

To: Community and Operations Services Committee

From: Mary Medeiros, Director, Legislative Services/City Clerk,
Office of the C.A.O.

Report Number: CO-25-42

Date of Report: September 10, 2025

Date of Meeting: September 15, 2025

Subject: Privacy Breach - Recreation Services

Ward: All Wards

File: 03-05

1.0 Purpose

The purpose of this report is to advise of a privacy breach which occurred on June 7, 2025 concerning personal information related to employees in Recreation Services.

2.0 Recommendation

That the Community and Operations Services Committee recommend to City Council:

That based on Report CO-25-42 dated September 10, 2025 concerning a privacy breach in the Recreation Services Branch, the Privacy Response Policy and Procedure be amended to change future privacy breach reporting to an Information Report.

3.0 Input From Other Sources

The following areas assisted in the investigation of the breach:

- Legislative Services
- Human Resource Services
- Recreation Services
- Information Technology Services

4.0 Analysis

4.1 Legislative Overview

The Municipal Freedom of Information and Protection of Privacy Act (“the Act”) provides individuals with a right to request access to information in the custody and control of the City, subject to several limited and specific exemptions. Additionally, it establishes a set of rules intended to protect the privacy of individuals and the personal information they entrust with the City.

Personal information is broadly defined in Section 2(1) of the Act. The following examples are the most common types of personal information collected and maintained by the City:

- the name, address, telephone number, email address, age and gender of an individual;
- information respecting an individual’s employment, medical, criminal and educational history;
- a record of financial transactions in which an individual has been involved; and,
- the personal opinions of the individual, except where they concern another individual.

To protect an individual’s right to privacy, the Act governs how the City may collect, retain, use and disclose personal information which is necessary for the delivery of various City programs and initiatives.

The Act and the obligation to protect an individual’s personal privacy applies to all individuals employed by or acting on behalf of the City, including members of Council, agents, contractors and volunteers.

4.2 What Constitutes a Privacy Breach?

A privacy breach is defined as any unauthorized collection, use or disclosure of personal information in contravention of the Act. Under the legislation, and in accordance with City policies, the City is responsible for ensuring that all forms of personal information in its custody and/or control are properly safeguarded from those not entitled to have access to the information.

4.3 Privacy Breach Response Policy and Procedure

The Council approved Privacy Breach Response Policy and Procedure (“the Policy”) confirms the City’s obligation to protect all personal information in the custody and/or control of the institution. It outlines the immediate actions that must be undertaken whenever a privacy breach is reported, to allow for a prompt, reasonable and coordinated response. A copy of the [Policy](#) is available on the City’s website.

The Policy outlines that a Privacy Breach is to be reported to a Standing Committee of Council with a recommendation to receive the report as there is no action required, it is strictly an information report. For this reason, it is recommended to amend the Policy to change the reporting from a Standing Committee Report to an Information Report which would still be available for members of Council and the public to be apprised of any Privacy Breaches affecting more than 50 individuals or that it is in the public interest to provide such a report.

4.4 June 7, 2025 Privacy Breach

On June 7, 2025, it was brought to the attention of Human Resource Services who informed Legislative Services, that various employees of Recreation Services were contacted without prior permission by an external party using personal contact details (e.g. telephone numbers, email addresses, etc.) obtained from records in the custody and control of the City's Recreation Services branch. The use of the contact information was not for City business.

4.5 Opportunities for Improvement

In light of the finding that a privacy breach occurred, the following recommendations are being implemented to prevent another similar breach from occurring in the future:

- Legislative Services has sought information wherever possible from the responsive branch in conjunction with Human Resource Services and Information Technology Services to construct a chronology of the events in order to determine how the breach occurred, to identify the affected parties involved, as well as to categorize the personal information that was inappropriately disclosed.
- The 257 employees affected by the breach have been notified and informed of their rights under the Act.
- Since staff have been unable to accurately track the source of the breach, all employees in Recreation Services will receive refresher training regarding the City's obligations for the handling of personal information under the Act.
- The Director, Recreation Services, in partnership with Legislative Services, has circulated a reminder to Recreation Services employees to reinforce their responsibilities to ensure the City's compliance with the privacy provisions of the Act.
- Legislative Services has recommended that the Recreation Services Branch undergo a records and privacy review to ensure all personal information is handled and stored appropriately, as required by the Act.

4.6 Notifications

Consistent with the Privacy Breach Response Policy and Procedure, and in an effort to remain transparent and accountable, the affected individuals and Information and Privacy Commissioner of Ontario have been notified of this breach.

5.0 Financial Implications

There are no direct financial implications associated with this report.

6.0 Relationship to the Oshawa Strategic Plan

This report responds to the Oshawa Strategic Plan Priority Area “Lead: Governance and Service Excellence” with the goal to embrace innovation and advance continuous improvement initiatives and actions.

A handwritten signature in black ink, appearing to read 'Mary Medeiros', is positioned above the printed name.

Mary Medeiros, Director, Legislative Services/City Clerk,
Office of the C.A.O.