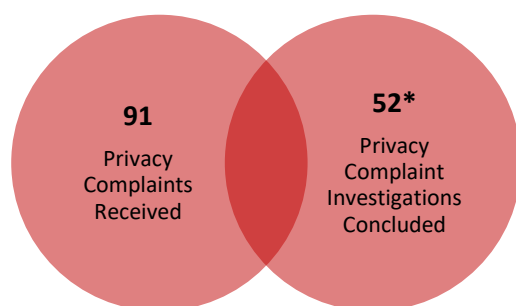# Privacy Management Program
2020 Annual Report
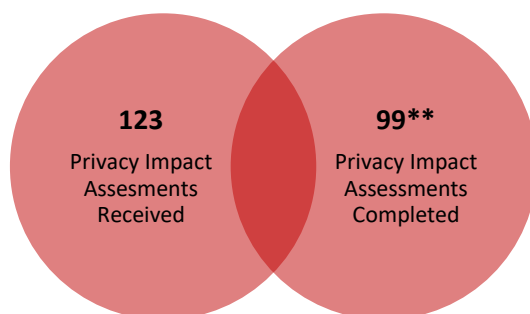
2020 Privacy Management Program at a Glance

Privacy Complaint Management

91
Privacy Complaints Received

52*
Privacy Complaint Investigations Concluded

0.04% Privacy Complaints received down from 2019

Privacy Impact Assessments

123
Privacy Impact Assesments Received

99**
Privacy Impact Assessments Completed

12.84% Privacy Impact Assessments received up from 2019

2020 Key Privacy Accomplishments

COVID-19 Privacy Impact Assessments

Internal and External Privacy Research

Access and Privacy Website Improvements

Operational Privacy Toolkit Development and Improvement

External Privacy Gap Assessment

*There were an additional 30 Privacy Complaint Investigations that were received in 2019 and closed in 2020.

