



Open Government: Key Concepts and Benefits

September 2016



Information and Privacy
Commissioner of Ontario

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

Acknowledgement

We would like to thank the City of Guelph, the City of Toronto, and Treasury Board Secretariat, Government of Ontario, for reviewing an earlier version of this paper and providing helpful comments.

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1. INTRODUCTION

The Office of the Information and Privacy Commissioner of Ontario (IPC) is a strong supporter of Open Government because it enhances transparency of government actions and decisions, accessibility of government services and information, and public participation.

The purpose of this paper is to provide institutions covered by the *Freedom of Information and Protection of Privacy Act (FIPPA)* and the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* with an introduction to some of the key concepts and benefits of Open Government. It is intended to act as a starting point for institutions considering Open Government by highlighting two critical goals: enhancing access to government-held information and public participation.¹

2. WHAT IS OPEN GOVERNMENT?

The concept of Open Government is based on the core belief that the public has the right to access the records and proceedings of government.² Governments around the world are recognizing Open Government as an essential ingredient for democracy.³

Two significant and far-reaching goals of Open Government are to:

- improve the quality of governance and services by becoming more transparent, more accountable, and more responsive to the public⁴
- enable the public to make better and more informed decisions, resulting in an improvement to the quality of their lives⁵

Three broad terms are widely used to describe its key aspects:

1. **Open Data** is the proactive release of government data⁶ in free, accessible and machine readable formats,⁷ to encourage its use by businesses, the public and government
2. **Open Information** is the proactive release of information⁸ about government programs, services and operations to improve transparency and accountability and increase public understanding and engagement

1 In this paper the term government-held information is used to mean both data and information. When appropriate to the context the term data is specifically referenced.

2 Treasury Board of Canada Secretariat, “**Directive on Open Government**” (online), modified October 9, 2014.

3 Organization for Economic Cooperation and Development (OECD), *Modernising Government: The Way Forward* (Paris: OECD, 2005), 28, as cited in Carter Center, *Access to Information: Building a Culture of Transparency - Jamaica* (Atlanta: The Carter Centre, June 2006), 133.

4 Open Government Partnership, “**Mission and Strategy**” (online), accessed July 8, 2016.

5 Gwanhoo Lee and Young Hoon Kwak, IBM Center for the Business of Government, *An Open Government Implementation Model: Moving to Increased Public Engagement* (Washington, D.C.: IBM Center for the Business of Government, 2011), 11-12.

6 Data is raw, unorganized facts and figures that need to be processed. For example, a database containing a collection of numbers.

7 Machine-readable means the data is in a format that can be easily read, written, parsed and displayed by a computer.

8 Information is processed, organized data. For example, an analysis of numbers in a database that organizes that data so it is understandable and reveals its meaning and context.

3. **Open Dialogue** is active and intentional engagement, using new ways to give the public a meaningful voice in planning, decision-making and the development of government policies, programs and services⁹

The key difference between Open Data and Open Information is the format of the records involved. The intent of both activities is to make government-held records accessible to the public with no, or few, restrictions. Both are based on the following fundamental values:

- **Timely:** Records should be published as quickly as possible and kept up-to-date
- **Accessible:** Records released by the government should be as accessible as possible
- **Complete:** Published records should be as complete as possible
- **Affordable:** Open records should be available for **free or at low cost** to eliminate barriers to access
- **Non-discriminatory:** Proactively published records should be available to everyone¹⁰

3. ENHANCING TRANSPARENCY

Increased openness and transparency are essential underpinnings of Open Government. Related benefits include:

- strengthening democracy by making government more accountable for its decisions and spending¹¹
- advancing a more efficient and effective government that is open to public scrutiny¹²
- creating economic opportunities that benefit business, government and the public

The public can only evaluate government conduct and hold it accountable if it has access to the information upon which decisions are based. Making the workings of government open and providing access to government-held information can enhance the ability of the public to scrutinize its actions, reduce the potential for corruption and promote integrity.¹³

9 Government of Ontario, Open Government Engagement Team, “**Open by Default: A new way forward for Ontario**” (online), modified April 1, 2016.

