



AGENDA ~ REGULAR COUNCIL MEETING

DATE: June 8, 2026
TIME: 5:30 PM
PLACE: Council Chambers, Cochrane RancheHouse

1 Call to Order

2 Adoption of Agenda

2a Adoption of Agenda

3 Consent Agenda

3a [Adoption of Minutes - Pdf](#)

3b [Cochrane Schools Status Report - Pdf](#)

4 Adoption of Previous Minutes

5 Public Hearings

6 Delegations

6a [Delegation ~ RCMP - Pdf](#)

7 Business

7a [Privacy, Access and Security Policy - Pdf](#)

7b [Mandatory Capital Projects ~ Long-Term Infrastructure Planning Update - Pdf](#)

8 Notices of Motion

9 Mayor's Report

10 Councillors' Reports

11 Closed Session

12 Adjournment

Town of Cochrane Council Report

Meeting:	Regular Council
Meeting Date:	June 8, 2026
Originated By:	David Singh, Manager, Legislative Services
Title:	Adoption of Minutes
Agenda Item:	3a

RECOMMENDED ACTION

That Council adopt the minutes of the June 1, 2026 Regular Council Meeting.

EXECUTIVE SUMMARY

BACKGROUND

COMMUNICATION / PUBLIC ENGAGEMENT

FINANCIAL IMPLICATIONS

LEGISLATION/AUTHORITY

STRATEGIC ALIGNMENT

OPTIONS / IMPLICATIONS

ATTACHMENTS

Minutes, June 1, 2026 Regular Council Meeting



MINUTES ~ REGULAR COUNCIL MEETING

DATE: Monday, June 1, 2026
TIME: 5:30 PM
PLACE: Council Chambers, Cochrane RancheHouse

PRESENT:

Mayor:
Councillors:

M. Nagel
M. Fedeyko
M. Gale
T. McFadden
L. McDonald
P. Singh
P. Wilson

Chief Administrative Officer:
Executive Director, Infrastructure & Operations:
Executive Director, Community Safety & Wellbeing:
Executive Director, People & Strategy:
Director, Legislative & Administrative Services:
Director, Social Development:
Director, Parks & Active Living:
Manager, Legislative Services:
Housing Strategist:

D. Hyndman
S. Hubl
S. Loe
K. Blanchette
J. Robertson
M. Knox
M. Ambrose
D. Singh
G. van den Burg

1 **Call to Order**

Mayor Nagel called the meeting to order at 5:30pm.

2 **Adoption of Agenda**

2a Adoption of Agenda

Mayor Nagel requested that Closed Session item 11a be removed from the agenda.

RES # 163/06/26 Moved by Councillor Fedeyko that Council adopt the agenda as amended.

Carried Unanimously

3 Consent Agenda

4 Adoption of Previous Minutes

4a Adoption of Minutes

RES # 164/06/26 Moved by Councillor McDonald that Council adopt the minutes of the May 19, 2026 Regular Council Meeting.

Carried Unanimously

5 Public Hearings

6 Delegations

6a Delegation ~ Bike Cochrane

RES # 165/06/26 Moved by Councillor McFadden that Council accept the Bike Cochrane presentation as information.

Carried Unanimously

7 Business

7a Community Housing Needs Assessment ~ Final Report

RES # 166/06/26 Moved by Councillor Singh that Council receive the Community Housing Needs Assessment - Final Report for information.

Carried Unanimously

Mayor Nagel recessed the meeting at 7:15pm.

Meeting reconvened at 7:22pm.

7b Draft Parks, Culture & Active Living Master Plan

RES # 167/06/26 Moved by Councillor McFadden that Council receive the Draft Parks, Culture & Active Living Master Plan presentation and report for information.

Carried Unanimously

8 Notices of Motion

9 Mayor's Report

9a Mayor's Report

RES # 168/06/26 Moved by Councillor Singh that Council accept the Mayor's Report as information.

Carried Unanimously

10 Councillors' Reports

10a Councillors' Reports

RES # 169/06/26 Moved by Councillor McDonald that Council accept the Councillors' Reports as information.

Carried Unanimously

11 Closed Session

12 Adjournment

Mayor Nagel adjourned the meeting at 8:38 pm.

