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STAFF REPORT
INFORMATION ONLY

Annual Statistical Report to the Information & Privacy Commissioner of Ontario

Date: February 24, 2025

To: Toronto Public Library Board

From: City Librarian

SUMMARY

This report provides a summary of Toronto Public Library's 2024 submission to the Information and Privacy Commissioner of Ontario ("IPC") in compliance with the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA").

FINANCIAL IMPACT

There is no financial impact associated with this report.

The Director, Finance & CFO has reviewed this financial impact statement and agrees with it.

ALIGNMENT WITH STRATEGIC PLAN

TPL provides its annual report to the IPC in compliance with MFIPPA. The freedom of information (FOI) process itself is designed to provide residents of Toronto, and other members of the public, with increased transparency and accountability by responding to FOI requests. Disclosure of information to the

public is in alignment with TPL's 2025-2029 Strategic Plan, namely it provides the vital ingredients for a socially connected and engaged democratic society.

EQUITY IMPACT STATEMENT

To meet the obligations under MFIPPA, the Library has a robust procedure for processing freedom of information requests and tracking these to enable internal oversight and annual reporting to the IPC. The procedure is designed to provide equitable access to Library records to all members of the public.

DECISION HISTORY

At its meeting on March 26, 2007, the Library Board requested staff to report on the annual report submitted to the IPC.

ISSUE BACKGROUND

TPL is governed by MFIPPA, which requires the Library to submit an annual report to the IPC on the statistics specified by the IPC. The IPC has jurisdiction and interest in gathering and analyzing annual statistics from institutions that are subject to laws over which the IPC has oversight. This report enables the collection and comparison of data across the province.

COMMENTS

Overview of Requests

The Toronto Public Library received six (6) new, complete, requests for access to records in 2024 that met the criteria for a request under MFIPPA. Seven (7) requests were completed in 2024, and none are carried over into 2025.

Of the requests completed, four (4) were closed within the statutory timeframe of 30 days and three (3) required a notice of extension, as permitted under MFIPPA, due to the requirement to review many records and to consult with third parties before issuing a final decision about access to the requested records.

No fees were charged if records are not found or if access was refused. Fees were waived for one (1) request that were not onerous to fulfill. In 2024, fees

were only charged for two (2) requests, as access was refused in two (2) other instances, and requests were abandoned in two (2) other instances.

Information and Privacy Commissioner Activity

Under MFIPPA, each requestor has the right to appeal to the IPC regarding the Library's decision about releasing records. Only one appeal was made in 2024 related to the estimated timeline; this appeal was closed without direction to TPL.

Proactive Disclosure

The spirit of MFIPPA is to provide mechanisms for greater transparency in government, while protecting personal information. MFIPPA does not restrict an institution's ability to proactively disclose information that is not confidential and in which the public is likely to have an interest; proactive disclosure is strongly supported by the current privacy commissioner. The Library routinely discloses information to the public and, despite the challenges in the beginning of 2024, continues to make a wide range of information available to the public, from Board documents and minutes to aggregate statistics.

Finally, many informal requests for information from the Library were answered by referring requestors to the Library website, through the branches answering questions from customers, and by Human Resources responding to questions raised by TPL employees and the TPL Privacy team in responding to questions raised by TPL customers in relation to the 2023 cybersecurity incident.

CONTACT

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SIGNATURE

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Vickery Bowles
City Librarian

ATTACHMENTS

Attachment 1: Summary of FOI Requests, 2024

Summary of Formal FOI Requests Received by TPL in 2024

For Reference Only – Not Submitted to the IPC

1. Five (5) formal requests were made directly to the Toronto Public Library in 2024:

Request Number	Type of Records Requested	Type of Requestor	Short Description of Request	TPL Response & Outcome
2024-003	General Information	Individual (general public)	Report/ briefing notes re. ransomware payment	Request refused in whole under solicitor-client privilege.
2024-004	General Information	Media	All Emails to/from Vickery, Frank, Brian between October 28-February 6 2023 (re. cyber incident)	Abandoned by requestor after receiving fee estimate.
2024-005	General Information	Media	Communications between TPL leadership & B'nai Brith re. Main Street branch Israel / Palestine display	Full access granted.
2024-006	General Information	Individual (customer)	Incident report re. child left unattended at TPL branch	Full access granted & fee waived.
2024-007	General Information	Individual (customer)	IP address and video surveillance images	Request refused in whole under personal privacy of another individual.

2. One (1) formal request was made to an external organization which was transferred to TPL in 2024:

Reference Number	Type of Information Requested	Type of Requestor	Description	Outcome
2024-001	General Information	Media	Cyber incident re: ITS communications	Transferred in from the City of Toronto. Abandoned by requestor after receiving fee estimate.

3. One (1) formal request from an external organization, for consultation by TPL as an affected third party, was received in 2024.

Reference Number	Type of Information Requested	Type of Requestor	Description	Outcome
MTCG 24-020, 029, 028	General Information	Consultation from MTCG	Transition Binders	Consultation request from the Ministry of Tourism, Culture and Gaming (MTCG), related to general statistics about TPL services. TPL provided consent to release in full.

4. One (1) formal request from 2023 was carried over to 2024 and closed in 2024.

Reference Number	Type of Information Requested	Type of Requestor	Description	Outcome
2023-007	Personal Information	Individual by agent (counsel)	List of a customer's main visits to TPL from July 23, 2016 - July 23, 2019	Full access granted.