Privacy and Access

Date Approved by Council:

Resolution: 2026-09-08-06

Review Date: Sept. 2029

Related Bylaws: N/A

Amendments:

Purpose

The purpose of this Policy is to provide guidance and direction with respect to the Village's adherence to and compliance with Privacy Legislation, and to establish principles and quality assurance standards to guide the establishment, implementation, and maintenance of the Privacy Management Program.

Definitions

1. **Employee** means Village employees, and any person who performs a service for the Village as an appointee, volunteer, student, or under a contract or agency relationship with the Village.
2. **Privacy Legislation** means collectively: Access to Information Act, SA 2024, c A-1.4; Access to Information Act Regulation, Alta Reg 133/2025; Protection of Privacy Act, SA 2024, c P-28.5; Protection of Privacy (Ministerial) Regulation, Alta Reg 143/2025; and Protection of Privacy Regulation, Alta Reg 132/2025.
3. **Privacy Management Program** means the Village's documented policies and procedures that promote its compliance with its duties under Privacy Legislation, as more specifically described in the Privacy and Access Directive.

Guidelines

A. Principles

The following provide guidance and direction for the Village's management of information:

1. Openness and Transparency
   The Village develops and follows access, privacy, and security policies and procedures that are compliant with Privacy Legislation. With limited exceptions as provided for in Privacy Legislation, these are publicly available on the Village's website.

2. Designation of Privacy Officer
   The Village designates the Chief Administrative Officer to the position of Privacy Officer that is accountable for implementing and maintaining access to information and privacy for information under the custody or control of the Village.

3. Collection of Personal Information
   The Village collects personal information only for authorized purposes and only to the extent that it relates directly to and is necessary for an operating program or activity of the Village. When collecting personal information directly from an individual, the Village informs the individual as required by the Protection of Privacy Act related to the collection.

4. Correction of Personal Information
   The Village makes all reasonable efforts to ensure that both general information and personal information created or received by the Village is accurate and complete. Individuals who believe there is an error or omission in their personal information have a right to request correction or amendment of the information.

5. Use and Disclosure of Personal Information
   The Village only uses and discloses personal information in accordance with the purpose for which it was collected, unless alternate use or disclosure is authorized or required by law, or with the knowledge and consent of the individual.

6. Compliance Challenges and Privacy Complaints
   The Village encourages individuals to bring forward to the Village any concerns or issues regarding privacy and access at the Village. The Village acknowledges that in certain situations individuals may appeal to the Privacy Commissioner of Alberta to review or investigate the Village right of access or correction responses, or any policies or practices that they feel are not in compliance with legislative requirements.

7. Information Safeguards
   The Village protects personal information in its custody or control by using security measures and practices to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction. In the event of a privacy incident, the Village will respond in a timely manner and as required by the Protection of Privacy Act.

8. Right of Access
   The Village respects the right of access of individuals to all information, including personal information about themselves, that is under the custody or control of the Village, subject to limited and specific exceptions.

B. Quality Assurance

The following provide guidance for quality assurance to be adhered to by the Village:

1. Policy Review
   The Village reviews this Policy at least as frequently as required by the Village's Policy Manual Review (Legislative Policy 2.4) and otherwise as necessary to ensure that it is effective and aligns with legislative, regulatory, or Village functional developments and changes.

2. Mandatory Training
   The Village provides employees with up-to-date and relevant training about their obligations under Privacy Legislation.

3. Privacy, Access and Security Monitoring and Testing
   The Village regularly monitors and tests its systems, practices, and repositories to identify and address any potential risks relating to the privacy, accessibility, usability, integrity, retention, continuity, and security of Village information.

4. Privacy Impact Assessments
   The Village completes privacy impact assessments for any systems, projects, programs, services, or practices that introduce significant new or expanded collection, use, disclosure, processing, or security exposure of personal information.

Responsibilities

Council

Council is responsible for approving this Policy, adhering to Privacy Legislation, handling Village information responsibly and supporting transparency in governance. This includes assisting in responding to access requests for Village information when requested by the Chief Administrative Officer or the Privacy Officer and taking training as offered by the Chief Administrative Officer.

Chief Administrative Officer

The Chief Administrative Officer is designated as the head of the Village for the purposes of Privacy Legislation pursuant to the Chief Administrative Officer Bylaw, and may delegate to any person any power, duty, or function of the head under Privacy Legislation, except the power to delegate. The Chief Administrative Officer is responsible for ensuring the Village's compliance with Privacy Legislation and identifying the Privacy Officer for the Village (if someone other than the CAO).

Privacy Officer

The Privacy Officer is responsible for those powers, duties, and functions delegated to it by the Chief Administrative Officer with respect to the overall management and coordination of privacy and access to information at the Village.

Employees

Each Employee is responsible for adhering to, and supporting the Village's adherence to, Privacy Legislation.