



## **BOARD REPORT**

**REPORT No.:** 2026-17

**MEETING DATE:** MAY 21, 2026

**SUBJECT:** PROTECTION OF PRIVACY POLICY – TWOMO ELECTION

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### **RECOMMENDATION**

THAT with respect to Report No. 2026-17 (Corporate Services Division) we, The District of Thunder Bay Social Services Administration Board, approve the revised Protection of Privacy policy as attached;

AND THAT the Chief Executive Officer be authorized to amend the Protection of Privacy policy with respect to housekeeping items, as may be required from time to time.

### **REPORT SUMMARY**

To provide The District of Thunder Bay Social Services Administration Board (TBDSSAB or the Board) with a revised Protection of Privacy Policy for approval.

### **BACKGROUND**

The TBDSSAB Board of Directors is made up of members of council from the 15 municipalities in the District of Thunder Bay, with one seat reserved for a representative of the Territory Without Municipal Organization (TWOMO). TBDSSAB is responsible for administering the TWOMO Election for the District of Thunder Bay alongside the municipal election. The 2026 municipal and TWOMO elections will be held on October 26, 2026.

Elections Ontario – Guidelines for the Use of Editorial Products and the Election Act, list products for provincial electoral purposes will only be provided to registered political parties, registered candidates and MPPs that have developed and implemented a privacy policy that has been approved by and on file with Elections Ontario.

In order to participate in the TWOMO election process, TBDSSAB must file an updated privacy policy with Elections Ontario.

## COMMENTS

Privacy policies approved by and on file with Elections Ontario will be valid for a 12-month period from the date the policy is signed by the political entity's Chief Privacy Officer. The Privacy Policy / Procedure must be reviewed on a regular basis, as policies will only remain valid with Elections Ontario up to 12 months. A 12-month extension may be requested after which a new privacy policy is required.

## STRATEGIC PLAN IMPACT

There are no direct correlations with the current Strategic Plan with this report.

## FINANCIAL IMPLICATIONS



There are no immediate financial implications for TBDSSAB with the approval of the Protection of Privacy Policy.

## CONCLUSION

It is concluded that the draft Protection of Privacy Policy be approved by the Board as presented.

## REFERENCE MATERIALS

- Attachment #1      POL CS-04:06 Protection of Privacy- Draft
- Attachment #2      PCR CS-04-66-10 TWOMO Privacy Measures - Draft
- Attachment #3      PCR CS-04-66-10 TWOMO Privacy Measures (Appendix) – Draft

PREPARED BY:	Richard Jagielowicz, CPA, CA, CBV – Director of Corporate Services
SIGNATURE	
APPROVED BY	Richard Jagielowicz, CPA, CA, CBV – Director of Corporate Services
SIGNATURE	
SUBMITTED BY:	Ken Ranta, Chief Executive Officer

**POLICY**

CATEGORY/SECTION

**CORPORATE SERVICES -  
INFORMATION SERVICES**

SUBJECT

**FREEDOM OF INFORMATION AND  
PROTECTION OF PRIVACY**

**AUTHORITY**

*Municipal Freedom of Information and Protection of Privacy Act, R.S.O 1990 (MFIPPA)*  
[\*Municipal Elections Act, 1996, S.O. 1996, C. 32, Sched.\*](#)

**INTENT OF POLICY**

To follow Section 1 of the [MFIPPA](#) statute to provide the right to access to information under the control of The District of Thunder Bay Social Services Administration Board (TBDSSAB) in accordance with the principle that information should be available to the public and necessary exemptions from the right of access should be limited and specific.

~~And to follow the guidelines of the Municipal Elections Act to ensure all staff, contractors and sub-contractors or any other agency acting on behalf of TBDSSAB in the capacity of conducting a Territory Without Municipal Organization (TWOMO) Election understands the responsibility to safeguard election information. To protect the privacy of individuals with respect to personal information about themselves held by TBDSSAB and to provide individuals with a right of access to that information.~~

~~To protect the privacy of individuals with respect to personal information about themselves held by TBDSSAB and to provide individuals with a right of access to that information.~~

**POLICY**

It is the policy of The District of Thunder Bay Social Services Administration Board to abide by the sections of the *Municipal Freedom of Information and Protection of Privacy Act* that apply to TBDSSAB.

**RELATED PROCEDURES**

CS-04:6-1 Request for Access / Correction of Information.

