



Information and Privacy  
Commissioner of Ontario  
Commissaire à l'information et à la  
protection de la vie privée de l'Ontario

April 11, 2024

**VIA ELECTRONIC MAIL**

Denise Allyson Cole  
Deputy Minister  
Ministry of Children, Community and Social Services  
7<sup>th</sup> Floor, 438 University  
Ave. Toronto, ON M5G 2K8

Dear Deputy Minister Cole:

**RE: Review of the Practices and Procedures of the Ministry of Children,  
Community and Social Services Inter-ministerial Data Integration Unit**

Pursuant to subsection 49.12 (2) of the *Freedom of Information and Protection of Privacy Act* (the Act), the Information and Privacy Commissioner of Ontario (IPC) is responsible for reviewing the practices and procedures of inter-ministerial data integration units (IMDIUs) initially, and at least once every three years thereafter. Pursuant to subparagraph 49.5 (1) 1.ii of the Act, IMDIUs may not begin collecting personal information until the IPC's first review has been completed.

As you are aware, my office has been actively reviewing and providing comments on the practices and procedures of the IMDIU located in the Business Intelligence and Practice Division of the Ministry of Children, Community and Social Services (MCCSS IMDIU). I am pleased to inform you that this review has now been completed.

Please find enclosed the IPC's report, which summarizes the practices and procedures reviewed, together with our findings, recommendations, and orders under subsection 49.12 (7) of the Act. The IPC reserves the use of orders to address the most significant issues which pose the highest risks to privacy and confidentiality. Compliance with binding orders, by or before their stipulated deadlines, is mandatory. I look forward to receiving a report back from MCCSS on these outstanding orders and recommendations, by or before the applicable deadlines.

I commend the staff at the MCCSS IMDIU for their demonstrable commitment to protect the privacy and confidentiality of individuals. I acknowledge the staff's significant efforts in developing operational processes that align with the OPS Data Integration Data Standards, and their cooperation in responding to my office's comments throughout the review process.



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In the interests of transparency, this letter and the enclosed report will be posted on the IPC's website and should also be posted on the website of the MCCSS IMDIU. Should the MCCSS IMDIU have concerns that posting any part of the report would expose the MCCSS IMDIU to significant security risks, please provide your submissions on this specific point to Alexander Firby, Senior Policy Advisor at Alexander.Firby@ipc.on.ca by April 18, 2024. The IPC will take these submissions into consideration in determining whether any redactions will be made before the report is posted publicly.

Sincerely,

A handwritten signature in black ink, appearing to read "Kosseim", with a stylized flourish underneath.

Patricia Kosseim  
Commissioner

Enclosure

cc: Alex Coleman, Assistant Deputy Minister (Acting), Business Intelligence and Practice Division

Binh Lu, Director (A), Data Strategy and Solutions Platform