



Privacy Management Program Framework Research Results and Key Findings

What We Heard Report 2020



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Project Overview

On 2019 April 29, City Council directed Administration in consultation with appropriate City staff and leading external privacy experts to consider conducting a city-wide public consultation process on the Privacy Framework and data governance principles (Notice of Motion, *City of Calgary Citizen Data Privacy Practices*, C2019-0560).

In 2020, City Clerk's Office developed a *Privacy Management Program Framework* for The City and sought input from citizens and City employees through a privacy research survey campaign to assess citizens' and City employees' awareness of the *Freedom of Information and Protection of Privacy Act* ("FOIP Act") and perceptions of The City's protection of personal information. A citizen survey and a City employee survey on The City's *Privacy Management Program Framework*, including The City's proposed privacy vision and principles, were both conducted by the City's Corporate Research Team ("CRT").

Feedback from the privacy research survey was analyzed and will inform and guide the continuous development and improvement of The City's *Privacy Management Program Framework*.

Engagement Overview

Citizens

The City's CRT conducted an online survey via Question Pro with panelists of the Citizens' View – Calgary's online panel. Citizens' View is an online research panel, managed by The City, through which citizens can participate in shaping City of Calgary programs and services through surveys, discussions and engagement activities. The CRT sent the survey invitation to all panelists of the Citizens' View. The survey was conducted between September 16, 2020 and September 28, 2020 and was sent to 2,873 panelists.

City Employees

The City's CRT conducted an online survey via Question Pro with a randomly selected sample of City employees with a City email address. The CRT randomly selected 2,967 City employees and sent each an email to invite them to take the survey, which was accessible via a link unique to each email address/employee. The questionnaire was similar to the Citizens' View Survey with revisions as appropriate. The survey was conducted between October 26, 2020 and November 9, 2020 and was sent to 2,967 City employees.



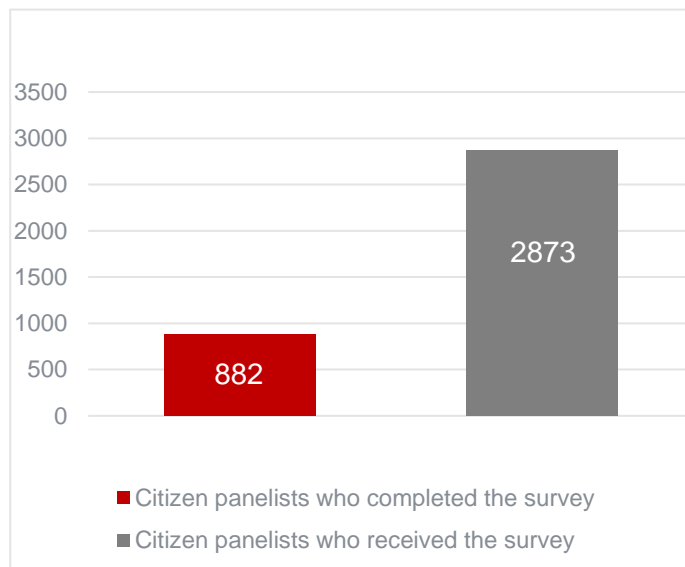
What We Asked

Citizen and City employee feedback on The City's *Privacy Management Program Framework* was sought to inform the review. We asked citizens City employees questions related to their:

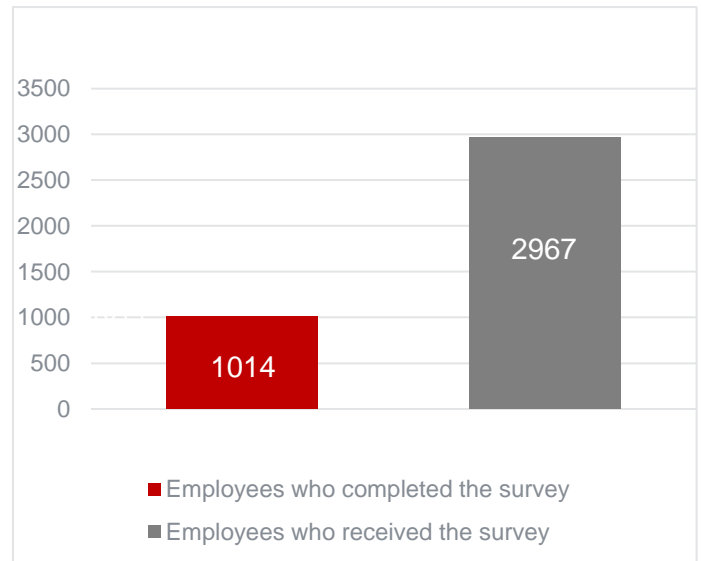
- awareness and knowledge of the FOIP Act,
- perceptions of privacy protection at The City;
- privacy breaches; and
- privacy program components and principles.

What We Heard

Citizens



City Employees



¹ Due to the methodology and the composition of the Citizens' View panel, these survey findings are not considered statistically representative of all Calgarians. The work is exploratory and as such, the results should be regarded as directional and should not be generalized to the larger population.

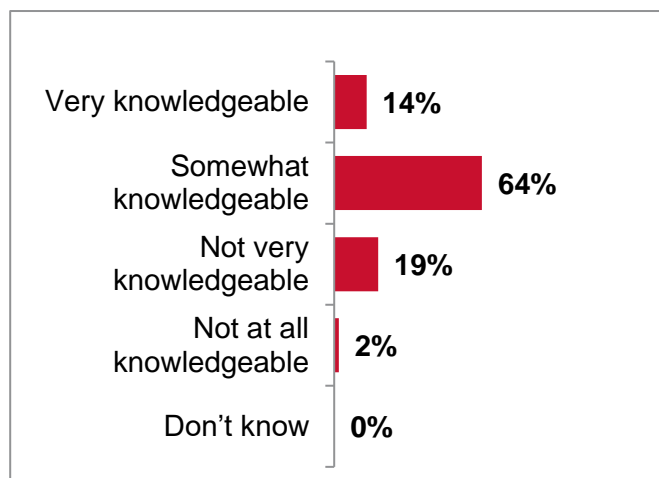
Citizen Results

The key findings that arose from the citizen research survey are summarized in the table below:

Theme	What We Heard from Citizens* *prepared by the Corporate Research Team
Awareness and Knowledge of the FOIP Act	<ul style="list-style-type: none">• While respondents self-report being knowledgeable about privacy rights and the protection of personal information and aware of the FOIP Act, awareness of details of FOIP Act is lower.
Perceptions of Privacy Protection at The City	<ul style="list-style-type: none">• A large majority of respondents are or would be comfortable providing their personal information to The City in person or online (not including mobile apps); however, fewer are comfortable doing so via other methods, particularly mobile apps and fax.• The majority of respondents tend to trust The City regarding the protection of their personal information and agree The City adheres to FOIP Act and respects citizen's privacy rights. Of note, the proportion of "don't know" responses indicates a sizeable minority of respondents don't know enough about this to have an opinion.
Privacy Breaches	<ul style="list-style-type: none">• Although a majority trust that The City uses sufficient security measures to protect personal information, fewer are confident in The City's handling of privacy breaches. In addition, news reports about privacy breaches negatively impacts willingness to provide personal information to The City for the majority of respondents.
Privacy Program Components and Principles	<ul style="list-style-type: none">• Respondents' ratings indicate that The City's compliance with the FOIP Act is most important to them while Privacy Impact Assessments (PIAs) are least important.• Respondents tend to think that Data Minimization should be the highest priority when it comes to principles to guide The City's Privacy Management Program while Collaboration should be the lowest priority.

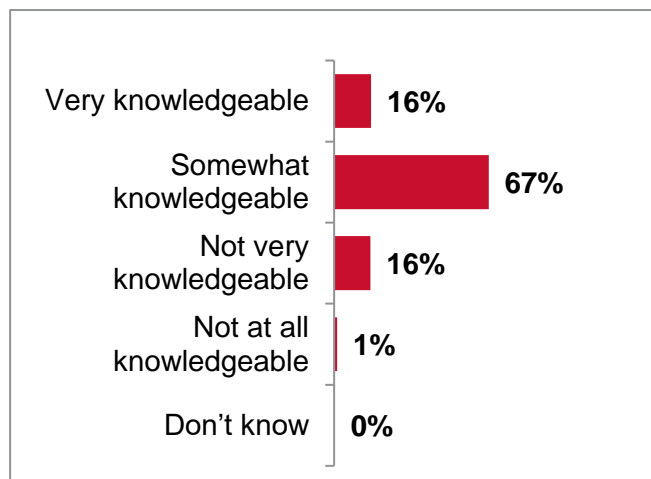
Awareness and Knowledge of the FOIP Act

Level of Knowledge about Privacy Rights



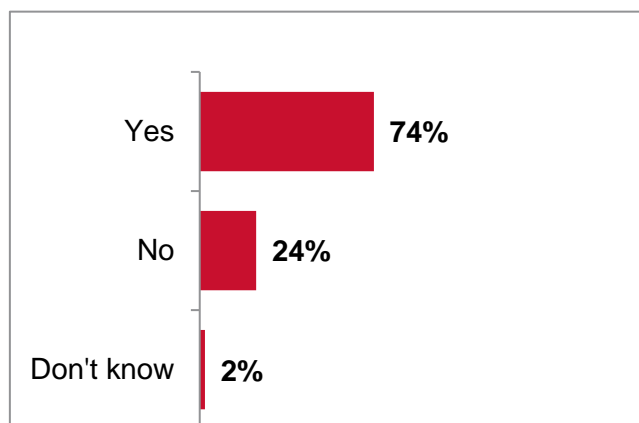
The majority (79%) of respondents report being knowledgeable (14% very and 64% somewhat) about privacy rights. Only 2% say they're not at all knowledgeable.

Level of Knowledge about Protection of Personal Information



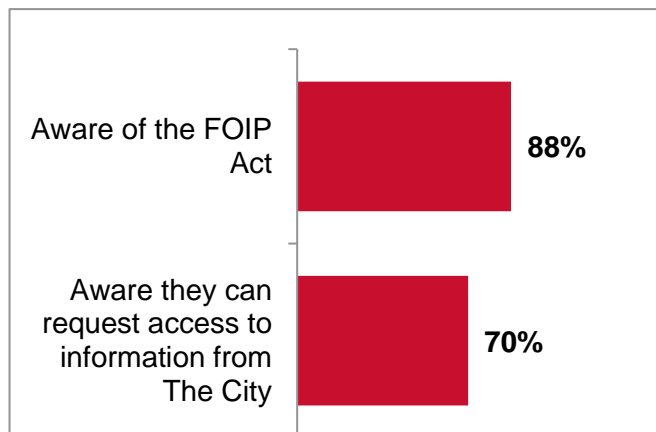
Self-reported knowledge level about protection of personal information is similar to that about privacy rights, with the majority (83%) saying they're knowledgeable (16% very and 67% somewhat).