10 Open Government Engagement Team, “**Open by Default**” (online), Sunlight Foundation, “**Open Data Policy Guidelines**” (online), accessed July 8, 2016, and Sunlight Foundation, “**Ten Principles for Opening Up Government Information**” (online), modified August 10, 2011.

11 Helen Darbishire, World Bank Institute, *Proactive Transparency: The future of the right to information? A review of standards, challenges, and opportunities* (Washington, D.C.: World Bank Institute, March 2010), 3, 10.

12 United States Government, Obama Administration (The White House), *The Obama Administration’s Commitment to Open Government: A Status Report* (Washington, D.C.: United States Government, September 2011), 4-5.

13 Rebecca Zausmer, Global Partners and Associates, *Towards open and transparent government: International experiences and best practices* (London: Global Partners and Associates, December 2011) 3, 4.

People are especially interested in understanding how public money is spent. Making procurement and other expenditure records open to the public can strengthen clarity and accountability around government spending. Transparency not only creates checks on spending, but it can drive competition around procurement and make for more efficient spending of public resources.¹⁴

Providing access to government-held information can also foster entrepreneurship, innovation, scientific discovery and new economic activities, including the creation of new services and products in both the public and private sectors. There has been more than \$3 trillion of potential economic benefit from Open Data worldwide,¹⁵ with \$1.3 trillion in possible economic development in North America alone.¹⁶ A 2015 review of Canadian cities' Open Data initiatives concluded that some are starting to see economic benefits through the development of applications based on their data. Some cities also reported operational cost savings as a result of their Open Data programs.¹⁷

In addition, there are indirect economic benefits of Open Government. For example, the City of Toronto's **Participatory Budgeting Pilot** enables community residents to propose and vote on projects related to their neighbourhoods. The resulting improvements could make an area safer or more accessible which, in turn, could foster commercial activity. The cities of Guelph and Hamilton have also reported experiencing indirect economic benefits of Open Government through their use of participatory budgeting.¹⁸

Below is a discussion of key considerations to help you advance the goal of enhanced transparency in your institution.

3.1 OPEN BY DEFAULT

A central tenet of Open Government is that government-held information should be made public, unless there are legitimate legal, privacy, security or confidentiality reasons not to do so. This concept is known as open by default and mirrors *FIPPA* and *MFIPPA*'s overarching access principles that government-held information should be available to the public, and necessary exemptions from the right of access should be limited and specific.¹⁹

Open Government expands access to government-held information beyond the traditional freedom of information system. It requires you to do more than just reactively disclose information in response to access requests under *FIPPA* and *MFIPPA*. A dominant focus of

14 Information and Privacy Commissioner of Ontario (IPC), *Open Contracting: Proactive Disclosure of Procurement Records* (Toronto: IPC, September 2015), 1.

15 James Manyika et al., McKinsey Global Institute, *Open data: Unlocking innovation and performance with liquid information* (New York: McKinsey & Company, October 2013), cited in United States Government, Obama Administration (The White House), *United States Open Data Action Plan* (Washington, D.C.: United States Government, May 9, 2014), 4.

16 Treasury Board of Canada Secretariat, *Canada's Action Plan on Open Government 2014-2016* (Ottawa: Her Majesty the Queen in Right of Canada, 2014), 10.

17 Tyler Sutton, *Public Sector Digest*, "Open Cities Index 2015 Report (online)," February 2016. Five Ontario cities were identified as part of the Open Cities Index Top Ten: Toronto, Ottawa, London, Windsor, and Oakville.

18 Melihate Limani, University of Western Ontario Department of Political Science, *Citizen Engagement in Budget Planning in Ontario Municipalities - MPA Research Report*, (London: University of Western Ontario, August 2014), 16.

19 *Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. F.31, s. 1(a)(ii)-(iii), (*FIPPA*), and *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56, s. 1(a)(ii)-(iii), (*MFIPPA*).

Open Government is on the proactive disclosure of government-held information in anticipation of, and in response to, the public's needs and interests.

Rather than waiting for an access request (formal or informal), Open Government encourages you to apply open by default to your institution's records, and to determine if there is a legitimate reason why you should not publish them. If there is not, your default practice should be to make them open while appropriately addressing your privacy, confidentiality, security and legal requirements.

