

Date: 2021-08-03

Subject: **Publication of City Employee Directory**

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Report Number: Corporate Support Services-2021-883

Recommendations:

1. That the report titled **Publication of City Employee Directory**, all wards, Report # Corporate Support Services – 2021-883 to the Committee of Council meeting of September 8, 2021, be received.

Overview:

City Council passed the following resolution on January 27, 2021:

Motion on Public Employee Directory

- **WHEREAS** The City of Brampton has committed to being an open and transparent municipality; and,
- **WHEREAS** The City of Brampton has a responsibility to its residents and businesses as taxpayers to be open and transparent; and,
- **WHEREAS** the Provincial Government of Ontario and the Government of Canada publicly list their employees and contact information (phone numbers) through search engines and departmental organization charts;
- **WHEREAS** the City of Brampton organizational chart is partially available and employee contact information is not made public;
- **THEREFORE BE IT RESOLVED** that staff report back to council before the end of Q2 with a strategy to publish the City of Brampton's organizational chart, including each employee's title and relevant contact information (email or phone) and identify any considerations for employees which cannot be published for reasons such as nature of their position, confidentiality, etc.

This report examines the range of implications (Privacy, Legal, Human Resources, I.T., et. al) for publishing the City of Brampton's organizational chart, and offers the recommended parameters for the City initiating this work in 2021.

Background:

Continuing to modernize the administration of access to information to allow members of the public to access staffing information in order to navigate City processes and receive information and updates regarding City functions may ensure Brampton continues to a Well-Run City that promotes a culture of customer service

Consideration should be given as to the purpose of posting such information externally as it relates to ensuring the appropriate protection of staff information and safety, cyber-security risks, and privacy considerations, while respecting departmental workflows as directed by management and City Council.

Current Situation:

The City currently outlines organizational structure and the names and roles of senior executives on the City website (<https://www.brampton.ca/EN/city-hall/departments/Pages/welcome.aspx>)

The Corporation also has an active directory on the City's main published number (905) 874-2000. This allows anyone to call that number and input an employee's extension or name to be redirected to the employee's extension #.

The Corporation provides an internal directory of all employees that is updated on a Monthly basis. Microsoft Exchange enables internal users, including Members of Council and their staff, to access an employee's phone number or email address, based on the names and titles listed in the directory.

Staff have presented recommendations that will enhance accountability and transparency for the City of Brampton by providing access to staff information (names, titles, contact information) in a similar way to the data published by the federal and some provincial governments as well as municipal comparators including the City of Toronto. Publishing the names, titles and contact information of staff is not considered to be private information under the *Municipal Act, 2001*, S.O. 2001, c. 25, or the *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56 (hereinafter referred to as *MFIPPA*).

It will take (3) months labour, and (1) dedicated FTE from I.T. Services to publish the City of Brampton's listing of contact info by employee in roles at the Manager level and up, and include general enquiry contacts and shared mailboxes. The template would be updated based on data available in the active directory or PeopleSoft. This process would occur monthly in keeping with existing processes for updating the internal organizational chart.

Staff will also include on the City's website, all current general contact information and existing communication and feedback processes for reporting, complaints, feedback, 3-1-1, and others, by Department and Operating areas.

Staff will ensure that all publication of any employee information complies with established regulations and legislation regarding privacy in Ontario, and therefore consult the Information and Privacy Commissioner of Ontario, on the appropriate implementation of this directory, and report back to Council in the event that staff receive substantive information that is contrary to these approved recommendations, to receive further direction.

Public Sector Comparators

1. The Government of Canada maintains the Government Electronic Directory Services (GEDS) –at <https://geds-sage.gc.ca/en/GEDS?pgid=002> - which provides a directory of public servants across Canada. Information in this directory is supplied by individual federal government departments and agencies and updated by one or more data administrators within each department. Some departments do not list all their employees. Employee information provided is limited to: Name – Title – Work Address and direct Phone Number.
2. The Government of Ontario maintains The INFO-GO website - <http://www.infogo.gov.on.ca/infogo/home.html> - and publishes two online corporate directories The INFO-GO website publishes two online corporate directories:
 - A. Employee Directory provides information on senior Government of Ontario employees, including:
 - *Office locations*
 - *Position Titles*
 - *Telephone numbers*
 - *Email addresses*
 - B. Organization Directory provides information on Government of Ontario offices, including:
 - *Office names and descriptions*
 - *Postal addresses*
 - *Telephone and fax numbers*
 - *Email and website addresses*
3. The City of Toronto provides regularly updates publicly available PDF documents online that include information for only key senior roles and their assistants within the organization, including: general phone lines and inboxes, street addresses and fax numbers. Employee information provided is limited to: Name – Title – and direct Phone Number.

