



CITY PROCEDURE

Personal Information Bank

Procedure Title	Personal Information Banks		
Procedure Number	507-4	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 processes for developing, maintaining and managing Personal Information Banks (PIBs) in accordance with Provincial Privacy Legislation and City policies.

2. Scope

- 2.1. This procedure applies to all Employees involved in the creation, maintenance or management of PIBs.

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. **"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.
- 3.3. **"Directory"** means the City's directory of Personal Information Banks maintained by the Privacy Officer under this procedure.
- 3.4. **"PIB" or "Personal Information Bank"** means a collection of Personal Information that is organized or retrievable by the name of an individual or by an identifying number, symbol or other particular assigned to an individual.



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- 3.5. **"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. Identifying PIBs

- 4.1.1. Employees must identify to the Privacy Officer any new PIB, and any existing PIB not yet listed in the Directory, in the form established by the Privacy Officer.
- 4.1.2. A new PIB will ordinarily be identified through a Privacy Impact Assessment under [Procedure 507-3](#) or at the design stage of a Collection. Where a new PIB is identified through a Privacy Impact Assessment, the Directory entry must be completed before the initiative is implemented.
- 4.1.3. The Privacy Officer may require departments to identify their existing PIBs and to confirm that their Directory entries remain accurate.

4.2. Directory Entries

- 4.2.1. Departments must provide the information required by section 4.2.2 for each PIB, using the form established by the Privacy Officer.
- 4.2.2. Each Directory entry must include:
- a. The title of the PIB and the responsible department or program
 - b. Location of the records;
 - c. Type of Personal Information collected;
 - d. Categories of individuals the information relates to;
 - e. The purposes for which the Personal Information was collected or compiled and the purposes for which it is Used or Disclosed; and
 - f. Legal authority for collection under applicable legislation.
- 4.2.3. A Directory entry describes a PIB at the category level; it must not contain, and does not provide access to, the Personal Information in the PIB.

4.3. The Directory

- 4.3.1. The Privacy Officer must establish and maintain the Directory, listing every PIB in the custody or under the control of the City. Only the Privacy Officer may add, amend or remove a Directory entry
- 4.3.2. The Directory must be published in printed or electronic form, kept as current as is practicable, and made available to the public.



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4.4. Reporting Changes

- 4.4.1.** Departments must report to the Privacy Officer any change to the information in a PIB's Directory entry, including a change to:
- a.** the kinds of Personal Information collected or the categories of individuals the information relates to;
 - b.** the purposes, Use or Disclosure of the Personal Information, the categories of persons who Use or receive it, or the legal authority relied on; or
 - c.** the title, location or responsible department of the PIB, or its decommissioning.
- 4.4.2.** Changes to the Records within a PIB, such as adding, updating or removing entries about individuals in the ordinary course, are not reportable under this Procedure.

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. 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. Deletion of provisions 4.3.3 and 4.3.4. in their entirety.