

Governing Municipal AI for Privacy and Human Rights

2026 AMO Annual Conference Concurrent Session



Governing municipal AI for privacy and human rights

Association of Municipalities of Ontario (AMO) Annual
Conference
August 2026 | Presentation by PwC



With you today



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Partner

Government and
Public Sector



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Municipal Government
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The public trust question

The technology is ready. The trust infrastructure is not.

33%

of global CEOs report a high degree of trust in embedding AI into key business processes

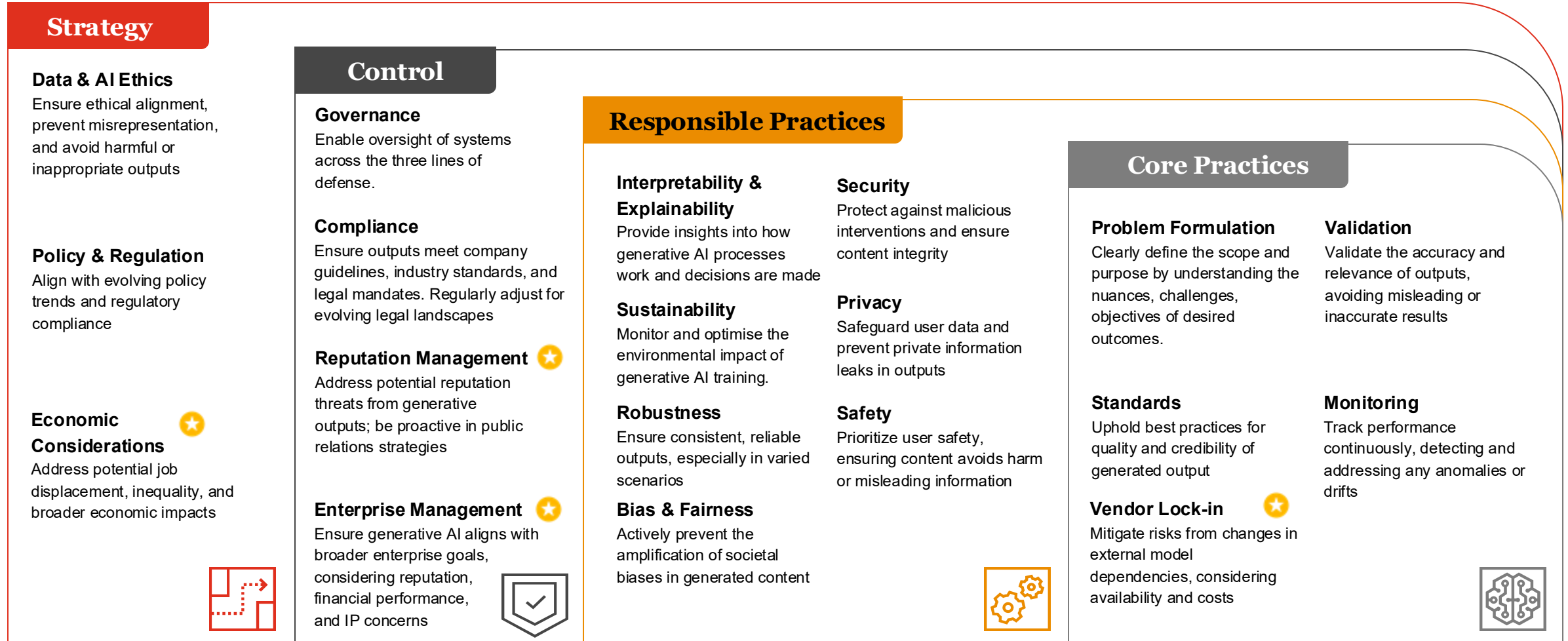
72%

of Canadian organizations call responsible AI a top priority — but just over 1 in 3 have no dedicated AI governance function

Ambition is not the gap. Accountability is. For municipalities, the trust deficit is not a brand issue — it is a legal exposure, an FOI exposure, and a council exposure.

PwC, 28th Global CEO Survey (2025); PwC Canada, Trust in AI (February 2026), survey of 220 Canadian decision-makers.

PwC's Responsible AI Framework



AI in the municipalities

First, a shared vocabulary: AI, generative AI, and agentic AI

Each layer sits inside the one above it — easier to deploy, harder to explain.

Artificial Intelligence

the field of computer science that seeks to create intelligent machines that can replicate or exceed human intelligence.

Machine Learning

a subset of AI that enables machines to learn from existing data and improve upon that data to make decisions or predictions.

Deep Learning

a machine learning technique in which layers of neural networks are used to process data and make decisions.

Generative AI

a capability of using prompts to create, improve, and interact with text, images, video, and sound using large trained models.

Agentic AI

systems designed to perform complex tasks, make decisions, and adapt to changing conditions with minimal human intervention to achieve a single goal.

Practicable — the infrastructure is in place. | Acceptance — the commercial value is clear.

Municipal opportunity: serve better, operate leaner

Highest-value use cases clustering into two buckets –

(1) **Better outcomes for residents and businesses**, and (2) **a leaner operating model inside municipal operations**.



*No-wrong door
permitting*

1. Permits & Licensing Management



*Validate data at scale, and
reduce operational risk*

2. Workforce & Payroll Management



*Standardized program
definitions for fraud
prevention*

3. Compliance & Enforcement Management



Low-value automation

4. Service Delivery Management

1. Permits & Licensing

- Use Case 1 - **Reduce Permitting delays and streamline housing approvals** - via digitized approvals, application reviews and eliminating sequential bottlenecks from land-use through occupancy by automating permit checks and aligning with regional demand

2. Workforce and Payroll

- Use Case 2- **Transforming Pay from Manual Control to Intelligent Assurance** - standardize complex inputs, validate data at scale, and continuously monitor pay accuracy, reducing operational risk while improving timeliness, compliance, and trust for employees.