Manager, Legislative Services

Mayor

Town of Cochrane Council Report

Meeting:	Regular Council
Meeting Date:	June 8, 2026
Originated By:	Rob Auclair, Manager, Planning Services
Title:	Cochrane Schools Status Report
Agenda Item:	3b

RECOMMENDED ACTION

That Council accepts this report as information.

EXECUTIVE SUMMARY

The purpose of this report is to provide Council with the status of existing and upcoming schools in Cochrane for 2026. In addition, the report will also summarize:

1. The different phases of school site planning.
2. The stages of provincial funding for schools.
3. Changes in school ownership (Bills 50 & 51 overview).
4. School site readiness.
5. School planning and construction timelines.

BACKGROUND

School Planning Overview

In 2024, Council asked Administration to provide a report on school status within Cochrane. This request was in response to public concern that schools are not being constructed fast enough to keep up with Cochrane's high growth rate. Administration produced the first *Cochrane School Site Status Report* and presented to Council on January 6, 2025. The report was well-received and Council mandated Administration to explore innovative ways to allow for more schools to be built faster in Cochrane. Administration is providing this report to update Council on the latest status of schools in Cochrane and will endeavour to do so annually.

Under the *Municipal Government Act* (MGA), when developing previously undedicated land, developers are obligated to provide a minimum of 10% of land to Municipal Reserve (MR), which usually comes in the form of parks and school sites. Cochrane is represented in the jurisdictions of one public school board - Rocky View Schools (RVS) - and two independent public boards - Calgary Catholic School Division (CCSD) and FrancoSud Scolaire (FrancoSud). RVS serves approximately 88% of Cochrane's student population and thus receives more school sites than the other two school boards. CCSD and FrancoSud account for the remaining 9% and 3% respectively.

Phases of School Site Planning

Planning school sites in Cochrane is a joint effort undertaken by the Town, all three school boards, and where applicable, land developers. Different levels of planning and design detail will occur at different stages. Generally, those stages are:

1. All school site planning policies and design considerations outlined in *Envision Cochrane 2050* (the Town's Municipal Development Plan) shall be considered in the planning of future school sites.
2. The Area Structure Plan (ASP) Stage: ASPs are statutory Planning documents that cover large areas with a low amount of detail. Traditionally in Cochrane, ASPs have been developer-driven and collaborated on with Administration. At this level, the Town will consult with school boards during the ASP planning process to determine how many schools and what school types will be needed within the planning area based on population and student projections. School sites may be represented by "floating" symbols on the ASP map to broadly locate each school and indicate the school type. At this stage, school boards can demonstrate their needs and have laid claim to sites.

Figure 1: An example of an ASP map (River Heights ASP) showing school sites as round symbols in general locations and the kind of schools that are intended.



3. The Neighbourhood Plan (NP) Stage: NPs are typically developer-driven and provide a higher degree of planning and design detail as they focus on smaller portions of an ASP area. At this level, Town Administration will circulate the proposed NP to the school boards for their review. This level will determine the specific location, size and configuration of school sites within the neighbourhood. Once the NP is established, the plan area (including the school site) may receive Land Use (zoning), if it has not already received it at the ASP stage.

Figure 2: An example of a NP map (Southbow Landing) showing defined school sites, including potential building footprints and playfields.



4. Subdivision & Land Title Stage: Once the NP is finalized, land parcels can be surveyed and registered through Land Titles. At this stage, the school site parcel is officially created and designated as a Reserve parcel (either as Municipal Reserve, School Reserve, or Municipal School Reserve). The developer of the property will be responsible for the subdivision application and preparing the parcel to be 'shovel-ready' (i.e., graded and seeded/sodded, and provide services to the parcel). Once school site parcels are created, the Town will assume ownership until a successful school approval is established for that site.

Figure 3: An example of a subdivided school site (Rivercrest School) that is comprised of a school envelope parcel (for the location of the school building and parking areas), and a playfield parcel (for open space and ballfields to be shared between the school and the Town).