[CS-04:66-2 Off-Site Information Asset Access](#)

[CS-04-66-3 Records Destruction](#)

[CS-04-66-5 Data Breach](#)

[CS-04-66-6 Missing File / Document](#)

[CS-04-66-9 Clean Desk Clean Screen](#)

IMPLEMENTATION / BOARD APPROVAL DATE:

**March 28, 2013**

REVISION DATE(S): [May 21, 2026](#)

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CATEGORY/SECTION

**CORPORATE SERVICES - INFORMATION SERVICES**

SUBJECT

**PROTECTION OF PRIVACY**

CS-04:66-10 Territory Without Municipal Organization (TWOMO) Privacy Measures

**REFERENCE**

Elections Ontario, Guidelines for the use of Electoral Products, January 1, 2024

**AUTHORITY AND RESPONSIBILITY:**

Manager, Information Services, and Chief Privacy Officer ensures privacy policy and related procedural compliance by all TBDSSAB staff, contractors, sub-contractors and agents.

**Authorized Signature(s)**

Michael Shafirka

Date

~~X-Committee Review Date: YYYYMonDA~~  
IMPLEMENTATION / BOARD APPROVAL DATE:

**Month date, YYYY March 28, 2013**

REVISION DATE(S): May 21, 2026

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**THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD**

<b>PROCEDURE</b>	<b>PROCEDURE NAME</b>	Territory Without Municipal Organization (TWOMO) Election Privacy Measures
	<b>PROCEDURE NUMBER</b>	CS-04:66-10
	<b>PROCEDURE SECTION</b>	Information Management
	<b>POLICY REFERENCE</b>	CS-04:6 Protection of Privacy
	<b>REVISION DATE</b>	NEW
	<b>SUPERSEDES</b>	n/a
	<b>IMPLEMENTATION DATE</b>	May 22, 2026

**PROCEDURE STATEMENT:**

Elections Ontario requires all entities conducting elections to provide acceptable policies and procedures on the use of elector's personal information prior to receiving extracts from the permanent and absentee registers. Political Entities wishing to receive the annual release and list of electors must submit a Privacy Policy & Procedure. Privacy policies approved by and on file with Elections Ontario will be valid for a 12-month period from the date the policy is signed by the political entity's Chief Privacy Officer.

This procedure applies to all The District of Thunder Bay Social Services Administration Board (TBDSSAB) employees, contractors and sub-contractors or any other agency acting on behalf of TBDSSAB in the capacity of conducting a Territory Without Municipal Organization (TWOMO) Election whether paid or unpaid. Its purpose is to ensure appropriate safeguards are in place for use of the electors' information, tracking and distribution of Election List Products and obtaining signed written acknowledgement forms from recipients before disclosure to other authorized persons.

**DEFINITIONS:**

List Products: Any lists containing electors' personal information made available by Elections Ontario, upon request, and include the Register Annual Update and the Lists of Electors.

List of Electors: Any list created from the Register or Absentee Register that is available upon request to registered political parties, candidates and municipal clerks for electoral purposes.

Procedure: TWOMO PRIVACY MEASURES

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**PROCEDURE:**

1. Limitation of use applies to both electronic and hardcopy. Only those required to see the information are permitted access. Use can include the examination of information without taking copies. For example: visual verification from an elector not already on the voters' list.
2. A spreadsheet will be maintained by the Executive Assistant of the CEO's Office to track the distribution of Election List Products
3. The use of electors' personal information is for electoral purposes only. It is an offense under the Elections Act to use electors' personal information for commercial purposes (Section 17.4(1)). Use in any unauthorized manner is punishable by a fine of up to \$5,000 (Section 97).
4. Any and all individuals that are or could be using electoral information must sign a written Elections Privacy Acknowledgement (see Appendix A).
5. The Privacy Policy, CS-04:6 Protection of Privacy, and Procedure must be published on TBDSSAB's website within 30 days of receiving an approval confirmation from Elections Ontario; Elections Ontario will also publish the TBDSSAB Privacy Policy/ Procedures on its website.
6. The Privacy Policy / Procedure must be reviewed on a regular basis, policies will only remain valid with Elections Ontario for a maximum of 24 months, after which a new privacy policy is required.
7. If at any point the privacy policy or its Chief Privacy Officer changes, a new privacy policy must be submitted to Elections Ontario for review and approval.

**Security Measures:**

1. All information used in the TWOMO election, when not in use will be kept secure through password protection for electronically held documents, or for hardcopies by keeping records in a locking fire-proof cabinet. Additional safeguards such as anti-virus software and firewalls are updated regularly.
2. Documents in transit will be securely packaged in a locking bag while electronic information is to be encrypted with a strong password (i.e. if accessed from a laptop).
3. Election List Products are not to be stored on shared computers and are not to be sent by unencrypted email nor by fax.
4. When working at locations outside the office, employees, volunteers, contractors, or agents of TBDSSAB must maintain constant control of wired and wireless devices and care must be taken to prevent loss or theft.