3. Compliance and Enforcement

- Use Case 3- **Error and Fraud Detection** - From fake documents to hidden anomalies and organized fraud, intelligent automation and real-time insights can detect and stop fraudulent transactions at source, strengthening authentication and protecting public funds.

4. Service Delivery

- Use Case 4- **Simplifying Access to Information** - From vast amounts of information across departments, often through manual and fragmented systems that slow approvals and expose the organization to compliance risk. Intelligent workflows connect these processes—accelerating decisions, safeguarding compliance, and freeing staff to focus on serving the public.

AI in Permitting

Municipal use case: Building permit review

Picture this scenario...

Today, a municipal building department takes applications at the counter, by email and through the portal. Work moves through multiple regulatory reviews — zoning, building code, engineering, fire... — one stage at a time. An examiner picks the next file out of the queue and checks it by hand.

Current state:

Four sequential reviews

Zoning, building code, engineering and fire each start the file over

Rules across many documents

By-law, Building Code and site conditions sit in separate documents

Incomplete applications

Missing drawings, forms and fees surface late, restarting the clock and spending examiner time on chasing rather than deciding

Weeks of resident wait time

Applicants resubmit and wait again, rarely knowing which rule they failed — and every delay lands on housing supply and public trust

 **30+** business days to decide



How can we use AI to take the weeks out of permitting and still produce the reasons a decision must stand on?



Pre-Application Compliance Check

Upload building permit PDFs for a quick compliance pre-check

Check your building plans for submission quality before submitting a formal application. Upload your PDF drawings below and receive a submission quality compliance report.

+

Drop PDF files here or click to browse

Accepted: PDF files only (max 50 files)

The screenshot shows a macOS Finder window titled 'Permitting Demo'. The left sidebar is expanded to the 'Favorites' section, with 'Applications' selected. The main pane displays a table of files. The first file, 'sample_building_permit.pdf', is highlighted in blue. The table headers are 'Today', 'Size', 'Kind', and 'Date Added'. The file details are: 9 KB, PDF Document, and Today at 2:59 PM. At the bottom right, there is a red circle with the number '1' overlaid on the 'Open' button.

Today	Size	Kind	Date Added
sample_building_permit.pdf	9 KB	PDF Document	Today at 2:59 PM

PRE-CHECK

Pre-Application Compliance Check

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Check your building plans for submission quality before submitting a formal application. Upload your PDF drawings below and receive a submission quality compliance report.



Drop PDF files here or click to browse

Accepted: PDF files only (max 50 files)

1 / 50 files selected

sample_building_permit.pdf

1

9 KB [Remove](#)

Run Pre-Check Compliance

2



Status: AI Reviewed

Review Phase: Human Review

Files: 4

Updated At: Jun 8, 2026, 11:05 p.m.

Reviewer: Platform Admin

Approve

Reject

Overview

Files

Rules (1 flagged)

Report

Export

Annotated PDFs



Rule	Name	Status	Value	Expected Value	Reasoning	
▼ SECTION A – SUBMISSION QUALITY (19 rules)						
A-01	▶ <u>Missing Dimensions</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-02	▶ <u>Missing designer signature/seal</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-03	▶ <u>Missing room labels</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-04a	▶ <u>Missing plans - Site Plan</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-04b	▶ <u>Missing plans - Floor Plans</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-04c	▶ <u>Missing plans - Elevations</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-04d	▶ <u>Missing plans - Cross Sections</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-05	▶ <u>Illegibility of Plans</u>	Pass	yes	yes	Meets the requirement.	↺ 🚩
A-06	▼ <u>Electronic Submission - PDF Version</u>	Fail	1.4	PDF version 1.7 or later	Does not meet the requirement: PDF version 1.7 or later	↺ 🚩
All documents must be submitted in PDF format, version 1.7 or later.						
A-07	▶ <u>Electronic Submission - PDF Security</u>	Pass	false	File is unsecured, not password protected	Meets the requirement: File is unsecured, not password protected	↺ 🚩

Reviewer: Platform Admin

Approve

Reject

- Overview
- Files
- Rules (1 flagged)
- Report
- Export
- Annotated PDFs

76TOTAL RULES

32PASS

7FAIL

0WARNING

6MISSING

2NEEDS INFO

3MANUAL

26N/A

0DISABLED

Rule	Name	Status	Value	Expected Value	Reasoning
▼ SECTION A – SUBMISSION QUALITY (19 rules)					
A-01	▶ Missing Dimensions	Pass	yes	yes	Meets the requirement.
A-02	▶ Missing designer signature/seal	Pass	yes	yes	Meets the requirement.
A-03	▶ Missing room labels	Pass	yes	yes	Meets the requirement.
A-04a	▶ Missing plans - Site Plan	Pass	yes	yes	Meets the requirement.
A-04b	▶ Missing plans - Floor Plans	Pass	yes	yes	Meets the requirement.
A-04c	▶ Missing plans - Elevations	Pass	yes	yes	Meets the requirement.
A-04d	▶ Missing plans - Cross Sections	Pass	yes	yes	Meets the requirement.
A-05	▶ Illegibility of Plans	Pass	yes	yes	Meets the requirement.
A-06	▶ Electronic Submission - PDF Version	Fail	1.4	PDF version 1.7 or later	Does not meet the requirement: PDF version 1.4
A-07	▶ Electronic Submission - PDF Security	Pass	false	File is unsecured, not password protected	Meets the requirement: File is unsecured, not password protected
A-08	▶ Electronic Submission - PDF Layers	Pass	0	Single layer (flattened)	Meets the requirement: Single layer (flattened)
A-09	▶ Electronic Submission - PDF Content	Pass	0	No comments present	Meets the requirement: No comments present

By-Law Assistant

By-Law Assistant

Ask about Ontario Building Code, Zoning By-law 569-2013, or permit requirements.