FIPPA and *MFIPPA* allow institutions to make general records (that is, those records that do not contain personal information)²⁰ publicly available on a proactive basis. Also, the acts require proactive disclosure of certain records so the public can better understand the work of institutions and the records they hold.²¹ These and other legislative publication requirements support the transparency objective of Open Government.

Proactive disclosure may help reduce the time, costs and effort associated with access requests for both the requester and your institution. For example, access requests to the City of Toronto dropped by 50 percent after its implementation of proactive disclosure.²²

The transparency goal can also be furthered by the reactive release of information. Embedding open by default into your access request response practices can help you disclose as much of the requested records as possible, while addressing privacy, confidentiality, security and legal requirements.

The open by default concept does not compromise or replace an individual's right of access to information, or limit your institution's obligations under *FIPPA* or *MFIPPA*. Rather, it complements the legislation by promoting the proactive and reactive release of government-held records while protecting privacy.

3.2 PUBLICATION PRIORITIES

Determining what government-held information should be made open is an on-going process. You will likely need to return to this step as your Open Government initiative expands and you receive feedback from your users and the public on their needs and priorities.

Data or information of no interest to anyone will not likely be used. To foster use of government-held information to develop applications and services, it needs to be relevant. Also, consider what is of interest to the public. For example, the City of Toronto's **Property Tax Lookup** enables residents to review their property tax account anytime, anywhere, from their computer or mobile device. The City of Toronto also has lookups for **utility** information and **parking tickets**. Other municipalities, such as the **City of Waterloo**, have similar initiatives.

20 Personal information means recorded information about an identifiable individual. For a full definition see s. 2(1) of *FIPPA* and *MFIPPA*.

21 For example, s. 33(1)(a)(i)-(iii), 33(1)(b), 35(2), 44 and 45(a)-(g) of *FIPPA*, and s. 34(1) of *MFIPPA*.

22 British Columbia Freedom of Information and Privacy Association (FIPA), *Proactive and reactive disclosure of government-held information in British Columbia* (Vancouver: FIPA, March 9, 2011), 1, 4.

Real-time and ongoing feedback from your users and the public on what information they value will help ensure your Open Government efforts are on target.²³ This issue is discussed further under **Enhancing Public Engagement**.

Government-held information that has been identified as being of high value by public feedback should be a priority for publication (for example, information that is the subject of a high number of website searches, related webpage usage and freedom of information or other requests). Work with your web team, correspondence unit, call centre, program areas and freedom of information and privacy coordinator to help determine what information is in high demand.²⁴

You can also determine what government-held information is highly valued by surveying the public and other internal and external users. As an example, the Ontario government published a list of 1,000 datasets and asked the public to vote on which should be made open.²⁵

Initially, you may also want to prioritize information that will cost less to release, such as data that is already published or collected in a machine-readable format and will take less time and resources to prepare for publication.

Types of government-held information that may be considered high value and a publication priority include information that:

- is collected or produced in support of government priorities
- increases transparency and accountability, specifically government-held information used to create legislation, regulations, or information related to asset management, procurement contracts and audited financial information
- is useful for internal and external stakeholders' evaluation of the delivery of policy, programs or services
- can help improve the delivery of programs and services²⁶

You may find it useful to look at what other similar institutions have done and their experience in terms of the proactive publication of their information. Their experience may help you to determine your publication priorities.

Open Government is not just about making more government-held information available because of potential government efficiencies or economic development. An overarching and paramount consideration is how access to government-held information can positively impact the public. To support this endeavour, feedback from the public on the usefulness and accessibility of your published records to facilitate continuous improvement is essential.²⁷ A vital lesson learned from early Open Government initiatives is that releasing information that is relevant to both your institution's performance and the public's interest is a good investment.²⁸

23 Lee and Kwak, *An Open Government Implementation Model*, 11-12.

24 Ontario Treasury Board Secretariat, *Open Data Guidebook: A Guide to the Open Data Directive, 2015* (Toronto: Government of Ontario, November 27, 2015), 8.