Familiarity with Access and Privacy



Three-quarters (74%) of respondents do or have worked in a role that requires them to be familiar with personal information and privacy.

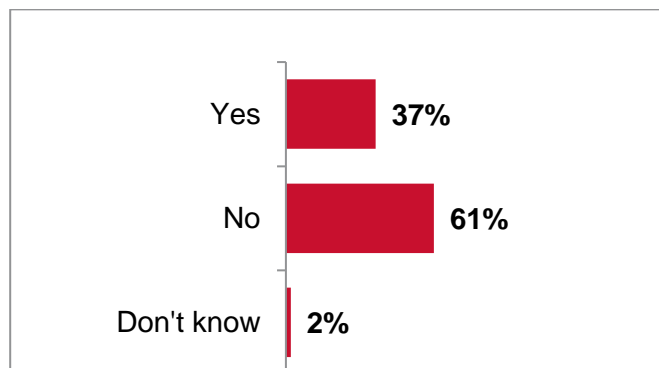
Awareness of the FOIP Act and Requesting Access to Information from The City (% yes)



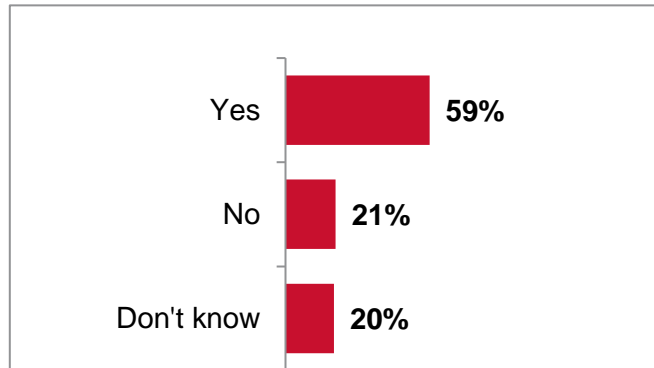
After reading a description of Alberta's *Freedom of Information and Protection of Privacy Act* (FOIP), around nine-in-ten respondents (88%) report being aware of it prior to the survey and 70% were aware they could request access to information from The City.

Privacy Training

Have Taken Training or Accessed Resources to Increase Privacy Awareness

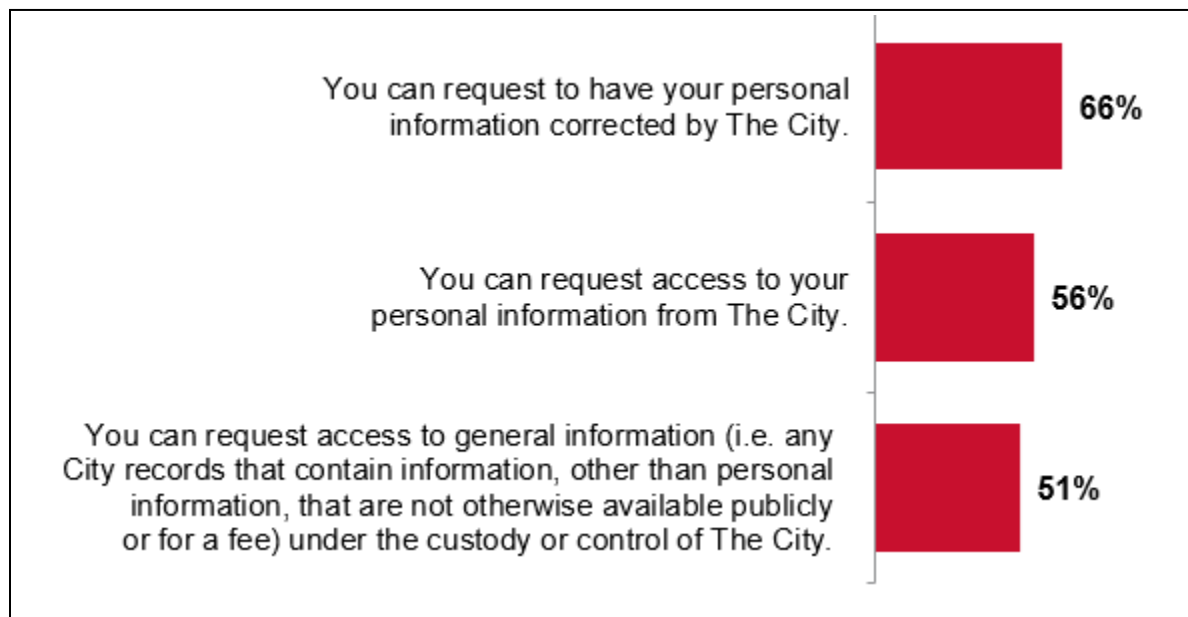


Would Consider Taking Privacy Training if Offered for Free by The City of Calgary



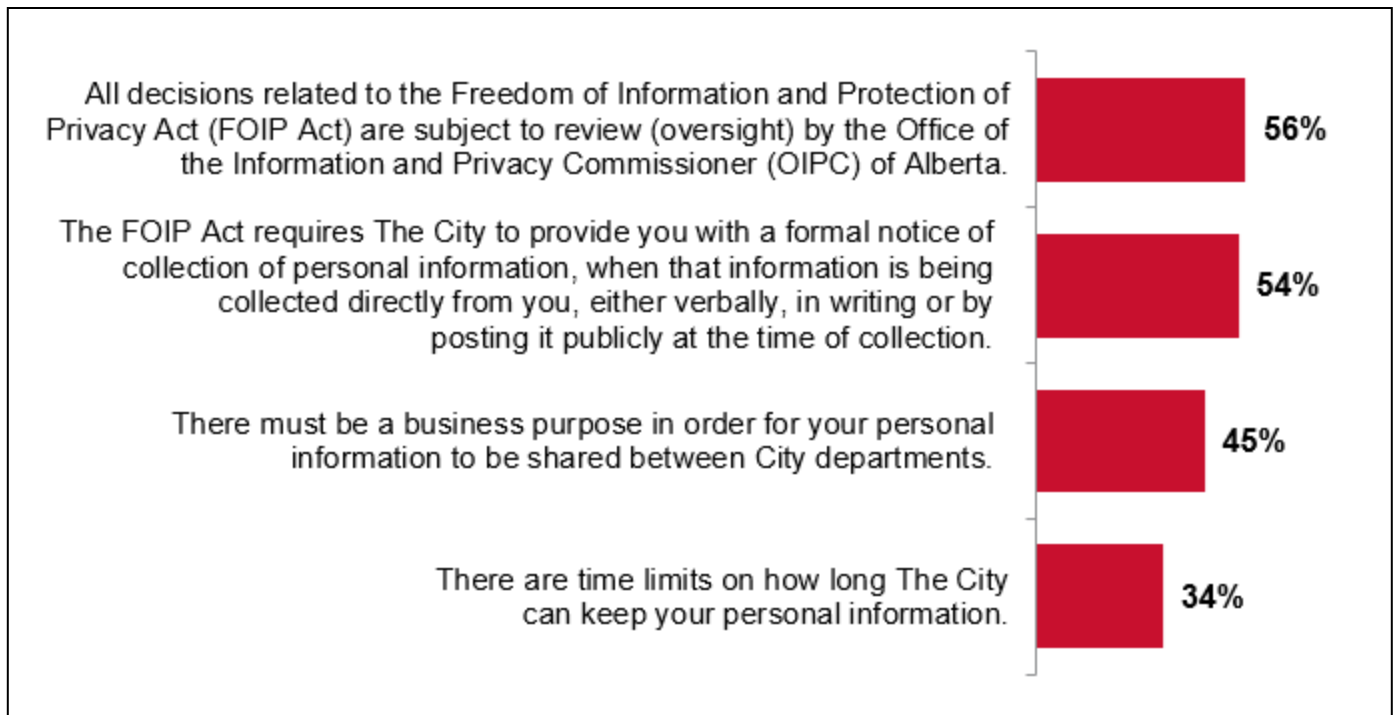
A minority of respondents (37%) have taken training or accessed resources to increase their privacy awareness; however, a majority (59%) would consider taking training if The City offered it for free.

Awareness: Requesting Access to Information (% yes)



Before the survey, the majority of respondents were aware they can request to have their personal information corrected by The City (66%). Fewer were aware they can request access to their personal information from The City (56%) and they can request access to general information in the custody or control of The City (51%).

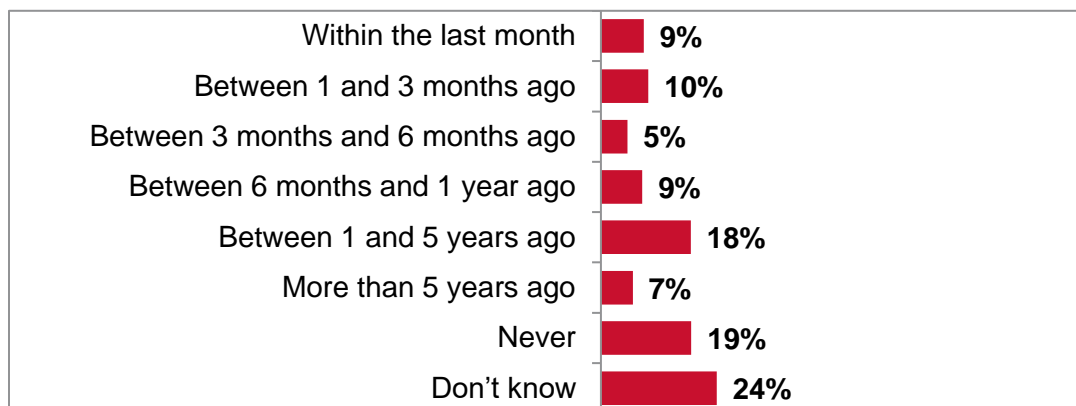
Awareness Regarding FOIP Requirements with which The City Must Comply (% yes)



A slight majority of respondents were already aware that all decisions related to the FOIP Act are subject to review by the Office of the Information and Privacy Commissioner (OIPC) of Alberta (56%). Just as many (54%) were aware the FOIP Act requires The City to provide them with a formal notice of collection of personal information when it's being collected directly from them. There was less awareness that there must be a business purpose for their personal information to be shared between City departments (45%) and that there are time limits on how long The City can keep their personal information (34%).