QUICK TOPICS

What are the minimum setback requirements for a residential property?

What documents are required for a building permit application?

What are the height restrictions in the R zone?

Explain the Ontario Building Code requirements for fire separation.

Ask about by-laws...

Send

Reviewer Dashboard

Overview of compliance reviews and system status

Pending Reviews78

My Active Reviews4

Closed Reviews10

Failed Reviews43

Average Turnaround—

Pending Reviews 78My Reviews 4In Progress Reviews 6Closed Reviews 10Failed Reviews 43

Search by Review ID...								All Statuses 
REVIEW ID	PROJECT ADDRESS	APPLICANT	REVIEWER	SUBMISSION DATE 	STATUS  	REVIEW PHASE  	DELETE	ACTIONS
1881a257...	42 MAPLEWOOD AVENUE TORONTO, ONTARIO	Kanishk Patoliya	Platform Admin	Jun 8, 2026, 10:55 p.m.	AI Reviewed	Human Review		View Details →
3e59c194...	—	Akeem Afuwape	Platform Admin	May 22, 2026, 09:51 a.m.	AI Reviewed	Human Review		View Details →
c123a325...	—	Akeem Afuwape	Platform Admin	May 21, 2026, 06:08 p.m.	AI Reviewed	Human Review		View Details →
d5eb8bfc...	42 MAPLEWOOD AVENUE TORONTO, ONTARIO	Kanishk Patoliya	Platform Admin	May 22, 2026, 11:15 a.m.	AI Reviewed	Human Review		View Details →

Rows per page 25

Prev 1 Next

Showing 1–4 of 4

REVIEWER PANEL

- Dashboard
- By-Laws Management
- Download Files

REVIEW DETAIL

Review 1881a257...

June 8, 2026 at 10:55 p.m.

← Back to Dashboard

Status: AI Reviewed Review Phase: Human Review Files: 4 Updated At: Jun 8, 2026, 11:05 p.m.

Reviewer: Platform Admin

Approve

Reject

Overview	Files	Rules (1 flagged)	Report	Export	Annotated PDFs			
76 TOTAL RULES	31 PASS	8 FAIL	0 WARNING	6 MISSING	2 NEEDS INFO	3 MANUAL	26 N/A	0 DISABLED
Rule	Name	Status	Value	Expected Value	Reasoning			
▶ SECTION A — SUBMISSION QUALITY (19 rules)								
▶ SECTION B — ONTARIO BUILDING CODE (14 rules)								
▶ SECTION C — ZONING BY-LAW 569-2013 (43 rules)								



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Rule	Name	Status	Value	Expected Value	Reasoning
▶ SECTION A — SUBMISSION QUALITY (2 rules)					
▼ SECTION B — ONTARIO BUILDING CODE (5 rules)					
B-09a	▶ Bedroom egress windows - 9.9.10	Fail	no	yes, not_applicable	Does not meet the requirement. Every floor with bedrooms must have an openable window (min 0.35 sqm, no dimension < 380mm) or exterior door.
B-09b	▶ Firefighter access windows - 9.10.20	Fail	no	yes, not_applicable	Does not meet the requirement. 2nd/3rd storeys of unsprinklered buildings need window/access panel (min 1100mm x 550mm) facing a street.
B-09c	▶ Bedroom egress per 9.7.2.2(4)	Fail	no	yes, not_applicable	Does not meet the requirement. Windows/doors for bedroom egress must conform to Subsection 9.9.10.
B-10	▶ Smoke Alarms	Fail	no	yes	Does not meet the requirement. Smoke alarms required in each dwelling unit, each sleeping room, on each storey.
B-11	▶ Carbon Monoxide Alarms	Fail	no	yes	Does not meet the requirement. CO alarms required adjacent to sleeping areas in buildings with fuel-burning appliances or attached garage.

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Rule	Name	Status	Value	Expected Value	Reasoning
▶ SECTION A — SUBMISSION QUALITY (2 rules)					
▶ SECTION B — ONTARIO BUILDING CODE (5 rules)					
▼ SECTION C — ZONING BY-LAW 569-2013 (1 rules)					
C-16	▼ Side Yard Setback	Fail	1.2	>= 1.5	Your value of 1.2 does not meet the requirement of at least 1.5. Override: FAIL → PASS It can be a range, so it falls under the acceptable range Override Cancel
Minimum side yard setback varies by required minimum lot frontage.					

