



LEGISLATIVE POLICY 1900-12

First Enacted: April 28, 2026


TITLE: ACCESS TO INFORMATION (ATI) & PROTECTION OF PRIVACY (POP) POLICY


POLICY STATEMENT: Westlock County is committed to safeguarding its valuable assets of records and information and adheres to the applicable laws and regulations of the *Municipal Government Act* (MGA), RSA 2000, c M-26, the *Access to Information Act* (ATIA), SA 2024, c. A-1.4, and the *Protection of Privacy Act* (POPA), SA 2024, c. P-28.5, or as amended.

PURPOSE: The purpose of the Access to Information (ATI) and Protection of Privacy (POP) Policy is to balance public access to information with the protection of confidential information exhibiting openness, accountability, and transparency and the responsible collection, use, and disclosure of personal information strengthening privacy protections.

1.0 DEFINITIONS:

- 1.1 "ATIA" is the acronym for *Access to Information Act*, which is the legislation that provides the framework for accessing records held by public bodies in Alberta.
- 1.2 "Access to Information (ATI) and Protection of Privacy (POP) Coordinator" is the Information Governance Coordinator and is the individual responsible for setting the vision and direction of strategies, implementing a comprehensive system for controlling information assets, and is delegated as described in the ATIA and the POPA to exercise the powers and duties under the Acts. The ATI and POP Coordinator drives organization change to ensure compliance with the Acts.
- 1.3 "Chief Administrative Officer (CAO)" is the official/the head, of the public body, Westlock County.
- 1.4 "Office of the Information and Privacy Commissioner of Alberta (OIPC)", also referred to as the "Commissioner", is a governing entity in Alberta that regulates and enforces how a public body operates and makes decisions in relation to the public body's information and protection of privacy, has the power to perform independent reviews of a public body of how that public body manages their information and protection of privacy, and can provide orders of the OIPC's decisions to a public body which they must comply with.
- 1.5 "POPA is the acronym for *Protection of Privacy Act*, which is the legislation that governs how public bodies collect, use, and disclose personal information in Alberta.


Initial


Initial



2.0 ACCESS TO INFORMATION (ATI):

- 2.1 The ATI and POP Coordinator must always be informed of any ATI concerns.
- 2.2 The County is compelled to follow the requirements of the ATIA and the purposes of the Act to:
 - 2.2.1 Allow any person the right of access to the records in the custody or under the control of the County, subject to the limitations and exceptions in the ATIA
 - 2.2.2 Allow individuals the right to access personal information about themselves.
 - 2.2.3 Comply with independent reviews and orders by the Commissioner or other authoritative bodies.
- 2.3 In demonstrating commitment to adhering to the ATI legislation, Westlock County has processes in place for:
 - 2.3.1 Delegation by the CAO to the ATI and POP Coordinator of the powers and duties under the ATIA and the POPA.
 - 2.3.2 Public Records Status and Disclosure.
 - 2.3.3 Obtaining access to records through a formal written ATI Request.
 - 2.3.4 Duty to assist individuals requesting information.
 - 2.3.5 Applying applicable fees and providing estimates of fees.
 - 2.3.6 Tracking of ATI Requests.
 - 2.3.7 Adhering to the legislated time limits for responding.
 - 2.3.8 Disclosing information only as outlined in the Acts and exceptions to disclosure.
 - 2.3.9 Complying with all other requirements outlined in the Acts such as third-party requests and consent.

3.0 PROTECTION OF PRIVACY (POP):

- 3.1 The ATI and POP Coordinator must always be informed of any POP concerns.
- 3.2 The County respects the privacy of our residents and is accountable and committed to the protection of personal information in all the programs and services, activities, and operations.
- 3.3 Employees are trained in specifics such as anonymized data, data derived from personal information, data matching, non-personal data, and synthetic data and compliance in the legislation surrounding these types of data. For example, the ATI and POP Coordinator tracks these types of data through an established and documented anonymization protocol.


