

Program Essentials		Current State	2021 Next Steps
	Risk Assessment Tools	A <i>Privacy Impact Assessment Policy</i> is in place, requiring a Privacy Impact Assessment for all projects, initiatives and technologies involving personal information. Privacy Impact Assessments are embedded in the Cloud Computing and Open Source Program, which assist business units in evaluating third party service providers. Threat Risk Assessments are completed by Corporate Security.	Continue
	Training and educational requirements	The City has mandatory Code of Conduct training, which includes modules on the FOIP Act and Acceptable Use of City Technology Resources. There are two (2) optional on-line training courses available to all City staff and vendors: Access to Information and Privacy Awareness. In person targeted access and privacy training courses are available for FOIP Program Administrators and specific business units handling personal information. Additional in-depth privacy training and electronic resources are desired and planned.	Enhance
	Privacy complaint management	Complaint management process is in place for responding to privacy complaints. A privacy breach response plan is in place. The City Clerk collaborates with Information Technology and Corporate Security, as well as other partners across the Corporation, as required.	Continue
	Service provider management	Standard processes are defined; however, follow through and monitoring require further development.	Enhance
	External communication	The Calgary.ca website provides public with information on access and privacy at The City. A project website was established to provide information on current work related to the <i>City of Calgary Citizen Privacy Data Practices (C2019-0560)</i> . Notices of collection are in place across the Corporation; however, monitoring could be improved to ensure consistency. Additional external communication is forthcoming as a result of work related to the <i>City of Calgary Citizen Privacy Data Practices (C2019-0560)</i> .	Enhance
Ongoing Assessment	Oversight and Review Plan	An annual oversight and review plan will be developed in 2021 following the current privacy management program evaluation being conducted by an external privacy expert.	Develop in 2021 Initiate in 2022
	Assess and Revise Program Controls	Assessment and revisions of the privacy program controls will be initiated following the current evaluation being conducted by an external privacy expert.	Initiate in 2022

¹ This Privacy Management Program framework is adopted from and is based on the *Privacy Management Program – At A Glance*, published in “*Getting Accountability Right with a Privacy Management Program*”. April 2012. Office of the Information and Privacy Commissioner of Alberta, Office of the Privacy Commissioner of Canada and Office of the Information and Privacy Commissioner for British Columbia. Available [online](#).