
Subject: Information Management Accountability Policy

Report to: Corporate Services Committee

Report date: Wednesday, December 8, 2021

Recommendations

1. That the Information Management Accountability Policy (Appendix 1 of Report CLK 11-2021) **BE APPROVED.**

Key Facts

- The purpose of this report is to seek Council's approval of a new corporate policy respecting accountability for information management.
- This policy puts into place requirements based on the *Municipal Act*, *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and the *Personal Health Information Protection Act* (PHIPA).
- Recommendation 5 of the Ontario Ombudsman Report "Inside Job", recommended Niagara Region ensure that all officials and employees with access to personal information understand their obligations under the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA).
- The proposed policy formalizes the approach to the accountability for information management at Niagara Region and supports the development and implementation of information management practices regarding information governance, accountability and openness.
- The proposed policy provides greater clarity respecting the roles and responsibilities of leaders and staff throughout the organization with regard to the accountability for the management of information.

Financial Considerations

There are no financial considerations associated with this report.

Analysis

On November 29, 2019, the Ontario Ombudsman released his report titled "Inside Job" respecting the investigation he conducted regarding the process Niagara Region

undertook in the 2016 hiring of its Chief Administrative Officer. Recommendation 5 of the Ombudsman Report states:

The Regional Municipality of Niagara should ensure that all officials and employees with access to personal information understand their obligations under the Municipal Freedom of Information and Protection of Privacy Act.

In light of the Ombudsman's recommendation, the accountability for management of information and corporate expectations of both leadership and staff regarding the management of information, including personal information, should be more clearly defined. The need to formalize Niagara Region's approach and to clarify accountability for information management was identified.

The Information Management Accountability policy was developed and reviewed as a result of a consultation process undertaken with internal stakeholders at Niagara Region. Recommendations and feedback from stakeholder consultations with staff, including members of Public Health, Legal, Public Works, Community Services, Corporate Administration, Corporate Services and Planning and Development Services, as well as members of the Corporate Leadership Team were incorporated in the policy. This proposed policy has been created in accordance with applicable legislation.

The proposed policy will formalize the following concepts at Niagara Region:

- Information will be recognized as a critical corporate asset.
- Information will be managed with the same consideration as other corporate assets, with all employees sharing the responsibility for the appropriate management of information.
- Information management accountability practices will be integrated into business planning and the delivery of services.
- Information management practices will be reinforced through awareness, training and communication.

The proposed policy will serve as the foundation for establishing information as a corporate asset and define accountabilities for information and the roles and responsibilities for those accountabilities, in compliance with the principles of legislation.

The Information Management Accountability policy will also act as a foundation to the establishment of a corporate information governance approach and will support the

development and implementation of information management policies and practices regarding information governance, accountability and openness.

This proposed policy will formalize some of the current work Niagara Region is doing with regard to accountability for information management, but will also allow for the ability to address areas for improvement.

Timely access to accurate information is crucial to the effective operations of Niagara Region. It is an essential component of operations and business activities. Information that is accurate, useable and accessible supports transparent and accountable regional government, and improves the delivery of programs and customer service.

The proposed policy was created to support the following information management accountability objectives:

- Establish principles for information accountability to enable organizational and operation efficiencies.
- Create a foundation to establish a corporate information governance approach.
- Define roles and responsibilities for information accountability.
- Respond to corporate, departmental and division needs.
- Ensure legislative compliance.
- Ensure information does not become a liability due to it not being managed effectively.

With the implementation of the proposed policy, Niagara Region will adopt the following six principles of information management accountability:

1. Information is recognized as a valuable corporate asset that shall be managed to improve openness and transparency in the delivery of Niagara Regional services and programs.
2. Information is governed and managed as a corporate asset.
3. Information and Information systems shall be accessible to the fullest extent permitted by law, in compliance with legislation and subject to privacy and confidentiality restrictions.

4. All employees of the Region shall be responsible for the proper management of information, including the provision of appropriate access, as defined by legislation or corporate policies, to current, accurate and reliable information.

5. Niagara Region shall protect personal information and privacy.

6. Niagara Region shall provide employees with resources and tools required for compliance with the accountability of information.

These principles are meant to guide Niagara Region in the practice and approach to accountability for information management. A more granular approach to the management of content from which information is created, such as data or records, will be defined in policies and approaches specific to those topics, such as records or data management.

To ensure the understanding of these expectations, Clerk's Office staff will lead an education campaign to ensure all staff are aware of this policy and their individual obligations as defined therein.

Alternatives Reviewed

Council may choose to not approve the policy. This is not recommended given the recommendation from the Ontario Ombudsman respecting staff knowledge and understanding of their roles regarding the accountability for information management.

Relationship to Council Strategic Priorities

The recommendations in this report align with Council's Strategic Priority of Sustainable and Engaging Government.

Other Pertinent Reports

CAO 17-2019 Recommendations from the Ontario Ombudsman Report "Inside Job" November 2019

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Appendices

Appendix 1 C-IMT-XXX (CX.FXX) - Information Management Accountability Policy