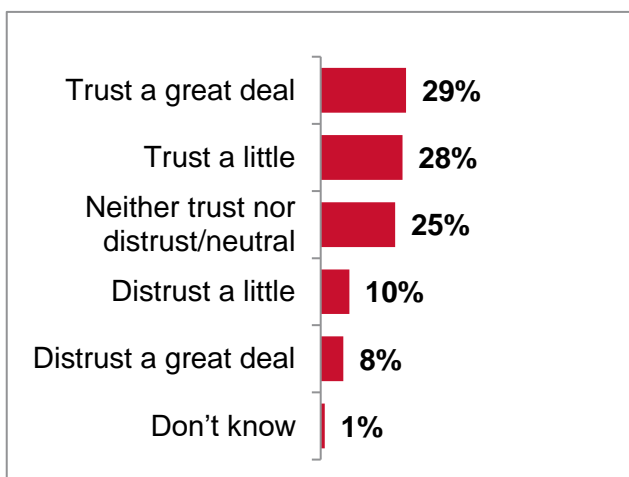
Perceptions of Privacy Protection at The City

Providing Personal Information to The City



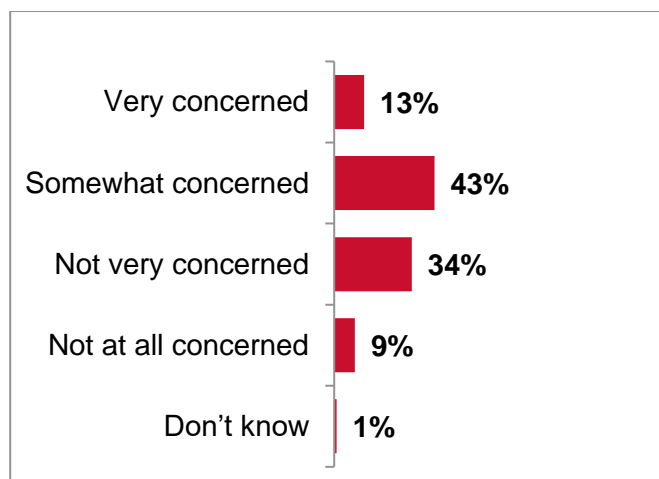
One-in-five respondents (19%) say they've never been asked to provide personal information to The City in order to access services or programs and one-quarter (24%) don't know. One-third of respondents (33%) were last asked in the past year.

Trust in The City to Protect their Personal Information



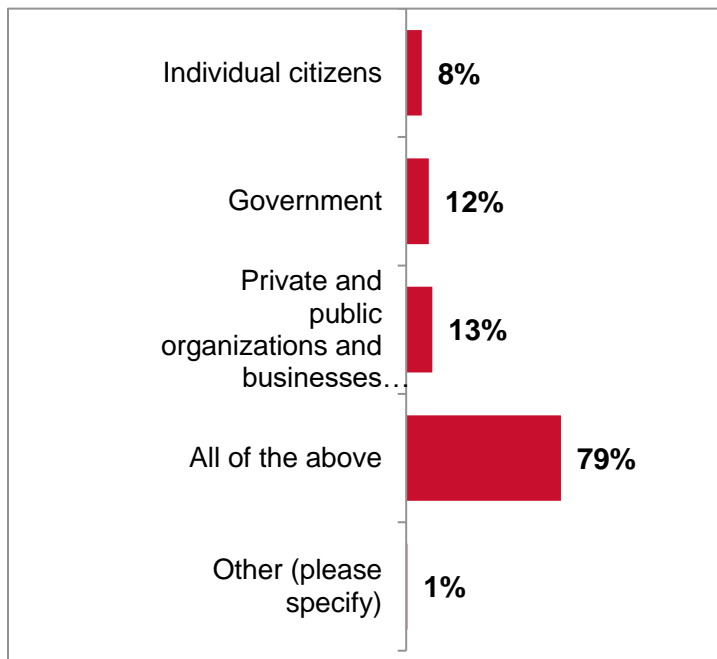
Just over one-half of respondents (56%) trust ('a great deal' or 'a little') The City to protect their personal information while one-quarter (25%) are neutral.

Concern about the Impact of City Technology on Privacy



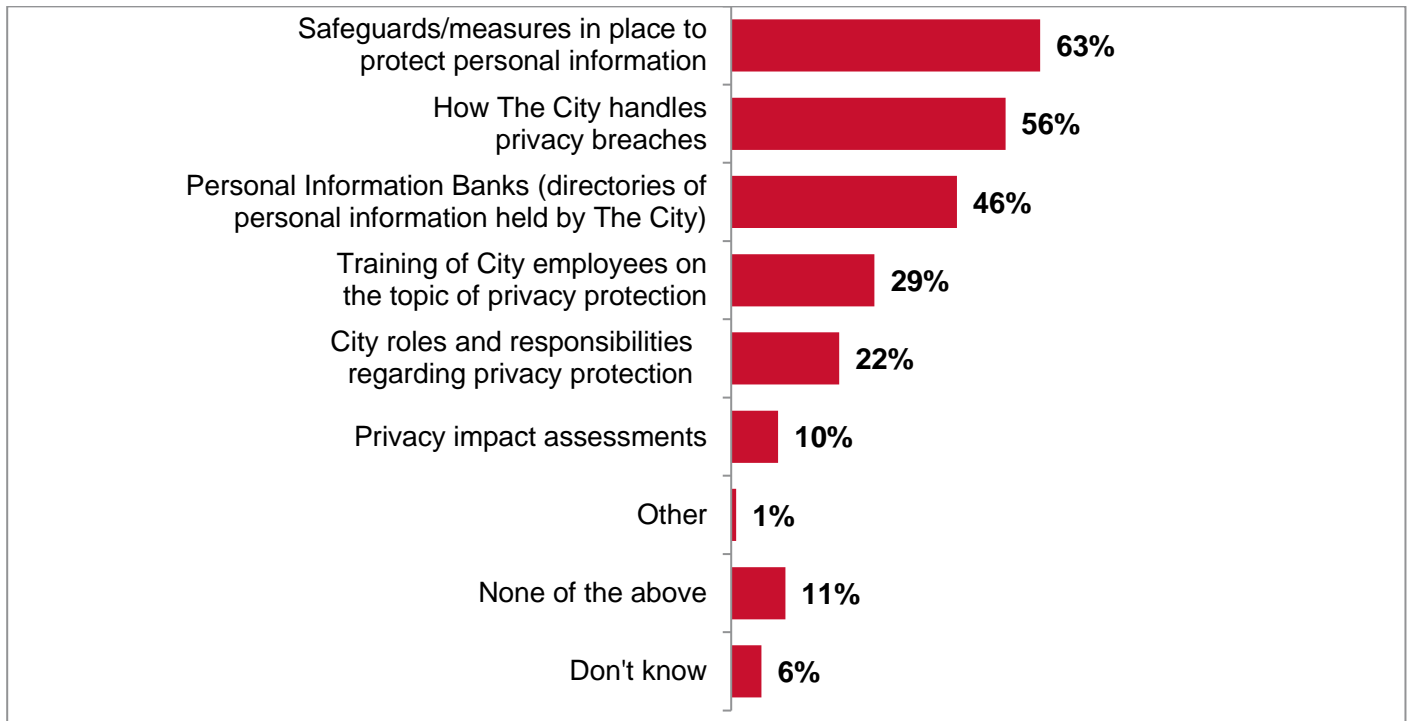
Slightly more than one-half of respondents (56%) are concerned about how The City's use of technology impacts their personal privacy, although more are 'somewhat' rather than 'very' concerned (43% vs. 13%, respectively). While a minority (43%) are not concerned, with 34% 'not very' and 9% 'not at all' concerned.

Responsibility for Protecting Personal Information



The majority of respondents (79%) think the responsibility for helping them protect their personal information belongs to everyone: individual citizens, government, and private and public organization and businesses that collect and/or store personal information.

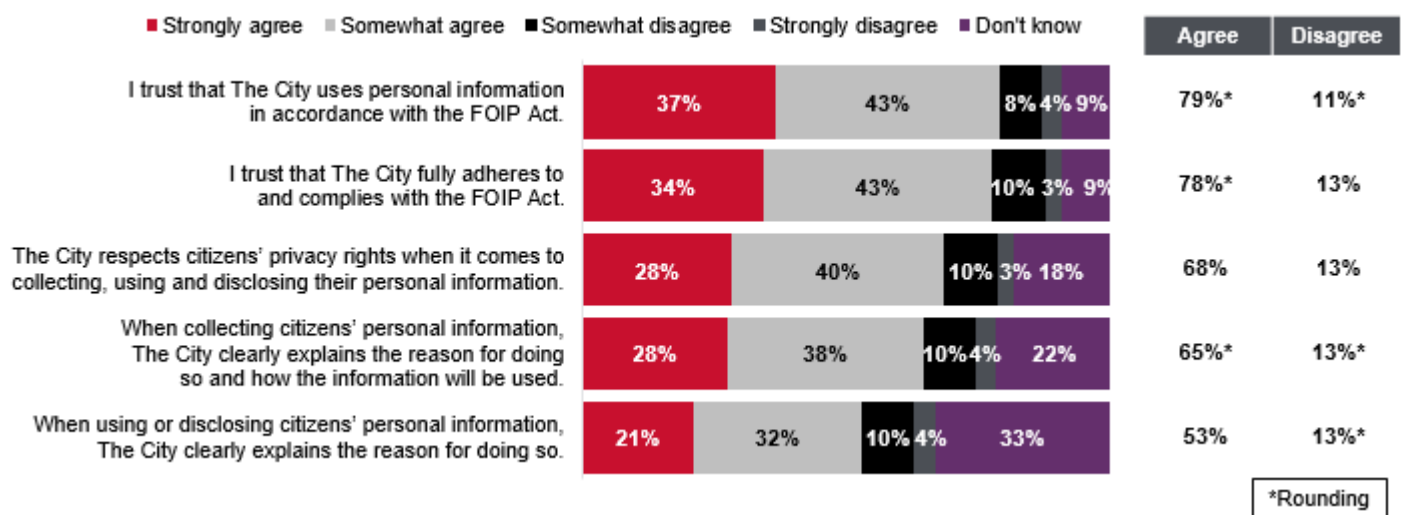
Topics of Interest



The top three elements of The City's privacy management program about which respondents would like to know more are:

1. Safeguards/measures in place to protect personal information (63%);
2. How The City handles privacy breaches (56%); and,
3. Personal Information Banks (directories of personal information held by The City) (46%).

