

OPERATIONAL POLICY

Policy Title:	Applies to:	Reference #
Privacy Assessment	City business areas	2015-OCC-P0005
Approved by:	Dates:	Total # of Pages
City Clerk	Effective:	4
	Last Review:	
	Next Review:	
Authority:		
<i>The Local Authority Freedom of Information and Protection of Privacy Act</i>		
Responsibility:		
Corporate Information Governance, Office of the City Clerk		

1.0 Purpose

The City of Regina (the “City”) integrates a privacy assessment process into its standard operating procedures to support and enhance its commitment to protect personal information in accordance with *The Local Authority Freedom of Information and Protection of Privacy Act*.

The purpose of this policy is to establish appropriate controls around the privacy assessment process.

2.0 Scope

This policy applies to all City business areas with initiatives (programs, projects, services, applications, software upgrades) where personal information is collected, accessed, used, processed, stored, modified, shared, disclosed and/or destroyed.

3.0 Definitions

Access and Privacy Team – Privacy & Freedom of Information Officers located in Corporate Information Governance, Office of the City Clerk.

Collection – the gathering of personal information for an existing or proposed City program.

Contractor – an individual or company retained under contract to perform services for the City.

Disclosure – when personal information is made available or released.

Employee – an individual employed by the City, including an individual retained under a contract to perform services for the City.

Information – what a record contains. It is also a term used to refer to the content of an electronic database or application. Regardless of the form, all recorded information in the possession or under the control of the City is a record.

Initiative – a standard term used to represent, but which is not limited to, a program, project, service, application or software upgrade.

LA FOIP – *The Local Authority Freedom of Information and Protection of Privacy Act.*

Personal Information – recorded information about an identifiable individual which may include but is not limited to: information about an individual’s race; religion; family status; age; birthdate; place of origin; employment or criminal history; financial information; health services number; driver’s license number; social insurance number; home address, email address or telephone number; physical or mental condition of an individual; an individual’s personal views or opinions except where they are about another individual.

Privacy – the right to keep certain information private; freedom from unauthorized access to, use, or disclosure of one’s personal information.

Privacy Assessment – a tool used to review privacy risks, associated with collecting, accessing, using, processing, storing, modifying, sharing, disclosing and/or destroying personal information, typically undertaken during the initial or conceptual stage of an initiative. It consists of two parts: Part 1: Privacy Quick Assessment, Part 2: Privacy Impact Assessment.

Privacy Impact Assessment – a detailed diagnostic tool used to identify and resolve privacy risks inherent to initiatives undertaken by the City.

Privacy Quick Assessment – a preliminary diagnostic tool used to determine whether an initiative has or will have privacy concerns that need to be reviewed in more detail through a Privacy Impact Assessment.

Record – a record of information in any form and includes information that is written, photographed, recorded, digitized or stored in any manner, but does not include computer programs or other mechanisms that produce records.

Third Party – a person or company other than the City.

Use – when personal information collected by the City is used for any purpose.

4.0 Policy

A privacy assessment is a standard operating process commenced during the conceptual stage of City initiatives that includes collection, accessing, using, processing, storing, modifying, sharing, disclosing and/or destroying personal information.

The purpose of a privacy assessment is to ensure protection of personal information is incorporated into all initiatives undertaken by the City.

A privacy assessment can be used on an existing initiative if it has never had a privacy review. Where changes are anticipated to various elements, a review of the original assessment may be required.

The outcomes or recommendations of a privacy assessment may have implications for the design or structure of new or existing initiatives. Considering privacy protection during the initial stages of an initiative reduces corporate risk.

The privacy assessment process begins with a Privacy Quick Assessment (PQA) to determine whether a more detailed Privacy Impact Assessment (PIA) is required. Completed PIAs must be signed and responsibility for mitigations accepted by Senior Management responsible for the business area.

5.0 Roles & Responsibilities

City Clerk is responsible for:

- Corporate information, including personal information at the City of Regina.

Manager of Corporate Information Governance is responsible for:

- Providing guidance with respect to this policy and ensuring this policy is maintained.
- Review and sign-off on all PAs.

Access and Privacy Team is responsible for:

- Consulting with and educating City employees regarding the privacy assessment process.
- Developing policies, procedures, guidelines, forms and protocols relating to the privacy assessment process.
- Determining the level of privacy assessment required.
- Working with Innovation, Energy & Technology (IET) Security as required, as well as the responsible business area/project managers to initiate, complete and routinely review privacy assessments.

Senior Management of the business area is responsible for:

- Providing resources and expertise to work with the Access & Privacy Team to initiate, complete and routinely review privacy assessments.
- Identifying and accepting risks and/or defining and implementing mitigations associated with the risks.

6.0 Related Forms

Privacy Assessment Form:

- Part 1: Privacy Quick Assessment
- Part 2: Privacy Impact Assessment

7.0 Reference Material

The Local Authority Freedom of Information and Protection of Privacy Act

Privacy Policy # 2015-OCCOP-P0001

Privacy Assessment Guideline # 2015-OCC-G0003

Employee Privacy Guideline # 2015-OCCOP-G0001

Privacy Breach Guideline #2016-OCC-G0001

8.0 Revision History

Date	Description of Revision	Authorized By	(Re)-Approval Required (y/n)
01-05-2016	Initial Release	CLO & CC	Yes
01-05-2017	Scheduled Review	CC	No
01-01-2018	Revision	CC	No
01-07-2018	Review - LA FOIP Amendments	CC	Yes
01-07-2019	Review - Definitions	CC	Yes
01-08-2021	Scheduled Review	CC	Yes