

Toronto Employers Face New COVID-19 Reporting Requirements

Article By:

Michael Comartin

Christina Persad

On January 4, 2021, the City of Toronto announced that employers and workplaces operating in Toronto's public health unit will be subject to new reporting requirements regarding positive COVID-19 cases. In addition, Toronto Public Health announced that it will begin reporting data on workplace outbreaks effective January 7, 2021.

Reporting Outbreaks to Toronto Public Health

On January 4, 2021, Toronto's medical officer of health, Dr. Eileen de Villa, issued a [Letter of Instruction](#) to all Toronto employers that are "permitted to be open under the *Reopening Ontario Act*." Under these instructions, employers must immediately notify Toronto Public Health when the employer or person responsible for a business or organization becomes aware of "**two or more people** who test positive for COVID-19 within a 14-day interval in connection with [the] workplace premises." [Emphasis in original.] Employers may notify Toronto Public Health via phone at (416) 338-7600.

In a [press release](#) issued on January 4, 2021, Toronto Public Health reiterated that according to the letter of instruction, employers must also provide to the department:

- the name of a "designated contact" who will "work with [Toronto Public Health] to immediately implement any additional required measures to reduce virus spread"; and
- "contact information for all workers within 24 hours to support case and contact tracing."

Toronto Public Health to Release Workplace Outbreak Data

Toronto Public Health also stated in the press release that it will publish data collected on reported workplace outbreaks on a weekly basis, starting January 7, 2021. According to Toronto Public Health, this data will not include specific information on individual workplaces or employees, but "will be published weekly in the following categories determined by Public Health Ontario and based on

the North American Industry Classification System:

- Bar, restaurant, nightclub and other entertainment venues
- Event venues, and religious facilities
- Non-institutional medical health services including doctor's offices, physiotherapy clinics, dental settings and wellness clinics
- Personal service settings including hair salons, tattoo parlours, nail salons and spas
- Recreational fitness facilities, group fitness classes, team sports and related events
- Retail settings including grocery stores, pharmacies and malls
- Farms
- Food processing plants
- Offices, warehouses, shipping and distribution, construction, and manufacturing settings
- Other workplaces and community settings not captured in these categories
- Unknown"

Key Takeaways for Employers

The announcements from the City of Toronto and Toronto's medical officer of health indicate that employers in Toronto's public health unit may face greater scrutiny of the measures they have taken to control and limit the spread of the COVID-19 virus in the workplace. This is also a reminder to employers that they may want to ensure that they have systems in place to ensure compliance with the various reporting requirements that are triggered by a COVID-19 workplace outbreak, including reports to local public health, Ontario's Ministry of Labour, Training and Skills Development, and the province's Workplace Safety and Insurance Board.

© 2025, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., All Rights Reserved.

National Law Review, Volume XI, Number 9

Source URL: <https://natlawreview.com/article/toronto-employers-face-new-covid-19-reporting-requirements>