

Standard

Consent to Use or Disclose Personal Information



This standard 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
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Standard Statement

This standard governs the collection of consent to use or disclose personal information as required by the *Protection of Privacy Act (POPA)* s 12 and *Protection of Privacy Regulation, Alta Reg 132/2025* s 2.

This standard falls under the Privacy (P) functional domain, as defined in *A1477 Data and Information Management Administrative Policy*.

Scope

This standard 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. All individuals listed above are responsible for protecting the privacy and confidentiality of personal information in accordance with POPA.

Definitions

Consent means a recorded, voluntary and clear agreement to a course of action.

Electronic consent means a consent provided by electronic means, including being created, recorded, transmitted or stored in digital form by electronic means, or by other means that have similar capabilities for creation, recording, transmission or storage.

Electronic signature means electronic information that an individual creates or adopts in order to sign a record that is in, attached to or associated with the record.

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.

Standard Specification

Under POPA, the City will rely on consent to use or disclose personal information **only** if the individual whose personal information is involved was informed of this use or disclosure at the time of consent. The City will rely only on consent to use or disclose personal information when the consent is freely given and the individual has been informed of any adverse consequences associated with their decision.

The City of Edmonton will use or disclose personal information only to the extent necessary to carry out the purpose stated in the original consent and not for any other purpose.

Providing Consent to Use or Disclose Personal Information

In all cases where consent is the authority to use or disclose personal information, there must be a record created of the consent that is accessible in the event of a dispute or complaint. The record of consent must be maintained for the life of the record being used or disclosed.

Written Consent

Written consent is accepted in all instances where consent is the authority to use or collect personal information. Written consent must include the consenting individual's signature.

Electronic Consent

Electronic consent can be used when written consent is unavailable or inaccessible to the individual who must provide consent.

Electronic consents are considered valid if:

- It is accessible and readable for subsequent reference.
- It is retained for the applicable retention period.
- It captures that consent was provided by the consenting individual.
- It demonstrates that the record has not been altered since consent was provided.
- It allows for the individual giving the consent to be identified.
- The association of the electronic signature with the consent is reliable for the purpose for which consent is given.

Oral Consent

Oral consent will be accepted from individuals who, by reason of disability, impairment or other lawful reason, can legally provide consent but are unable to sign a document. Consent will be obtained orally, with a third-party individual signing on their behalf or with an audio recording of the consent. The employee collecting the consent form will document that consent was provided orally.

Business areas will determine on a case-by-case basis which consent options will be offered for a particular use or disclosure. The business area must explicitly state which forms of consent they will accept.

Implied Consent

If an individual voluntarily provides personal information to the City for a specific purpose, but does not explicitly provide consent, the City will use and disclose the provided information as is reasonable for that person under the principle of implied consent. Implied consent only allows the City to use or disclose the personal information as is necessary to fulfill the purposes for which it was provided.

Withdrawing Consent to Use or Disclose Personal Information

Under POPA, individuals have the right to change or withdraw their consent to use or disclose their personal information. When the City of Edmonton receives notification from an individual that they wish to withdraw their consent, the City will:

- 1) Inform the individual of the likely outcomes if they are not readily apparent. In the case of disclosure, the City will inform the individual that the withdrawal will affect future disclosures but will not reverse disclosures already made.
- 2) Confirm with the individual that, now that they know the potential outcomes, they still want to withdraw their consent.
- 3) Record the withdrawn consent.
- 4) Once confirmed, stop collecting, using or disclosing the individual's personal information.
- 5) Maintain the record of withdrawal in accordance with the City of Edmonton Classification and Retention Schedule.

Compliance

All City of Edmonton employees, contractors, volunteers, Council Committees and any individuals for whom the City Clerk acts as the Access and Privacy Head are responsible for maintaining the privacy and confidentiality of information in accordance with POPA. Branch managers are accountable for ensuring that privacy practices within their branches comply with legislation and City of Edmonton policy tools, including the *Corporate Records and Information Management Accountability Model* (RASCI). Failure to comply with this standard could result in the loss of personal information, damage to the City of Edmonton's reputation, unnecessary costs and fines, increased legal risk, information breaches and complaints from the public.

References and Supporting Resources

Legislation

- [*Protection of Privacy Act, SA 2024, c P-28.5*](#)
- [*Protection of Privacy \(Ministerial\) Regulation, Alta Reg 143/2025*](#)
- [*Protection of Privacy Regulation, Alta Reg 132/2025*](#)
- [*Electronic Transactions Act, SA 2001, c E-5.5*](#)
- [*City Administration Bylaw, Bylaw 16620*](#)
- [*A1477 Data and Information Management Administrative Policy*](#)

Employee Resources Available via the Intranet ([OneCity](#))

- City of Edmonton Delegation of Authority Order
- Corporate Information Management Glossary of Terms