**There were an additional 35 Privacy Impact Assessments that were received in 2019 and closed in 2020.

Privacy Complaint Management

The City is committed to protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction. There are times when mistakes are made or threats arise to our information assets. When that occurs, The City has a privacy breach response plan in place, comprised of the below key steps:
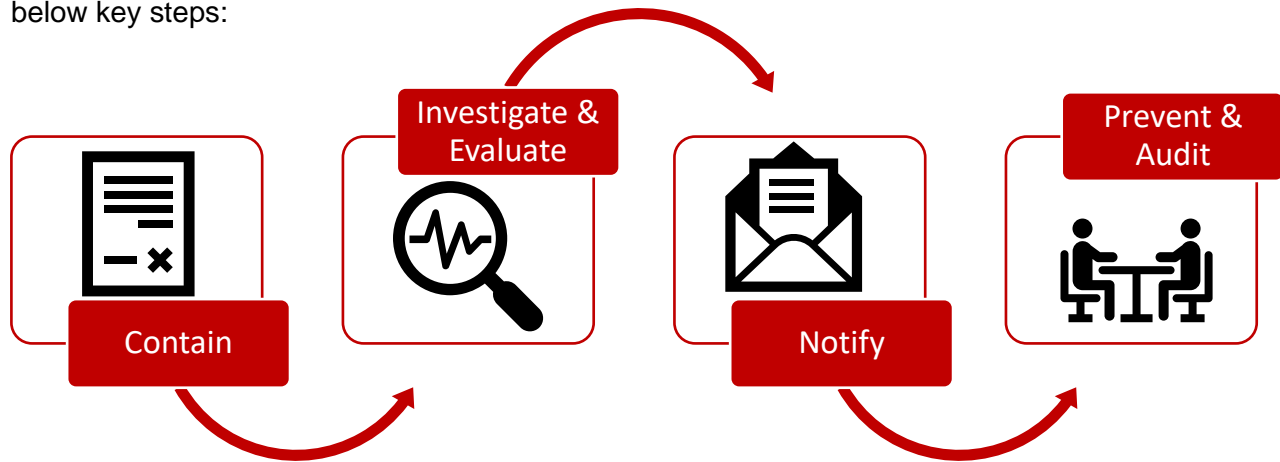
Privacy Complaint Management by the numbers:
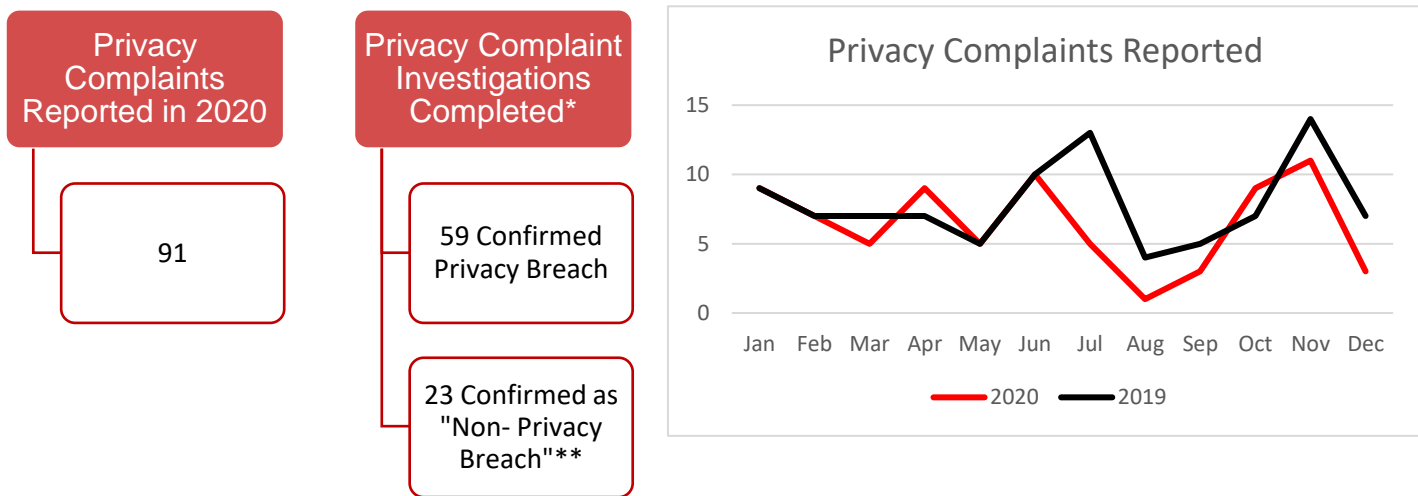
Notes: *Privacy complaint investigations carry over from year to year. These figures include privacy complaints reported in 2019 and investigations completed in 2020. There are 33 privacy complaints reported in 2020 that remain under investigation.

**"*Non-Privacy Breach*" means the collection, use or disclosure of personal information was authorized pursuant to the *Freedom of Information and Protection of Privacy Act* ("FOIP Act").

Privacy Complaint Management: Auditing

The privacy complaint management process includes providing Business Units with appropriate recommendations in order to mitigate or prevent future privacy complaints and breaches of similar nature. Access and Privacy follows up with each Business Unit that experienced a privacy breach on a monthly basis to ensure that recommendations have been implemented.

Some of our key privacy recommendations:

- ✓ Enroll in Privacy Awareness training;
- ✓ Review best practices surrounding privacy;
- ✓ Complete a Privacy Impact Assessment;
- ✓ Create or update processes and/or procedures; and,
- ✓ Stop practices that have privacy risks.

174 Recommendations provided in 2020

71* Recommendations implemented

103* Recommendations in progress
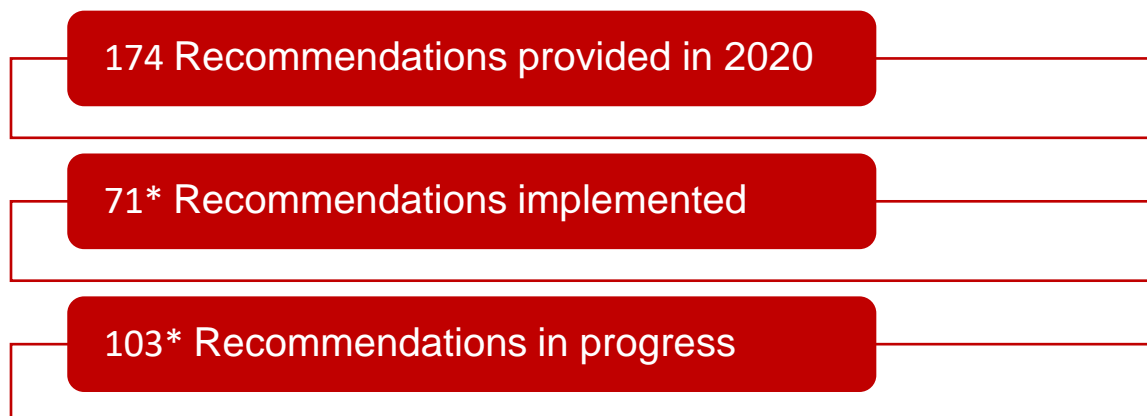
Recommendations are in progress for one or more of the following reasons:

