**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 **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[[1]](#footnote-2) applies.

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| 1. **CONTACT DETAILS FOR THIS ENTRY**
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| Privacy/Data Protection Authority: | Information and Privacy Commissioner of Ontario (IPC) |
| Person completing this form: | Patricia | Kosseim |
|  | *First name* | *Last name* |
| Job title: | Commissioner |
| Email address: | commissioner.ipc@ipc.on.ca |

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| 1. **ELIGIBILITY**
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| By submitting this entry, I confirm that (*please tick all boxes to confirm)*:  |
|[x]  The Authority is a member of the Global Privacy Assembly |
|[x]  The initiative described in this entry was undertaken before 16 June 2025. |
|[x]  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. |

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| 1. **CATEGORIES**
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| 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 |
|[x]  Accountability |
|[ ]  Dispute Resolution and Enforcement |
|[ ]  Innovation |
|[ ]  People’s Choice |
| 1. **DESCRIPTION OF THE INITIATIVE**
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| 1. **Please provide a brief summary of the initiative** *(no more than 75 words)*
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| Public sector organizations increasingly rely on data processors to deliver services, but this reliance can present privacy and security concerns. In 2024, the IPC published guidance on third-party contracting with practical advice to help organizations build privacy and security into these arrangements. It includes best practices and recommendations to support accountability for personal information throughout the entire procurement process and help drive stronger privacy due diligence and governance practices. |

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| 1. **Please provide a full description of the initiative** *(no more than 350 words)*
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| The IPC developed guidance for third-party contracting practices that addresses the privacy, security and transparency concerns associated with outsourcing. We drew inspiration from past findings and decisions of our tribunal and consulted extensively across different sectors throughout the province to get their practical input. Organizations can outsource data and services, but not accountability. We encourage organizations to use this guidance to better understand the privacy and accountability obligations that continue to rest with them, even when they contract out certain data processing functions. The IPC’s guidance is intended to help organizations exercise due diligence and demonstrate the measures they have taken to ensure that privacy and security issues are addressed throughout the procurement process, from planning right up to and including agreement termination. The guidance document is organized according to five key stages of procurement:* Part 1: **Procurement planning** outlines considerations when identifying and evaluating business needs and planning to engage a service provider.
* Part 2: **Tendering** outlines considerations when developing or reviewing tendering documents, such as requests for proposals.
* Part 3: **Vendor selection** outlines considerations for access and privacy during the evaluation and award stages of the procurement process.
* Part 4: **Agreement** outlines considerations when entering into an agreement with a service provider.
* Part 5: **Agreement management and termination** outlines considerations for the duration of an agreement related to its management, monitoring, enforcement and termination.

This third-party guidance supports our strategic priority of [Privacy and Transparency in Modern Government](https://www.ipc.on.ca/en/about-us/privacy-and-transparency-in-a-modern-government). Our goal is to advance Ontarians’ privacy and access rights by working with public institutions to develop bedrock principles and comprehensive governance frameworks for the responsible and accountable deployment of digital technologies. This contracting guidance helps organizations exercise due diligence and maintain accountability throughout the entire procurement process. It promotes responsible and transparent deployment of digital technologies by public sector institutions, even when relying on private sector partners to process personal information on their behalf.While institutions may have all the right contractual provisions in place, without robust due diligence practices throughout the procurement process, they may overlook significant risks and fail to take necessary measures to mitigate them.  |

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| 1. **Please explain why you think the initiative deserves to be recognised by an award***(no more than 200 words)*
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| Many jurisdictions have contracting guidance and model service agreements, but contracts are no longer enough. Outsourcing must now be supported by robust due diligence and oversight practices to uphold the highest standards of accountability throughout the entire procurement process.Timely: Today’s outsourcing practices and complex data flows are blurring lines of custody and control. More than 35% of data breaches [globally](https://securityscorecard.com/resource/global-third-party-breach-report/) involve third-party suppliers or vendors. These breaches can damage reputation and trust --and highlight the need for robust third-party risk management programs. Unique: Each year, Ontario public sector institutions spend $29 billion on goods and services, including to process personal data. Yet, there is little current guidance available to help them meet their privacy obligations. In response, our guidance establishes a standard for due diligence, oversight, and effective governance.Useful: Based on best practices, our guidance covers all stages of procurement and is written in clear and accessible language. It aligns with existing Ontario government procurement directives and response by regulated entities has been highly positive to date.Universal: Our guidance was designed for use by the Ontario public sector but can be adapted to meet the needs of any organization, public or private, in any jurisdiction.  |

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| 1. **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)*
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| A close-up of a person typing on a computer  Description automatically generated  |
| 1. **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)*
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| Privacy and Access in Public Sector Contracting with Third Party Service Providers<https://www.ipc.on.ca/en/resources-and-decisions/privacy-and-access-public-sector-contracting-third-party-providers>  |
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| 1. **Please provide any other relevant links that help explain the initiative or its impact or success***(e.g. links to news reports or articles):*
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| A good example of the direct relevance of this guidance is illustrated by this recent investigation into the use of facial detection technology in smart vending machines on university campuses: <https://decisions.ipc.on.ca/ipc-cipvp/privacy/en/item/521985/index.do>The IPC’s outsourcing guidance has been referred to and discussed by many privacy experts and practitioners in the sector: IAPP Canada Symposium Workshop (Sunday 11 May 2025): *A Holistic Approach to Third-party Vendor Management*) A major international privacy organization designed a half-day vendor management workshop around the procurement stages in the guide. <https://iapp.org/conference/past-conferences/CPS25/>Borden Ladner Gervais Law (7 June 2024)*New outsourcing guidance by Ontario public sector privacy regulator*<https://www.blg.com/en/insights/2024/06/new-outsourcing-guidance-by-ontario-public-sector-privacy-regulator> Lerners Law (7 June 2024) *The IPC Provides New Guidance to Public Sector Entities*<https://lerners.ca/lernx/privacy-access-considerations-when-contracting-with-third-parties-ipc-new-guidance-public-sector> INQ Law (20 June 2024)*Navigating Privacy and Access in Public Sector Contracts*<https://www.inq.law/post/navigating-privacy-and-access-in-public-sector-contracts> Mondaq (21 June 2024)*You Are The Company You Keep: Managing Third Party Privacy Risk*<https://www.mondaq.com/canada/privacy-protection/1481764/you-are-the-company-you-keep-managing-third-party-privacy-risk> |

1. [GPA Rules and Procedures](https://globalprivacyassembly.org/wp-content/uploads/2020/10/GPA-Rules-and-Procedures-October-2020.pdf), 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. [↑](#footnote-ref-2)