5. School Authority Applications for School Sites: School boards will apply for school sites by identifying their needs in a school site priority list published in their respective 3-Year Capital Plans. The school board will submit an application to the GoA for planning and design funding. If successful, the GoA will request a transfer of title for the ownership of the subject site. The school board would then enter into a leasing agreement with the GoA for the subject site.
6. Development Permit (DP) Stage: After having the Land Title transferred, the GoA, through a third-party contractor, can start the DP process with the Town. The contractor or sub-contractors shall submit DP applications to the Planning Services Department and work with the Administration throughout the DP process. The DP will focus on site planning, building design and architecture, grading, landscaping, parking, services and utilities, building setbacks, and any other issues that are covered under the Town's Land Use Bylaw.

Approval and Funding of Schools

The Government of Alberta (GoA) is responsible for selecting successful school applications from various public school boards across the province (including Catholic and French immersion schools) and approving the funds to build those schools. The Schools Now initiative (formerly known as the School Construction Accelerator Program) will invest in up to 90 new schools and up to 24 modernizations and replacement schools over the next three years.

The process for seeking school capital project approvals is through the regular annual submission of a school board's three-year capital plan. The projects identified in these capital plans will be used to determine which capital projects will be approved through the annual provincial budget. Once a project is approved for capital funding (planning or design stage), it will be eligible to proceed from one stage to the next (design, or construction) without having to wait for the next annual capital submission.

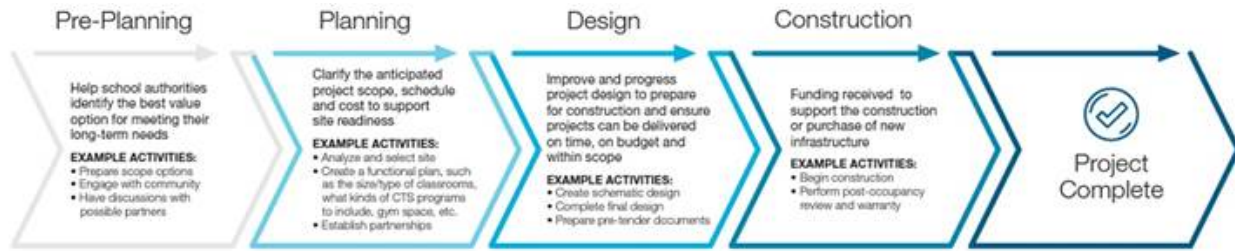
There are four different levels of provincial funding that school sites will receive based on readiness:

Pre-Planning funding – The GoA can provide preliminary funding to a school board that is investigating their school site options. Pre-planning funding may go toward initiatives such as conducting site evaluations or public engagements.

Planning funding – This stage allows for finalizing of the anticipated project scope and schedule and verifying site readiness. This stage may include activities such as site investigation studies, the creation of a functional plan for the school layout, and site fit studies. This stage also allows for the development of partnerships.

Design funding – This stage will support the project through schematic design and design development all the way to the completion of tender-ready drawings, so the project is ready to be tendered for construction.

Construction funding - This stage begins with project tendering and continues through to completion and occupancy of the new or modernized facility.



Changes to School Ownership

Until this past year, it was common practice for the Town to transfer the land title of a school site to a school board once a parcel was created through the subdivision process. The school boards would then enter into the 32-year P3 agreement with the GoA. Although the school boards were on title, the GoA provided all funding while the school boards were responsible for the delivery of education and provided custodial services. At the end of the 32-year period, the school boards assumed full control over the school sites.

However, on May 15, 2025, Bill 51 of the Alberta Education Act stipulates that the GoA will become the sole owner of Reserve sites and facilities intended for educational purposes (i.e., public school sites). This means that the title of ownership of the school site must transfer to the GoA. The intent is that the GoA will essentially become the landlords of school sites and the school boards will lease the land. The purpose of this method is to allow the GoA to focus on the planning, designing, constructing and maintaining of the site, while the school boards can focus on the day-to-day operations of delivering educational services to students. This will only affect new schools sites. Schools awarded funding prior to May 15 will not be affected.

