



CITY PROCEDURE

Consent

Procedure Title	Consent		
Procedure Number	507-8	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 obtaining, documenting and managing Consent in accordance with Provincial Privacy Legislation and City policy.

2. Scope

- 2.1. This procedure applies to all Employees who Collect, Use or Disclose Personal Information, or who obtain and manage Consent as part of their duties.

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. **"Electronic Consent"** means a Consent provided by electronic means.
- 3.4. **"Consent"** means the voluntary and informed agreement of an individual to a specific Use or Disclosure of their Personal Information, given in the prescribed manner under the POPA and its regulations in one of the following forms: Written Consent, Electronic Consent or Oral Consent.
- 3.5. **"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.



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- 3.6. **"Oral Consent"** means Consent communicated verbally by an individual and documented in accordance with this procedure.
- 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 the POPA.
- 3.8. **"Written Consent"** means Consent given on paper signed (wet signature) by the individual who is giving Consent.

4. Procedure & Guidelines

4.1. Determine Whether Consent is Required

- 4.1.1. A Use or Disclosure that is authorized under the Collection, Use and Disclosure Procedure 507-1, including one to which the individual has already given Consent, proceeds under that procedure. Where a Use or Disclosure is anticipated that is not authorized under Procedure 507-1, including one beyond the scope of an existing Consent, Employees must obtain Consent under this procedure before the Use or Disclosure occurs, or refer the matter to the Privacy Coordinator.

4.2. Valid Consent

- 4.2.1. A Consent is valid only if it:
 - a. Is informed and voluntary, and is given as Written, Electronic or Oral Consent in accordance with this procedure;
 - b. Clearly specifies the Personal Information to which it relates;
 - c. Identifies to whom the Personal Information may be Disclosed and how it will be Used; and
 - d. States the date on which it takes effect and, if applicable, the date on which it expires.
- 4.2.2. Employees must confirm these requirements are met before relying on a Consent, and must inform the individual of any consequence of declining to give Consent.
- 4.2.3. Providing a Collection Notice does not constitute obtaining Consent. Where Consent is required, Employees must obtain and document Consent in accordance with this Procedure.

4.3. Obtain Consent

- 4.3.1. Consent may be given as Written Consent, Electronic Consent or Oral Consent.
- 4.3.2. Departments determine which forms of Consent to accept for a program, service or activity, and must consult the Privacy Coordinator where uncertain.



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- 4.3.3.** Written Consent is accepted in all instances where Consent is required and must include the individual's signature.
- 4.3.4.** Electronic Consent may be obtained wherever Consent is required. An Electronic Consent must:
 - a.** Include the individual's electronic signature, or be authenticated in a manner that identifies the individual and reliably associates the Consent with the individual;
 - b.** be accessible to, and capable of being retained by, the City; and
 - c.** Can be relied upon as evidence of the Consent provided.
- 4.3.5.** Oral Consent may be obtained where:
 - a.** The City is satisfied that the individual cannot provide Written or Electronic Consent (for example, due to disability, accessibility needs or other circumstances);
 - b.** The individual has the authority to provide the Consent; and
 - c.** The Employee documents the Consent, including the date, the purpose and any conditions or limitations, sends a copy of the documented Consent (where practicable) to the individual for confirmation, and retains the documentation and any response.

4.4. Verify Authority to Consent

- 4.4.1.** Employees must verify the identity of the individual giving Consent, using a method set out in section 4.2.2 of the Access to and Correction of Personal Information Procedure 507-2, and the method used must reliably associate the Consent with the individual.
- 4.4.2.** A person may give Consent on an individual's behalf only as permitted under section 54 of the POPIA (for example, a guardian, an attorney, an agent under a personal directive, or a person with the individual's written authorization). Employees must verify and record that person's authority.

4.5. Document Consent

- 4.5.1.** Employees must retain:
 - a.** for Written Consent, the signed document;
 - b.** for Electronic Consent, the authenticated electronic record; and
 - c.** for Oral Consent, the Employee's written record of the Consent and the confirmation sent (where practicable) to the individual.
- 4.5.2.** The Privacy Officer must establish a standard Consent form and standard Consent wording that meet the requirements of this procedure. Departments must use the standard form, or incorporate the standard wording into their own forms, unless the Privacy Officer approves an alternative.



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4.6. Manage Withdrawal of Consent

- 4.6.1. An individual may withdraw Consent at any time by notice to the City. On receiving a withdrawal, Employees must document it, notify the affected program areas, and cease any further Use or Disclosure that relied on the Consent.
- 4.6.2. Withdrawal of Consent operates prospectively only: it does not invalidate, or require the reversal of, a Use or Disclosure made before the withdrawal was received.

4.7. Assistance

- 4.7.1. An Employee who is uncertain whether Consent is required, or whether a Consent is valid, must consult the Privacy Coordinator.

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 4.5.2.