

CITY OF WETASKIWIN

PRIVACY MANAGEMENT PROGRAM



*Providing Exceptional
Privacy Management*



Table of Contents

- 1. Introduction and Purpose..... 2
- 2. Governance and Accountability 3
- 3. Privacy Management Framework.....3
- 4. Collection, Use and Disclosure..... 5
- 5. AI Governance and Data Matching 7
- 6. Privacy Incident Management 8
- 7. Risk Management..... 9
- 8. Training.....12



Introduction and Purpose

Purpose

A Privacy Management Program (PMP) is a legislated, documented framework of policies, procedures, and practical tools established by municipalities to ensure compliance with Alberta's [*Protection of Privacy Act \(POPA\)*](#), and [*Access to Information Act \(ATIA\)*](#). The PMP supports the City's dual responsibility to provide lawful access to records while protecting the personal information entrusted to it by residents, businesses, and employees.

By providing clear guidance and consistent practices, the PMP helps manage privacy risks, strengthen accountability, and integrate privacy considerations into everyday City operations. Through its implementation, the City of Wetaskiwin promotes transparency, public trust, and a culture that values privacy and access as essential components of good local governance.

Organizational Commitment

The City of Wetaskiwin is committed to upholding the principles of openness, accountability, and respect for individual privacy in accordance with provincial legislation. Through the establishment and ongoing maintenance of this comprehensive Privacy Management Program (PMP), the City ensures that access to records is provided lawfully while personal information entrusted to the organization is collected, used, disclosed, retained, and protected in a responsible and transparent manner.

By integrating privacy considerations into everyday municipal operations, the City of Wetaskiwin promotes compliance, manages risk, and fosters a culture of awareness and accountability. This commitment reflects the City's dedication to maintaining public trust and ensuring that privacy and access rights remain fundamental.



Governance and Accountability

Governance and accountability are fundamental to a transparent, effective, and trusted organization. Clear leadership direction, well-defined roles, and consistent oversight ensure that responsibilities are understood and that decisions are made in a responsible and transparent manner. The City of Wetaskiwin has established robust governance structures that promote ethical conduct, support compliance with legislative requirements, and enable sound decision-making across all levels of the organization.

The PMP outlines the governance framework that supports accountability for privacy and access to information obligations. It defines roles, responsibilities, and decision-making authority, ensuring that privacy considerations are integrated into both organizational leadership and day-to-day operations. Through strong governance and ongoing accountability, the City reinforces its commitment to responsible information management, effective risk mitigation, and maintaining public trust.

Roles and Responsibilities

This section provides an overview of the City of Wetaskiwin's roles and responsibilities related to privacy and access to information. A comprehensive description is available in the 'Information Privacy and Access Administrative Directive GA-008'.

City Manager

The City Manager is accountable for establishing and overseeing a framework that ensures all actions and decisions under the *Access to Information Act* (ATIA) and the *Protection of Privacy Act* (POPA) are carried out in compliance with applicable legislation.

Privacy Officer

The Privacy Officer, designated as the General Manager of Corporate Services, is responsible for the oversight of the Privacy Management Program. This includes the development, implementation, and ongoing review of the City's privacy management framework. The Privacy Officer reports to the City Manager to ensure effectiveness and accountability and serves as the lead for privacy incident response.

ATIA and Records Management Coordinator

The ATIA and Records Management Coordinator is responsible for managing public inquiries, administering access to information requests, and supporting the day-to-day protection of personal information in accordance with legislative requirements.

Employees

All employees are responsible for handling records in accordance with the City's security and confidentiality requirements. This includes safeguarding confidential information and preventing unauthorized access, use, or disclosure.