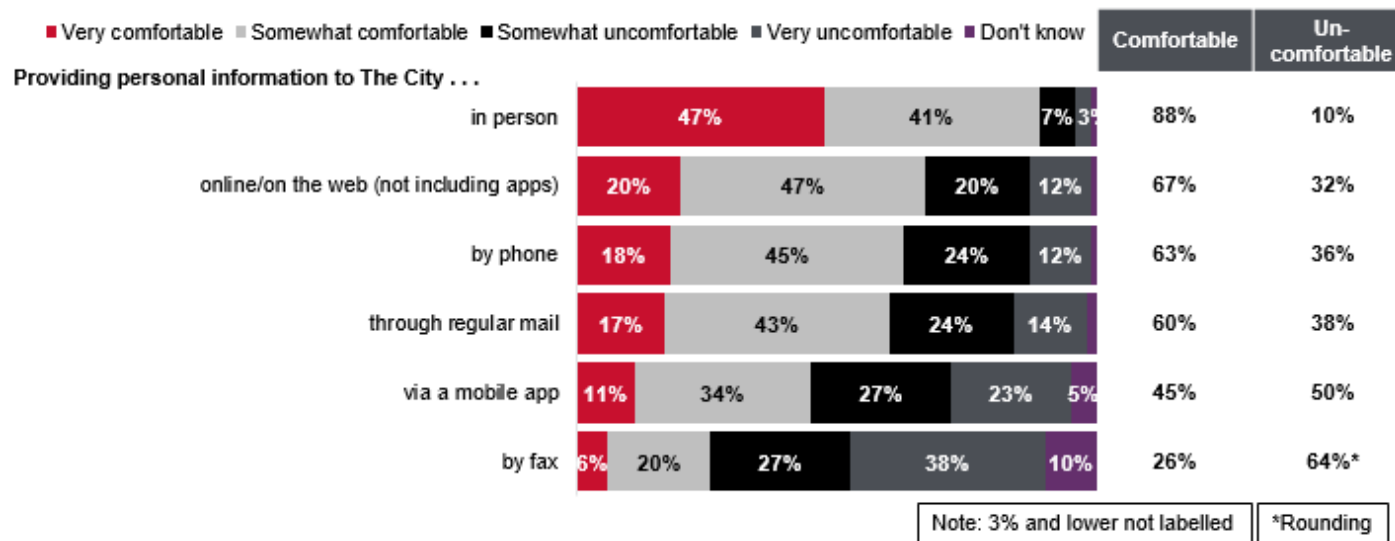
Privacy and Protection of Personal Information



The majority of respondents agree (strongly or somewhat) that they trust The City uses personal information in accordance with the FOIP Act (79%) and they trust The City fully adheres to and complies with the FOIP

Act (78%). A smaller majority (68%) agree The City respects citizens' privacy rights when it comes to collecting, using and disclosing their personal information. Around as many (65%) agree that when collecting citizens' personal information, The City clearly explains the reason for doing so and how the information will be used. Around one-half of respondents (53%) agree that when using or disclosing citizens' personal information, The City clearly explains the reason for doing so while a third (33%) say they don't know.

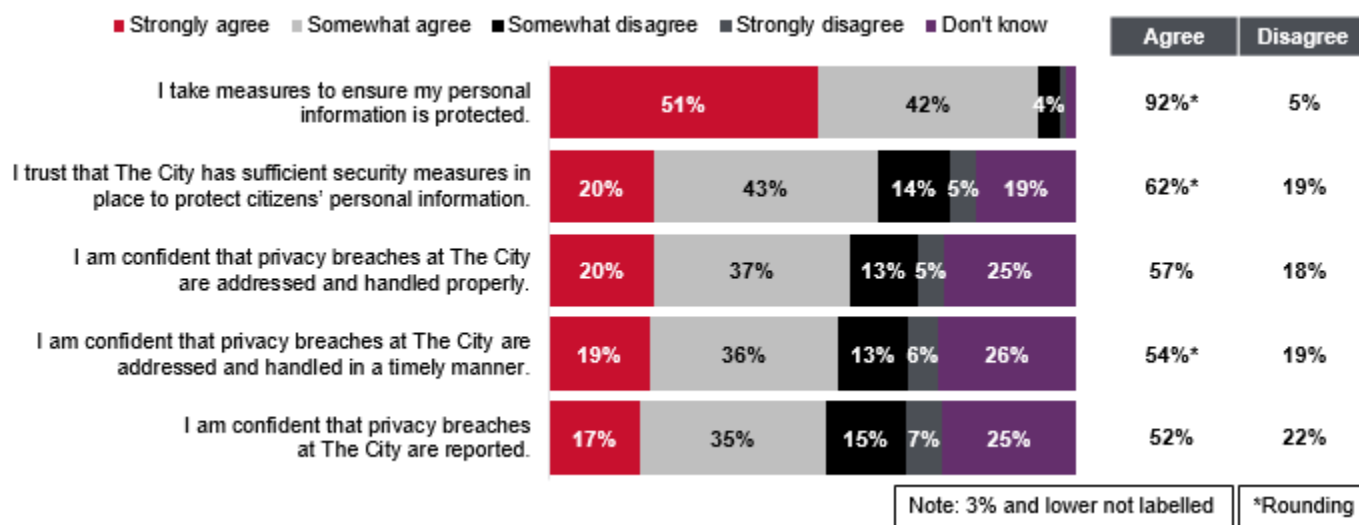
Providing Personal Information to The City



Most respondents are or would be comfortable (very or somewhat) providing personal information to The City in person (88%, with 47% 'very' comfortable). A large majority (79%) also agree they are/would be comfortable doing so online/on the web (not including apps), although more say they are/would be 'somewhat' (as opposed to 'very') comfortable. Fewer are/would be comfortable providing their personal information to The City by phone (63%), through regular mail (60%), via a mobile app (45%), or by fax (26%).

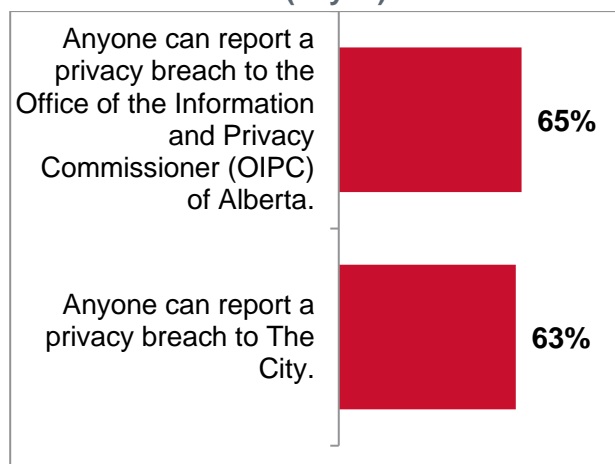
Privacy Breaches

Perceptions about Privacy Breaches at The City



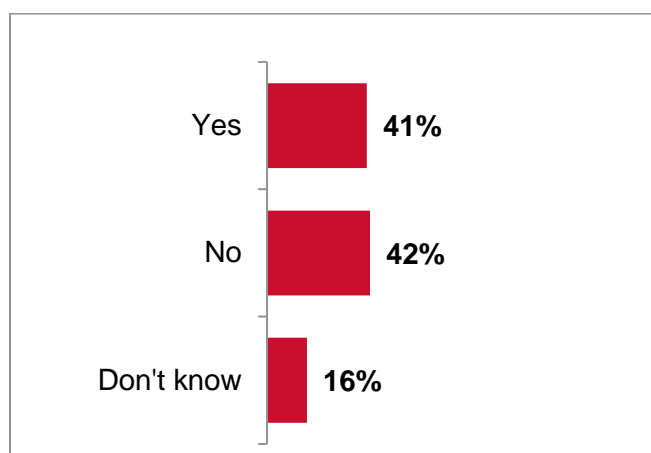
Most respondents (92%) agree (strongly or somewhat) that they take measures to ensure their personal information is protected and a majority (62%) agree they trust The City has sufficient security measures in place to protect citizens' personal information. More than one-half of respondents agree that they're confident that privacy breaches at The City are addressed and handled properly (57%) and in a timely manner (54%). Around half (52%) agree they're confident that privacy breaches at The City are reported.

Awareness about Reporting Privacy Breaches (% yes)



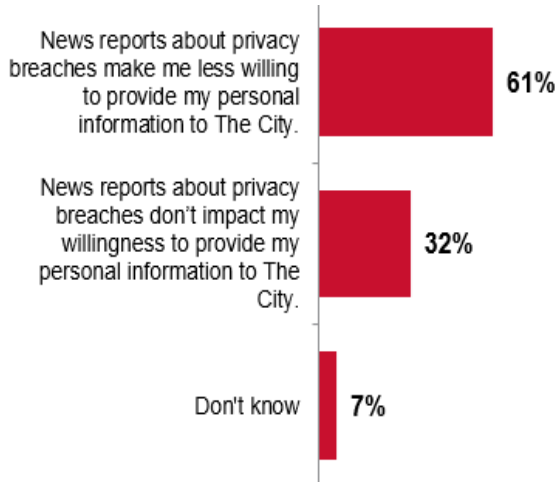
Around two-thirds of respondents were already aware that anyone can report a privacy breach to the Office of the Information and Privacy Commissioner (OIPC) of Alberta (65%) and anyone can report a privacy breach to The City (63%).

Ever Had Their Personal Information Breached



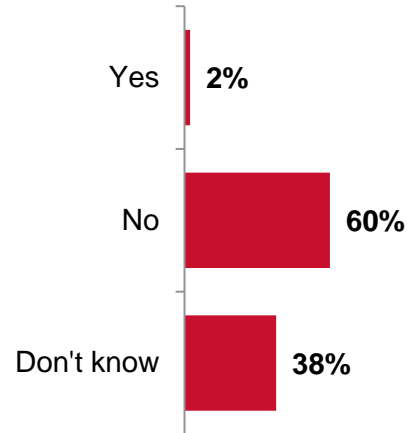
Two-in-five respondents (41%) report ever having their personal information breached while just as many (42%) say they haven't and 16% don't know.