Since Bill 51 was passed, Cochrane has not had a new school approved and therefore has yet to go through the new process. Administration has raised many concerns about the new ownership process, such as:

- When exactly is the Town obligated to turn over title to the GoA? And does the title need to be transferred in the school board's name before it ultimately is passed along to the GoA?
- If a school does not get built, or if the site becomes obsolete for a school facility, does the GoA keep the land or will it be transferred back to the Town?
- Even though the GoA now owns the school site, is the Town and/or the school board still responsible for maintaining land it no longer owns?
- Is the Town able to have partial ownership with the GoA over the playfield areas?

The last point is perhaps the most concerning for Administration. School sites in Cochrane typically consist of two components:

1. The School Envelope, which includes the school building footprint, any parking, loading or drop-off facilities, any landscaped yards around the building, land for a playground equipment site, and which may include land needed for future expansion of the school building, and

- 2. The Playing Field, which is the portion of Reserve Lands that are contiguous to a school envelope upon which sports facilities or recreational amenities are constructed and are generally shared by the Town and school boards for outdoor activities.

According to the new legislation, the GoA would own the entire school site (i.e., both the school envelope and the playing fields). Administration has expressed their concern with this process because school playing fields represent a large portion of Cochrane's parks and recreational infrastructure. It does not make sense to have the GoA own a significant portion of Cochrane's programmable green space, which the Town maintains and operates. Administration has learned that other municipalities in Alberta have the same concerns. Administration is currently in the process of exploring options to only transfer the school envelope portion to the GoA, while keeping the playing field portion under municipal ownership (or at least co-ownership).

School Site Readiness

Ideally, school sites will be planned within the early phases of ASPs and therefore can be constructed early in the development of the community. The GoA will only grant funding of a new school project if it deems the school site to be "ready". Usually, a site's "readiness" is determined by:

- Removal of site hindrances such as loam piles, construction debris or temporary water retention ponds
- Servicing adjacent to the site, including roads, water, stormwater, sewer, and shallow utilities
- The site being fully graded
- The site being fully seeded or sodded

School Completion Timelines

According to RVS, the time a school project receives provincial planning funding to the time of school completion is approximately 4 years. This process includes approximately 6 months to prepare the design drawings, up to 1 year to apply for and receive development and building permits from the Town, and approximately 2.5 years for construction and landscaping.



School Site Status

All school boards are annually required to prepare and release a 3-Year Capital Plan, which is a list of prioritized school facilities throughout each school board's jurisdiction. Capital Plans are what aid the GoA to select school projects for the school allocation process. Within each Capital

Plan, school boards will establish a school site priority list, ranking the top school projects based on the highest needs. The school projects that are ranked highest in these lists will be given greater consideration when the GoA decides on awarding funds for building schools.

The following is a summary of the latest 3-Year Capital Plans for each school board for the 2027-2030 budget cycle. These plans can be found in the attachment *3-Year Capital Plans ~ RVS, CCSD & FrancoSud*.

RVS 2027-2030 Capital Plan Summary

- Currently, RVS operates 9 schools in Cochrane, including 2 high schools.
- As of November 2025, RVS enrollment for K-12 students in Cochrane reached at 6,580 students, having an overall utilization rate of 90% capacity. This figure has decreased by 91 students in the previous year (6,671 students enrolled in 2024).
- RVS projects student enrollment in Cochrane will be approximately 7,800 students by the time Rivercrest school is anticipated to open in September, 2028.
- Cochrane elementary and middle schools are currently operating at 81% of their enrollment capacities.
- Cochrane high schools are seeing much larger capacity concerns as they are operating at 119% of their enrollment capacity as of last year. This includes 131% capacity at Bow Valley High School and 106% at Cochrane High School. However, the Bow Valley High School expansion scheduled for completion by September, 2026, plus the recent approval of the high school planned for Horse Creek is expected to alleviate the overcapacity issues.

RVS Approved Projects

School Site	Status	Notes
Bow Valley High School Expansion	Under construction	<ul style="list-style-type: none"> • Received DP approval in July 2024. • Construction preparation started November 2024. • Anticipated completion date is September 2026. • Received DP approval in July 2025, but still awaiting issuance upon conditions being met. • Construction funding is anticipated for Q2 2026, with construction to commence in soon after. • Anticipated to be operational for the 2028-2029 school year.
Rivercrest K-8	Design stage	<ul style="list-style-type: none"> • Anticipated to be operational for the 2028-2029 school year.

