



CITY PROCEDURE

Creation and Protection of Non-Personal Data

Procedure Title	Creation and Protection of Non-Personal Data		
Procedure Number	507-7	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 requirements for creating, assessing, using, protecting and disclosing Non-Personal Data in accordance with Provincial Privacy Legislation and City policy.

2. Scope

- 2.1. This procedure applies to Employees who create, Use or Disclose Non-Personal Data.
- 2.2. This procedure does not apply to redaction of Records for access to information requests;

3. Definitions

The definitions in **Policy 507 Privacy Management** apply to this procedure. In addition, in this procedure:

- 3.1. **"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.
- 3.2. **"Identifiers"** are pieces of data that are unique, or mostly unique, to an individual.
- 3.3. **"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.
- 3.4. **"Quasi-identifiers"** are pieces of data that may not identify an individual on their own but a collection of quasi-identifiers could identify an individual. Examples of quasi-identifiers include home address, age, an anecdote about a person, family affiliations or professional associations.



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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 the POPA.

4. Procedure & Guidelines

4.1. Creation

- 4.1.1. Employees must not create Non-Personal Data except for one or more of the following purposes:
- a. Research and analysis;
 - b. Planning, administering, delivering, managing, monitoring or evaluating a program or service; or
 - c. Other purposes authorized by POPA.
- 4.1.2. Employees must not create Non-Personal Data except from Personal Information or Data Derived from Personal Information already in the custody or under the control of the City, and must create it in accordance with generally accepted best practices and any requirements prescribed under POPA, so that no individual can be identified or re-identified from the data.
- 4.1.3. Each time Non-Personal Data is created, the Employee must record, in the form established by the Privacy Officer:
- a. A description of the Personal Information or Data Derived from Personal Information used;
 - b. The purpose for creating the Non-Personal Data;
 - c. The method used to create the Non-Personal Data; and
 - d. The assessment done to ensure that the identity of an individual cannot be identified or re-identified from the data
- 4.1.4. For a recurring report or data product, one record may be maintained and kept current for the series.

4.2. Re-identification Assessment and Review

- 4.2.1. The assessment referred to in 4.2.4.d. must consider:
- a. The presence of Identifiers or Quasi-Identifiers;
 - b. Whether the data could be combined with other information;
 - c. The nature and sensitivity of the data; and
 - d. The effort required to identify an individual.



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- 4.2.2.** The Privacy Coordinator must review the assessment before the data is treated, Used or Disclosed as Non-Personal Data.
- 4.2.3.** Employees must consult the Privacy Coordinator where the re-identification risk is unclear. Where the creation of Non-Personal Data forms part of a new, or a substantial change to an existing, initiative, the Privacy Impact Assessment Procedure 507-3 applies.

4.3. Use and Protection

- 4.3.1.** Non-Personal Data validly created under this procedure may be Used for any purpose. This does not authorize any actual or attempted re-identification (see section 4.3.3) and does not displace any other applicable enactment or agreement.
- 4.3.2.** Non-Personal Data must be classified and protected by reasonable security arrangements, appropriate and proportional to its security classification, in accordance with the Safeguarding Personal Information Procedure 507-5.
- 4.3.3.** Employees must not identify, re-identify or attempt to re-identify an individual from Non-Personal Data. Knowingly doing so is an offence under POPA.
- 4.3.4.** Departments using a system to create Non-Personal Data must implement human oversight, auditing and validation measures to ensure the accuracy and reliability of the data.

4.4. Disclosure

- 4.4.1.** Employees must refer any proposed Disclosure of Non-Personal Data to the Privacy Coordinator.
- 4.4.2.** Non-Personal Data may be Disclosed to another public body for any purpose. It may be Disclosed to a person other than a public body only where:
 - a.** The Disclosure is for a purpose listed in section 4.1.1;
 - b.** The Privacy Coordinator has approved conditions governing the Disclosure that address: (i) security and confidentiality; (ii) the prohibition of any actual or attempted re-identification; (iii) the prohibition of any subsequent Use or Disclosure without the City's express authorization; and (iv) the destruction of the data at the earliest reasonable time after it has served its purpose, unless the City has expressly authorized a subsequent Use or Disclosure; and
 - c.** The person has signed an agreement, reviewed by the City Solicitor's Office, to comply with those conditions, POPA, its regulations and the City's policies and procedures relating to Non-Personal Data.
- 4.4.3.** Data from which an individual can be identified or re-identified is not Non-Personal Data and must not be Disclosed under this procedure.



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4.4.4. Nothing in this section restricts the Disclosure of a report, summary or other publication containing Non-Personal Data in aggregate or statistical form.

4.5. Data Matching and Data Derived from Personal Information

4.5.1. Employees must not carry out data matching to create Data Derived from Personal Information without the prior approval of the Privacy Officer. Data Derived from Personal Information may be retained and Used only for the purpose for which it was created and must be destroyed, or transformed into Non-Personal Data, as soon as reasonably possible after that purpose is fulfilled. It must not be Disclosed except to the public body from which the Personal Information was collected for the data matching, or as expressly permitted by POPA.

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	Change in responsibilities from "Privacy Coordinator" to "Privacy Officer" in 4.1.3.