Impact of News Reports about Privacy Breaches



News reports about privacy breaches at organizations and businesses have a negative effect on a majority (61%) of respondents' willingness to provide personal information to The City. For one third (32%), it doesn't impact their willingness and 7% don't know.

Ever Had Their Personal Information Breached at The City



When it comes to having ever had their personal information breached at The City, only 2% say this has happened to them. The majority (60%) say they haven't experienced a breach at The City while 38% don't know if this has happened to them.

Privacy Program Components and Principles

Importance of Privacy Program Components

	1 (most)	2	3	4	5	6	7 (least)	Average rank
Compliance with the FOIP Act (how The City collects, uses, discloses personal information)	51%	16%	10%	7%	7%	4%	5%	2.4
Retention and Disposal of Personal Information	16%	20%	17%	13%	11%	10%	13%	3.6
Privacy Governance, Policies, and Procedures	11%	20%	16%	15%	15%	12%	11%	3.8
Privacy Complaint and Incident Management	6%	14%	20%	17%	18%	16%	11%	4.2
Accountable Privacy Management Program Reporting	7%	13%	16%	18%	16%	18%	12%	4.3
Audit and Review of the Privacy Program	6%	12%	14%	18%	17%	17%	16%	4.4
Privacy Impact Assessments (PIAs)	4%	5%	8%	12%	16%	23%	33%	5.3

Respondents were asked to rank the importance of seven components of The City's draft Privacy Management Program. The component with the most respondents ranking it most important (1) was "compliance with the FOIP Act". The component ranked least important (7) by the largest proportion of respondents was "Privacy Impact Assessments (PIAs)" (33%).

Prioritizing Privacy Principles

	1 (highest priority)	2	3	4	5 (lowest priority)	Average rank
Data Minimization – The City identifies the minimum amount of data needed and limits collection of personal information to only that which is required to deliver City services or programs.	31%	31%	19%	12%	7%	2.3
De-Identification and Anonymization - Before analyzing and sharing data, The City takes steps to prevent personal information from being revealed.	19%	28%	28%	18%	7%	2.7
Notice – The City provides individuals with clear, transparent and concise information about why it collects personal information and intended use.	23%	19%	21%	23%	14%	2.9
Privacy by Design – The City recognizes and practices the seven Privacy by Design ¹ foundational principles	22%	16%	20%	24%	18%	3.0
Collaboration - The City protects personal information through collaborative working relationships.	4%	6%	12%	24%	53%	4.1

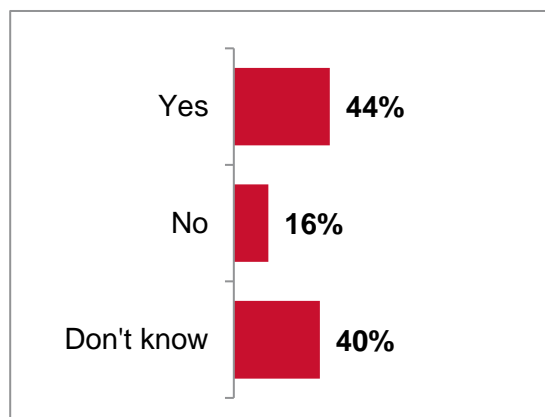
¹ Privacy by Design Centre of Excellence. Ryerson University

Respondents were asked to prioritize five draft privacy principles that guide The City's Privacy Management Program. The principle rated as the highest priority (1) by the most respondents was "Data Minimization" (31%), although just as many (31%) rated it as 2. The principle rated as the lowest priority (5) by the largest proportion of respondents was "Collaboration" (53%).

The City's Draft Privacy Vision

The City's draft privacy vision is:

"The City of Calgary protects citizen privacy while operating an open and transparent government through a collaborative City-wide privacy model that connects technology and leverages data to build an efficient, equitable and accessible city."



While slightly more than two-in-five respondents (44%) think The City's draft privacy vision fully captures The City's commitment to privacy, around as many (40%) say they don't know.

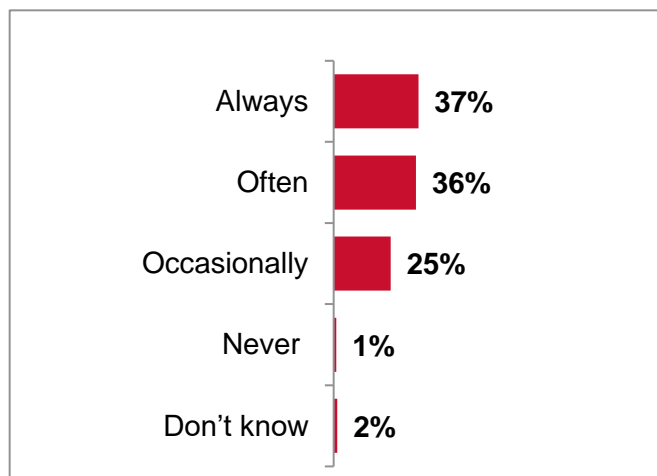
City Employee Results

The key findings that arose from The City's employee research survey are summarized in the table below:

Theme	What We Heard from City Employees* *prepared by the Corporate Research Team
Awareness and Knowledge of the FOIP Act	<ul style="list-style-type: none"> • For the majority of respondents, privacy is a consideration in their role at least 'often' and nearly all are confident that they are reasonably protecting personal information, although only half have taken the FOIP Act online training available on myHR. • While nearly all respondents have heard of the FOIP Act and the majority are aware of the details, there is room to increase awareness of aspects that relate to protecting citizens' privacy. • A majority of respondents are aware that each business unit has a FOIP Program Administrator/ Alternate who is the first point of contact on access and privacy matters, but a minority are familiar with accessing resources to complete a Privacy Impact Assessment (PIA).
Perceptions of Privacy Protection at The City	<ul style="list-style-type: none"> • A large majority of respondents are or would be comfortable providing their personal information to The City in person or online, but fewer are comfortable doing so via other methods. • The vast majority of respondents trust The City adheres to the FOIP Act, but fewer agree The City clearly explains the reasons for collecting, using or disclosing citizens' personal information.
Privacy Breaches	<ul style="list-style-type: none"> • While a large majority of respondents trust that The City has sufficient security measures in place to protect citizens' personal information, somewhat fewer are confident in the way The City handles privacy breaches. • A minority of respondents are familiar with the process for reporting a privacy breach at The City.
Privacy Program Components and Principles	<ul style="list-style-type: none"> • Respondents' ratings indicate that The City's compliance with the FOIP Act is most important to them while Audit and Review of the Privacy Program is least important. • In terms of principles to guide The City's Privacy Management Program, no one principle clearly ranked as the highest priority although Collaboration tends to be seen as the lowest priority.

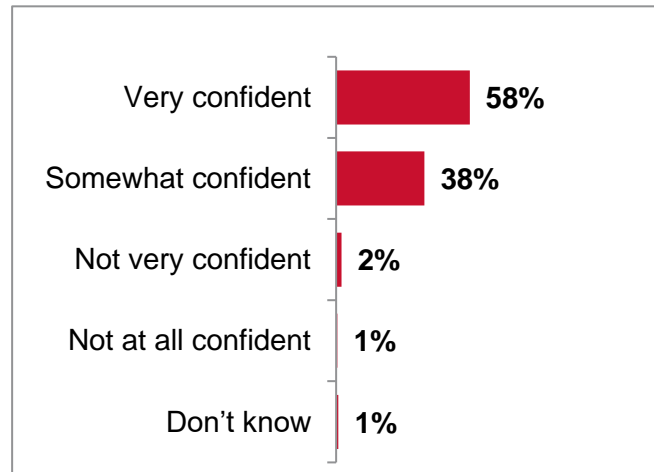
Awareness and Knowledge of the FOIP Act

Frequency of Considering Privacy in Their Role



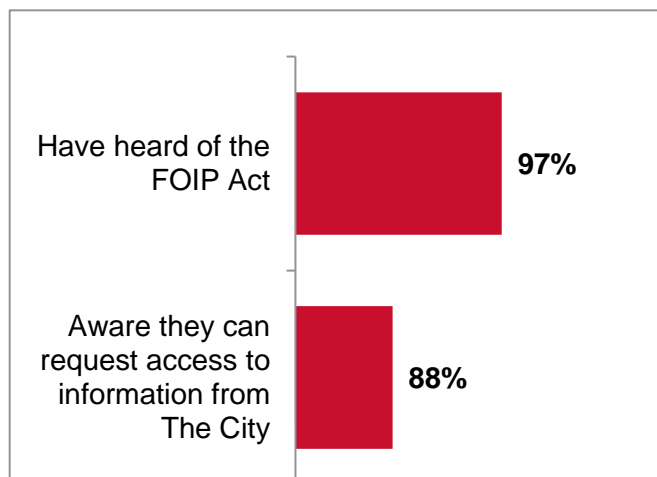
Respondents are split in terms of the frequency with which privacy is a consideration in their role at The City. Slightly more than a third say always (37%) while just as many say often (36%) and a quarter (25%) say it's occasionally a consideration.

Level of Confidence in Protecting Personal Information



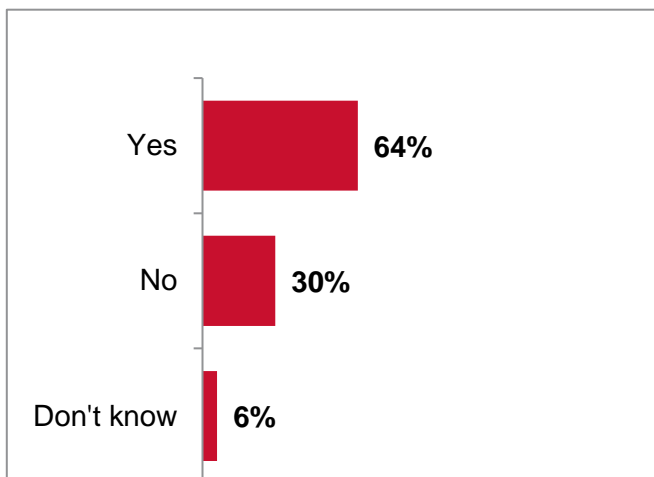
Nearly all respondents (96%) are confident (58% 'very' and 38% 'somewhat') that they're reasonably protecting personal information in their role.

Awareness of the FOIP Act and Requesting Access to Information from The City (% yes)



Nearly all respondents (97%) have heard of the FOIP Act and the majority (88%) are aware they can request access to information from The City.