RVS Approved Projects

Horse Creek High School	Planning stage	<ul style="list-style-type: none"> • Design funding was announced on March 5, 2026. • No timeline for completion yet but could be as early as Fall 2030. • Projected capacity of 1,525 students
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RVS Planned Projects

Heartland K-5	2027 budget request (high priority)	<ul style="list-style-type: none"> • Listed as #1 priority in the RVS 2027-2030 3-Year Capital Plan. • Site has stripping & grading, and has services installed up to the parcel. • 840-student capacity • Listed as #8 priority in the RVS 2027-2030 3-Year Capital Plan.
Heritage Hills 6-8	2028 budget request (medium priority)	<ul style="list-style-type: none"> • Site has stripping & grading, and has services installed up to the parcel. • 840-student capacity • Listed as #11 priority in the RVS 2027-2030 3-Year Capital Plan.
Southbow Landing K-6	2029 budget request (low priority)	<ul style="list-style-type: none"> • None of the Southbow Landing school sites have subdivision. • 840-student capacity

CCSD 2027-2030 Capital Plan Summary

- Currently, CCSD operates 2 schools in Cochrane, including Holy Spirit (in Fireside) K-8, and St. Timothy High School (9-12).
- CCSD saw an overall 8% combined utilization rate increase in Cochrane from 58% (2024-2025) to 66% (2025-2026). CCSD is projecting a further 8% utilization increase in 2026-2027, bringing the current utilization rate to 74%.
- The capacity at Holy Spirit School is currently 807 students (using 10 modular classrooms) and is operating at 79% utilization. CCSD is projecting that the utilization rate will grow to 108% by 2030 if no other CCSD projects are approved in Cochrane.
- The capacity at St. Timothy High School is currently 622 students (no modular classrooms) and is operating at 50% utilization. CCSD is projecting that the utilization rate will grow to 75% by 2030 if no other CCSD projects are approved in Cochrane.

- CCSD is proposing a "solution project" for Cochrane in their 2027-2030 3-year Capital Plan, where they would build a new high school (9-12) in Southbow Landing. Once this school is completed, they would move the student population from St. Timothy High School into the new high school. Then, St. Timothy would undergo "reconfiguration and modernization" to become a K-8 school. When complete, the new St. Timothy school could then alleviate the projected overcrowding of K-8 students in Holy Spirit School.

CCSD Planned Projects

School Site	Status	Notes
St. Timothy High School and Southbow Landing	2028 budget request (medium priority)	<ul style="list-style-type: none"> • Listed as #13 priority in the CCSD 2027-2030 3-Year Capital Plan. • Project would see the construction of a new high school (9-12) at Southbow Landing and the reconfiguration and updating of St. Timothy to become a new K-8. • Projected capacities: 1,200 students for high school; 650 students for reconfigured St. Timothy K-8

FrancoSud 2027-20230 Capital Plan Summary

- Currently, FrancoSud operates the École Notre-Dame des Vallées in Cochrane, which was built as a K-8 school, but now serves grades K-12.
- The capacity of École Notre-Dame des Vallées is 239 students. As of the 2024-2025 school year, École Notre-Dame des Vallées had 216 students, resulting in a 90% utilization rate. FrancoSud projects a student population of 260 for École Notre-Dame des Vallées by the 2028-2029 school year. This would result in a 109% utilization rate.
- Due to overcrowding and the lack of proper facilities, École Notre-Dame des Vallées experiences a sharp decline of student retention after the seventh grade, as junior and senior high schoolers are forced into other non-FrancoSud secondary schools in Cochrane.

FrancoSud Approved Projects

School Site	Status	Notes
Cochrane Secondary School (7-12)	Pre-planning stage	<ul style="list-style-type: none"> • Town Council & Administration signed a Letter of Support for the proposed secondary school to utilize the northern school site in Southbow Landing in

- late March 2026, pending GoA funding.
- GoA awarded pre-planning funding in early April 2026.
- No set timeline, but could be ready as early as September, 2030.
- 275-student capacity

COMMUNICATION / PUBLIC ENGAGEMENT

N/A

FINANCIAL IMPLICATIONS

N/A

LEGISLATION/AUTHORITY

N/A

STRATEGIC ALIGNMENT

N/A

OPTIONS / IMPLICATIONS

Option 1 (Recommended):

That Council accepts this report as information.

