

Calgary

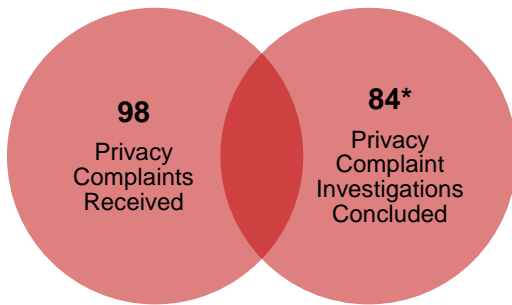


Privacy Management Program 2021 Annual Report

2021 Privacy Management Program at a Glance

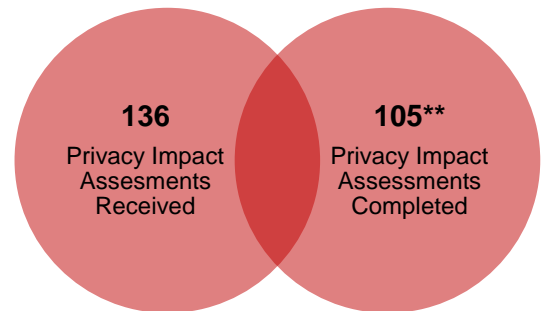
The City of Calgary's ("The City") 2021 Privacy Management Program consists of two main functions: Privacy Complaint Management and Privacy Impact Assessments ("PIAs"). Privacy Complaint Management is a reactive process that investigates and addresses privacy complaints after they have happened. PIAs are a proactive process that identify potential privacy risks associated with the collection, use, and disclosure of personal information to new and changing systems and processes.

Privacy Complaint Management



7.69% increase in Privacy Complaints received, up from 2020

Privacy Impact Assessments



24.77% increase in PIAs received, up from 2020

*There were an additional 62 Privacy Complaint Investigations that were received in 2019/2020 and closed in 2021.

**There were an additional 17 Privacy Impact Assessments that were received in 2019/2020 and closed in 2021.

2021 Notable Privacy Management Program Accomplishments



Access and Privacy Paperless Privacy Impact Assessment



Privacy Charter, Framework and Strategic Plan endorsed by Council



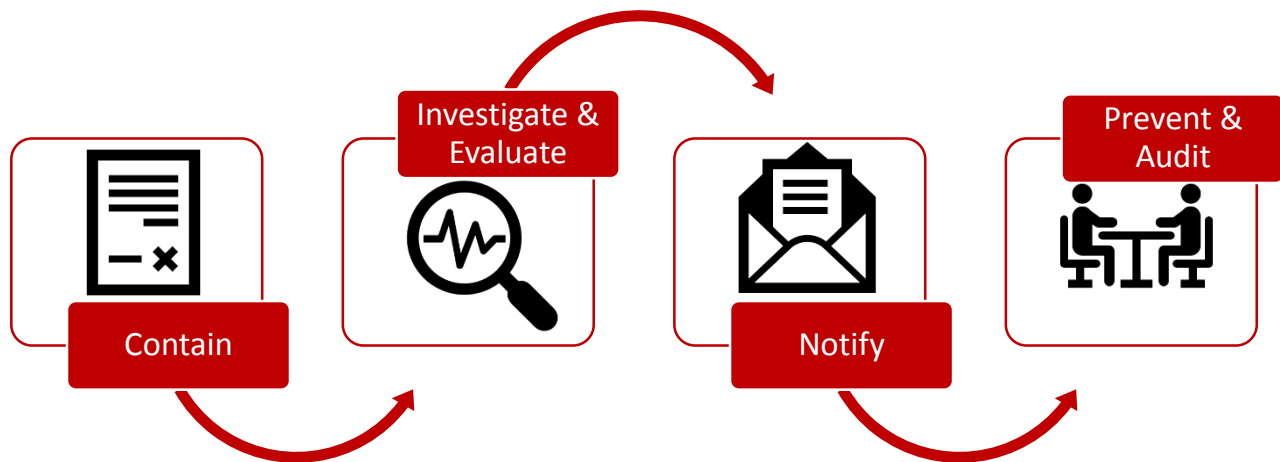
Access and Privacy Social Media Campaign