Corporate Implications:

Financial Implications:

- This systems would have a financial implication of the cost of 3 months (1FTE) labour. Many of the systems already exist and would not have additional costs to implement a public directory.

Legal Implications:

- Council may consider whether an employee should be able to opt out of having their information published.

Privacy Implications:

- **Personal Information** - In terms of privacy implications, pursuant to section 2(2.1) of *MFIPPA*, the name, title, work email, and work phone number are not considered "personal information". Hence, this information is excluded from the Act. This is also the position taken by the Information and Privacy Commissioner of Ontario. There are exceptions to this section, but in the case of publishing an organizational chart with contact information, there would not likely be privacy issues with respect to the Act.
- **Opting Out** - Council may consider whether an employee should be able to opt out of having their information published.

Human Resources Implications:

- **Employee safety** – For employees dealing with domestic violence or other safety concerns, making full contact information actively available may increase their vulnerability and exposure
- **Appropriate and timely handling of complaints** – If concerns are being addressed to managers, directors or commissioners, there is a risk of delay in addressing the concerns that may be caused by the required redirection of complaints to appropriate parties in order to comply with the organizational policies, SOPs and legislative requirements.

- **Adhering to Existing Recruitment Processes** – Most candidates for employment are savvy about competitive recruitment processes and may choose to directly connect with the hiring managers or send their applications to the hiring managers instead of using the required Applicant Tracking System. Not only would that flood the inboxes of hiring managers, but it may also create additional work to ensure that applications were appropriately submitted and there were no actual or perceived conflict with compliance to the Recruitment and Retention Policy.
- **Retention challenges** – Recruitment firms would have greater and direct access to employees in critical positions and may increase the attempts to poach top talent that is hard to retain as is.

Information Technology Implications:

- **Timeline & Datasets** – It would take the I.T. Services team approximately 3 months (1 FTE) to implement an online organizational share in a searchable format, informed by current employee databases.

I.T. Services can make any level or layer of information available based on MDM (Master Data Management) which constructs the master data based PeopleSoft: Name, Title, Reporting relationship; Microsoft Exchange: Email address; and the Avaya Telephone System: Phone number.

- **I.T. Security** - Publicly sharing employee's email addresses and/or phone numbers will offer additional security risks from automated systems and actors against the City's I.T. systems.
 - Email addresses: Phishing attacks (i.e. emails sent with malicious links) will potentially increase. Attackers can automatically scrape the org chart for email addresses and automate phishing emails. Phishing email attacks happen already, but publishing employee emails will make the City an easier target and at greater risk of cyber-attacks.
 - Phone Numbers: Social engineering attacks will potentially increase. In this context, social engineering is defined as calling people and manipulate them to give up confidential information.

I.T. Services strongly recommends that any format utilized for publicly sharing employee information only include phone numbers, as the impact of publishing email addresses is far greater.

3-1-1 Customer Service Implications:

- **Active Directory** - The Corporation also has an active directory on the City's main published number (905) 874-2000. This allows anyone to call that number and input an employee's extension or name to be redirected to the employee's extension #.
- **3-1-1 Contact Process** - 3-1-1 maintains a process approved by Human Resources for when someone calls to ask for an employee and we are unable to locate them in the directory. 3-1-1 has a "personal transfer" article for each partner. The process is generally the same, regardless of the partner. (i.e. If someone requests to directly speak with an employee individual in the *Animal Services* department, 3-1-1 staff will refer to the directory and provide the relevant contact information for future reference before transferring to the individual
- **2020 Transfers to Departments vs. Specific Individuals** - In 2020, for 3-1-1 transfers, 8.27% were "tier 2" transfers to other operating departments/external agencies, only 0.27% of transfers were to named employees. This information suggests that transfers are both satisfied with and seeking departmental level contacts, rather than specific individuals.

Other Implications:

Term of Council Priorities:

This measure aligns with the TOCP that Brampton is a Well Run City and supports the City-mandated priority of establishing an improved Customer Service Engagement/ Tracking Model that will ensure timely and effective response to questions/applications from the public, and will ensure seamless transition between various employees and departments on multi-party processes to provide the best service to the public. Providing additional contact information for those contacting City staff may expedite response time and reduce the number of contacts required to receive a response.

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