ATTACHMENTS

- RVS Capital Plan 2027-30 (Extracted Pages)
- CCSD Capital Plan 2027-30 (Extracted Pages)
- FrancoSud Capital Plan 2027-30 (Extracted Pages)

Rocky View Schools Capital Priorities

The following pages outline RVS' Capital Priorities for the Government of Alberta's budget years 2027, 2028 and 2029. Detailed information for each community and request, beginning with Airdrie and ending with rural county schools, is provided after the overall capital priority list.

Capital Priority List

2027 Budget Request	Capital Project	Build Out Capacity	Community	Project Classification	Site Readiness Status
1	Cochrane K – 5	840	Heartland	New School	Ready
2	Chestermere K – 6	890	Clearwater Park	New School	Ready
3	Airdrie K – 6	890	Cobblestone Creek	New School	Spring 2026
4	Crossfield 6 – 8	625	Vista Crossing	New School	2026
2028 Budget Request	Capital Project	Build Out Capacity	Community	Project Classification	Site Readiness Status
5	Airdrie 7 – 9	915	Vantage Rise	New School	2027
6	Springbank Middle School	280	Springbank	Addition	Ready
7	Chestermere K – 9	905	Bridgeport	New School	Ready
8	Cochrane 6 – 8	820	Heritage Hills	New School	Ready
2029 Budget Request	Capital Project	Build Out Capacity	Community	Project Classification	Site Readiness Status
9	Rocky View County K – 8	680	Goldwyn Estates	New School	2029
10	Chestermere K – 6	840	Waterford	New School	TBD
11	Cochrane K – 6	840	Southbow Landing	New School	TBD
12	Airdrie K – 6	840	Sawgrass Park	New School	TBD

RVS is continuing to work with developers, Alberta Government departments and municipalities to ensure these sites are 100 per cent site-ready at the time of approval. Sites may have a temporary loam pile on them at the time of report but can be removed by the developer following funding approval.

Cochrane

At-A-Glance

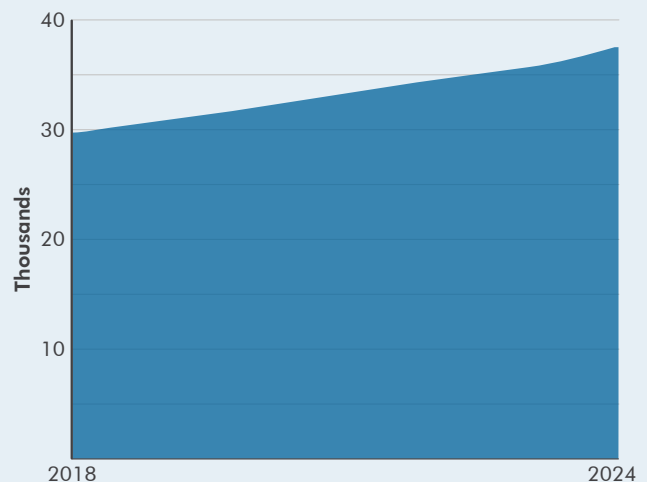
Cochrane continues to experience steady enrolment growth. Cochrane’s geography adds complexity to school planning. The community’s layout — shaped by intersecting highways, the Bow River and varied elevations — does not follow a typical grid or quadrant pattern. As a result, boundary planning, walk zones, and long-range accommodation strategies require more nuanced approaches than in other RVS municipalities.

Cochrane’s schools also serve a broader catchment extending into Rocky View County, particularly for students accessing French Immersion, Christian programming and Cochrane High School. This contributes to a higher proportion of students requiring transportation into town, even though many sites do not have large, dedicated bus zones, increasing congestion within neighbourhoods and on local roads.

Due to delays in new school approvals, many students in developing neighbourhoods are unable to attend a school within their community. Families often rely on busing as the only viable option, which adds to traffic congestion and creates additional financial and logistical pressures. Further demand comes from Westbrook School and Bearspaw School, whose Grade 9 students transition into Cochrane High School, increasing the number of rural students traveling long distances each day.