**Breach Management:**

1. To prevent unauthorized parties from accessing electoral information, the Chief Privacy Officer (CPO) will assume responsibility for safeguarding the electoral products by communicating privacy measures to TBDSSAB staff, contractors, sub-contractors and agents and instilling the importance of protecting the privacy of electors' information. In addition, all individuals working on the TWOMO election will sign the Election Privacy Acknowledgement form in Appendix A.
2. Any unauthorized or suspected unauthorized access to, use of, and / or disclosure of the elector's personal information is considered a breach of their privacy and will immediately be reported to Elections Ontario.
3. TBDSSAB Procedure, CS-04-66-5 Data Breach, identifies steps to contain, record, notify affected parties of the breach, and undertake preventive measure to mitigate further breaches.

**Disposal Procedures:**

1. The Elector information is to be either returned to Elections Ontario or destroyed. Destruction will occur via the appropriate method for the medium of the information. Whether electronic (permanently erased using data erasure software\*) or in paper (cross-cut shredded) the destruction method will ensure the information cannot be reconstructed.  
*\*Date erasure software must conform to standards set by the Communication Security Establishment of Canada (CSEC) – [CSEC ITSG-06](#) wiping method.*
2. As per the Records Retention By-Law, and Procedure CS-04-66-3 Records Destruction, documents will be listed and forwarded through the Disposition memo process to the Chief Executive Officer for sign off. The final destruction notice will be signed by the CPO.
3. Once disposal has taken place, the certificate of destruction must be filed with the Chief Electoral Officer or Returning Officer.

**AUTHORITY AND RESPONSIBILITY:**

The **Manager, Information Services, and Chief Privacy Officer** ensures privacy-related procedural compliance by all TBDSSAB staff, contractors, sub-contractors and agents.

**Michael Shafirka:**

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Date

Procedure: TWOMO PRIVACY MEASURES

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The **Chief Executive Officer** is appointed as the **TWOMO Election Returning Officer** responsible for the planning, delivery, control and administration of the TWOMO Election.

**Chief Executive Officer:**

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Date

**Executive Assistant** liaises with internal and external stakeholders on TWOMO Election processes and will assist the CPO in ensuring privacy measures are being followed.

**TRAINING:**

The Manager of Information Services, and Chief Privacy Officer is responsible for providing training on the TWOMO Privacy Measures.

Training will occur each election cycle. Prior to training, all communications will be reviewed and updated to address changes to legislation, agreement requirements and reflect the latest best practices for privacy.

**REFERENCE:**

Policy CS-04:06 – Protection of Privacy

[Elections Ontario, Guidelines for the use of Electoral Products, January 1, 2024](#)

MCCSS, TWOMO Election Resource Guide, 2026

Procedure CS-04-66-5 – Data Breach

Procedure CS-04-66-3 – Records Destruction

APPENDIX A – Territory Without Municipal Organization (TWOMO) Privacy Measures



THE DISTRICT OF THUNDER BAY  
SOCIAL SERVICES ADMINISTRATION BOARD

## Election Privacy Acknowledgement

<b>Surname (Family Name):</b>		<b>Given Name(s):</b>	
<b>Telephone:</b>		<b>Residential Address:</b>	
<b>Position Title:</b>			

In accordance with Section 17.4 of the Election Act, I acknowledge the following regarding the information I obtain, directly or indirectly, from the Permanent Register, or from a list of electors prepared from the Permanent Register and/or Absentee Register, whether the information obtained is in printed or electronic format, or examined in either format without obtaining a copy:

- a) I will only use it for electoral purposes and will not use it for commercial purposes.
- b) I will only disclose it to others after obtaining their written acknowledgement that they are bound by the restrictions in the subsection.
- c) I have read and will comply with the privacy policy developed by my Political Party and approved by Elections Ontario.
- d) I will comply with Elections Ontario's Guidelines for the Use of Electoral Products (available at [elections.on.ca](http://elections.on.ca)).
- e) I will securely destroy the List Products on completion of the activities for which I received them.

DATED at Thunder Bay, Ontario this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Or, if alternate Municipality:

DATED at \_\_\_\_\_, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

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Name of Electoral District (please print)

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Signature of Person making acknowledgement