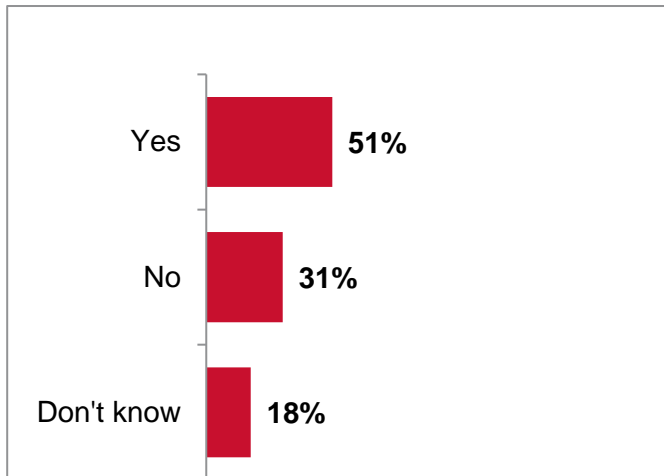
Awareness Regarding Who is the First Point of Contact about Access and Privacy



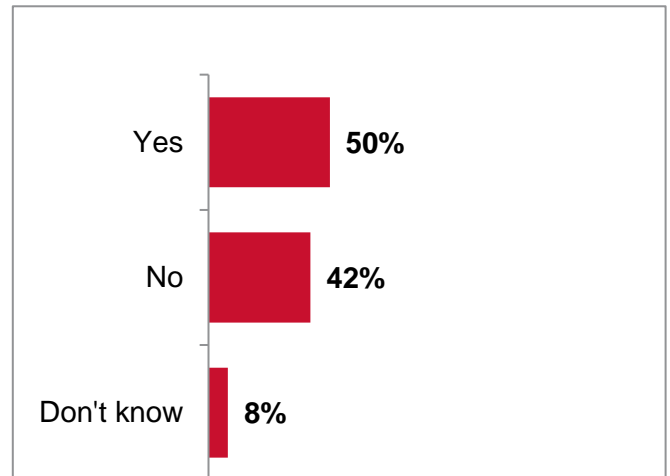
Around two-thirds (64%) of respondents are aware that each Business Unit has a FOIP Program Administrator/Alternate who is the first point of contact about access and privacy matters.

Privacy Training

Have Taken Online Training Related to the FOIP Act that is Available on myHR

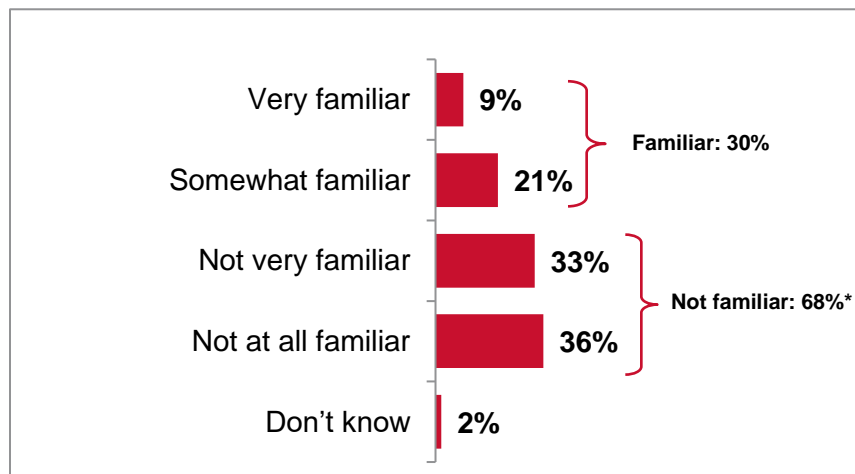


Aware of Access to Information & Privacy Employee Handbook



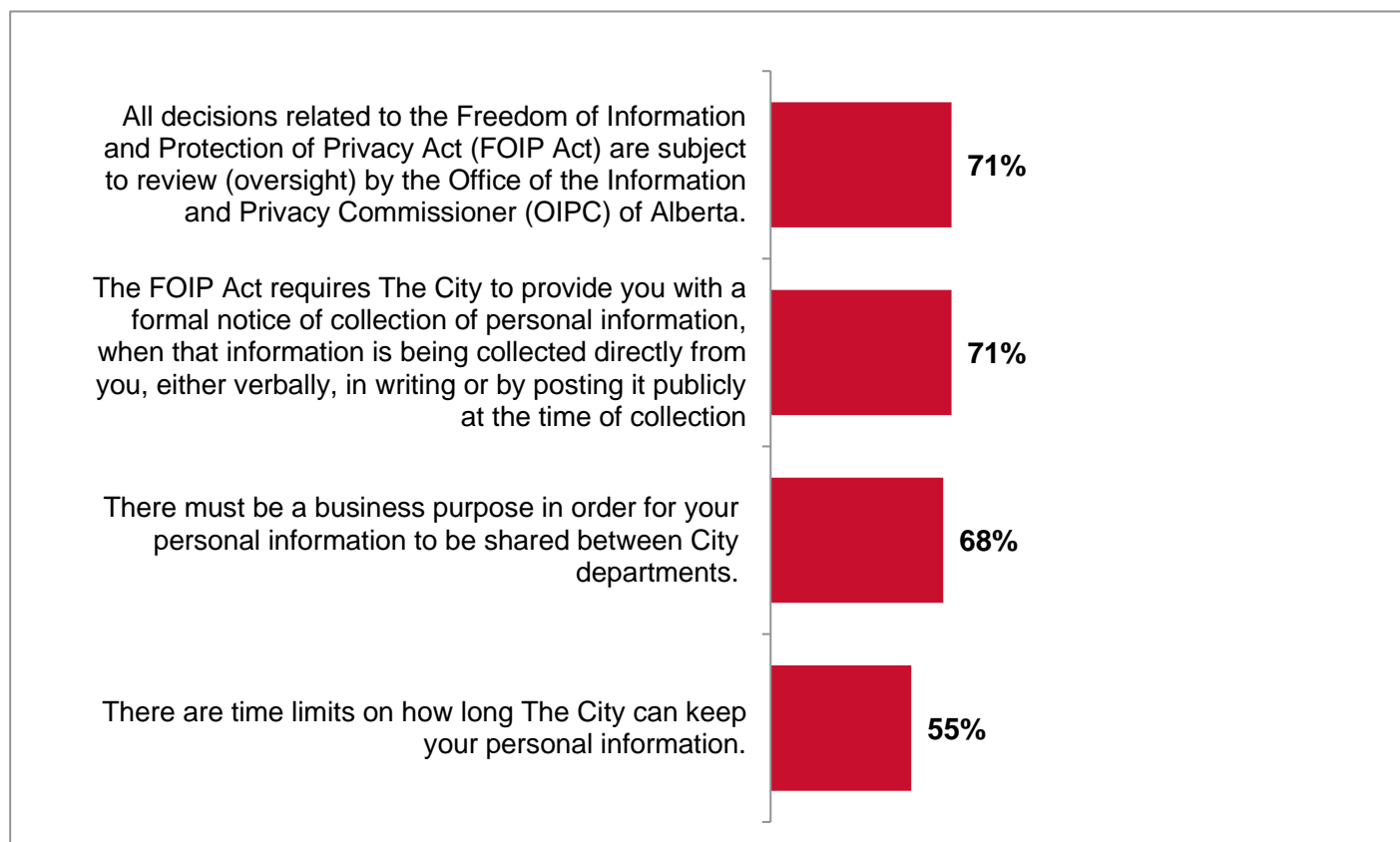
Half (51%) of respondents have taken access to information or privacy awareness training related to the FOIP Act that is available on myHR and just as many (50%) are aware of the Access to Information & Privacy Employee Handbook available on myCity.

Level of Familiarity with Accessing PIA Resources



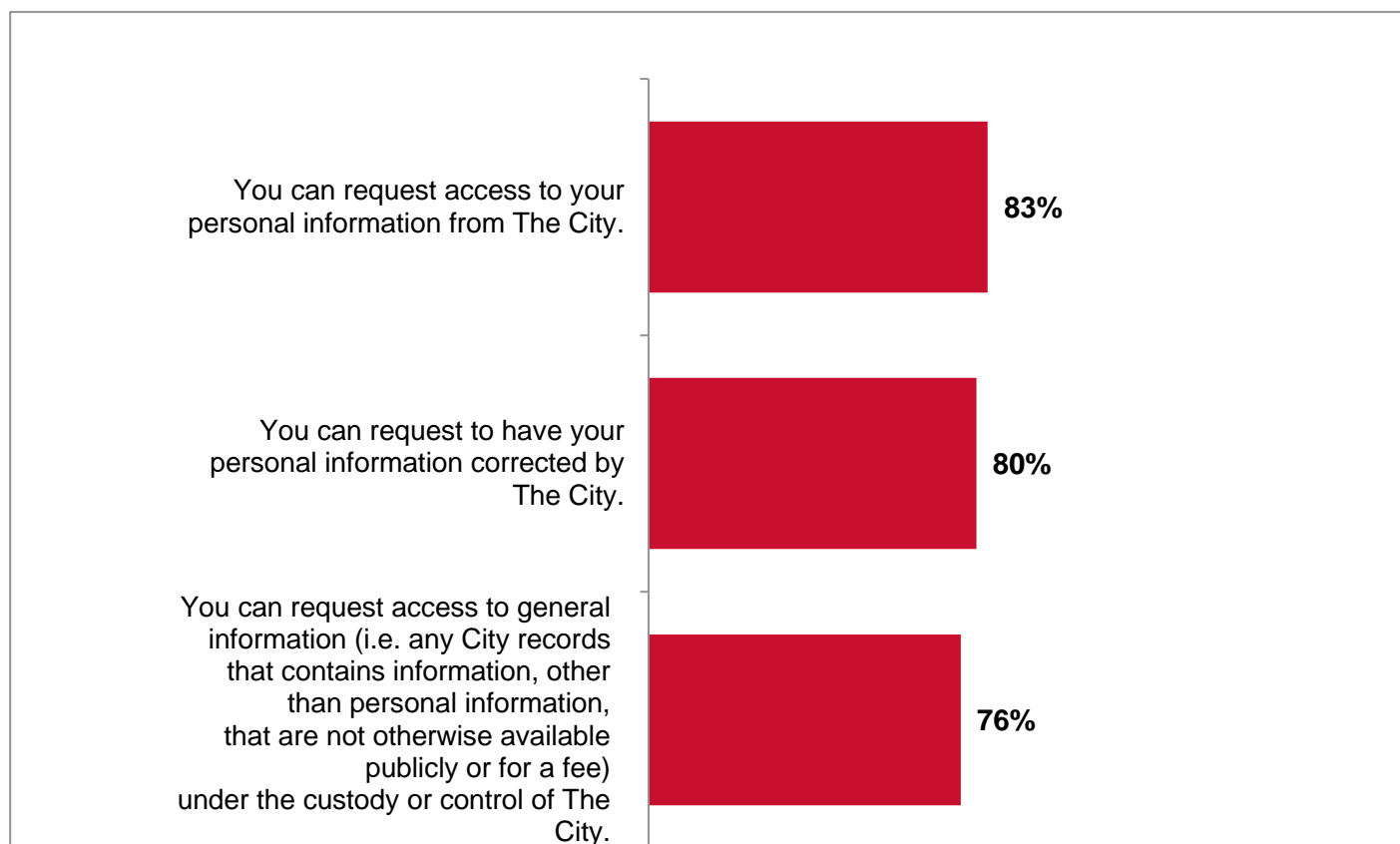
The minority of respondents (30%) are familiar (9% 'very' and 21% 'somewhat') with how to access resources on completing a Privacy Impact Assessment (PIA). One third are 'not very' familiar and around as many (36%) are 'not at all' familiar.