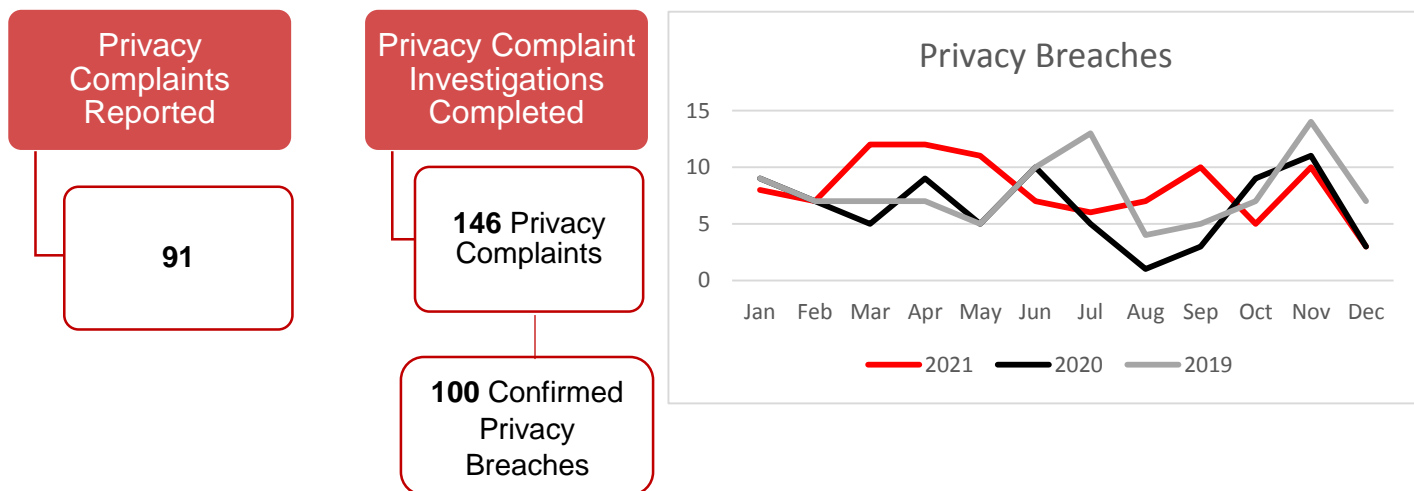
Operational Privacy Toolkit Development and Improvement

Privacy Complaint Management

The City is committed to safeguarding personal information in its custody or under its control to build and maintain trust. 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 four key steps:



Privacy Complaint Management by the numbers:



Note: There are 4 privacy complaints reported in 2021 that remain under investigation.

Privacy Complaint Management: Auditing

The Privacy Complaint Management process includes providing business units with appropriate recommendations to mitigate future privacy complaints and breaches of similar nature. The Access and Privacy section (“Access and Privacy”) follows up monthly with each business unit that experienced a privacy breach to ensure that recommendations have been implemented.

Key privacy recommendations in 2021:

- ✓ 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.

215 Recommendations provided

150 Recommendations implemented

65 Recommendations in progress

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

- Training may be scheduled for a date in 2022;
- Privacy Impact Assessment under development and/or analysis;
- New practice or policy under development; or,
- Conflicting priorities due to COVID-19.

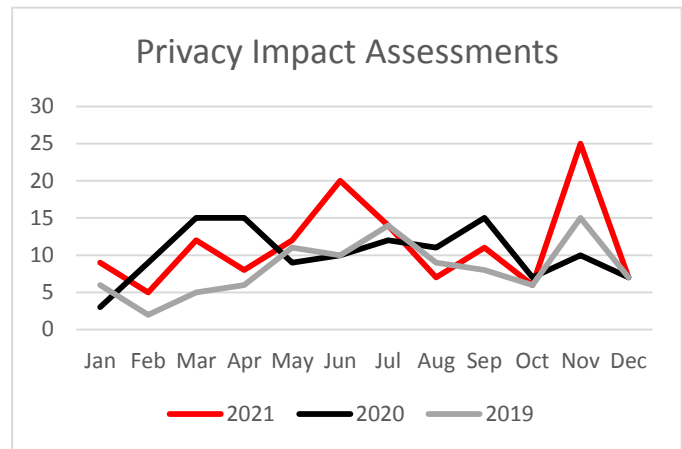
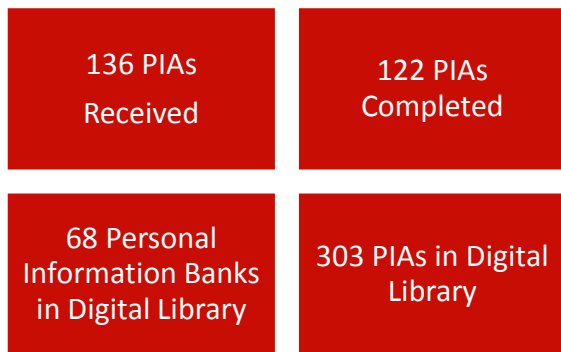