Building Permit Compliance Report

Reviewer Report — 2026-05-12T02:58:42.024471+00:00 — Generated 2026-06-08 22:57:37

DOCUMENT	PROJECT ADDRESS	WORK TYPE	TOTAL RULES
sample_building_permit copy.pdf, sample_building_permit.pdf	42 MAPLEWOOD AVENUE TORONTO, ONTARIO	Addition	76

32	7	6	26	2	3	50 rules evaluated
PASS	FAIL	MISSING	NOT APPLICABLE	NEEDS CONTEXT	MANUAL REVIEW	

Section A: Submission Quality

17 PASS 2 FAIL

A-01	Missing Dimensions Submission Quality EXTRACTED VALUE yes Show AI Reasoning	EXPECTED VALUE yes	NOTE Meets the requirement.	PASS
A-02	Missing designer signature/seal OBC Div. C, Part 3, Section 3.2 EXTRACTED VALUE yes Show AI Reasoning	EXPECTED VALUE yes	NOTE Meets the requirement.	PASS
A-03	Missing room labels Submission Quality EXTRACTED VALUE yes Show AI Reasoning	EXPECTED VALUE yes	NOTE Meets the requirement.	PASS
A-04a	Missing plans - Site Plan Submission Quality EXTRACTED VALUE	EXPECTED VALUE	NOTE	PASS

Building Permit Application: Compliance Summary

Compliance Check Results

DOCUMENT	PROJECT ADDRESS	WORK TYPE	DATE
sample_building_permit copy.pdf, sample_building_permit.pdf	42 MAPLEWOOD AVENUE TORONTO, ONTARIO	Addition	2026-06-08

15 Items Require Attention

Please review the items below before resubmitting your application.

32 passed 7 non-compliant 6 missing info 2 need clarification

Submission Quality

A-06: Electronic Submission - PDF Version

City Electronic Submission Guidelines

NON-COMPLIANT

This item does not meet the required compliance criteria.

FOUND IN PLANS	EXPECTED VALUE
1.4	PDF version 1.7 or later

Action needed: Revise your plans so that electronic submission - pdf version meets the expected value of PDF version 1.7 or later.

A-10: Electronic Submission - Embedded Fonts

City Electronic Submission Guidelines

NON-COMPLIANT

This item does not meet the required compliance criteria.

FOUND IN PLANS	EXPECTED VALUE
Non-TrueType: Helvetica, Helvetica-Bold Unembedded: None	TrueType fonts, all embedded

Action needed: Revise your plans so that electronic submission - embedded fonts meets the expected value of TrueType fonts, all embedded.

REVIEWER PANEL

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- Download Files

REVIEW DETAIL

Review 1881a257...

June 8, 2026 at 10:55 p.m.

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Approve

Reject

- Overview
- Files
- Rules (1 flagged)
- Report
- Export
- Annotated PDFs

These PDFs have been annotated with compliance deficiency callouts highlighting failed and missing checks directly on the drawings.

sample_building_permit copy.pdf

sample_building_permit.pdf

Side by Side

Annotated Only

Edit Annotations

Download

ORIGINAL

ANNOTATED

Reviewer: Platform Admin

Approve

Reject

Overview

Files

Rules (1 flagged)

Report

Export

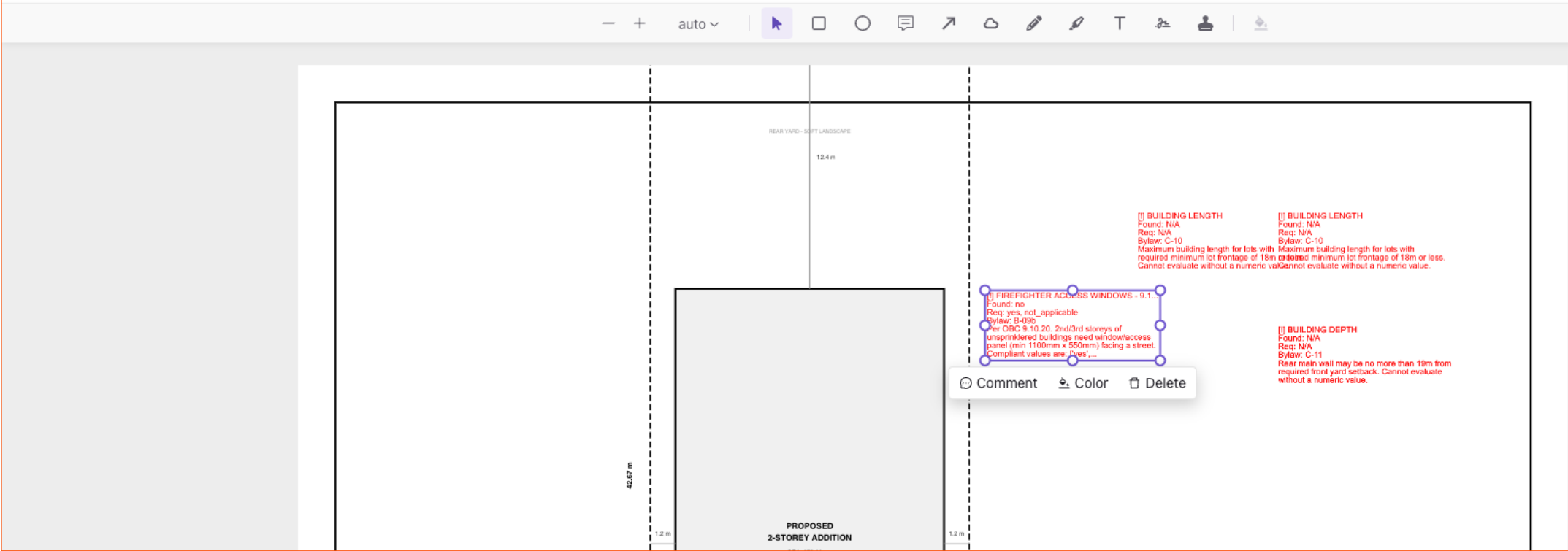
Annotated PDFs

These PDFs have been annotated with compliance deficiency callouts highlighting failed and missing checks directly on the drawings.

sample_building_permit copy.pdf

sample_building_permit.pdf

PDF ANNOTATOR



What governed AI delivers

The operating benefits, once the guardrails are in place.

