

TORONTO SHELTER BULLETIN

Bulletin No.: 2025-02

Date Issued: March 19, 2025

**Bulletin
Type:** General Update

Subject: Toronto Shelter and Support Services (TSSS) is Committed to Protecting Client Personal Information and Privacy

Bulletin: This Bulletin is to provide staff with key information related to protecting client privacy and to remind staff of their obligation to report privacy breaches under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) to the City of Toronto.

The City of Toronto is committed to delivering high-quality services that improve the lives of individuals and families experiencing homelessness. As we continue to provide support to shelter users, we must also remain vigilant in safeguarding their personal information and privacy.

To foster continuous best practices, we kindly advise staff to revisit their privacy responsibilities as outlined in the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), Toronto Shelter Standards, 24-Hour Respite Site Standards, SMIS Privacy Guidelines, operating agreements, and the City of Toronto's Protection of Privacy policies. We emphasize the critical importance of maintaining the confidentiality of client data and remind staff to continue to follow their own agency or divisional privacy policies and guidelines.

Here are some key reminders and protocols that should be embedded in your protection of client personal information and privacy policies and procedures.

Notice of Collection

Ensure all service users are informed of the legal authority for the collection of their personal information, the purposes of collection, and the contact information of an individual who can be contacted regarding the collection of personal information and/or privacy questions.

Unauthorized Access:

Protect against unauthorized access to client records and information systems. Ensure that only authorized personnel have access to sensitive data, that access is promptly revoked during staff offboarding, and that appropriate safeguards are

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implemented to protect records and technology applications containing personal information.

Consult with Management:

When in doubt about disclosing client information, consult with your agency's management or designated privacy contact. They can provide guidance on whether the disclosure is appropriate and in compliance with privacy regulations.

Privacy Breach Protocol:

Familiarize yourself with the privacy breach protocol, which outlines the steps to take in the event of a privacy breach. Prompt reporting and action are crucial to minimize potential harm.

Immediate Action: In the event of a privacy breach, shelter staff must take immediate action:

- **Step 1 - Confirm:** Confirm the breach and assess its circumstances, involving a supervisor or shelter manager.
- **Step 2 - Contact:** The shelter supervisor (or SMIS Access Manager/ designate) must contact the TSSS Supervisor Agency Review or their respective Agency Review Officer by the next business day after staff become aware of the breach. The TSSS Supervisor/ Agency Review Officer will then provide guidance on the process.
- **Step 3 - Contain:** Suspend any processes causing the breach and review policies related to the breach.
- **Step 4 - Investigate:** Share information about policies or procedures leading to the breach with the TSSS Supervisor Agency Review and the Agency Review Officer.
- **Step 5 - Document:** TSSS Supervisor Agency Review or the Agency Review Officer will complete the Privacy Investigation Initial Questionnaire, document the breach details, including date, time, place, individuals involved, and mitigation attempts.
- **Step 6 - Mitigation:** Develop and implement mitigation strategies, such as staff re-education, notice letters, policy revisions, and record retrieval.

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Conflict of Interest and Confidentiality:

All TSSS and applicable agency staff should understand their roles and responsibilities under the Toronto Public Service By-Law Conflict of Interest and Confidentiality provisions to avoid and manage conflicts of interest and maintain public trust.

Staff must disclose any potential or actual conflicts to their supervisor or management, or to the Ethics Executive (for Directly Operated Shelters) and consult them if uncertain. Managers are responsible for helping staff address conflicts and can refer them to the appropriate authority for further guidance.

Adherence to Policies and Guidelines:

Continue to adhere to your existing privacy policies and guidelines. According to the Toronto Shelter Standards, 24-Hour Respite Site Standards, and operating agreements, it is essential for service providers to have established policies addressing the privacy, security, and confidentiality of information within SMIS, including its maintenance, uploading, storage, and accessibility.

All TSSS and agency staff are expected to follow the City of Toronto's Protection of Privacy Policy. Service providers are encouraged to develop employee learning plans to promote privacy awareness and best practices, tailored to the complexity and sensitivity of the information they handle and manage, in alignment with the Protection of Privacy Policy.

Thank you for your continued commitment to our clients and for maintaining the highest standards of privacy protection. Your dedication ensures that we can continue to provide important services to those who depend on us.

Please ensure that this Bulletin is shared with all relevant staff as soon as possible and that a hard copy of this document is posted in a highly visible area for ongoing reference.

Resources:

- [SMIS Access Manager Roles and Responsibilities](#)
- [Shelter Management Information System](#)
- [SMIS Privacy Guidelines](#)
- [City of Toronto Protection of Privacy](#)
- [City Information Management Policies and Legislation](#)
- [Conflict of Interest and Confidentiality](#)
- [Toronto Shelter Standards](#)
- [24-Hour Respite Site Standards](#)

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- [Toronto Public Service By-Law](#)
- [Municipal Freedom of Information and Protection of Privacy Act](#)
- [Protecting Privacy on the Job](#)

**Contact
Information:**

For more information about this Bulletin, please contact the TSSS Supervisor Agency Review at hostels@toronto.ca, or reach out to your Agency Review Officer.