25 Ontario Treasury Board Secretariat, "Open data voting tool results" (online), published April 30, 2015.

26 Ontario Treasury Board Secretariat, *Open Data Guidebook*, 7-8.

27 Lee and Kwak, *An Open Government Implementation Model*, 11-12.

28 Natalie Helbig et al., University at Albany Center for Technology in Government, *The Dynamics of Opening Government Data: A White Paper* (Albany: The Research Foundation of State University of New York, December 2012), 28-29.

3.3 FEES

Around the world there is a general understanding that government-held information published as part of Open Government should be available free of charge or at minimal cost. For example, the Canadian and Ontario governments both provide access to Open Data at no charge.

Some jurisdictions permit the charging of minimal processing fees in certain circumstances. If you decide to charge fees, they should be justified (for example, photocopying and postage), transparent, consistent and kept to a minimum.²⁹ To advance the transparency objective and to ensure equitable access, it is critical that fees not be so high as to deny access for those who cannot afford it.

The potential loss of income from the sale of government-held information has been a concern for some governments. A United Kingdom study showed that ending the practice of reselling datasets such as maps and postcodes would cost the government around £50 million a year in lost fees. However, it also found that the overall benefit of opening up government-held data far outweighed this loss, with some estimates suggesting that the impact for the economy could be billions of pounds.³⁰

3.4 OPEN GOVERNMENT LICENCE

The Canadian government, in consultation with the provinces and the public, developed an **Open Government Licence**. It is intended to be used by all levels of government to increase openness and minimize restrictions on the use of information.³¹ To date, that licence has been adopted by the Government of Canada and several provincial governments, including Ontario, and numerous municipalities across the country. The Open Government Licence is designed to remove restrictions on the use of published information.³² It permits users to copy, modify, publish, translate, adapt, distribute or otherwise use the information in any medium, mode or format, for any lawful purpose. Use of any information made available under the licence indicates the user's acceptance of the defined terms. Users must acknowledge the source of the data or information. The licence also defines a few exemptions (for example, it does not grant users any right to use personal information or information subject to other intellectual property rights, including patents, trademarks and official marks).³³

You will need to determine if and how you are going to licence your Open Data and Open Information. The IPC urges you to consider the advantages to your institution and users of harmonizing your licence with other Canadian jurisdictions. When information from different institutions or levels of government has a common licence, such as the Open Government Licence, it is governed by the same legal principles and users do not have to meet different terms and conditions.³⁴

29 United Kingdom Information Commissioner's Office (ICO), *UK Model Publication Scheme* (version 1.2) (Wilmslow: ICO, October 23, 2015), 3.

30 Chris Yiu, Policy Exchange, *A Right to Data - Fulfilling the promise of open public data in the UK* (London: Policy Exchange, March 2012), cited in United Nations Department of Economic and Social Affairs (UNDESA), *Guidelines on Open Government Data for Citizen Engagement*, UN Doc ST/ESA/PAD/SER.E/177, 2013, 33.

31 Government of Canada, "Open Data 101" (online), accessed July 7, 2016.

32 Government of Canada, "Open Government Licence Consultation Report" (online), modified February 2, 2015.

33 Government of Canada, "Open Government Licence – Canada" (online), modified March 11, 2015.

34 British Columbia Ministry of Labour, Citizens' Services and Open Government, "British Columbia Adopts Canadian Open Government License," DataBC (blog), June 19, 2013.

4. ENHANCING PUBLIC ENGAGEMENT

A central objective of Open Government is to support and empower the public to make informed decisions, better engage with the government and have a more active voice in society. By enabling the public to observe the workings of government, Open Government helps them hold it accountable. In addition, enhanced public participation can result in more informed and better government policies, practices and decisions, and in more responsive, innovative and effective governance and services.