01

Faster approvals

Automated triage and pre-checks cut the time it takes to move an application from intake to decision.

02

More accurate reviews

Consistent checks against the same rules reduce missed conditions and variation between reviewers.

03

A single regulation repository

One searchable source of by-laws and regulations makes amendments, precedents and reporting far easier to manage.

Governance is what makes these benefits defensible — faster decisions only hold up if you can show how they were made.

Key takeaways

What already binds you — and what is coming

BINDING NOW

MFIPPA

Governs every collection, use and disclosure of personal information in an AI system. There is no AI exemption — training data, prompt logs and vendor processing are all in scope.

BINDING NOW

Ontario Human Rights Code

The Ontario Human Rights Commission is explicit that the Code applies to everyone in Ontario, including public entities. A discriminatory outcome is a Code issue regardless of intent.

COMING

Bill 194 / EDSTA

The Enhancing Digital Security and Trust Act, 2024 defines “public sector entity” to include MFIPPA institutions — so municipalities are in scope. Its AI duties apply only as “may be prescribed,” and those regulations are not yet finalized. In scope now, bound later.

NOT BINDING

Federal regimes

The federal Directive on Automated Decision-Making binds federal institutions, not municipalities — but its tools are borrowable.

In summary

01

You are already regulated

MFIPPA and the Ontario Human Rights Code apply to municipal AI today, with no AI exemption. Bill 194 will land on whatever governance you have built by then — so start now.

02

Govern the use case, not the tool

Permits, enforcement, chatbots and workforce carry the exposure. Tier by consequence.

Trust is the permission structure for municipal AI. Municipalities that can show their work will be free to move faster than those that cannot.

Thank you!

Human Rights and Artificial Intelligence

Alfred Fung

Senior Policy Analyst

Ontario Human Rights Commission

AMO Annual Conference

Governing Municipal AI for Privacy and Human Rights

August 18, 2026

AI and human rights

Prevailing framing of the concerns about AI systems

1. AI presents both significant opportunities and risks that need to be balanced.
2. Bias in AI systems and the data used to train them can lead to biased decisions and outcomes.

... and so we must ensure that our use of AI is safe, responsible, trustworthy.

Canada's National Artificial Intelligence Strategy: AI for All

Prime Minister Carney on January 22, 2026 re: Building Canada Together

"The advent of artificial intelligence will simultaneously **challenge fairness, inclusion, and solidarity** and create enormous opportunities to improve how we live, work, and play. And **these tensions can only be reconciled if AI works for all.**"

"In a time of democratic decline, **we can show how rights can be protected and how equal freedoms can endure.**"

"We are choosing to build inclusively, in full partnership with Indigenous Peoples. Inclusively, **to ensure that AI benefits all Canadians.**"

The Ontario Human Rights Code

- "... it is public policy in Ontario to recognize the dignity and worth of every person and to provide for **equal rights and opportunities without discrimination**..."
- Create a climate of respect and mutual understanding, and ensure that everyone can take part in society fully.
- Responsible parties must prevent and respond to discrimination, ensuring that barriers are not embedded in their organizations, including facilities, services and programs.
 - That also means reviewing policies, practices, decision-making processes and overall culture.

The Ontario Human Rights Code

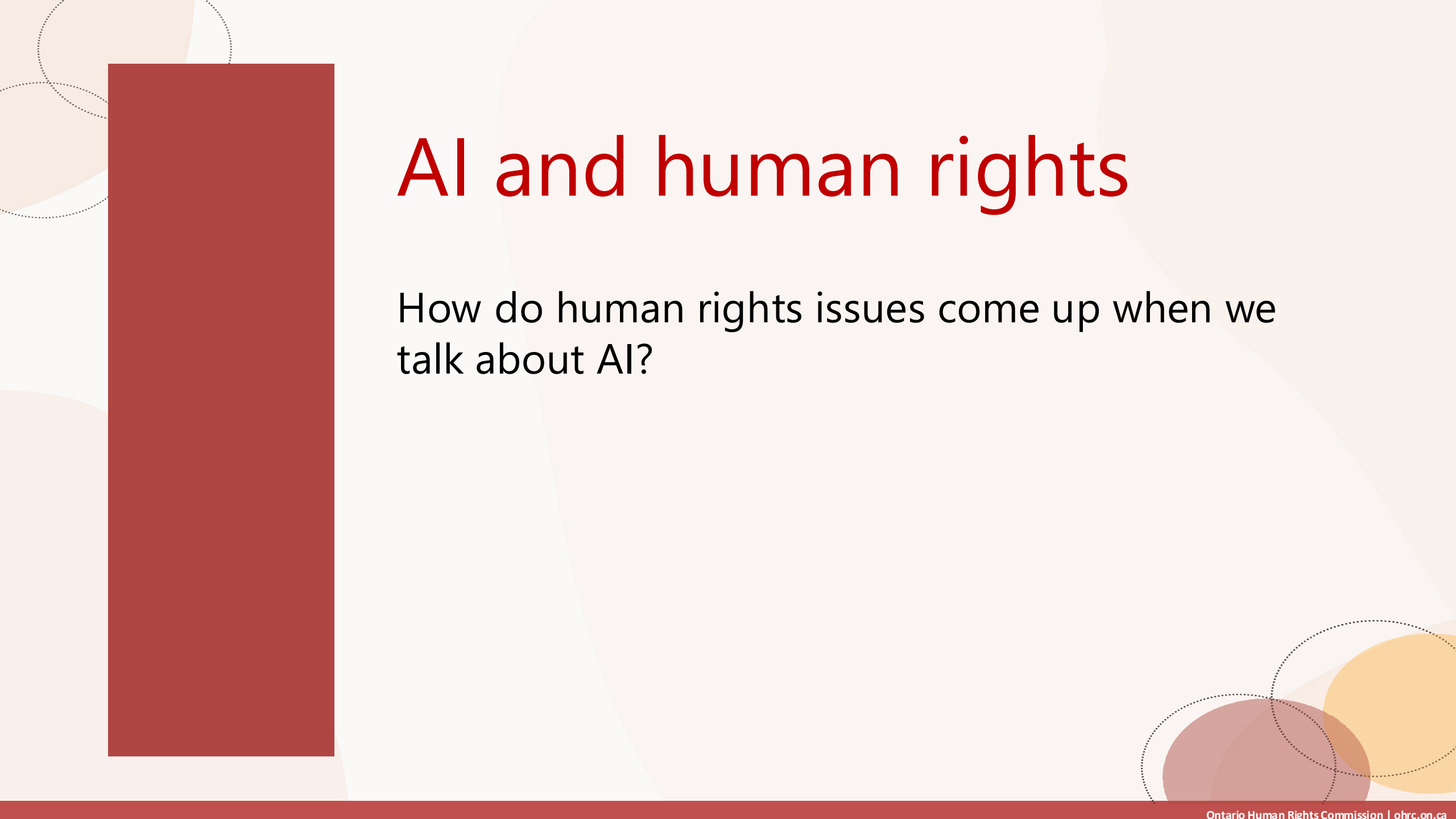
Prohibits discrimination and harassment in 5 social areas based on 17 protected grounds

