

# Standard

## Privacy Impact Assessments

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

<b>Program Impacted</b>	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>
<b>Approved By</b>	Aileen Giesbrecht, City Clerk
<b>Date of Approval</b>	May 13, 2026
<b>Approval History</b>	N/A
<b>Next Scheduled Review</b>	May 13, 2027

### Standard Statement

This standard governs the requirements for a Privacy Impact Assessment (PIA) as required by the *Protection of Privacy Act (POPA) s 26* and *Protection of Privacy (Ministerial) Regulation, Alta Reg 143/2025 s 7*.

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

*Common or integrated program or service* means a program or service planned, administered, delivered, managed, monitored or evaluated by the City working collaboratively with one or more other public bodies, another public body working on behalf of the City or the City and one or more other public bodies.

*Innovative technology*, for the purpose of this standard and the PIA Guideline, means a method, software, hardware, application or manipulation of personal information, data derived from personal information or non-personal data that is:

- a) new to the City of Edmonton;
- b) not previously used in the way it will be used in the initiative; or
- c) is likely to be considered novel, new or innovative by the public.

*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.

*Reasonable security arrangements* mean administrative, physical and technical safeguards to protect personal information, data derived from personal information and non-personal data in the custody or under the control of a public body that:

- a) are appropriate and proportional to the security classification level of the information or data; and
- b) in the case of non-personal data, ensure, to the extent possible, that the identity of an individual who is the subject of the non-personal data cannot be re-identified from the data.

## Standard Specification

Effective June 11, 2026, business areas must prepare Privacy Impact Assessments (PIAs) for new practices, programs, projects or services (“initiatives”) or for substantial changes to existing ones, where:

- a) the *Protection of Privacy (Ministerial) Regulation* requires a PIA to be submitted to the Office of the Information and Privacy Commissioner (OIPC);
- b) unauthorized access or disclosure of the personal information involved in the initiative presents a real risk of significant harm (RROSH); or
- c) the Information and Privacy Commissioner requests a copy of a PIA under section 27(1)(j) of POPIA.

The level of detail included in the PIA shall match the complexity of the project.

The PIA will include:

- a description of the project;
- a summary of the purpose of the collection, use or disclosure of personal information;
- the types of personal information that will be collected, used or disclosed;
- the reasonable security arrangements in place to protect that personal information;
- the legal authority for the collection, use or disclosure of the personal information;
- any privacy risks and mitigation strategies respecting the personal information;
- any administrative, physical or technical safeguards in place to protect the personal information, including how the personal information will be securely transmitted, matched or linked by the City of Edmonton, if applicable;
- the procedures to ensure accuracy and completeness of the personal information used; and
- if two or more public bodies are involved, a clear governance structure respecting the responsibilities and accountability of each party.

These PIAs shall be provided to the Information and Privacy Commissioner before implementation of the initiative when a practice, program, project or service:

- involves highly sensitive personal information;
- involves the personal information of a substantial portion of the population;
- involves data matching between two or more public bodies;
- involves programs or services operated in cooperation with another public body or organization; or
- involves the development or use of innovative technology.

PIAs will also be provided upon request from the Commissioner.

A Privacy Impact Assessment conducted by any City of Edmonton business area will use the instructions and questionnaire provided by the Office of the Information and Privacy Commissioner (OIPC).

Corporate Access and Privacy in the Office of the City Clerk will advise business areas on the preparation of PIAs and conduct reviews to ensure they are complete and compliant with both City and regulatory requirements before approval. Where appropriate, the business area will engage the Corporate Access and Privacy team, the Corporate Information Security Office, Legal Services, Corporate Records and Information Management and any other corporate stakeholder necessary to complete the PIA to corporate standards, as defined in the Privacy Impact Assessment Standard Operating Procedure.

Where required by the POPA Regulation, the Office of the City Clerk will submit any PIAs to the Office of the Information and Privacy Commissioner before implementation of the initiative.

### **Common and Integrated Programs and Services (CIPS)**

A PIA must be completed for all common or integrated programs or services (CIPS), as defined above, entered into by the City of Edmonton with other public bodies, under section 7 of the *Protection of Privacy (Ministerial) Regulation, Alta Reg 143/2025*. The agreement establishing the City's involvement in a common or integrated program or service must contain the necessary information to complete the required PIA.

The CIPS agreement must:

- describe how the public bodies will comply with the *Protection of Privacy Act*.
- clearly define the governance structure of the common or integrated program or service, including the roles, activities and purposes of each public body's involvement.
- outline each public body's responsibilities regarding the personal information and non-personal data involved, including:
  - what types of personal information and non-personal data each public body is responsible for; and
  - who has custody and control of the personal information and non-personal data.

Each public body must be responsible for the personal information and non-personal data under its custody and control, including:

- managing retention schedules;
- processing Access to Information Requests;
- responding to a privacy incident or complaint related to the program;
- answering any questions from the public regarding their personal information, including how it is governed and protected; and
- ensuring adequate security measures to protect personal information and non-personal data.

The agreement, memorandum of understanding (MOU) or other governing document between public bodies must be finalized, or at least substantially and reliably worked out with respect to the above responsibilities, before proceeding with the PIA.

## **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, 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](#)
- [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](#)
- Office of the Information and Privacy Commissioner (OIPC): [Privacy Impact Assessment Resources](#)
- [Privacy Impact Assessment Guideline](#)
- Privacy Impact Assessment Template