- ➢ Training may be scheduled for a date in 2021;
- ➢ Privacy Impact Assessment under development and/or analysis;
- ➢ New practice or policy under development; or
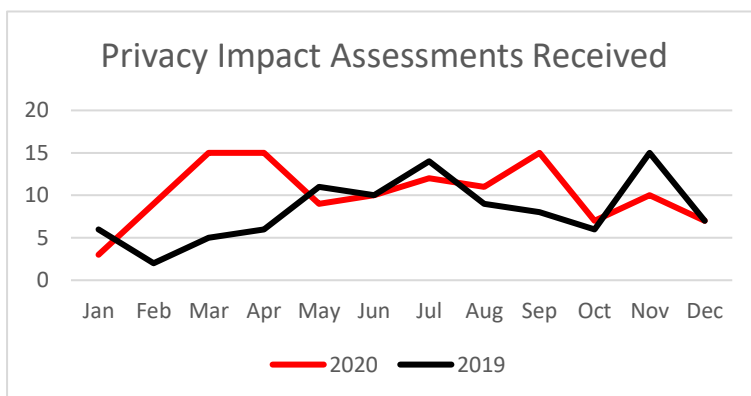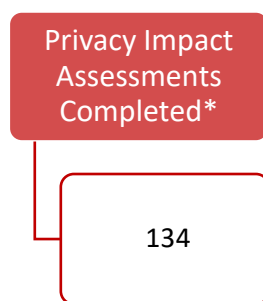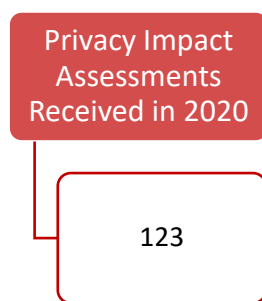- ➢ Conflicting priorities due to COVID-19.

Note: *The figures are current as of 2021 February 2.

Privacy Impact Assessments

A Privacy Impact Assessment ("PIA") is a process that assists The City assess impacts that a new program, administrative process, initiative or practice, technology or legislation may have on privacy. A PIA is both a due diligence exercise and a risk management tool that identifies privacy risks, recommends how to mitigate or eliminate privacy risks, and contributes to transparency, accountability, and informed decision making.

PIA Intake	1st Collaboration	Privacy Analysis	2nd Collaboration	Privacy Risks and Mitigations	PIA Report

Privacy Impact Assessments by the numbers:

Privacy Impact Assessments Received in 2020	Privacy Impact Assessments Completed*
123	134

Privacy Impact Assessments Received

Line chart showing PIAs received by month (Jan–Dec) comparing 2020 (red) and 2019 (black), with vertical axis from 0 to 20.

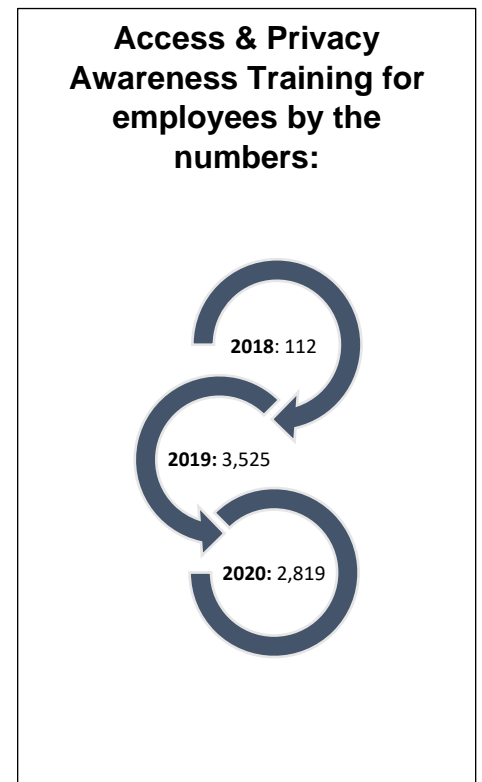## Some of our key Privacy Impact Assessments:

