

Standard

Privacy Incident Risk Assessment and Notification

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

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| 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 |
| Date of Approval | May 13, 2026 |
| Approval History | N/A |
| Next Scheduled Review | May 13, 2027 |

Standard Statement

This standard governs responses to privacy incidents as required by the *Protection of Privacy Act (POPA)* s 10 and *Protection of Privacy (Ministerial) Regulation, Alta Reg 143/2025* s 4.

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

Non-personal data means data, including data derived from personal information, that has been generated, modified or anonymized so that it does not identify any individual. It includes synthetic data.

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.

A *privacy incident* is any potential unauthorized collection, access, use, disclosure or destruction of personal information or non-personal data. This may include complaints, observations or reasonable suspicion of unauthorized activity regarding personal information or non-personal data or any other breach of POPA.

A *privacy breach* is a confirmed unauthorized collection, access, use, disclosure or destruction of personal information or non-personal data.

Significant harm means bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, identity theft, negative effects on insurability, negative effects to an individual's credit record, damage to or loss of property or other legal harms or financial losses.

Synthetic data means artificial data created to maintain the structure and patterns of real data without being linked to any individual in the original data set.

Standard Specification

In the event of a privacy incident, the City of Edmonton will conduct an assessment to determine if a real risk of significant harm exists, which includes, but is not limited to, assessing:

- a) if there is a reasonable basis to believe that the personal information has been misused or will be misused
- b) whether the incident occurred as a result of malicious intent
- c) the sensitivity of the personal information involved in the incident
- d) any steps taken to reduce the risk of significant harm

In the event that the privacy incident represents a risk of significant harm to an individual under *Alta Reg 143/2025 S4(2)*, the City of Edmonton will give written notice, without unreasonable delay, to the individual(s) whose personal information was involved, the Information and Privacy Commissioner and the Minister responsible for POPA.

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)* and the *Access to Information and Protection of Privacy Authority Chart*. Failure to comply with this guideline 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](#)
- [Council Committees Bylaw 18156](#)
- [Agencies, Boards, Committees and Commissions Council Procedure](#)
- [A1477 Data and Information Management Administrative Policy](#)

Supporting Resources

- [City of Edmonton Delegation of Authority Order](#)
- [Corporate Information Management Glossary of Terms](#)

- [Corporate Records and Information Management Accountability Model \(RASCI\)](#)