



## Information Memo

To: Special Council Meeting  
Date: May 20, 2025  
Division: Office of the Chief Administrative Officer  
Department: Administration  
Ward: All Wards  
Subject: Breach of Confidential Correspondence – Investigative Update

### Recommendation(s):

That the Information Memo regarding a breach of CONFIDENTIAL Correspondence – Investigative Update be received as information, and

That Council direct staff on next steps, if any, as deemed appropriate by Council.

### Background

On February 28, 2025, Norfolk's Chief Administrative Officer (CAO) was notified of a potential security / confidentiality breach, possibly involving Norfolk staff.

The CAO of Haldimand County had noticed an anonymous post on a Facebook page that contained CONFIDENTIAL correspondence between the two municipalities (Norfolk and Haldimand). The anonymous post indicated the documents were leaked by a Norfolk staffer, as the headline contained:

“Norfolk County staffer proving Amy Martin’s disdain for Haldimand County”

The documents posted on the Facebook page involved CONFIDENTIAL correspondence in relation to the health unit merger. To be clear, Norfolk’s concern in regard to this confidentiality breach focused on the source of the leak, a “Norfolk staffer”.

### Discussion:

In response to this very concerning security / confidentiality breach, the CAOs of both Norfolk and Haldimand decided to launch an investigation into this very important development, as an organization cannot run efficiently and effectively in the absence of trust amongst staff.

It was determined that Haldimand would retain an investigative firm, and the costs of the investigation would be shared equally by the municipalities. Both CAOs met with the lead investigator and answered all questions related to the investigative assignment.

Norfolk made all staff and elected officials available to the investigator and the investigator had full and unfettered access to any and all individuals they felt needed to be interviewed, including full access to our information technology systems, including email and texts, in an attempt to identify the source of the security / confidentiality breach.

On Friday May 09, 2025, both CAOs received the confidential report and investigation. A redacted version of the report is available in Appendix A attached to this report. The 40-page report is quite extensive and on page 39, as part of the conclusion states:

“There are clues in the emails, which assist in determining where they were printed. The emails were printed by someone from Haldimand County.”

As such, Norfolk’s CAO feels confident that neither Norfolk staff nor Norfolk elected officials were responsible for the security / confidentiality breach and wanted to assure Council and the public that Norfolk staff were not responsible for the breach. This reassurance is extremely important in running the administration and confirming that staff in Norfolk can be trusted with confidential information.

#### **Financial Services Comments:**

The agreement with Haldimand stipulates that investigative costs associated with this report and investigation are to be shared equally between Haldimand and Norfolk. At the time of retaining the investigator, an upside limit of \$15,000 was negotiated. The invoice for this work was received on May 15, 2025. Total cost was \$10,789.24 (including HST). Norfolk and Haldimand will be sharing the costs equally. The Approved 2025 Levy Supported Operating Budget includes sufficient funds to accommodate this expenditure.

It is worth noting that investigating and managing potential confidentiality breaches as soon as possible is more cost effective and lower risk than any deferral of action. This type of investigation can also ensure that appropriate policies and procedures are in place for handling confidential information or highlight any areas for improvement or additional training requirements.

#### **Attachment(s):**

- Attachment A: CONFIDENTIAL REPORT – BREACH OF CONFIDENTIAL CORRESPONDENCE – *REDACTED VERSION*

**Conclusion:**

Maintaining trust in administrative operations and public trust in our local government is paramount to our society and democracy. Any breaches of trust and confidentiality need to be investigated and those found responsible for breaches must be held to account. Based on the results of the investigation, Norfolk County staff were not responsible for this breach and the public should be reassured that Norfolk County administration remains trustworthy, professional and ethical.

**Approval:**

Prepared, Reviewed and Approved By:  
Al Meneses, CAO