

In Data We Trust

Unlocking the Value of Data in Ontario



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SUMMARY OF RECOMMENDATIONS

A. RECOMMENDATIONS FOR GOVERNMENT

PRIVACY

RECOMMENDATION	ADDITIONAL RECOMMENDATIONS	GOVERNMENT	
		ONTARIO	CANADA
Avoid duplicating federal government laws pertaining to the collection, use, and disclosure of personal information by private sector organizations.		●	
Preserve the principles-based nature of PIPEDA and PHIPA while encouraging the development and widespread adoption of industry standards or codes of practice.	<ul style="list-style-type: none">• Facilitate the development of clear expectations around consent through a combination of legislative amendments to PHIPA and PIPEDA, clear guidance, and industry standards.• Build on international efforts to secure interoperability of privacy standards and ensure that Canadian authorities have immediate and complete access to information stored abroad for the purposes of investigation and enforcement.• Take a measured, industry-specific approach to data portability and allow sufficient time for businesses to implement any new requirements.• Continue promoting privacy by design as a best practice to help organizations comply with PIPEDA and PHIPA.	●	●
Take measured steps to strengthen enforcement of privacy laws while preserving the current ombudsman model. This may include giving the OPC limited order-making powers.			●
Experiment with small-scale civic data trusts.		●	

CYBERSECURITY

RECOMMENDATION	ADDITIONAL RECOMMENDATIONS	GOVERNMENT	
		ONTARIO	CANADA
Encourage and monitor adoption of cybersecurity standards in sectors where they are not already enforced by regulators.	<ul style="list-style-type: none">• Adopt globally recognized cybersecurity standards internally and within the broader public sector.• Work with industry groups to assess the strengths and weaknesses of cybersecurity defences across the economy and, where appropriate, help to address them.	●	●
Establish public-private partnerships focused on developing Ontario’s cybersecurity talent pool and encouraging talent to remain in the province.	Continue to build pathways to data and digital literacy within the public education curriculum.	●	
Encourage municipalities to use provincial procurement vehicles for digital services when provincial cybersecurity standards are higher than municipal ones.		●	
Exchange information on an ongoing basis about public sector cybersecurity threats and defence techniques.	Owners of critical infrastructure should partner with the Canadian Centre for Cyber Security to share threat information and support the integration of cyber defence technology as appropriate and in a manner consistent with privacy obligations.	●	●

DATA SHARING

RECOMMENDATION	ADDITIONAL RECOMMENDATIONS	GOVERNMENT	
		ONTARIO	CANADA
Work with organizations to clarify privacy and security expectations around data sharing in different sectors.		●	●
Continue transitioning towards a more centralized data management system for health care information.	Work with health care stakeholders to harmonize standards and technologies required to effectively share health data. This process could be informed by an arm's length stewardship committee.	●	
	Collaborate with federal and provincial counterparts to accelerate systemic, nationwide sharing of health data.	●	●
Improve upon both the speed and breadth of Ontario's open data system. Practices should include open contracting and proactive disclosures of completed freedom of information requests.	<ul style="list-style-type: none">• Assist municipal governments in releasing a broader range of datasets by providing technical support, guidance around privacy and security, and information on the benefits for communities.• Establish a feedback loop with open data users to facilitate ongoing improvements to Ontario's open data catalogue.	●	

ARTIFICIAL INTELLIGENCE

RECOMMENDATION	ADDITIONAL RECOMMENDATIONS	GOVERNMENT	
		ONTARIO	CANADA
Support commercialization and adoption of AI within Ontario.	<ul style="list-style-type: none"> • Implement the recommendations of the Expert Panel on Intellectual Property. • Leverage more innovation-oriented procurement processes to accelerate development of the AI marketplace. 	●	
	<ul style="list-style-type: none"> • Continue to fund AI research, industry-academia partnerships, and implementation supports for businesses. • Target more support towards scale-up firms. • Harmonize federal and provincial innovation support programs. • Embrace a whole-of-government approach to streamline business supports. 	●	●
Continue to work closely with industry to invest in regional internet network expansions and upgrades.		●	●
Partner with employers and training institutions across Ontario to support data and digital skills development.	Work with stakeholders to ensure diversity and inclusion are factored into workforce development initiatives.	●	
Carry out gap analyses to identify risks around AI and whether they are adequately addressed in current legal and regulatory frameworks. This review should take place on a recurring basis with support from stakeholder advisory committees.	<ul style="list-style-type: none"> • Based on the findings of a gap analysis, consider updating legislation and regulation to clarify protections against AI-related risks. Providing clarity around liability should be a priority. • Help ensure Canadian stakeholders are well represented and given a voice in international standard-setting forums. • Follow international best practices when procuring AI internally. 	●	●

SUMMARY OF RECOMMENDATIONS

B. RECOMMENDATIONS FOR ORGANIZATIONS

CHAPTER	RECOMMENDATIONS	
Privacy	<ul style="list-style-type: none">• Structure consent policies conscientiously to ensure customers are meaningfully informed of their options and empowered to exercise those options.• Exercise due diligence to ensure privacy and security requirements are met when transferring information to other jurisdictions.	<ul style="list-style-type: none">• Facilitate data portability where doing so could have material benefits for consumers without unreasonably increasing risk.• Incorporate privacy by design across systems, where feasible, and keep up with the most up-to-date guidance and standards as they evolve.• Embrace transparency by openly communicating details about data privacy practices.
Cybersecurity	<ul style="list-style-type: none">• Adopt and maintain best-in-class cybersecurity standards.• Share learnings and best practices to strengthen overall cybersecurity capacity within sectors and the wider economy.• Carry out comprehensive cybersecurity risk assessments and regard cybersecurity as a business risk rather than an IT risk.• Train staff regularly to build internal cyber hygiene.	<ul style="list-style-type: none">• Where appropriate, adopt technology to help staff manage cyber threats.• Explore cybersecurity insurance options.• Industry owners of critical infrastructure should partner with the Canadian Centre for Cyber Security to share threat information and support the integration of cyber defence technology as appropriate and in a manner consistent with privacy obligations.
Data Sharing	<ul style="list-style-type: none">• Businesses and research institutions should share data where possible while maintaining privacy and security, including through robust de-identification measures, and contribute to collaborative data sharing initiatives such as data libraries and the development of standards.	<ul style="list-style-type: none">• Health stakeholders should support adoption of consistent standards around the sharing of health data.
Artificial Intelligence	<ul style="list-style-type: none">• Work with international partners to advance and adopt responsible AI standards and best practices around risk assessments, transparency, and employee training.• Businesses that have not adopted AI should evaluate the applicability of AI to their own operations and experiment with its use.	<ul style="list-style-type: none">• Take an active approach to upskilling workers with data and digital skills. A holistic approach should be taken to ensure employees across departments are equipped to work with or alongside AI.



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