- ✓ Remote Planning and Development Video Inspections
- ✓ Covid-19 Secondary IT Help Desk
- ✓ Covid-19 Delivery of Basic Needs for Non-Profit Agencies
- ✓ SAVE Program – Employee Data Analysis
- ✓ SAVE Program – Engage Portal
- ✓ COVID-19 Service Impact and Investment Analysis Research Project

Note: *Privacy Impact Assessments carry over from year to year. The figure includes Privacy Impact Assessments received in 2019 and completed in 2020. There are 16 Privacy Impact Assessments received in 2020 that remain in process.

Effective January 2021, Access and Privacy will begin auditing the implementation of its recommendations issued to Business Units for mitigating and/or eliminating privacy risks identified within Privacy Impact Assessments.

Privacy Culture Snapshot

Building a culture of privacy awareness is one of the key components of an accountable privacy management program, and promoting privacy at The City was a priority throughout 2020:

Four Information and Privacy Newsletters published

Three Privacy Tip Sheets published

City-wide employee livestream

Calgary 9-1-1 recruits received privacy training

Corporate Initiatives received privacy training

Calgary Housing Company received privacy training

Law received privacy training

Corporate Analytics & Innovation received privacy training

Privacy Impact Assessment training delivered to City Clerk's

Access & Privacy Awareness Training for employees by the numbers:

2018: 112

2019: 3,525

2020: 2,819

Key Privacy Initiatives: Tracking and Managing Projects with Digital Tools

Two key privacy initiatives were developed and launched at The City in 2020:

I.   **Digital Directory of Personal Information Banks:** this digital tool meets The City's obligation to publish a directory that lists the public body's personal information banks and provides employees and the public with information about the type of personal information collected, used, and disclosed at The City; and,

II. **Digital Library for tracking, managing, and reporting City services and projects involving personal information**: this digital tool provides Administration and the public with information on completed PIAs, providing them with information about how The City handles personal information.

Number of Personal Information Banks Created in 2020 **46**	Number of Privacy Impact Assessments Managed with the Digital Library in 2020 **205**

Accountable Privacy Management

Accountability is a key principle of privacy and good governance. Since 2018, The City's Privacy Management Program has been undergoing development and evaluation to ensure that The City is meeting its obligations under Alberta's access and privacy legislation. Privacy must be built into all City initiatives, services and technologies by design in order to maintain the trust of employees and citizens.

Privacy Management Program[i]

Program Essentials		Current State	2021 Next Steps
Organizational Commitment	**Commitment and support**	On 2019 April 29, Council adopted Notice of Motion (C2019-0560), which stated "there is a strategic governance requirement for City Council to lead in the overall public domain of digital governance, by ensuring administrative controls are in place over The City's data (including citizen data) when deploying Smart Cities technologies. And, as part of our legislative responsibility and social contract obligation with citizens, ensure that a comprehensive Administrative Privacy Program is in place to uphold the public's trust and confidence". An administrative governance structure is in place.	**Continue**
	Designate a privacy team	Council appointed the City Clerk as the head of the local public body for the purposes of the FOIP Act. The City Clerk is supported by an Access and Privacy Section. There is an opportunity to improve clarity about authorities for decision making.	**Enhance**
	Reporting	Internal reporting mechanisms established: 1. Regular reporting to ELT on access and privacy matters; and 2. Annual Privacy Management Program Report to the Priorities and Finance Committee (implemented effective 2021).	**Enhance**
Program Controls	**Directory of Personal Information Banks**	A digital Directory of Personal Information Banks was established in 2020, and The City began the process of identifying Personal Information Banks across the Corporation.	**Continue**
	Policies	There is an opportunity to develop further Administration policies to ensure comprehensive Corporate guidance with respect to protection of privacy.	**Develop and Enhance**

Program Essentials		Current State	2021 Next Steps
Ongoing Assessment	**Risk Assessment Tools**	A *Privacy Impact Assessment Policy* 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 *City of Calgary Citizen Privacy Data Practices* (C2019-0560). 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 *City of Calgary Citizen Privacy Data Practices* (C2019-0560).	**Enhance**
	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**

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[i] 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.