

Program/Service Information Report
Annual Privacy Program Update
2024

To: Board of Health

Meeting Date: March 5, 2025

Report No.: **BH.01.MAR0525.C04**

Key Points

- All requests for information received by WDG Public Health in 2024 were completed by the privacy team within 30 days as required by legislation.
- Although there was a small increase in the number of privacy breaches experienced in 2024 compared to 2023 (6 breaches compared to 2 breaches), the number was comparable to pre-pandemic rates.
- 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

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.

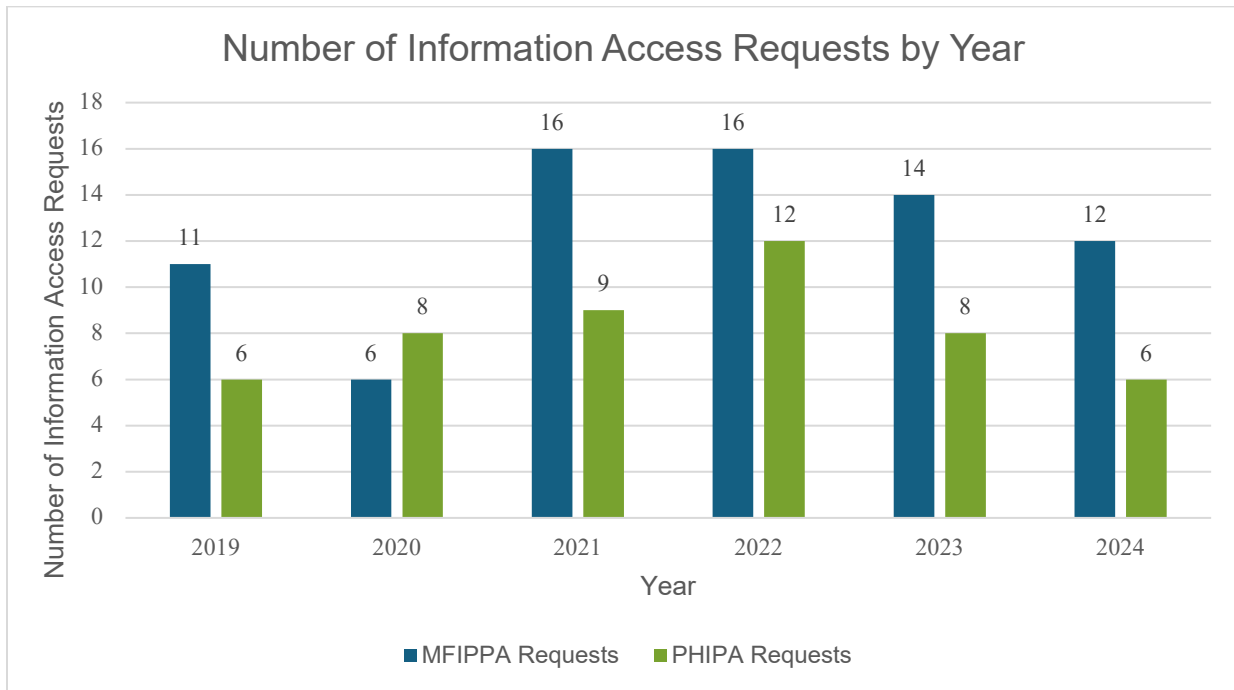
Highlights

Access Requests

Under the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*¹ and the *Personal Health Information Protection Act (PHIPA)*², WDG Public Health is required to provide individuals with access to certain general records and to their own personal information, with limited exceptions. In 2024, WDG Public Health received 12 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 2024, all requests were responded to within 30 days, as required by legislation.