Privacy Impact Assessments

A PIA is a process that assists The City in assessing 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. The PIA process is as follows:



Privacy Impact Assessments by the numbers:



Privacy Impact Assessments Highlights:

- ✓ ArchivEra (archival collection management system)
- ✓ COVID-19: Rapid Response and Re-Exit Plan
- ✓ Access and Privacy ePay Solution
- ✓ COVID-19: Voluntary Rapid Testing Program
- ✓ SAVE Program – Duplicate/Fragmented Functions and Spans of Control
- ✓ Organizational Racial Equity Project
- ✓ COVID-19: Contractor and Volunteer Policy Update

Privacy Impact Assessments: Auditing

Effective January 2021, Access and Privacy began following up with business units to confirm that the privacy risk mitigations identified within a PIA were implemented as a part of the new program, administrative process, initiative or practice, or system or technology. The objective, in accordance with the external privacy recommendations, will be to expand the existing process into a more robust follow up and auditing process.

Key privacy recommendations in 2021:

- ✓ Correct FOIP Statement for compliance under *Freedom of Information and Protection of Privacy Act* (“FOIP Act”);
- ✓ Use embedded links to share information, rather than email;
- ✓ Review records retention requirements;
- ✓ Review and audit access permissions; and,
- ✓ Avoid over collection of personal information.

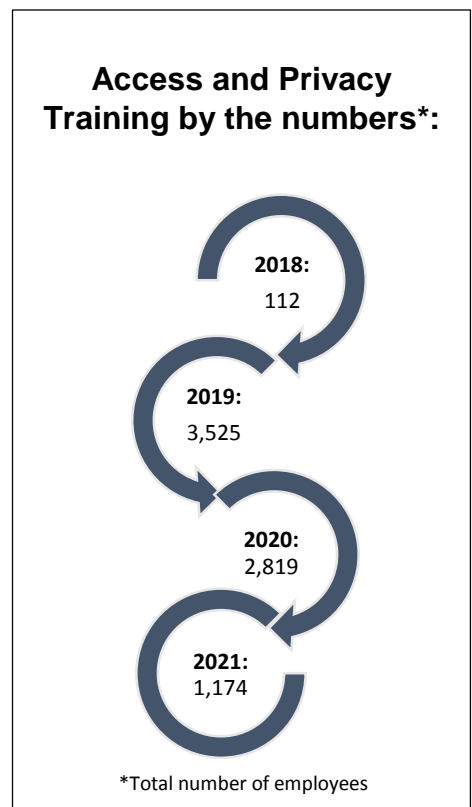
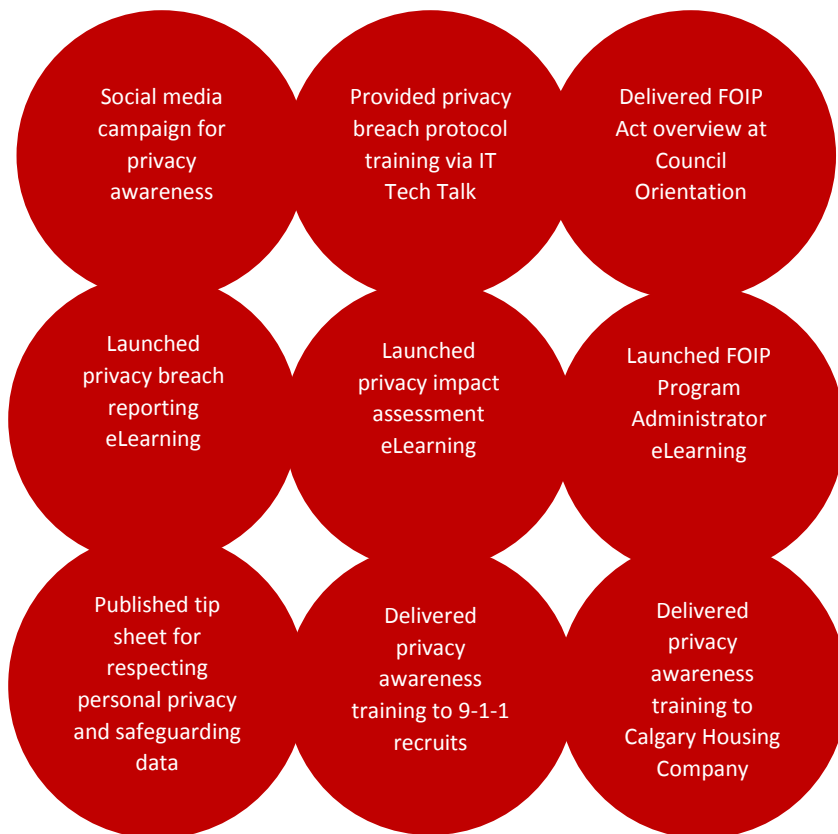