Privacy Management Framework

The City of Wetaskiwin provides a clear, practical framework that supports staff in understanding their privacy responsibilities and making informed decisions in their day-to-day work. This is established by the following administrative directives, policies, procedures and bylaws:

1. [The Access and Privacy Bylaw \(2108-26\)](#) – designates the head as it pertains to the Acts and as appointed by Council and also establishes the fees and charges for services provided under the Acts in accordance with the Access to Information Act Regulation, AR 133/2025.
2. [Information Privacy and Access Directive GA-008](#) – provides the roles and responsibilities, the standards and procedures of how the City of Wetaskiwin manages Access to Information and Protection of Privacy in line with legislative requirements as set out in the Acts.
3. [The Records Management Bylaw \(2046-23\)](#) – provides the structure of how the City of Wetaskiwin manages records, including those that contain personal information.
4. [The Records Management Directive GA-002](#) – provides high level detail of how the City of Wetaskiwin processes and retains records, including those that contain personal information.
5. [The Records Retention Schedule GA-002-2](#) – identifies the records retained by the City and establishes clear timelines for the retention and disposition of all Records.
6. [The AI Policy CO-060](#) - governs the use of Artificial Intelligence as a tool and ensures that use reflects the City's commitment to trust, integrity, and resourcefulness while fostering innovative and efficient service delivery.
7. [Information Systems Security Directive GA-001](#) - establishes measures to safeguard information assets, ensuring the City fulfills its legislative obligations under applicable statutes, including the Access to Information Act (ATIA) and the Protection of Privacy Act (POPA). It also supports the protection of information related to the City's financial, operational, and administrative functions and helps maintain public trust and organizational reputation.
8. [Use of Technological Assets Directive GA-015](#) - governs the use of City technology assets and personal devices used in business operations and the security governance associated.
9. [Privacy Incident Response Directive GA-013](#) – governs the procedures the City of Wetaskiwin follows in relation to Privacy Incidents (breaches).
10. [Risk management](#) – includes a combination of structured classifications and operational controls to ensure data safety and legislative compliance.
11. [Privacy Impact Assessment \(PIA\) Directive GA-014](#) – govern the procedures for conducting a PIA.



Collection, Use and Disclosure

The City of Wetaskiwin has established standards governing the collection, use, and disclosure of personal information through its 'Information Privacy and Access Directive'. This directive aligns with legislative requirements regarding consent and outlines how the City collects, uses, stores, and protects personal information obtained from individuals.

Under this directive, personal information is collected directly from the individual to whom it relates and only when necessary for the delivery of City of Wetaskiwin programs, services, or activities, unless otherwise authorized by applicable legislation. All City forms that request personal information include a privacy notice (POPA Disclaimer), which clearly identifies the purpose of the collection, the legal authority for collecting and using the information, and contact information for the Access, Privacy and Information Coordinator (ATIA Coordinator).

In addition, the City maintains a publicly accessible [Personal Information Bank \(PIB\) Directory](#). This directory outlines the types of personal information collected in the course of delivering municipal services and conducting business with residents and taxpayers. Each PIB entry describes the categories of information collected, the purposes for its use, and who may access it. PIBs may include records such as contact lists, client records, or program databases that are searchable by name or other identifiers.

Maintaining a current and accurate PIB inventory supports the City in:

- Responding efficiently to access requests and privacy inquiries;
- Determining when a Privacy Impact Assessment (PIA) is required;
- Managing information sharing and disclosure practices;
- Applying appropriate safeguards based on the sensitivity of information; and
- Promoting transparency and public trust.



Individual Rights and Access to Information

The City of Wetaskiwin abides by the *Access to Information Act* which states:

Part 1 **Freedom of Information**

Division 1 **Obtaining Access to Records**

Information rights

6(1) *An applicant has a right of access to any record in the custody or under the control of a public body, including a record containing personal information about the applicant.*

(2) *The right of access to a record does not extend to information excepted from disclosure under Division 2 of this Part, but if that information can reasonably be severed from a record, an applicant has a right of access to the remainder of the record.*

(3) *The right of access to a record is subject to the payment of any fee required under this Act.*

The City of Wetaskiwin is committed to protecting and ensuring consistency in the actions and decisions made by the City of Wetaskiwin employees regarding the personal information of its residents, taxpayers and customers and that privacy protection is the core consideration in the collection, management, use and disposition of all personal information obtained from the programs, operations, activities and services in the City.

The Information Privacy and Access Directive is created to align with the legislative requirements as set out in the [Access to Information Act](#) and [Protection of Privacy Act](#).