Initial


Initial

- 3.4 The County will only collect, use, and disclose personal information as specified in the Acts and as outlined below.
- 3.5 **Collection:** Under Part 1, Section 4 of the POPA, personal information will only be collected if:
- 3.5.1 The collection of that information is expressly authorized by an enactment of Alberta or Canada.
 - 3.5.2 It is collected for law enforcement.
- 3.6 The information relates directly to and is necessary for an operating program or activity of the public body collecting that information.
- 3.7 If no provision authorizing the collection of personal information applies, we cannot, nor will we, collect it. Per Section 5(1) of the POPA, we will only collect personal information directly from the individual it is about, ensuring transparency and as Section 5(1) of the POPA outlining the exceptions.
- 3.8 **Use:** Use of personal **information** under Section 12 of the POPA will be permitted only:
- 3.8.1 For the purposes for which the information was collected or compiled, or for a consistent purpose as outlined in Section 14 of the POPA.
 - 3.8.2 With the consent of the individual.
 - 3.8.3 For a purpose for which the information may be disclosed to the public body under the disclosure provisions.
- 3.9 Use of personal **information** means using it to accomplish the County's purposes; for example, to administer a program or activity, to provide a service, or to determine eligibility for a benefit.
- 3.10 If no provision authorizing the **use** of personal information applies, we will not use it.
- 3.11 **Disclosure:** Disclosure of **personal** information under Section 13 of the POPA will only be allowed if:
- 3.11.1 The disclosure would not be an unreasonable invasion of personal privacy under Section 20 of the ATIA.
 - 3.11.2 The information is disclosed for the purpose it was collected or for a use consistent with that purpose.
 - 3.11.3 The individual consents to the disclosure.
 - 3.11.4 Another Act, or regulation of Alberta or Canada authorizes, or requires the disclosure of the personal information.
 - 3.11.5 The disclosure is to comply with an order from a court having jurisdiction in Alberta.


Initial


Initial



- 3.11.6 To an officer or employee of the public body, or to a member of Executive Council if the disclosure is necessary for the performance of the duties of the officer, employee, or member.
- 3.12 The County's website describes the Privacy and Security Statement and is as follows:
 - 3.12.1 What occurs when an individual visits our website, including:
 - i. links to other websites;
 - ii. cookies;
 - iii. sending emails to our County; and
 - iv. using our online services.
 - 3.12.2 The collecting of personal information, the use of it, and how it is protected.
 - 3.12.3 The right to review personal information, change personal information, and as applicable, submit a complaint.
 - 3.12.4 Who to contact if there are questions and/or if there is an access to information request.

4.0 Other Information Governance Guidelines

- 4.1 The Municipality has established other Information Governance initiatives for ATI and POP guidelines to ensure proper records and information management through:
 - 4.1.1 The County's Privacy Management Program (PMP).
 - 4.1.2 The Records and Information Management (RIM) Bylaw 63-2025.
 - 4.1.3 Policies such as the Artificial Intelligence Policy, Social Media Policy, etc.
 - 4.1.4 Directives, including but not limited to:
 - i. Privacy, Security and Breach of Privacy,
 - ii. Legal Holds,
 - iii. Cybersecurity,
 - iv. e-Signature, and
 - v. Access to Information (ATI) Public Record Status & Disclosure.


Initial

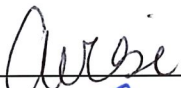

Initial




5.0 REVIEW OF POLICY:

5.1 This Policy will be reviewed every three years, or as otherwise deemed necessary, by the Chief Administrative Officer or their designate and will determine if changes are required.

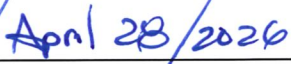
6.0 END OF POLICY



Reeve



Chief Administrative Officer



Date Signed

POLICY HISTORY:

First Enacted: April 28, 2026
Reviewed: [date]
Reviewed and Amended [date]



Initial



Initial