

Procedure Access

This procedure falls under *A1477 Data and Information Management Administrative Policy*.

Program Impacted	Civic Services <i>Edmontonians contribute to civic society and are engaged in promoting the quality of the community.</i> Technology & Data <i>The City of Edmonton's technology and data are leveraged to enable quality decision-making and enhance innovative service delivery.</i>
Approved By	Aileen Giesbrecht, City Clerk
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Approval History	N/A
Next Scheduled Review	June 3, 2027

Procedure Statement

This procedure is to be used by all City of Edmonton employees to ensure compliance with the *Access to Information Act (ATIA)*.

Scope

This procedure applies to City of Edmonton employees, contractors, volunteers, Council Committees and any individuals for whom the City Clerk acts as the Access and Privacy Head. It applies to these parties whenever their work involves creating, collecting, receiving, accessing, using, disclosing, storing, maintaining, destroying or transferring City records and information. Under the *Access to Information Act (ATIA)*, any person is allowed a right of access to the records or personal information about themselves in the custody or under the control of a public body subject to limited and specific exceptions set out in the Act. The above listed individuals are responsible for supporting the City's compliance with the public's right of access.

Procedure Description

This procedure provides an introduction to the Access (A) functional domain, as defined in *A1477 Data and Information Management Administrative Policy*:

“[The] Access (A) [function] ensures that access to data and information is available and accessible to the fullest extent allowed by security, legal and ethical considerations.”

This procedure presents a brief version of the City’s Access to Information strategy and practices.

Definitions

Access and Privacy Head of the Public Body means the City Clerk, to whom the City Manager, as the head of the public body, has delegated all powers, duties, and functions under the *Access to Information Act* (ATIA) and the *Protection of Privacy Act* (POPA), except the power to delegate under section 87 of ATIA and section 55 of POPA.

Access to Information (ATI) request means a process prescribed in the *Access to Information Act* describing an individual’s right to access any information in the custody or control of the City, including an individual’s own information.

Applicant means a person who makes a request for access to information under the *Access to Information Act* or a request for correction of personal information under the *Protection of Privacy Act*.

Disclosure means the process of making information available.

Personal information means any recorded information about an identifiable individual, including but not limited to:

- a) the individual’s name, home or business address, home or business telephone number, home or business email address, or other contact information, except where the individual has provided the information on behalf of the individual’s employer or principal in the individual’s capacity as an employee or agent,
- b) the individual’s race, national or ethnic origin, colour, or religious or political beliefs or associations,
- c) the individual’s age, gender identity, sex, sexual orientation, marital status or family status,
- d) an identifying number, symbol or other particular assigned to the individual,
- e) the individual’s fingerprints, other biometric information, blood type, genetic information or inheritable characteristics,
- f) information about the individual’s health and health care history, including information about the individual’s physical or mental health,
- g) information about the individual’s educational, financial, employment or criminal history, including criminal records where a pardon has been given,
- h) anyone else’s opinions about the individual, and
- i) the individual’s personal views or opinions, except if they are about someone else.

Record means any electronic record or other record in any form where information is contained or stored, including information in any written, graphic, electronic, digital, photographic, audio or other medium, but does not include any software or other mechanism used to store or produce the record.

Procedure Specification

Access to information is one of the pillars of democracy and individuals have a right under the *Access to Information Act* (ATIA) to access or to request records held by the City. Four core principles govern access to City information:

- **Open by default** - Records in the custody and control of the City of Edmonton will be made available to the public and will not be withheld except as permitted by legislation.
- **Withheld under limited circumstances** - Specific information may be withheld from the public, as permitted by ATIA, including:
 - *Mandatory*: Information the City must protect, such as someone else's personal information.
 - *Discretionary*: Information the City may protect, such as internal advice used to reach a decision.
- **Duty to assist** - The City of Edmonton is legally required to assist applicants and must make every reasonable effort to:
 - Respond openly, accurately and completely;
 - Respond in a timely manner; and
 - Provide an explanation if any information is withheld.
- **Independent oversight** - The correct application of access to information practices in accordance with the legislation and any regulations is overseen by the Office of the Information and Privacy Commissioner (OIPC) of Alberta. Applicants have a right to request that the OIPC review any City decision, act or failure to act regarding the processing of their ATI request. Third parties also have a right to request a review of the City's decision regarding access to records about them or their organization.
 - There are two stages to the OIPC review process:
 - *Settlement phase* - The OIPC completes the review and provides mediation services. The City of Edmonton cooperates with the OIPC by assigning City Access Analysts to provide subject-matter expertise during OIPC reviews and dispute resolution proceedings, if necessary. As a result of this process, the City may update its decision on access.
 - *Inquiry phase* - If the issues are not settled during mediation, the review may proceed to inquiry. Legal Services is responsible for leading the response during this stage; Corporate Access and Privacy (CAP) transitions the file to the assigned City lawyer and provides ongoing support.

Access to Information

There are three ways that information is made accessible to the public:

Proactive Disclosure

Proactive disclosure means releasing information periodically and making it available to the public without a request. Examples include posting approved bylaws to the City's public-facing website and publishing road construction data on the Open Data portal, accessible to anyone with internet access.

If a business area is uncertain about what information should be disclosed proactively, they may contact CAP in the Office of the City Clerk for guidance.

Routine Disclosure

Routine disclosure means releasing information to the requestor upon request to the relevant business area. Examples include property owners who ask for permits or inspection records that are available via the City's search of records process or fire reports available directly from Edmonton Fire Rescue Services.

Business areas are responsible for responding to requests for routine disclosure of information. Corporate Access and Privacy (CAP) in the Office of the City Clerk will provide guidance as needed.

Access to Information (ATI) Request

The public may submit a formal ATI request for information only if it is not available via proactive or routine disclosure (ATIA Section 3).

The City's Access Analysts oversee the statutory processing of records requests to ensure full compliance with the ATIA. This includes reviewing records for responsiveness, applying sections of ATIA to withhold information where appropriate and managing legislated timelines. The process often involves complex consultations with internal departments and external stakeholders, which must be completed in order for the analyst to be able to respond openly, accurately and completely.

Types of Access to Information (ATI) Request

When information is not available via proactive or routine disclosure, individuals may make a formal access to information request. There are two kinds of requests:

- *General requests* are for records that are not specific to the applicant. Examples include agreements, City reports and emails about certain City programs.
- *Personal requests* are for records that contain the applicant's personal information. Examples include bylaw complaints involving the applicant and the subsequent 311 call ticket notes.

Personal access to information requests may be made on behalf of someone else if the applicant has authorization from that individual or another right under the Act. Common examples include access requests by the individual's legal representative and requests by insurance companies with their insured's authorization.

There is a \$25 initial fee for general requests, while personal requests do not require an initial fee. Depending on the estimated number of pages and the required search time, additional fees may apply.

Compliance

Branch Managers are accountable for ensuring that access and disclosure practices within their branches comply with ATIA and City of Edmonton policies. Business areas have both the duty to assist members of the public in accessing records appropriately under ATIA and the responsibility to assist the Corporate Access and Privacy team in the Office of the City Clerk when contacted. Business areas are responsible to complete and maintain records for records access tasks, including but not limited to:

- Searching for records responsive to an ATI request in a thorough and timely manner;
- Documenting the search details in the search log;
- Responding to consultations to advise if there are concerns with the release of business area records;
- Creating and maintaining accurate records of routine disclosure decisions and actions; and
- Developing and implementing routine disclosure procedures compliant with ATIA and this Standard.

Failure to comply with this standard could result in the loss of personal information, damage to the City of Edmonton's reputation, costs and fines, legal risk, information breaches and complaints from the public.

References and Supporting Resources

Legislation

- [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](#)
- [City Administration Bylaw, Bylaw 16620](#)
- [A1477 Data and Information Management Administrative Policy](#)

Supporting Resources

- [City of Edmonton Delegation of Authority Order](#)
- [Corporate Information Management Glossary of Terms](#)
- [Fact Sheet: Records Available Without a Request for Access Under the ATIA](#)
- [Corporate Records and Information Management Accountability Model \(RASCI\)](#)