AI Governance and Data Matching

The City of Wetaskiwin is committed to using Artificial Intelligence (AI) in a responsible, safe, and ethical manner to enhance community services, support informed decision-making, and improve operational efficiency.

AI technologies are implemented in accordance with the [‘Artificial Intelligence \(AI\) Policy’](#) in ways that protect privacy, safeguard security, ensure accountability, and maintain transparency. These efforts align with the City’s long-term vision of delivering high-quality services while fostering a safe, thriving, and inclusive community.

The City’s approach to AI reflects its core values of trust, integrity, and resourcefulness. By embracing innovation thoughtfully, the City aims to improve service delivery while upholding the confidence of residents.

The City of Wetaskiwin is committed to safeguarding privacy by ensuring that personal information is not used in its artificial intelligence (AI) functions. Any AI tools or processes implemented by the City are designed to operate without accessing, storing, or analyzing identifiable personal data. Additionally, the City does not use AI to make decisions that involve personal information, ensuring that all such decisions remain subject to appropriate human oversight and established privacy protections.

Data governance is a key priority. Any data derived from personal information is carefully managed in accordance with the original purpose and legal authority under which it was collected. Where there is a reasonable possibility that individuals could be identified, such data is treated with the same level of protection as personal information.

The City also ensures that non-personal data is handled responsibly. Safeguards are in place to prevent the identification or re-identification of individuals, particularly when data is combined with other datasets or shared within or outside the organization. These safeguards include technical, administrative, and contractual measures.

Additionally, data matching and the use of non-personal data are conducted only when legally authorized, necessary, and proportionate. The City limits the scope of data used and applies appropriate protections to prevent identification or re-identification of individuals.

Through these practices, the City of Wetaskiwin demonstrates its commitment to using AI in ways that benefit the community while maintaining strong standards for privacy, security, and public trust.



Privacy Incident Management

The City of Wetaskiwin recognizes that privacy incidents can pose significant risks and cause considerable harm to individuals, organizations, and public bodies. Accordingly, the City is committed to responding promptly, effectively, and in a coordinated manner to mitigate potential impacts. A timely and well-managed response is essential to minimizing adverse effects for all affected parties, particularly individuals.

The City's response procedures are guided by the sensitivity and security classification of the information involved, including the application of appropriate notification protocols.

All privacy-related incidents—both actual and suspected—are subject to review and investigation by the City. Investigations are initiated upon notification of a Privacy Incident to the Privacy Officer.

Investigation activities may include reviewing and assessing the information provided, conducting interviews, and collecting relevant evidence to accurately document the circumstances surrounding the incident.

The [Privacy Incident Response Administrative Directive](#) establishes clear governance and accountability to support a timely, consistent, and coordinated approach to assessing and managing privacy incidents. This framework is designed to reduce potential harm and to implement corrective measures that help prevent similar incidents in the future.



Risk Management

Effective risk management is a cornerstone of the City of Wetaskiwin's PMP. It ensures that personal information is protected throughout its lifecycle and that privacy risks are proactively identified, assessed, and mitigated. Through a combination of structured classification, legislative compliance, and operational controls, the City maintains a consistent and accountable approach to managing privacy-related risks.

Risk Classification Framework

To support a standardized approach to risk assessment, the City of Wetaskiwin has established a four-tier security classification model. This model evaluates the sensitivity of information and the potential impact of unauthorized access, use, or disclosure. Each classification level is supported by defined controls proportionate to the level of risk.

Level	Classification Name	Definition	Examples	Required Controls
1 High Risk	Sensitive Personal Information	Personal information where exposure is likely to cause real risk of harm.	Biometric data; financial data; health data; law-enforcement information; minors' information; automated-decision inputs.	Encryption; strict access; mandatory PIA; breach notification; annual review.
2 Medium Risk	Protected Personal Information	Personal info where exposure may cause moderate harm, distress, or service disruption.	Home address; personnel files; demographic info; program participation.	Role-based access; retention controls; PIA when appropriate.
3 Low-Risk	Personal Information	Personal info with low risk of harm if exposed.	Work titles; public-facing info; generic logs.	Basic access; standard handling.
4	Non-Personal Data	Data de-identified under POPIA; includes data matching outputs and derived data.	Aggregated stats; anonymized datasets; derived analytics.	Re-identification risk assessment; quality assurance; transparency for reuse.