All levels of government recognize that many complex policy and program issues require the collective knowledge and creativity of government, civil society, business and the public.³⁵ In particular, the inclusion of underrepresented constituencies in policy and program development, implementation and evaluation can improve decision-making, transparency and accountability.³⁶

Public engagement can take many forms — from a one-way dissemination of information to public consultation and collaboration where solutions are developed together. The goals of engaging the public as part of Open Government include:

- **Informing the public:** let the public know about issues, changes, resources and policies
- **Exploring an issue:** help the public to learn about a topic or problem
- **Transforming a conflict:** help resolve disagreements and improve relations among groups
- **Obtaining feedback:** understand stakeholders' and the public's view of an issue, problem or policy
- **Generating ideas:** help create new suggestions and alternatives
- **Collecting data:** gather information about stakeholders' and the public's perceptions, concerns, needs, values and interests
- **Identifying problems:** get information about current and potential issues
- **Building capacity:** improve the community's ability to address issues
- **Developing collaboration:** bring groups and people together to address an issue
- **Making decisions:** make judgments about problems, alternatives and solutions³⁷

35 United Kingdom Cabinet Office, *Open Government Partnership - UK 2013 Draft National Action Plan* (London: Crown Copyright, June 2013), 8.

36 UNDESA, *Citizen Engagement*, 20-21.

37 Tina Nabatchi, IBM Center for the Business of Government, *A Manager's Guide to Evaluating Citizen Participation*, (Washington, D.C.: IBM Center for the Business of Government, 2012), 10.

To achieve these diverse objectives and ensure your Open Government initiative is sustainable, your institution should have a meaningful two-way dialogue with the public.³⁸ Sometimes called **Open Dialogue**, this public engagement is an essential component of Open Government, beyond just determining your **publication priorities**, outlined earlier.

One challenge in developing Open Government activities is to match the appropriate type of public engagement with the right issues. A mismatch of processes and issues could result in initiatives that are ineffective, difficult to implement or that lack buy-in from stakeholders and the public.³⁹ Therefore, you will need to use different methods in different situations. For example, the Government of Ontario's **Public Engagement Framework** was developed to help it engage more Ontarians in a meaningful way. It lays out four approaches that can be used for different situations: share, consult, deliberate and collaborate.⁴⁰

Below are some key considerations to help you advance the goal of enhanced public engagement.

4.1 USEFUL ACCESS ENABLES PUBLIC PARTICIPATION

Another important lesson learned from early Open Government efforts is that some users may lack the expertise and technical knowledge to use Open Data and Open Information to its full potential. Explaining the records you publish can make them more useable and understandable to diverse audiences.

For example, one jurisdiction initially published its restaurant inspection data in the same format used by inspectors and restaurant owners. The lack of context and an explanation of the technical language used created misunderstandings of the data.⁴¹

Using effective data management systems (for example CKAN — Comprehensive Knowledge Archive Network) and visualization tools can help your users organize voluminous and complex data in a way that they understand.⁴² For example, the City of Burlington's **Open Budget initiative** allows for visualization and exploration of the City's capital and operating budgets.

4.2 CITIZEN CENTRIC USE OF TECHNOLOGY

Technological developments have made the exchange of information more convenient and affordable, raising people's awareness and expectations of the extent and quality of government-held information available to the public. Nearly 90 percent of Ontarians regularly make purchases, find information and interact online. Increasingly, the public wants to connect with government anytime, anywhere, on any device. To meet changing public expectations, the Government of Ontario is adopting a "digital-by-default" approach that makes online services

38 Government of Canada, "Open Government Frequently Asked Questions" (online), modified June 10, 2016.

39 Don Lenihan and Carolyn Bennett, *Canada 2020*, "Rebuilding Public Trust: Open Government & Open Dialogue in the Government of Canada" (online), April 28, 2015.

40 Government of Ontario, "Public Engagement" (online), modified May 18, 2016.

41 Helbig et al., *The Dynamics of Opening Government Data*, 25-26.

42 UNDESA, *Citizen Engagement*, 27.

simpler, easier and more intuitive.⁴³ All levels of government and public sector institutions face this challenge, and it is a central priority for enhancing public participation.

