

Reduced Implementation Timeline Privacy Program Strategic Plan

RECOMMENDATION:

That the Executive Committee recommend that Council approve the reduced implementation timeline for the Privacy Program Strategic Plan, as set out in Attachment 1.

HIGHLIGHTS

- This report presents for Council's approval a reduced implementation timeline for the Privacy Program Strategic Plan.
- What does this mean to Calgarians? The City of Calgary ("The City") collects Calgarians' personal information in order to deliver municipal programs and services. Accelerating the execution of the Privacy Program Strategic Plan reflects The City's commitment to the purposes set out within the *Freedom of Information and Protection of Privacy ("FOIP") Act*. Further, it demonstrates The City's commitment to earning and maintaining public trust by exceeding privacy requirements prescribed by the FOIP legislation and be transparent about The City's internal governance structures and privacy practices.
- Why does this matter? As municipalities leverage technology and data to enable efficiencies in programs and service delivery, Calgarians need to have trust that their privacy is protected by The City.
- At the time of completing the 2021-2025 Privacy Program Strategic Plan, the existing resource levels allowed for the implementation of the Privacy Program Strategic Plan's initiatives within five years. The reduction of the implementation timeline from five years to three years will allow Administration to implement initiatives more quickly, narrowing the gap between The City's current practices and the previously assessed maturity model's ideal state.
- On 2021 March 22, Council endorsed *The City of Calgary's Privacy Charter and Privacy Management Program Framework* and directed Administration to report back to the Executive Committee with a [compressed] workplan no later than Q4 2021 with the intention of bringing resource requests, if any, to the budget adjustment process in November 2021. One-time funding to accommodate the reduction in the timeline of the five-year Privacy Program Strategic Plan was approved by Council during the 2022 Adjustments to the One Calgary Service Plans and Budgets.
- Strategic Alignment to Council's Citizen Priorities: A well-run city
- Previous Council Direction and timeline is included as Attachment 2.

DISCUSSION

During 2020 and 2021, Administration completed a series of privacy-related deliverables as directed by Notice of Motion C2019-0590, *City of Calgary Citizen Privacy Data Practices*, to develop, document, supplement and/or bring awareness to internal privacy practices. As part of Administration's response, external consultants from Cenera completed a Privacy Gap Assessment and provided a five-year Privacy Program Strategic Plan.

The Privacy Program Strategic Plan includes 15 initiatives to mature The City's privacy program with a focus on promoting greater privacy awareness, policy development and enhanced practices. The implementation of the Privacy Program Strategic Plan will advance The City's organizational privacy maturity and will narrow the gap between our practices and maturity model's ideal state.

Reduced Implementation Timeline Privacy Program Strategic Plan

Reducing the implementation timeline of the Privacy Program Strategic Plan from five years to three years will reduce risks, strengthen public trust, and will allow innovation and advancement of privacy related best practices for delivery of City services to Calgarians. Acceleration of the Privacy Program Strategic Plan will make the following conditions and milestones achievable:

1. Establish strategic planning and privacy program goals.
2. Enhance and facilitate organization-wide privacy understanding, support, and practices.
3. Enhance accountability and communication.
4. More effectively identify, monitor, and govern personal information flows and security.
5. Establish and maintain clear and comprehensive program roles and authorities.

Following Council's approval of the 2022 New Operating Investment Opportunities, as set out in C2021-1436 Revised Attachment 2 – Operating Approval Package, Administration prepared a reduced implementation timeline for the 2021 – 2025 Privacy Program Strategic Workplan. Attachment 1 sets out the new three-year timeline for the implementation of the privacy program initiatives.

STAKEHOLDER ENGAGEMENT AND COMMUNICATION (EXTERNAL)

- Public Engagement was undertaken
- Public Communication or Engagement was not required
- Public/Stakeholders were informed
- Stakeholder dialogue/relations were undertaken

External stakeholder engagement and communication was not required for this report; however, as part of its initial assessment and creation of the Privacy Program Strategic Plan, Cenera conducted internal and external stakeholder engagement and research. In addition, Administration conducted research with two stakeholder groups: (1) Members of Citizens' View – Calgary's online panel; and (2) City employees. A Privacy Management Program Framework Research Results and Key Findings report was presented to Council on 2021 March 22.

IMPLICATIONS

Social

The increasing digitization of services has brought privacy to the forefront and the importance of protecting privacy is critical.

As The City integrates information and communication technology solutions, the collection, use, storage, and disclosure of personal information increases, which increases risks to privacy. The acceleration of the Privacy Program Strategic Plan and the dedicated resource will yield greater privacy awareness, preparation of City employees to confidently provide information about The City's privacy practices, enhanced privacy roles and responsibilities, and integration of Privacy by Design principles into The City's privacy practices. A *Privacy Management Program Framework* will enable The City to identify weaknesses, strengthen good practices, demonstrate due diligence, and raise the protection of personal information above the minimum legislated requirements.

Reduced Implementation Timeline Privacy Program Strategic Plan

Environmental

Not applicable

Economic

Not applicable

Service and Financial Implications

No anticipated financial impact

In 2021 November, Council approved the 2022 New Operating Investment Opportunity, Privacy Program Strategic Plan – Reducing Implementation Timeline, in the amount of \$132, 000. As the Privacy Program Strategic Plan spans over two budget cycles (2021 to 2023), Administration will bring a request to the 2023-2026 One Calgary Service Plans and Budgets to fund the remaining 12 months of this work in 2023.

RISK

There are no risks associated with this report; however, continuing with the original five-year implementation timeframe risks The City not having privacy-related best-practices in place. The integration of the principles of Privacy by Design and implementation of best practices will enhance the protection of personal information and respect privacy rights of individuals which together reduces risks and promotes public trust.

ATTACHMENT(S)

1. Reduced Implementation Timeline: Privacy Program Strategic Plan
2. Previous Council Direction and Timeline

Department Circulation

General Manager/Director	Department	Approve/Consult/Inform
David Duckworth	City Manager's Office	Approve
Jill Floen	City Manager's Office	Inform