Recommendations are in progress for one or more of the following reasons:

- Project implementation date may be scheduled for a date in 2022;
- New practice or policy still under development;
- Audit process is currently in progress; or,
- Conflicting priorities due to COVID-19.

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 2021:



Privacy Management Program

A comprehensive privacy management program helps foster a culture of privacy throughout the organization and when an organization takes the position that privacy is vital to its operations, enhanced public trust follows. The City's Privacy Management Program has undergone development and enhancement in 2021 to ensure that The City is meeting its obligations under the FOIP Act. The following table outlines the baseline fundamentals from Alberta's Office of the Information and Privacy Commissioner for a comprehensive privacy management program and highlights The City's progress in 2021.

Privacy Management Program

Program Essentials		2021 At a Glance	2022 Next Steps
Organizational Commitment	a) Commitment and support	Council and the Executive Leadership Team ("ELT") are committed to fostering a privacy respectful culture demonstrated by the endorsement of a revised 3-year <i>Privacy Program Strategic Plan</i> and allocation of additional resource.	Continue
	b) Designate a privacy team	City Clerk is appointed as the Head of Local Public Body, responsible for the Privacy Management Program, and is supported by Access and Privacy who work on access and privacy matters.	Continue
	c) Reporting	Internal reporting mechanisms implemented: 1. Regular reporting to ELT on access and privacy matters; and, 2. Annual Privacy Management Program Report to the Executive Committee.	Continue
Program Controls	a) Personal Information Banks Directory	A Personal Information Banks Digital Directory was established in 2020, and The City continues the process of identifying Personal Information Banks across the Corporation.	Continue
	b) Policies	There is an opportunity to develop further Administration policies to ensure appropriate and comprehensive Corporate guidance with respect to The City's Privacy Management Program.	Develop

Program Essentials	2021 At a Glance	2022 Next Steps	
	c) Risk Assessment Tools	Privacy Impact Assessment policy is in place, requiring a PIA for all projects, initiatives and technologies involving personal information in the custody or under the control of The City. PIAs are embedded in the Cloud Computing and Open Source Program, which assist business units in evaluating third party service providers.	Continue
	d) Training and educational requirements	The City has mandatory Code of Conduct training, which includes modules on the <i>FOIP Act</i> and the Administration policy on <i>Acceptable Use of City Technology Resources</i> . There are two optional online training courses available to all City employees and vendors: 1) access to information, and 2) privacy awareness. Online 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 were developed and published.	Continue
	e) Privacy complaint management	A complaint management process is in place for responding to privacy complaints, and a privacy breach response plan is in place. Online training modules were created and published to ensure employees have operational privacy tools and resources.	Continue
	f) Service provider management	The current process includes criteria concerning vendor compliance with the FOIP Act and privacy expectations. Exploration, development and follow through will be developed in accordance with the recommendations of the external privacy expert.	Enhance
	g) External communication	The Calgary.ca website provides the public with information on access and privacy at The City. Updates to web content on Calgary.ca and myCity were completed to increase privacy awareness for Calgarians and City employees. Notices of collection are in place across the Corporation; however, monitoring could be improved to ensure consistency. A social media campaign was launched to increase awareness of key elements of the Privacy Management Program.	Enhance

Program Essentials		2021 At a Glance	2022 Next Steps
Ongoing Assessment and Revision	a) Oversight and Review Plan	An annual oversight and review plan will be developed in 2021/2022 in accordance with the recommendations of the external privacy expert.	Developed in 2021 Initiate in 2022
	b) Assess and Revise Program Controls	Assessment and revisions of Privacy Management Program controls will be initiated in accordance with the external privacy expert's recommendations.	Initiate in 2022