

# Standard

## Release of Personal Information to Other Public Bodies

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>	June 3, 2026
<b>Approval History</b>	N/A
<b>Next Scheduled Review</b>	June 3, 2027

### Standard Statement

This standard governs the disclosure of personal information to other public bodies and federal institutions, including municipal, provincial and federal law enforcement agencies, under the *Protection of Privacy Act (POPA)* s 13(1).

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

*Law enforcement*, as defined in ATIA, means:

- a) policing, including criminal intelligence operations,
- b) a police, security or administrative investigation, including the complaint giving rise to the investigation, that leads or could lead to a penalty or sanction, including a penalty or sanction imposed by the body conducting the investigation or by another body to which the results of the investigation are referred, or
- c) proceedings that lead or could lead to a penalty or sanction, including a penalty or sanction imposed by the body conducting the proceedings or by another body to which the results of the proceedings are referred.

Law enforcement agencies include, but are not limited to, Alberta Justice, RCMP, provincial, municipal and First Nations' police services and the Canada Customs and Revenue Agency (CCRA).

*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.

*Public body*, for the purposes of this standard, includes any of the following entities:

- Any government institution, including departments, agencies, boards, commissions, or Crown Corporations of the Government of Canada or as defined in the *Canada Access to Information Act, R.S.C., 1985, c.A-1*.
- Any department, branch, or office of the Government of Alberta or other province.
- The Legislative Assembly Office and any independent offices of the Legislature.
- Any agency, board, commission, corporation, or other body designated as a public body within applicable regulations.

- Any local public body, such school boards, post-secondary institutions, public health care institutions, municipal governments and the boards, committees, commissions, panels, agencies or corporations created or owned by them, or as defined in the *Access to Information Act* (ATIA) - see below.

For the full legal definitions, see the Access to Information Act, Section 1 and the Protection of Privacy Act, Section 1.

*Record* means any electronic record or other record in any form in which 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.

## **Standard Specification**

### *Responsibilities*

The City Manager or delegate shall:

- a. approve this standard and amendments.

The Department Contact Person shall:

- a. liaise with representatives of public bodies when requests for personal information are made, and
- b. ensure records related to the disclosure are maintained in accordance with the City of Edmonton Classification and Retention Schedule.

### *Disclosure Requirements - Disclosure Enabled or Required by an Enactment of Alberta or Canada*

Requests to the City of Edmonton from a public body or a federal institution for personal information in accordance with an enactment of Alberta or Canada must:

- be in writing, and
- be referred to an appropriate department contact person.

The request must contain the following information:

- the name of the individual whose information is requested;
- the exact nature of the information desired;
- the receiving public body or federal institution's collection authority or authorities, including specific sections of Acts or Regulations that authorized collection;
- the purpose for which the public body will use the information;
- the public body or federal institution's file number; and
- the name, title and address of the person authorized to make the request.

### *Disclosure Requirements - Law Enforcement Agency*

Requests to the City of Edmonton from a law enforcement agency must be:

- in writing using the Law Enforcement Disclosure form or a site-specific form that includes all the same elements, and
- referred to an appropriate department contact person.

The City of Edmonton will not disclose personal information to a law enforcement agency under section 13(1)(p) unless the agency can provide sufficient information to satisfy that the purpose relates to a bona fide law enforcement matter as defined in POPA. Personal information will not be disclosed merely based on suspicion, surmise or guess.

The Law Enforcement Disclosure form, which demonstrates an authority to disclose personal information under section 13(1)(p), must be completed, containing the following information:

- the name of the individual whose information is requested;
- the exact nature of the information desired;
- the authority for the investigation;
- the purpose for which the requesting law enforcement agency will use the information;
- the law enforcement agency's file number; and
- the name, title and address of the person authorized to make the request.

The department contact person will:

- review the form to confirm completeness;
- consent to or refuse the disclosure of personal information;
- ensure that only the information necessary to answer the request is disclosed if the request is granted;
- consult with the Corporate Access and Privacy in the Office of the City Clerk if unsure there is an authority for the disclosure of personal information;
- ensure that when the record is provided, appropriate safeguards are used (for example, encryption); and
- ensure that a record of when and to whom personal information was released is kept in a separate file. This record must be retained 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 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 policies, 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, legal risk, information breaches and complaints from the public.

## **References and Supporting Resources**

### *Legislation*

- [Access to Information Act, SA 2024, c A-1.4](#)
- [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](#)
- [Law Enforcement Disclosure Form](#)
- [Corporate Information Management Glossary of Terms](#)
- [Corporate Records and Information Management Accountability Matrix \(RASCI\)](#)