



CITY PROCEDURE

Privacy Impact Assessments

Procedure Title	Privacy Impact Assessments		
Procedure Number	507-3	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 establish procedures for the development and implementation of Privacy Impact Assessments in accordance with Provincial Privacy Legislation and City policy.

2. Scope

- 2.1. This procedure applies to all Employees responsible for the design, development, implementation or modification of programs, services, systems or activities involving Personal Information.

3. Definitions

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

- 3.1. **"Collection"** means the gathering, acquisition, receiving or obtaining of Personal Information, whether that information is collected through such methods as interviews, questionnaires, surveys, polling or by completing forms. Collection may be of writing, audio or video recordings, electronic data, or other such formats.
- 3.2. **"Department Head"** means the senior Employee in the highest level of authority of a department.
- 3.3. **"Disclosure"** means to release, transmit, reveal, expose, show, provide copies of, verbally state the contents of or give Personal Information by any other means to someone. It includes oral transmission or information by telephone, or in person; provision of Personal Information on paper, by facsimile or in any other format; and electronic transmission through electronic mail, data transfer or the internet.
- 3.4. **"Information Sharing Agreement"** means a formal arrangement governing the Collection, Use or Disclosure of Personal Information between the City and another public body, organization or third party.
- 3.5. **"Office of the Information and Privacy Commissioner of Alberta" or "OIPC"** means the independent government agency that ensures compliance with the Provincial Privacy Legislation.



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- 3.6. **"Privacy Risk"** means the possibility that Personal Information may be handled in a manner that is unauthorized, unlawful, inappropriate or inconsistent with privacy requirements.
- 3.7. **"Use"** means employing Collected information to accomplish the City's purposes such as using the information to administer a program or activity, provide a service or determine eligibility for a benefit. Access to a file or database by program staff or contract agent constitutes "use" as defined under POPA.

4. Procedure & Guidelines

4.1. Determine the Need for a PIA

- 4.1.1. Employees must consult their Department Head and the Privacy Coordinator at the earliest stage of planning where a project may involve Personal Information.
- 4.1.2. A PIA is required where the City introduces, or makes a substantial change to an existing, administrative practice, program, project or service that will involve the Collection, Use or Disclosure of Personal Information, and one or more of the following apply:
- a. the loss of, unauthorized access to or unauthorized Disclosure of the Personal Information could result in significant harm, as determined in accordance with section 4 of the Protection of Privacy (Ministerial) Regulation;
 - b. the Personal Information is considered to be of high sensitivity;
 - c. the initiative will involve the Personal Information of a significant percentage of the population the City serves;
 - d. the initiative will involve data matching between two or more public bodies;
 - e. the initiative is part of a common or integrated program or service; or
 - f. the initiative involves the development or use of innovative technology.
- 4.1.3. A required PIA must be completed and approved under this procedure before the practice, program, project, or service is implemented.

4.2. PIA Template

- 4.2.1. PIAs will be completed using the OIPC's POPA PIA template, as amended or replaced from time to time.
- 4.2.2. Every PIA must be completed in full using the template.

4.3. Complete the PIA

- 4.3.1. The responsible Department must complete the PIA fully and accurately, including a description of the initiative, the Personal Information involved and the information flows.



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4.4. Information Sharing Agreements

- 4.4.1.** Where an initiative involves ongoing or systematic sharing of Personal Information with another public body or organization, the City may develop an Information Sharing Agreement to be executed by the City and the public body or organization.
- 4.4.2.** An Information Sharing Agreement must be reviewed by the City Solicitor's Office before execution.

4.5. Review and Approval

- 4.5.1.** The responsible Department must submit the completed PIA to the Privacy Officer for review.
- 4.5.2.** The Privacy Officer must review each PIA, may require the responsible department to provide additional information or to revise and resubmit the PIA.
- 4.5.3.** The Privacy Officer must approve or reject each PIA before the initiative is implemented.
- 4.5.4.** On approval, the Department Head must confirm the Department's acceptance of the commitments and mitigation measures set out in the PIA.

4.6. Submission to OIPC

- 4.6.1.** The Privacy Officer must submit a PIA to the OIPC where the initiative falls within any of sections 4.1.2(b) to (f), as required under section 7(5) of the Protection of Privacy (Ministerial) Regulation, and may submit a PIA in any other case the Privacy Officer considers appropriate.
- 4.6.2.** Where an initiative is part of a common or integrated program or service, or involves data matching under section 17(3) of POPA, the PIA must document the governance structure and each public body's responsibilities.
- 4.6.3.** Where a PIA must be submitted to the OIPC and POPA or its regulations require the City to enter into an agreement relating to the initiative, the portions of the agreement relating to the protection of privacy must be submitted to the OIPC together with the PIA.

4.7. Implementation and Changes

- 4.7.1.** Employees must comply with, and implement, the requirements and mitigation measures set out in an approved PIA. A Department Head shall ensure Employees within their department comply with and implement the requirements and mitigation measures set out in an approved PIA governing any initiative involving that department.



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- 4.7.2. Where a substantial change is proposed to an initiative covered by an approved PIA, the change must be assessed under this procedure in the same manner as a new initiative, and the PIA must be amended, or a new PIA completed, and approved before the change is implemented.

4.8. PIA Records

- 4.8.1. The Privacy Officer must maintain the authoritative record of all completed PIAs in accordance with the City's records classification and retention requirements, and the responsible Department must retain the records needed to administer and demonstrate implementation of its PIAs.

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. Office of the Information and Privacy Commissioner of Alberta: oipc.ab.ca
- 6.2. [Privacy Impact Assessment on Cynet](#)

7. Version History

Action	Date	Description
New Procedure	2026-07-16	
Amendment	2026-10-06	Removal of the Privacy Coordinator definition and transfer of responsibilities to the Privacy Officer. Clarified PIA requirements in 4.2.1. and 4.6.2. Deleted 4.3.2., 4.3.3. and 4.8.2. in their entirety. Clarified information sharing agreements and review and approval processes. Added responsibilities of the Department Head in 4.7.1.