



## GPA Global Privacy and Data Protection Awards 2025

### Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards, please complete and email this form to [secretariat@globalprivacyassembly.org](mailto:secretariat@globalprivacyassembly.org) **no later than 16 June 2025**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2<sup>1</sup> applies.

#### 1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection

Authority: Information and Privacy Commissioner of Ontario

Person completing this form: Patricia Kosseim  
*First name* *Last name*

Job title: Commissioner

Email address: [commissioner.ipc@ipc.on.ca](mailto:commissioner.ipc@ipc.on.ca)

#### 2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- ☒ The Authority is a member of the Global Privacy Assembly
- ☒ The initiative described in this entry was undertaken before 16 June 2025.
- ☒ I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

#### 3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- ☐ Education and Public Awareness
- ☐ Accountability
- ☒ Dispute Resolution and Enforcement
- ☐ Innovation
- ☐ People's Choice

<sup>1</sup> [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

#### 4. DESCRIPTION OF THE INITIATIVE

**a. Please provide a brief summary of the initiative (no more than 75 words)**

A first in Canada, the Information and Privacy Commissioner of Ontario (IPC) has the authority to impose administrative monetary penalties (AMPs) in the health sector. These AMPs can be imposed directly against individuals and organizations who contravene Ontario's health privacy law (PHIPA). To be transparent about how we intend to apply AMPs, the IPC issued a **guidance document** and an **animated video** that explain our approach to enforcement: pragmatic, fair, and proportionate.

**b. Please provide a full description of the initiative (no more than 350 words)**

Effective since 2024, this new enforcement authority to impose AMPs is intended to give Ontarians confidence that there are effective mechanisms to encourage compliance with PHIPA and deter against threats to their personal health information.

On the day the regulation came into force, the IPC released guidance setting out a comprehensive roadmap of how the IPC intends to exercise these new powers. The guidance explains what we may consider when issuing AMPs, as well as the factors that will inform the amount imposed on a case-by-case basis.

The IPC's enforcement model for AMPs is adapted from the "just culture approach", commonly used in the health sector to address medical errors. This approach uses a gradation of responses to foster a culture of learning, continuous improvement and accountability. It emphasizes the value of reporting and learning from errors that occur in complex systems, reserving more severe consequences for recalcitrant behaviours where stronger responses are necessary.

Similar to medical errors, privacy breaches can be the result of honest, one-off mistakes, while others may be due to more repeated or systemic issues. In yet other cases, privacy breaches may result from reckless or negligent behaviour, or even deliberate and maligned intention.

The IPC's enforcement approach under PHIPA was modelled after this "just culture approach" to reflect the plurality of situations that may give rise to privacy breaches. It includes a range of tools to be used in a just and proportionate manner, depending on the severity of the circumstances. The toolbox includes: awareness-raising and education, advice and recommendations, early resolution and mediation, binding orders, AMPs, and in the most serious of cases, referral to the Attorney General for prosecution of offences that may result in significant fines and imprisonment.

The IPC's guidance explains, in clear language:

- What AMPs are, and what they are intended to achieve

- When AMPs might be issued, using concrete examples
- How the IPC will determine the quantum of AMPs depending on a number of explicit factors

To accompany the guidance document, the IPC also released an [animated video](#) to explain and raise awareness of AMPs in the health sector.

**c. Please explain why you think the initiative deserves to be recognised by an award**  
(no more than 200 words)

IPC's AMP guidance was designed to uniquely map onto the "just culture approach" used in the health system to deal with medical errors. By resonating with a regulatory approach already familiar to most health institutions, our intention was to secure early buy-in and understanding. Ultimately, we want to support compliant behaviour in a fair and proportionate manner -- not create a chill against reporting breaches for fear of undue punishment.

IPC's AMP guidance provides health institutions with clear guidance on what they can expect as we implement this new enforcement authority, while at the same time assuring individuals that there is a strong regulatory framework in place to protect their personal health information.

These aims foster [trust in digital health](#), one of the IPC's key strategic priorities. Our goal is to promote confidence in the digital health care system by guiding custodians to respect the privacy and access rights of Ontarians, and supporting the pioneering use of personal health information for research and analytics to the extent it serves the public good.

Written in accessible language, this document makes it easy for both institutions and the public to discern key takeaways about AMPs and how they will be implemented.

**d. Please include a photograph or image, if you wish** (This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)





- e. Please provide the most relevant link on the authority's website to the initiative, if applicable (*The website content does not need to be in English*)

[Administrative Monetary Penalties: Guidance for the Health Care Sector](#) (guidance document)

[IPC FYI – A Guide to AMPs](#) (video)

- f. Please provide any other relevant links that help explain the initiative or its impact or success (*e.g. links to news reports or articles*):

[Administrative monetary penalties under the \*Personal Health Information Protection Act\*](#) (notice)