario Public Health Standards

Foundational Standards

☒ Population Health Assessment

☒ Health Equity

☒ Effective Public Health Practice

☐ Emergency Management

Program Standards

☐ Chronic Disease Prevention and Well-Being

☐ Food Safety

☒ Healthy Environments

☐ Healthy Growth and Development

☐ Immunization

☐ Infectious and Communicable Diseases Prevention and Control

☐ Safe Water

☐ School Health

☐ Substance Use and Injury Prevention

2024-2028 WDGPH Strategic Goals

More details about these strategic goals can be found in WDGPH's 2024-2028 Strategic Plan.

☐ Improve health outcomes

☒ Focus on children's health

☒ Build strong partnerships

☒ Innovate our programs and services

☒ Lead the way toward a sustainable Public Health system

References

National Institute of Standards and Technology. Artificial Intelligence Risk Management Framework (AI RMF 1.0). January 2023.