Figure 1: Number of MFIPPA and PHIPA requests received by WDGPH from 2019 to 2024

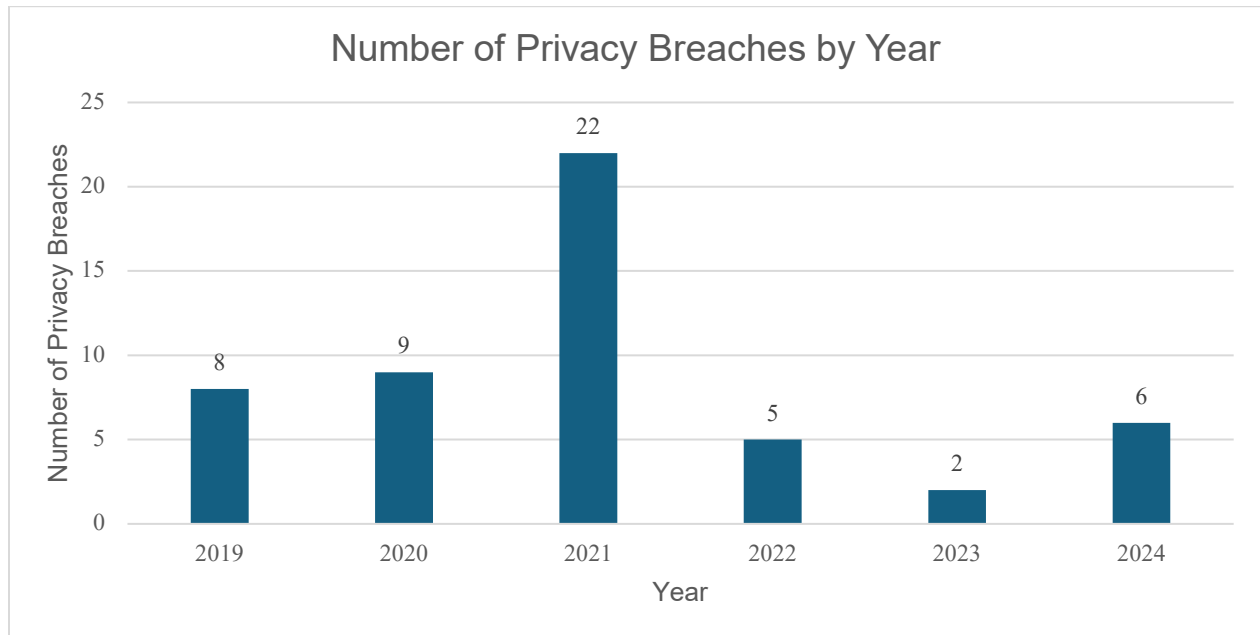


Privacy Breaches

In 2024, WDG Public Health had six documented privacy breaches (**Figure 2**). Privacy breaches in 2024 occurred due to misdirected mail or individuals accidentally opening mail not intended for them.

Despite a small increase in the number of breaches experienced in 2024 compared to 2023, the number remains small in comparison to those seen during the COVID-19 pandemic. 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.

Figure 2: Number of documented privacy breaches experienced by WDG Public Health from 2019 to 2024



There were also no major breaches that occurred in 2024. 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.

Seven PIAs were initiated in 2024. This is a marked decrease from the 16 completed in 2023. Now that programming has returned to pre-pandemic levels there are typically fewer new programs to be established and therefore fewer PIAs to complete. 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.

Privacy Trends

At the federal level, Bill C-27 is currently being considered by the Standing Committee on Industry and Technology.³ The purpose of this bill is to enact the *Consumer Privacy Protection Act* (CPPA), the *Personal Information and Data Protection Tribunal Act* and the *Artificial Intelligence and Data Act* and to suggest amendments to other relevant acts. The CPPA would replace Canada's existing private sector privacy legislation (currently *the Personal Information Protection and Electronic Documents Act (PIPEDA)*). If passed, the CPPA would introduce stricter requirements around consent and data governance at the federal level.

Provincially, Bill 194, the *Strengthening Cyber Security and Building Trust in the Public Sector Act*⁴, received royal assent on November 25, 2024. 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.

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

1. Ontario Government. Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M.56. Accessed: 2025-01-07. 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: 2025-01-07. Available from: <https://www.ontario.ca/laws/statute/04p03>
3. Parliament of Canada - LEGISinfo. C-27, 44th Parliament, 1st session Monday, November 22, 2021, to Monday, January 6, 2025. Accessed: 2025-01-07. Available from: <https://www.parl.ca/legisinfo/en/bill/44-1/c-27>
4. Legislative Assembly of Ontario. Bill 194, Strengthening Cyber Security and Building Trust in the Public Sector Act, 2024. Accessed: 2025-01-08. Available from: <https://www.ola.org/en/legislative-business/bills/parliament-43/session-1/bill-194>

Related Reports

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

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