Awareness Regarding FOIP Requirements with which The City Must Comply (% yes)



The majority of respondents are aware that all decisions related to the FOIP Act are subject to review by the Office of the Information and Privacy Commissioner (71%), that the FOIP Act requires The City to provide formal notice of collection of personal information at the time of collection (71%) and that there must be a business purpose in order for their personal information to be shared between City departments (68%). Fewer are aware there are time limits on how long The City can keep their personal information (55%).

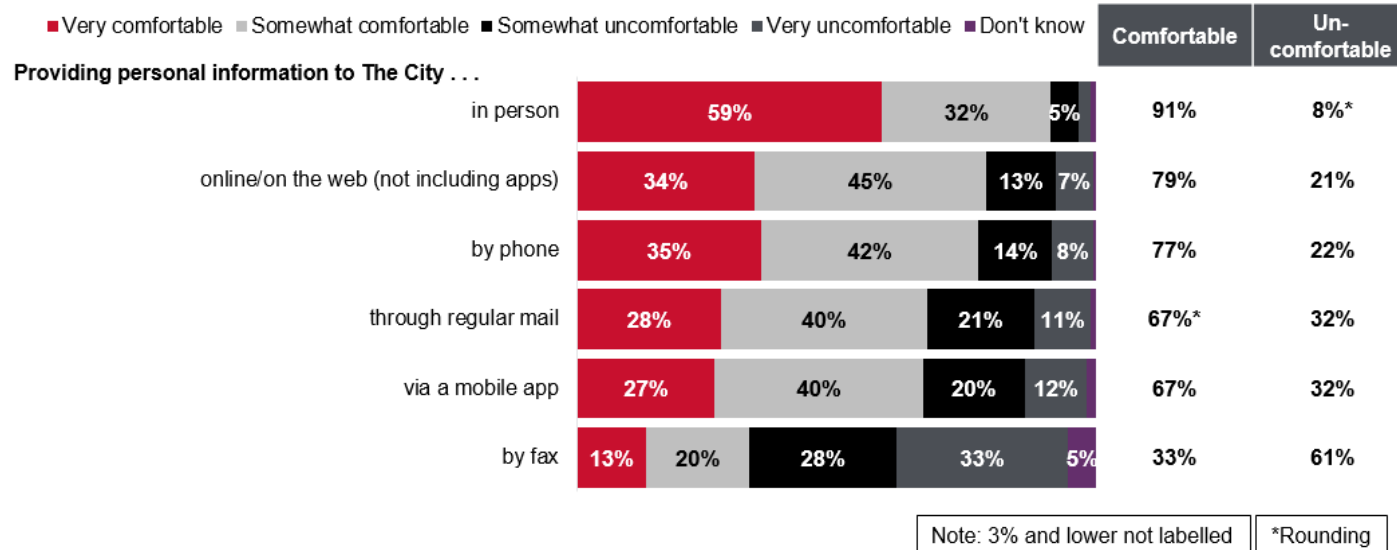
Awareness Regarding Requests for Information (% yes)



The majority of respondents are aware they can request access to their personal information from The City (83%), can request to have their personal information corrected by The City (80%) and can request access to general information under the custody or control of The City (76%).

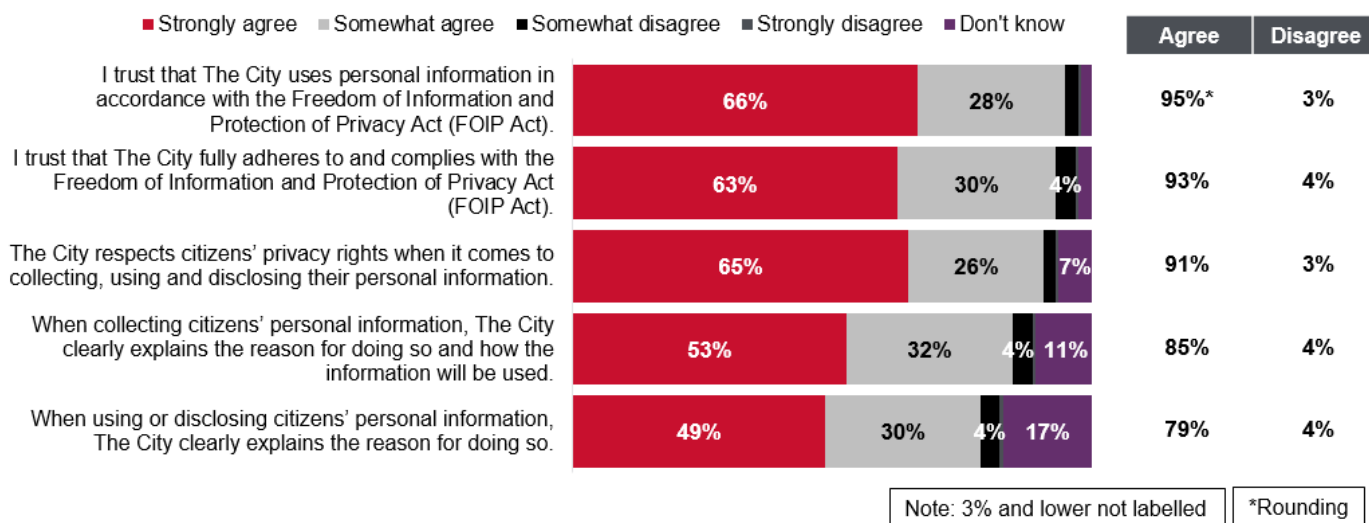
Perceptions of Privacy Protection at The City

Comfort with Providing Personal Information to The City



Most respondents (91%) are or would be comfortable providing personal information to The City in person (91%) while fewer are/would be comfortable doing so online/on the web (not including apps) (79%) and by phone (77%). Even fewer, although still a majority, are/would be comfortable providing personal information through regular mail (67%) or via a mobile app (67%). Fax is the method with which the fewest respondents are or would be comfortable providing personal information (33%).

Perceptions of Privacy and Protection of Personal Information at The City



Most respondents agree that they trust The City uses personal information in accordance with the FOIP Act (95%) and that The City fully adheres to and complies with the FOIP Act (93%). The majority also agree The City respects citizens' privacy rights when it comes to collecting, using and disclosing their personal information (91%) and that, when collecting citizens' personal information, The City clearly explains the reason and how the information will be used (85%). Four-in-five respondents (79%) agree that when using or disclosing citizens' personal information, The City clearly explains the reason for doing so; however, nearly one in five (17%) don't know.

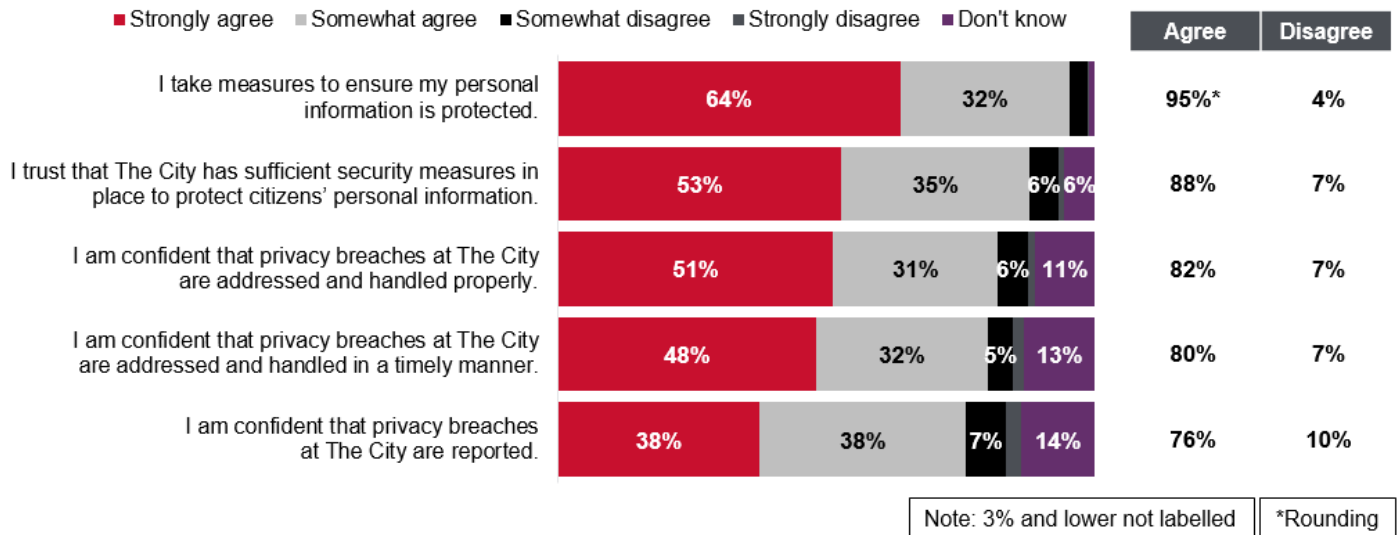
Topics of Interest



The privacy management topics of most interest to respondents are how The City handles privacy breaches (39%) and safeguards/measures in place to protect personal information (39%). Slightly fewer would like to know more about training of City employees on privacy protection (30%).