Cochrane’s school infrastructure reflects this persistent growth. RVS operates nine schools in the community. Eight of these schools have 10 or more modulars. While the Rivercrest school and the eventual construction of the high school in Horse Creek will provide short-term relief, continued residential activity and ongoing in-migration underscore the need for additional new schools to support long-term enrolment growth.

Cochrane’s population has grown by 27 per cent since 2018, the last time a school opened in the community.



Student Enrolment and Projections

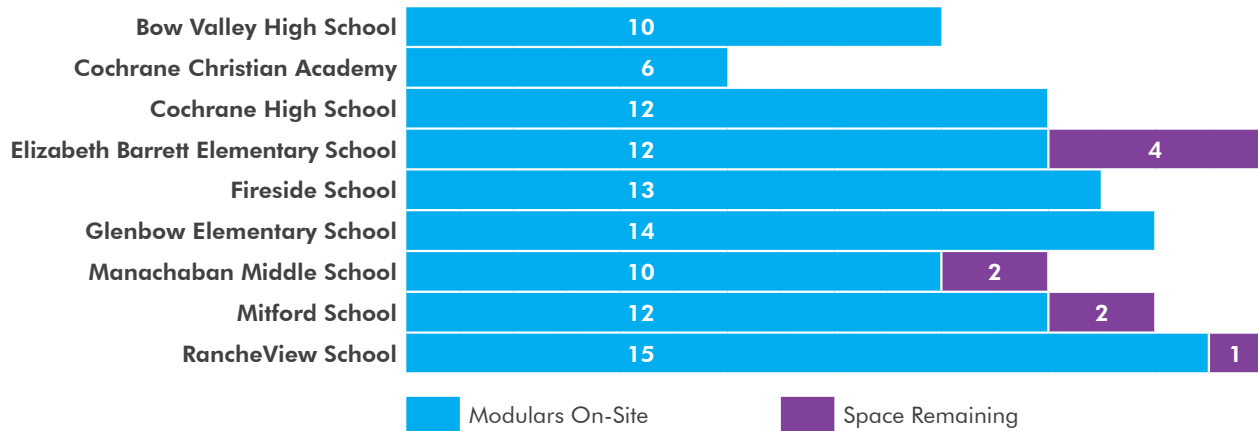
The table below outlines the 2025 RVS student population in Cochrane. RVS' Cochrane student enrolments increase annually by approximately three per cent by grade. Between 2021 and 2025, RVS' student population in the community increased by more than 1,000 students. In 2021, Cochrane enrolled 5,444 students at an overall utilization rate of 85 per cent. By November 2025, enrolment had reached 6,580 students, increasing utilization to 90 per cent. Cochrane schools currently provide capacity for 6,393 students, a figure that will increase to 7,803 when the new Rivercrest K – 8 school opens in 2028. For the 2025 school year, only 491 spaces remain available, and these will be filled as residential development continues.

Grade	K	1	2	3	4	5	6	7	8	9	10	11	12
Enrolment	368	463	493	499	562	554	547	546	562	517	495	472	490

Cochrane area includes Westbrook and Bearspaw K – 8 schools.

A RVS staff working group was assembled to discuss viable solutions to balancing student enrolment and providing relief in some of Cochrane's most highly utilized schools. It is difficult to provide a long-term solution other than building more schools with so little capacity in Cochrane schools.

Current Cochrane Modular Unit Capacity



PRIORITY



Kindergarten – Grade 5 School Heartland, Cochrane

New School Information

The Heartland community is in northwest Cochrane, adjacent to the neighbourhoods of Heritage Hills, West Terrace, West Valley and West Point. The proposed school site is an eight-acre parcel on Heartland Way, situated between Morgan Street and Saddlebred Link. RVS is requesting an 840-capacity elementary school, with a core building structure designed for 740 students and the option to add four modular units to accommodate the full enrolment.

This request is smaller than the previous year's submission due to updated site constraints and municipal requirements. Because the site fronts only one adjacent roadway, the Town of Cochrane will require on site bus drop-off and pick up to avoid congestion on surrounding streets. This requirement reduces the school's available building envelope and limits the overall footprint of the permanent structure. Until 2025, there was no timeline for the site in Heritage Hills to be ready, but now that it is, it is included as priority 8, taking some pressure off the Heartland site.