Technology and applications that focus on user collaboration, sharing of user-generated content, and social networking (for example, Web 2.0 tools such as web dialogues, blogs, photo/video sharing, social bookmarking/tagging, contests and voting) enable greater public participation. Unlike conventional feedback methods such as surveys and questionnaires, social media can allow the public to engage in informal conversations with government.⁴⁴

For example, in addition to other venues for feedback, such as in-person information sessions, working groups, and stakeholder and expert panels, the Ontario government used online consultation for the following initiatives:

- **Open Data Directive** — via Google Docs, email and social media
- Culture Strategy — through **Culture Talks**, an interactive forum to discuss and vote on ideas
- **Condominium Act** — by enabling email submissions
- **Red Tape Challenge** — by crowdsourcing and soliciting online comments

Many types of institutions are using online consultation and discussion forums to engage with the public (for example, the **City of Ottawa** and **Legal Aid Ontario**). Increasingly, institutions are allocating staff and creating formal community engagement policies. For example, the City of Guelph has a **framework** and **guiding principles** of community engagement, and the City of Brampton has an **office of community engagement**.⁴⁵ Municipalities are often at the forefront of Open Government, but the need for enhanced public engagement is relevant to all types of institutions.

Open Government is about engaging the public in new ways. It should involve technology that is accessible, easy to use and accommodates different levels of knowledge and diverse interests to provide better public services. Examples of this approach include:

- instead of posting static PDF documents online, present information in a format that makes it easy for a person to understand and use (for example, a map or a data visualization tool)
- instead of having a web feedback form for people to submit ideas, offer a dialogue-based platform where people can post and comment on ideas and vote them up or down (for example, the Government of Ontario's **Budget Talks**)
- instead of a website that only works on a desktop computer screen, create a website that adapts its layout and navigation tools to any screen size, on any device

43 Government of Ontario, "Digital Government" (online), modified June 24, 2016.

44 Lee and Kwak, *An Open Government Implementation Model*, 13.

45 Limani, *Citizen Engagement in Budget Planning*, 35-36.

4.3 TWO-WAY DIALOGUE

The public expects to be able to comment and ask questions using a wide variety of online channels.⁴⁶ Therefore, you will need to develop and implement robust engagement tools and strategies to enable a true dialogue.⁴⁷ Your Open Government initiative will need to solicit and receive public input, to review and analyze comments, and to provide timely and consistent feedback on how they were considered. This capability requires appropriate technology and support, formal processes, coordination mechanisms and staff to respond to public comments.⁴⁸

Ineffective public engagement practices could lead to disengagement by your users and the public.⁴⁹ Be clear and transparent about how you will be addressing public feedback so you can effectively manage expectations and not jeopardize public trust.

It is also important to understand that Open Government is not exclusively an online activity. The public's needs should dictate how you engage with them. You may need to publish information through multiple communication channels. The primary goal is to help the public to quickly and easily locate the information and services they need.

When developing your Open Government activities make sure they do not increase the digital divide, further marginalizing those who are already marginalized.⁵⁰ Promoting accessibility and inclusion is critical when engaging the public (for example, language options for content and access for the disabled, including the hearing and vision impaired).⁵¹

5. CONCLUSION

The IPC encourages institutions under *FIPPA* and *MFIPPA* to adopt Open Government. The intent of this paper is to support efforts to advance Open Government in your institution.

To be effective, you should be guided by open by default, which means that your information and data are presumed to be open to public scrutiny unless there is a compelling reason for them not to be. You should also engage your users, stakeholders and the public to ensure that your Open Government initiative is relevant, effective and sustainable.

46 Kathleen McNutt, ed., University of Regina Graduate School of Public Policy, *Social Media & Government 2.0* (Regina: University of Regina, November 30, 2012), 12-13.

47 Barbara Ubaldi, Organisation for Economic Co-operation and Development, "Open Government Data: Towards Empirical Analysis of Open Government Data Initiatives," *OECD Working Papers on Public Governance*, no. 22 (2013), 35, doi:10.1787/5k46bj4f03s7-en.

48 Lee and Kwak, *An Open Government Implementation Model*, 13.

49 Ellie Brodie et al., Pathways through Participation, *Pathways through Participation: What creates and sustains active citizenship?* (London: NCVO, IVR and Involve, September 2011), cited in Open Government Partnership, "Open Gov Guide-Citizen Engagement" (online), accessed March 16, 2016.

50 UNDESA, *Citizen Engagement*, 41.

51 Ubaldi, "Open Government Data," 37-38.



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September 2016