



CITY PROCEDURE

Access to and Correction of Personal Information

Procedure Title	Access to and Correction of Personal Information		
Procedure Number	507-2	Approved Date	2026-07-16
Department	Legislative and Legal Services	Last Amended	2026-10-06
City Manager Signature	"S. Bourke" (signed)	Last Reviewed	2026-10-06
		Signature Date	2026-10-09

1. Purpose

- 1.1. The purpose of this procedure is to provide direction for responding to Access Requests and Correction Requests in accordance with Provincial Privacy Legislation and City policy.

2. Definitions

The definitions in [Policy 507 Privacy Management](#) apply to this procedure. In addition, in this procedure:

- 2.1. **"Access Request"** means a request under section 7 of ATIA for access to a Record, including a Record containing the applicant's own Personal Information.
- 2.2. **"Correction Request"** means a request by an individual under section 7 of POPIA to correct an error or omission in their own Personal Information.
- 2.3. **"Privacy Coordinator"** means the position responsible for operational administration, carrying out the powers, duties and functions related to Provincial Privacy Legislation that are delegated to the Privacy Coordinator by the City Manager.
- 2.4. **"Third Party"** means any person, group of persons or organization, but does not include: (a) the City; (b) the person making the request; or (c) a person on whose behalf the request is made.

3. Scope

- 3.1. This procedure applies to all Employees who receive, process or support access to or requests for correction of Personal Information.
- 3.2. Employees receive and refer requests and assist with intake; the Privacy Coordinator administers formal requests and issues decisions under Provincial Privacy Legislation.



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4. Procedure & Guidelines

4.1. Receiving Requests

- 4.1.1.** Employees who receive an inquiry about access to or correction of Personal Information must direct the individual to the required form and the Privacy Coordinator's contact information, and may assist the individual to describe the Records sought or the correction requested.
- 4.1.2.** A request that can be satisfied as a Routine Disclosure under section 4.7 of Procedure 507-1, or as a routine update under section 4.4.1 of this procedure, may be handled by Employees in the ordinary course.
- 4.1.3.** Every other request for access to or correction of Personal Information is a formal request. A request made in writing under ATIA or POPA, or on a City access or correction form, is always a formal request. Employees must refer formal requests to the Privacy Coordinator without delay and must not respond to them except as directed by the Privacy Coordinator.
- 4.1.4.** An Employee who is uncertain whether a request is formal must refer it to the Privacy Coordinator.

4.2. Identity Verification

- 4.2.1.** Employees must verify the identity, and where applicable the authority, of the person making a request before any Personal Information is released or corrected. For a formal request, verification is completed as directed by the Privacy Coordinator; for a Routine Disclosure, as specified in the Routine Disclosure Schedule.
- 4.2.2.** Identity must be verified by at least one of the following methods:
 - a.** Government-issued photo identification;
 - b.** Two pieces of identification, at least one of which contains the individual's name and current address;
 - c.** Matching identifying information provided by the individual against information already held by the City, where sufficient to confirm identity;
 - d.** Authentication through a secure electronic service or account established by the City, where available; or
 - e.** Another method approved by the Privacy Coordinator where the methods above are unavailable or impractical.



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- 4.2.3.** Employees must not reveal Personal Information in the course of verifying identity. Verification is performed by confirming that the identification or information provided by the individual is genuine and matches the individual, not by reading back or displaying information the City holds.
- 4.2.4.** Where identity cannot be verified, Employees must not release or correct the Personal Information and must refer the request to the Privacy Coordinator.

4.3. Processing Formal Access Requests

- 4.3.1.** The Privacy Coordinator will log each formal request, record the date of receipt and direct its processing. Where the applicable framework or the application of an exception is unclear, the Privacy Coordinator will obtain direction from the Privacy Officer, who may seek advice from the City Solicitor's Office.
- 4.3.2.** Employees must conduct a reasonable search for responsive Records when requested by the Privacy Coordinator and must provide the Records, and any context requested, within the time specified.
- 4.3.3.** The Privacy Coordinator will decide, in accordance with ATIA, whether access is granted in full, granted in part with severing, or refused, and will document the exceptions applied.

4.4. Correction Requests

- 4.4.1.** Employees may update basic contact or account information (for example, an address, telephone number or the spelling of a name) as a routine update in the ordinary course of service delivery where the individual's identity is verified and the accuracy of the updated information can be readily confirmed. A routine update is not a Correction Request.
- 4.4.2.** Employees must refer every other request to correct an error or omission in Personal Information to the Privacy Coordinator as a Correction Request, and must provide Records, context and supporting information when requested by the Privacy Coordinator.
- 4.4.3.** Where the Personal Information was collected or created by another public body, the Privacy Coordinator may transfer the Correction Request to that public body in accordance with section 8 of POPIA, and must notify the individual of any transfer as soon as possible.
- 4.4.4.** The Privacy Coordinator will decide, in consultation with the responsible program area, whether a Correction Request is accepted or refused. An opinion, including a professional or expert opinion, must not be corrected.
- 4.4.5.** Where a correction is not made, the Privacy Coordinator must ensure the Record is annotated: the part of the requested correction that is relevant and material is added to, or linked with, the Record so that it is seen by anyone who retrieves the Record, without altering the original entry.



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4.5. Response and Timelines

- 4.5.1. The Privacy Coordinator must respond in writing within 30 business days of receiving a formal request, subject to any extension permitted by Provincial Privacy Legislation, and must give the individual written notice of any extension, including the reason and the revised response date.
- 4.5.2. A written response to an Access Request must state whether access is granted in full, in part or refused; where and how access will be given; and, for any refusal or severing, the reasons and the provisions relied on.
- 4.5.3. A written response to a Correction Request must state that the correction has been made, or that the Record has not been corrected but has been annotated.
- 4.5.4. Every written response under this section must inform the individual of the right to request a review by the Information and Privacy Commissioner within 60 business days after being notified of the decision, and how to do so.
- 4.5.5. The Privacy Coordinator must give any Third Party the notice required by ATIA before disclosing information affecting that Third Party, and, where a correction, annotation, or linkage is made, must notify each public body and Third Party to whom the Personal Information was disclosed during the year before the Correction Request was made.

5. Roles and Responsibilities

- 5.1. The City Manager will review and approve this procedure and any amendments.
- 5.2. Employees will comply with this procedure.

6. References and Related Documents

- 6.1. [Request to Correct Personal Information Form](#)
- 6.2. [Request to Access Information Form – Personal](#)
- 6.3. [Request to Access Information Form – General](#)
- 6.4. [City Procedure 507-1 Routine Disclosure Schedule](#)

7. Version History

Action	Date	Description
New Procedure	2026-07-16	



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Amendment	2026-10-06	Clarified request processing requirements in 4.3.1. Removed 5.3 and 5.4.
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