Social Areas

- Employment
- Housing
- Goods, services and facilities
- Contacts
- Vocational associations

Grounds of discrimination

- Age
- Ancestry
- Citizenship
- Colour
- Creed (religion)
- Ethnic origin
- Disability
- Family status
- Gender identity
- Gender expression
- Marital status
- Place of origin
- Race
- Sex/pregnancy
- Sexual orientation
- Receipt of public assistance (accommodation only)
- Record of offence (employment only)

The slide features a light beige background with several overlapping circles in shades of orange and red. A solid red rectangle is positioned on the left side of the slide.

AI and human rights

How do human rights issues come up when we talk about AI?

Technology

Here are some examples that can raise human rights concerns

Triage and screening

AI systems can exclude people and result in unequal access when used to prioritize, rank and screen for access to opportunities, services and resources.

- To screen applicants for job positions, subsidized rental housing, financial assistance
- Risk of following historic patterns... but also because access to technologies never reaches communities equally, e.g. Boston "Street Bump", urban vs rural

Consultation and analysis

Use of data, e.g. simply changing the labels applied to the same dataset can lead AI systems to produce different analyses.

Further considerations for use of AI systems

Technology:

Does the AI system produce results that discriminate based on protected grounds?

Use:

Are there concerns about the choices as to how AI systems will be used? Does the AI system operate in an area where there are already concerns about systemic discrimination?

Examples:

- Tracking specific groups using automated license plate recognition
- Altering the accents of service agents to avoid racism
- Using generative AI to produce diverse content

Further considerations for use of AI systems

Governance

Some of the key areas:

- **Review:** Are the stated function and performance real? Can the system and its use be tested and evaluated? How effective is the organization's ability to evaluate?
- **Accountability:** Are there clear roles and responsibilities, procurement processes, operational policies and complaint and review procedures?
 - Do people in those roles have the knowledge and skills to perform their duties?
- **Explainability:** Can people understand how they are impacted? Can the organization identify and correct issues?

Example

Processing temporary resident applications

- AI systems used to flag risks and fraud, summarize application files.
- Allows officers to **decide on multiple cases at the same time**.
- Found to **fabricate employment details** of an applicant, leading to a wrongful rejection.
- Applications were rejected because they were missing documentation, **even though they were provided**.
- Timestamps confirm that cases have been **decided in a few minutes**. Representatives concerned about "**bulk and blanket treatment**" of applicants.
- "Final decisions made by staff" (human in the loop). But unlike AI scribes in health and policing, staff have not necessarily engaged with the source information.

Policy context

What's happening in Ontario?

- The Enhancing Digital Security and Trust Act (2024) enables the government to set regulations on public sector use of AI.
- Ontario Public Service's Trustworthy AI Framework and AI Playbook.
- Some municipalities have noted their use of the federal Algorithmic Impact Assessment for automated decision-making.

The background features a large, solid red rectangle on the left side. To its right, the title is written in a large, bold, red sans-serif font. Below the title, a paragraph of text is presented in a smaller, black sans-serif font. The bottom right corner contains a small, dark red footer with white text. The overall design is minimalist, using a palette of reds, oranges, and yellows, accented with thin dotted lines forming circles.

Human rights impact assessment

To ground your implementation in human rights by design. Developed by the OHRC and Law Commission of Ontario.

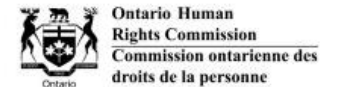
Human Rights AI Impact Assessment

A product of our joint initiative with the Law Commission of Ontario and Canadian Human Rights Commission

- Assists designers, developers, operators and owners of AI systems to create and use AI systems that align with human rights obligations in Canada and Ontario.
- Does not require human rights expertise.
- Based on extensive stakeholder consultations.