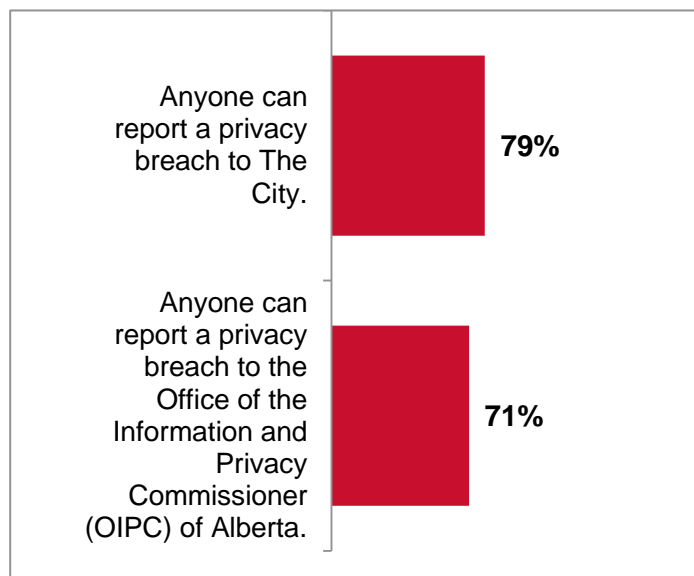
Privacy Breaches

Perceptions about Privacy Breaches at The City



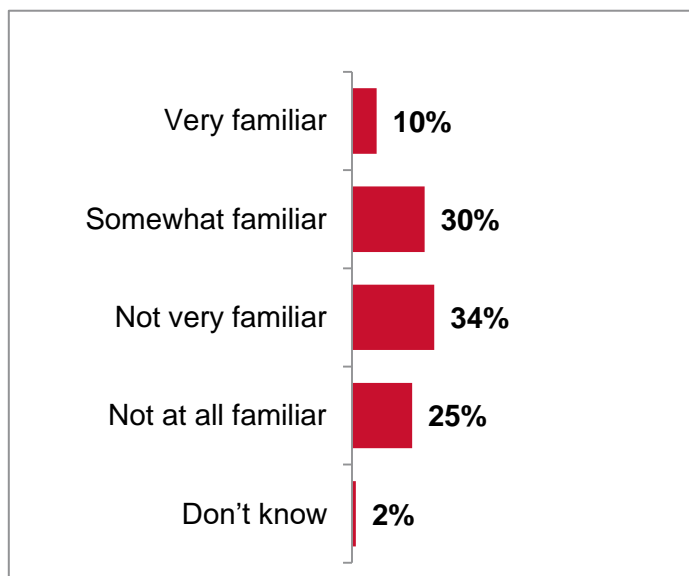
Most respondents (95%) agree they take measures to ensure their personal information is protected and the majority agree they trust that The City has sufficient security measures in place to protect citizens' personal information (88%). The majority also agree they're confident that privacy breaches at The City are addressed and handled properly (82%), in a timely manner (80%), and that they're reported (76%).

Awareness Regarding Reporting Privacy Breaches (% yes)



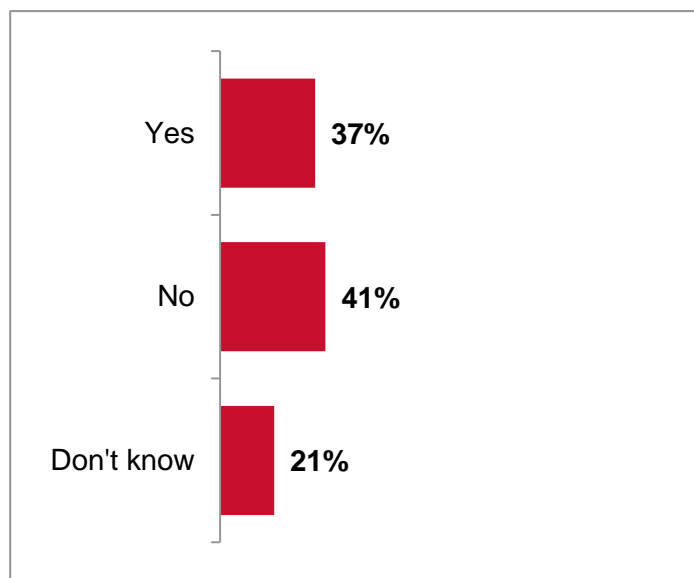
Four-in-five respondents (79%) are aware that anyone can report a privacy breach to The City while slightly fewer are aware anyone can report a privacy breach to the Office of the Information and Privacy Commissioner (OIPC) of Alberta (71%).

Level of Familiarity with the Process for Reporting a Privacy Breach



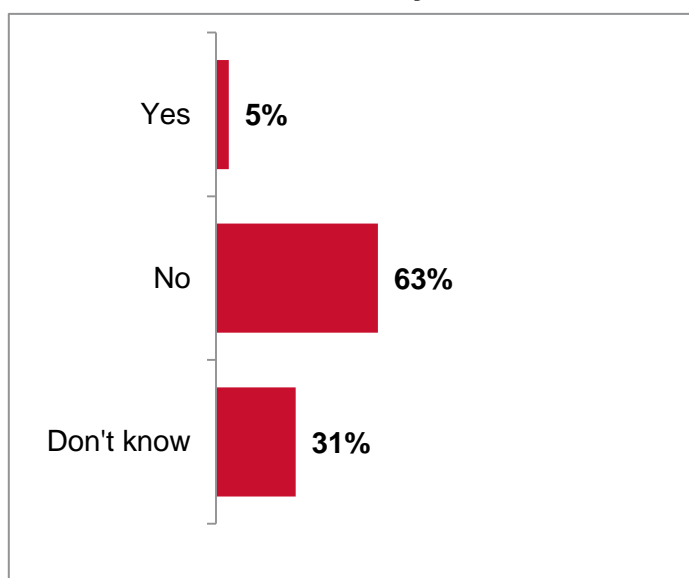
Despite the majority's confidence in the reporting and handling of privacy breaches at The City, a minority (40%) say they're familiar (10% 'very' and 30% 'somewhat') with the process of reporting a privacy breach.

Ever had their Personal Information Breached



Just over one-third (37%) of respondents have ever had their personal information breached while one fifth (21%) don't know if they've been the victim of a privacy breach. Very few (5%) say they've had their personal information breached at The City.

Ever had their Personal Information Breached at The City



Privacy Program Components and Principles

Importance of Privacy Program Components

	1 (most)	2	3	4	5	6	7 (least)	Average rank
Compliance with the FOIP Act (i.e. the manner in which The City collects, uses, and discloses personal information)	53%	15%	10%	7%	5%	4%	5%	2.33
Privacy Governance, Policies, and Procedures	14%	23%	15%	13%	15%	11%	9%	3.63
Retention and Disposal of Personal Information	14%	19%	15%	15%	10%	11%	18%	3.92
Privacy Complaint and Incident Management	6%	14%	20%	19%	17%	16%	8%	4.08
Accountable Privacy Management Program Reporting	6%	11%	16%	16%	19%	17%	15%	4.44
Privacy Impact Assessments (PIAs)	4%	10%	12%	14%	18%	20%	21%	4.79
Audit and Review of the Privacy Program	4%	10%	13%	15%	16%	20%	23%	4.82

Respondents were asked to rank the importance of seven components of The City’s draft Privacy Management Program. The component with the most respondents ranking it most important (1) was “compliance with the FOIP Act”. The component ranked least important (7) by the largest proportion of respondents was “Audit and Review of the Privacy Program” (23%), followed closely by “Privacy Impact Assessments (PIAs)” (21%, although just as many rated it as a 6).

Prioritizing Privacy Principles

	1 (highest priority)	2	3	4	5 (lowest priority)	Average rank
De-identification and Anonymization – Before analyzing and sharing data, The City takes steps to prevent personal information from being revealed.	23%	26%	25%	15%	11%	2.63
Data Minimization – The City identifies the minimum amount of data needed and limits collection of personal information to only that which is required to deliver City services or programs.	23%	25%	22%	16%	14%	2.73
Notice – The City provides individuals with clear, transparent and concise information about why it collects personal information and intended use.	23%	22%	18%	23%	14%	2.84
Privacy by Design – The City recognizes and practices the seven Privacy by Design ¹ foundational principles	24%	16%	20%	22%	18%	2.96
Collaboration - The City protects personal information through collaborative working relationships.	8%	11%	14%	23%	44%	3.84

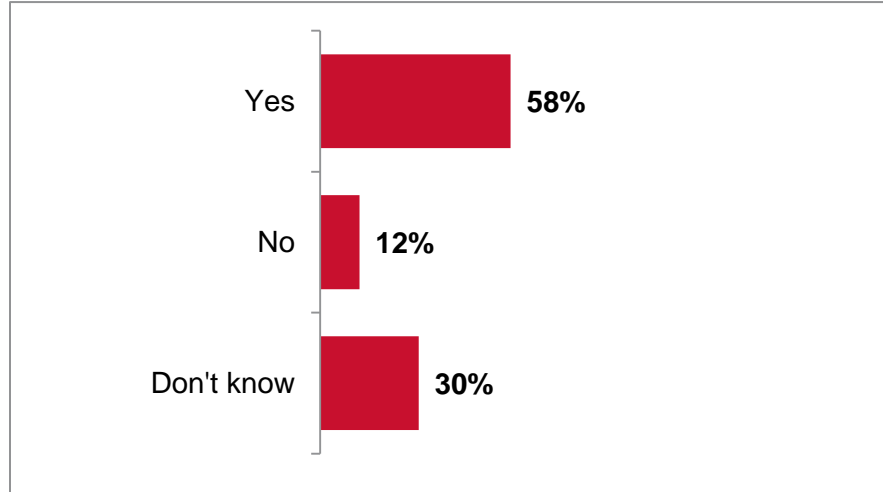
¹ Privacy by Design Centre of Excellence. Ryerson University.

Respondents were asked to prioritize five draft privacy principles that guide The City’s Privacy Management Program. Of the five principles, four received essentially the same proportion of ratings of 1. The principle rated as the lowest priority (5) by the largest proportion of respondents was “Collaboration” (44%).

The City's Draft Privacy Vision

The City's draft privacy vision is:

"The City of Calgary protects citizen privacy while operating an open and transparent government through a collaborative City-wide privacy model that connects technology and leverages data to build an efficient, equitable and accessible city."



Six-in-ten respondents (58%) think The City's draft privacy vision fully captures The City's commitment to privacy, while 30% don't know.

Appendix A: Citizen Privacy Research Key Findings



Appendix B: City Employee Privacy Research Key Findings

