



Council Policy #59

PRIVACY MANAGEMENT AND ACCESS TO INFORMATION POLICY

Approved by Council Resolution # 26/05/19

1. PURPOSE:

This Policy establishes the governance framework and guiding principles for the City's Privacy Management Program and supports the City's compliance with applicable access to information and privacy legislation.

2. POLICY STATEMENT:

The City of Beaumont is committed to responsible information management, protection of personal information, and transparent governance in accordance with applicable legislation.

3. DEFINITIONS:

Employee means any employee of the City and includes volunteers, students, contractors, consultants, agency personnel, appointees, and any other individual acting on behalf of the City.

Personal Information has the same meaning as set out in the *Protection of Privacy Act*, SA 2024, c P-28.5, as amended from time to time.

Privacy Legislation means collectively: *Access to Information Act*, SA 2024, c A-1.4; *Protection of Privacy Act*, SA 2024, c P-28.5; and all associated regulations, as amended from time to time.

Privacy Management Program or "PMP" means the coordinated framework of policies, procedures, practices, training, safeguards, oversight mechanisms, and accountability measures established by the City to support compliance with Privacy Legislation.

Privacy Officer means the individual designated by the Chief Administrative Officer to administer and coordinate the City's privacy and access to information functions and any delegated responsibilities under applicable legislation.

4. SCOPE/APPLICATION:

This Policy applies to Council, Employees, and all City records and information systems within the custody or control of the City. Compliance with this Policy is required in all City programs, services, projects, and business activities involving City information.

5. GUIDELINES:

5.1. Principles

The following principles guide the City's management of information and operation of its Privacy Management Program:

5.1.1. Openness and Transparency

The City is committed to transparent and accountable governance and will maintain policies, procedures, and practices that support lawful access to information while protecting personal information and confidential records. The City's Privacy Management Program is available to the public, subject to any withholdings required or permitted by law.

5.1.2. Designation of Privacy Officer

The City designates the position of Privacy Officer responsible for overseeing and coordinating the City's privacy and access to information functions. The Privacy Officer serves as a resource to Employees, Council, and the public regarding privacy and access matters

5.1.3. Collection of Personal Information

The City will collect personal information only where authorized by legislation and where the information relates directly to and is necessary for a municipal program, service, or activity. When collecting personal information directly from an individual, the City will provide notice of collection in accordance with legislative requirements.

5.1.4. Correction of Personal Information

The City will take reasonable steps to ensure personal information in its custody or control is accurate and complete. Individuals who believe there is an error or omission in their personal information have a right to request correction of their personal information in accordance with applicable legislation and City processes.

5.1.5. Use and Disclosure of Personal Information

The City will use and disclose personal information only for the purpose for which it was collected or as otherwise authorized or required by legislation. Employees and Council are expected to handle personal information responsibly and in accordance with this Policy and Privacy Legislation.

5.1.6. Compliance Challenges and Privacy Complaints

The City encourages individuals to raise questions, concerns, or complaints regarding the handling of personal information or access to records. Concerns may be directed to the Privacy Officer for review and response. Individuals also have rights under applicable legislation to request a review or investigation by the Information and Privacy Commissioner of Alberta

5.1.7. Information Safeguards and Privacy Incidents

The City will maintain reasonable administrative, technical, and physical safeguards to protect information in its custody or control against unauthorized access, collection, use, disclosure, modification, loss, or destruction. The City will respond to privacy incidents in a timely manner in accordance with legislative requirements and established procedures.

5.1.8. Right of Access

The City respects the public's right of access to information, including personal information about themselves, in the custody or control of the City, subject to the limited and specific exceptions established by legislation. The City will respond to access requests in accordance with legislative requirements and established procedures.

5.2. Quality Assurance

The following measures support the ongoing effectiveness and continuous improvement of the Privacy Management Program:

5.2.1. Policy Review

The City will review this Policy every 2 years and otherwise as necessary to ensure alignment with legislative requirements, operational needs, and evolving best practices.

5.2.2. Mandatory Training and Awareness

The City provides Employees with training about their obligations under Privacy Legislation every 3 years and otherwise as necessary to support compliance with legislative and organizational requirements.

5.2.3. Monitoring and Risk Assessment

The City regularly monitors and tests its systems, practices, and repositories to identify and address any potential risks relating to the privacy, accessibility, usability, integrity, retention, continuity, and security of City information, and to support compliance with legislative and organizational requirements.

5.2.4. Privacy Impact Assessments

The City completes privacy impact assessments in accordance with Privacy Legislation for any systems, projects, programs, services, or practices that introduce significant new or expanded collection, use, disclosure, processing, or security exposure of personal information.

6. ROLES AND RESPONSIBILITIES:

6.1. Council

Council is responsible for approving this Policy, adhering to Privacy Legislation, handling City information responsibly, and supporting transparency in governance. Members of Council are expected to comply with the Privacy Legislation, including but not limited to assisting in responding to access requests for City information when requested by the Chief Administrative Officer or the Privacy Officer and taking privacy-related training as offered by the Chief Administrative Officer.

6.2. Administration

Administration is responsible for developing and maintaining procedures, practices, safeguards, and training programs necessary to support the implementation of this Policy and the ongoing operation of the Privacy Management Program.

6.3. Chief Administrative Officer

The Chief Administrative Officer serves as the Head of the City for the purposes of Privacy Legislation and is responsible for supporting organizational compliance with Privacy Legislation requirements. The Chief Administrative Officer is responsible for ensuring appropriate administrative structures, resources, and procedures are established to support the Privacy Management Program. The Chief Administrative Officer may delegate powers, duties, or functions in accordance with Privacy Legislation and is responsible for designating the Privacy Officer.

6.4. Privacy Officer

The Privacy Officer is responsible for administering and coordinating the City's Privacy Management Program and supporting compliance with Privacy Legislation. This includes providing guidance on privacy and access matters, coordinating responses to access requests and privacy incidents, supporting training and awareness initiatives, and overseeing related procedures and processes. The Privacy Officer also performs such powers, duties, and functions as may be delegated by the Chief Administrative Officer under applicable legislation.

6.5. Employees

Each Employee is responsible for protecting City information and supporting the City's compliance with this Policy, associated procedures, and Privacy Legislation, including, but not limited to:

- adhering to this Policy and all associated procedures;
- reporting privacy incidents to the Privacy Officer;
- directing privacy complaints or concerns to the Privacy Officer; and
- completing required training.

7. AUTHORITY TO IMPLEMENT:

- 7.1. For the purposes of the *Access to Information Act*, the Chief Administrative Officer is the designated Head of the Municipality.

7.2. The Head has authority for the policy and must ensure the policy requirements are met and updated as required.

Policy Record

Adopted by Council: May 26, 2026

Council Resolution: 26/05/19

Cross Reference:

Access to Information Act, SA 2024, c A-1.4

Access to Information Act Regulation, Alta Reg 133/2025

Protection of Privacy Act, SA 2024, c P-28.5

Protection of Privacy (Ministerial) Regulation, Alta Reg 143/2025

Protection of Privacy Regulation, Alta Reg 132/2025

Access to Information Act (ATIA) Bylaw

Administrative Responsibility: Director, Legal and Legislative Services

Next Review Date: Q2, 2028