Human Rights AI Impact Assessment

November 2024



HRIA Road Map

Part A: Screening

Purpose of the AI system

Impact of the AI system

Disproportionate
impacts on protected
grounds

Part B: Mitigation

Internal human rights
process

Design and structure

Consultations

Test and review

Part A

Examples of screening questions

- ▶ Does the AI system make or aid decisions in an area covered by human rights law?
- ▶ Is the AI system operating in an area where there have been concerns raised about bias and discrimination in the past?
- ▶ Does the AI system produce results that differentiate based on one or more protected grounds?
- ▶ Does the AI system rely on factors that correlate with a protected ground? (including proxies)
- ▶ Are there gaps or limitations in your ability to meaningfully answer these questions?

Outcomes:

Not applicable, **monitor** or **mitigate**

- ▶ Not high risk
- ▶ High risk and **low stakes**
- ▶ High risk and **no differential treatment**
- ▶ High risk and **cannot assess whether there is differential treatment**
- ▶ High risk and **differential treatment that fits into an exception** (rare)
- ▶ High risk and differential treatment **that is not justified or acceptable**, or you are questioning whether it is justifiable

Application of the HRIA

Alignment with developing AI governance in Canada

Treasury Board of Canada Secretariat

Sections of the HRIA were adopted into the most recent updates of the Federal Directive on Automated Decision-Making and accompanying Algorithmic Impact Assessment.

Ontario Public Service

OPS's AI Playbook directs users to the HRIA for best practices. The principles in the OPS AI Directive are based on the OHRC and IPC principles.

... and more

- Included in the Vector Institute's Playbook for Responsible AI Product Development.
- Private sector continues to inform the development of the HRIA.



Thank you!

Alfred.Fung@ohrc.on.ca

Impact Assessment

ohrc.on.ca/en/human-rights-ai-impact-assessment

Principles

ohrc.on.ca/en/principles-responsible-use-artificial-intelligence

Governing Municipal AI for Privacy

Javier Ruiz-Soler

Senior Technology and Policy Advisor



Information and Privacy
Commissioner of Ontario

Commissaire à l'information et à la
protection de la vie privée de l'Ontario

AMO

August 18, 2026

Outline

- The IPC: who we are, and what we do?
- Privacy Dimensions of AI systems
- IPC-OHRC AI Principles
- EDSTA and AI Regulation in the Public Sector



Key Takeaways

Trust is the determining factor for AI success

Adoption in the public sector depends on maintaining legitimacy with residents, staff, and institutions.

AI governance is built on existing values

Privacy, accountability, transparency, and fairness must be embedded from the outset.

Clear, consistent principles provide practical guidance

The IPC/OHRC AI principles are already being applied to assess, design, and govern AI systems in practice.

Regulation is evolving, but action cannot wait

Institutions are expected to act using established principles and best practices.

Municipalities play a critical frontline role

Decisions made locally will directly shape public trust, service delivery, and real impact of AI

Information and Privacy Commissioner of Ontario



Commissioner Kosseim

- Ontario's Information and Privacy Commissioner is an officer of the legislature
 - Appointed by and reports to the Legislative Assembly of Ontario
 - Independent of the government of the day
- The IPC has authority under the following laws:
 - *Freedom of Information and Protection of Privacy Act (FIPPA)*
 - *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*
 - *Personal Health Information Protection Act, 2004 (PHIPA)*
 - *Child, Youth and Family Services Act, 2017 (CYFSA)*
 - *Anti-Racism Act, 2017 (ARA)*
 - *Coroners Act*

IPC's Overall Role & Mandate

In addition to overseeing provincial access and privacy laws, the office of the IPC also serves the government, public institutions and the public through its mandate to:

- Resolve appeals when access to information is refused
- Investigate privacy complaints related to personal information
- Ensure compliance with the province's access and privacy laws
- Review privacy policies and information management practices
- Conduct research on access and privacy issues and provide comment on proposed legislation and government programs
- Educate the public, media and other stakeholders about Ontario's access and privacy laws and current issues affecting access and privacy

IPC'S VISION

Enhance Ontarians' trust that their access and privacy rights will be respected by ...



Privacy Dimensions of AI

- AI systems rely on vast amounts of data.
- Often includes collection or use of personal, behavioral, biometric, and sensitive data.
- Can potentially raise significant privacy risks.



Key Privacy Expectations



Lawful authority for data collection and use



Necessity and proportionality



Accuracy and safeguards against disclosure



Retention to what is necessary



De-identification, wherever possible

Data Protection Practices

- De-identification of structured data
- Use of synthetic data
- Minimize exposure of real personal information