Privacy Impact Assessments (PIAs)

A key component of the City's risk management approach is the use of Privacy Impact Assessments (PIAs) and the [PIA Directive GA-014](#). Risk management begins at the earliest stages of any initiative involving personal information, ensuring privacy considerations are embedded into project design and implementation.

A PIA is a formal risk management tool used to identify and mitigate privacy risks associated with the collection, use, or disclosure of personal information. Under Alberta's Protection of Privacy Act (POPA), PIAs are a mandatory and foundational element of privacy compliance.

Privacy Impact Assessments (PIAs) serve several critical functions within the City's privacy framework. They are used to identify how personal information is collected, used, disclosed, and stored, allowing potential risks to be recognized early in a project's lifecycle. PIAs also support the development of appropriate safeguards, controls, and processes to mitigate identified risks. In addition, they ensure that initiatives align with the legal requirements established under the *Protection of Privacy Act (POPA)* and demonstrate due diligence, transparency, and responsible data stewardship to both the Office of the Information and Privacy Commissioner (OIPC) and the public.

A PIA must be completed and submitted to the OIPC in specific circumstances, including when a project involves highly sensitive personal information, affects a large portion of the population, includes data matching or information sharing between public bodies, or introduces new or emerging technologies. PIAs are also required for integrated or shared service delivery programs, as well as for significant changes to existing programs or systems.

Supporting Risk Management Controls

In addition to classification and PIAs, the City of Wetaskiwin has implemented several corporate policies, directives, and bylaws that collectively strengthen its risk management framework

[Information Systems Security Directive \(GA-001\)](#)

This directive establishes the technical and administrative safeguards necessary to protect the City's information assets. It ensures compliance with the Access to Information Act (ATIA) and the Protection of Privacy Act (POPA) while protecting sensitive information related to financial, operational, and administrative functions. It also supports the preservation of public trust and organizational reputation.

[Use of Technological Assets Directive \(GA-015\)](#)

This directive governs the appropriate use of City-issued technology and personal devices used for business purposes. It outlines security expectations, acceptable use standards, and safeguards to minimize risks associated with unauthorized access, data loss, or misuse of technology.



Records Management Framework

The City's [Records Management Bylaw](#), [Records Management Administrative directive](#), and [Records Retention Schedule](#) establish clear requirements for the lifecycle management of records, including personal information.

Key risk management components include:

- Defined retention periods aligned with legal and operational requirements
- Secure storage and handling practices
- Controlled and documented disposition processes
- Reduction of unnecessary data accumulation to minimize exposure risk

Continuous Improvement and Oversight

Risk management within the City of Wetaskiwin is an ongoing process. The Privacy Management Program is reviewed annually and updated as required to reflect legislative changes, evolving risks, and organizational needs. Continuous monitoring, policy refinement, and staff awareness ensure that privacy protection remains proactive, consistent, and effective.

The City of Wetaskiwin employs a comprehensive and structured approach to risk management that integrates classification standards, proactive assessments, and strong governance controls.

By embedding privacy into decision-making and operations, the City demonstrates its commitment to protecting personal information, reducing risk, and maintaining the confidence and trust of the public it serves.



Training

The City of Wetaskiwin is committed to ensuring that all employees understand their responsibilities in protecting personal information and maintaining compliance with applicable legislation. To support this, comprehensive privacy training is provided to all staff on a regular basis.

Full staff training is conducted every four years, or more frequently when there are significant updates to privacy legislation or related policies. The City utilizes the Government of Alberta's online training resources, along with the Privacy Management Program, to deliver consistent and reliable guidance on tiered levels within the organization.

This approach ensures that employees, regardless of their role or position, are equipped with the knowledge and tools necessary to manage personal information responsibly. In addition to formal training, ongoing support is available to staff through the Privacy Officer and the ATIA and Records Management Coordinator, who are accessible to answer questions, provide guidance, and address privacy-related concerns on a regular basis.

By fostering awareness, accessibility to expertise, and accountability across the organization, the City strengthens its commitment to effective privacy management and the protection of public trust.