De-Identification Guidelines for Structured Data

UPDATED AND EXPANDED



October

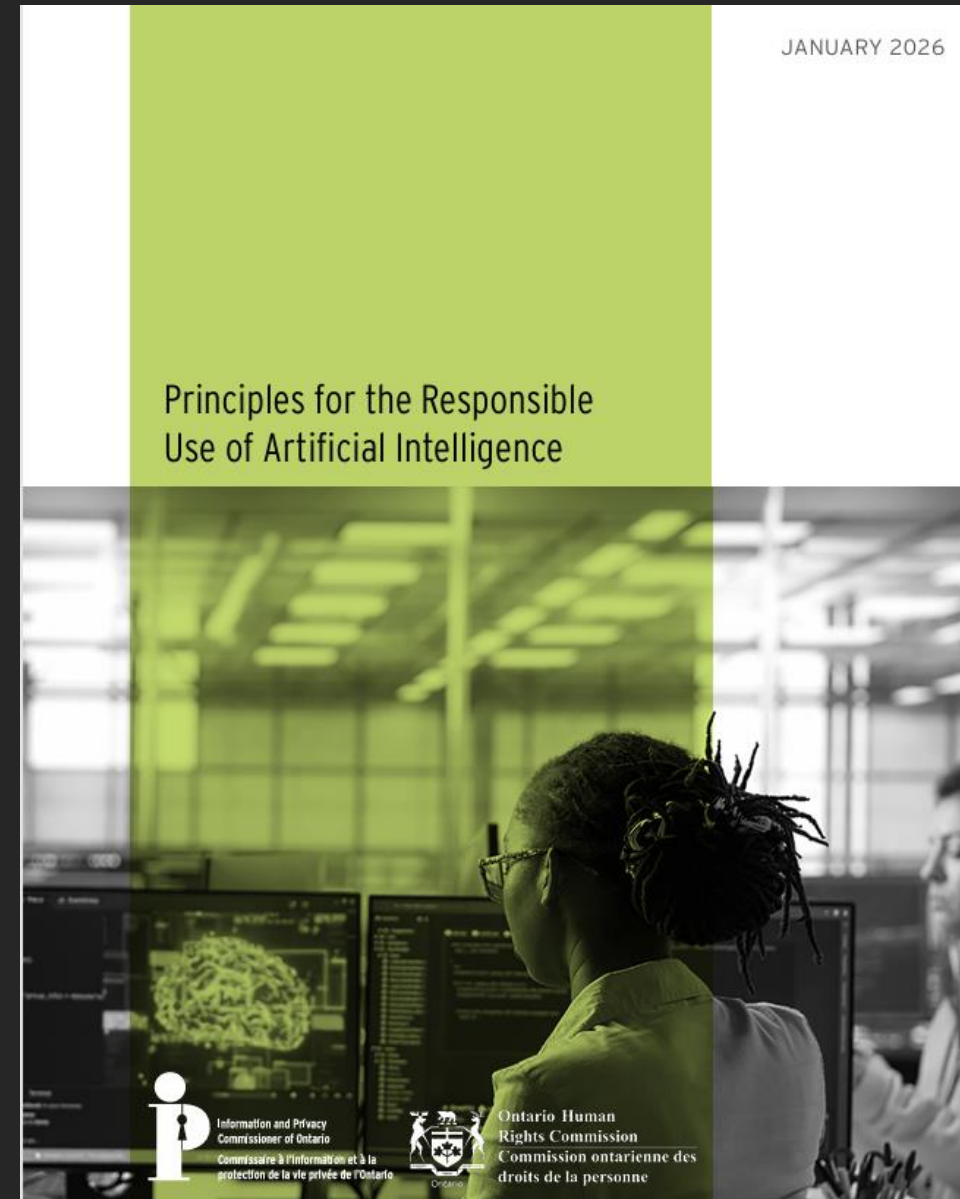
Enhancing Digital Security and Trust Act (EDSTA)

- Bill 194: Ontario's missed opportunity to lead on AI ([Link](#))
- AI regulations still not introduced or established, 20 months later
- IPC-OHRC Principles operate as functional governance instruments



IPC-OHRC AI PRINCIPLES

"... a machine-based system that, for explicit or implicit objectives, infers from the input it receives in order to generate outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments."



Alignment Across frameworks

"... The IPC–OHRC principles presented in this document are designed to complement these provincial, national, and international principles, while emphasizing the protection of human rights, including privacy laws."



Principles for the Responsible Use of Artificial Intelligence



The Principles

Principle: Valid and Reliable

AI systems must exhibit valid, reliable, and accurate outputs for the purpose(s) for which they are designed, used, or implemented.

Principle: Safe

AI must be developed, acquired, adopted, and governed to prevent harm or unintended harmful outcomes that infringe upon human rights, including the right to privacy and non-discrimination.



Principles for the Responsible Use of Artificial Intelligence



The Principles

Principle: Privacy protective

AI should be developed using a privacy by design approach. Developers, providers, or users of AI systems should take proactive measures to protect the privacy and security of personal information and support the right of access to information from the very outset.

Principle: Human rights affirming

Human rights are inalienable, and protections must be built into the design of AI systems and procedures. Institutions using AI systems must prevent and remedy discrimination effectively and ensure that benefits from the use of AI are universal and free from discrimination.



Principles for the Responsible Use of Artificial Intelligence



The Principles

Principle: Transparent

Institutions that develop, provide, and use AI must ensure that these AI systems are visible, understandable, traceable, and explainable to others.

Principle: Accountable

Institutions should implement a robust internal governance structure with clearly defined roles, responsibilities, and oversight procedures, including a human-in-the-loop approach, to ensure accountability throughout the entire life cycle of their AI systems.



Principles for the Responsible Use of Artificial Intelligence



Importance of Municipalities

"The way AI is adopted at the municipal level will directly shape how your residents experience these technologies, and whether they trust them. Decisions about data collection, system design, procurement, and oversight are not abstract; they have immediate, tangible impacts on people's daily lives. What happens in municipalities will affect your institutions' adoption of them, as well as whether provincial or federal AI programs are seen as more or less legitimate."



In Closing



AI will be embedded across society



Choices now shape future outcomes



Trust is the foundation of success

Thank you!

Information and Privacy Commissioner of Ontario

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