The proposed school would include 24 classrooms, six ancillary learning spaces, a 595 square-meter gymnasium, four science rooms and an expansive 340 square-meter learning commons, providing a full range of learning opportunities. As development continues across the northwest, where multiple neighbourhoods remain under construction, the Heartland area is a growing source of new students. Glenbow Elementary School is currently operating at 92 per cent utilization, and the next closest K – 4 school, Elizabeth Barrett Elementary, is already at 86 per cent utilization. School capacity in this part of Cochrane is not keeping pace with residential growth, reinforcing the need for a new elementary school to serve the area.

- Three subdivisions remain in this area with Cochrane expecting final applications for development in 2024.
- Approximately 1,100 units have been built to date, of an anticipated 2,130 total units.
- Complete build-out is expected in the next two to three years.

Impacted Schools

Cochrane's growth is moving at a rapid rate. According to the Cochrane Growth Report, the Town is expecting a 3.9 per cent annual growth rate. When this school opens, it will most probably serve the communities of Heartland and Heritage Hills. Students from these communities must travel to Glenbow Elementary and Elizabeth Barrett for K – 4 and then to Manachaban Middle School and Mitford School for middle school.

With the addition of a K – 5 school in Cochrane's northwest, there would be fewer enrolment pressures seen across the entire north portion of the town and significant improvement to the current situation in Heartland and Heritage Hills.

Cochrane Elementary and Middle Schools							
Year Actuals (A) Projected (P)	Elizabeth Barrett K – 4 Current Capacity 542	Glenbow K – 4 Current Capacity 548	Manachaban 5 – 8 Current Capacity 560	Mitford 5 – 8 Current Capacity 604	RancheView K – 8 Current Capacity 857	Total Enrolment Capacity 3,111	Approximate Utilization Rate
2022 (A)	479 (83%)	515 (87%)	559 (100%)	319 (53%)	646 (71%)	2,518	79%
2023 (A)	465 (79%)	556 (93%)	537 (96%)	355 (59%)	657 (73%)	2,570	80%
2024 (A)	472 (80%)	546 (91%)	518 (93%)	410 (68%)	688 (77%)	2,634	82%
2025 (A)	449 (76%)	546 (92%)	477 (85%)	457 (76%)	669 (75%)	2,598	81%
2026 (P)	427 (72%)	527 (89%)	470 (84%)	485 (80%)	657 (74%)	2,566	80%
2027 (P)	426 (72%)	508 (85%)	443 (79%)	518 (86%)	635 (71%)	2,530	79%
2028 (P)	426 (72%)	495 (83%)	444 (79%)	519 (86%)	610 (68%)	2,494	78%
2029 (P)	423 (72%)	486 (81%)	429 (77%)	525 (87%)	584 (65%)	2,447	76%
2030 (P)	422 (71%)	489 (81%)	399 (71%)	511 (85%)	574 (64%)	2,395	74%

Current capacity is as of Sept. 2025

Need

If this school were approved in the 2027 provincial budget, the earliest possible opening date would be 2032. At opening, the school is projected to enrol more than 400 students, close to 60 per cent of capacity without additional modular units. The school would provide immediate relief for families in Heartland, Heritage Hills and nearby northwest communities by reducing busing distances and allowing students to attend a school closer to where they live. Within five years of opening, enrolment is expected to grow to more than 700 students, reflecting the continued build out of northwest Cochrane.

Currently, approximately 300 Heartland students and more than 200 Heritage Hills students are enrolled in RVS K – 8 programming (2025/26 school year). These students are distributed across multiple schools due to space constraints, resulting in longer travel times, boundary adjustments and limited ability for students to remain with peers from their own neighbourhoods.

These projections assume the Rivercrest K – 8 school opens as planned in September 2028, supporting short term needs but not addressing the continued growth expected across Cochrane’s northwest. A new elementary school in Heartland is needed to keep pace with enrolment and ensure long-term stability for students and families in this rapidly developing area.

Challenge

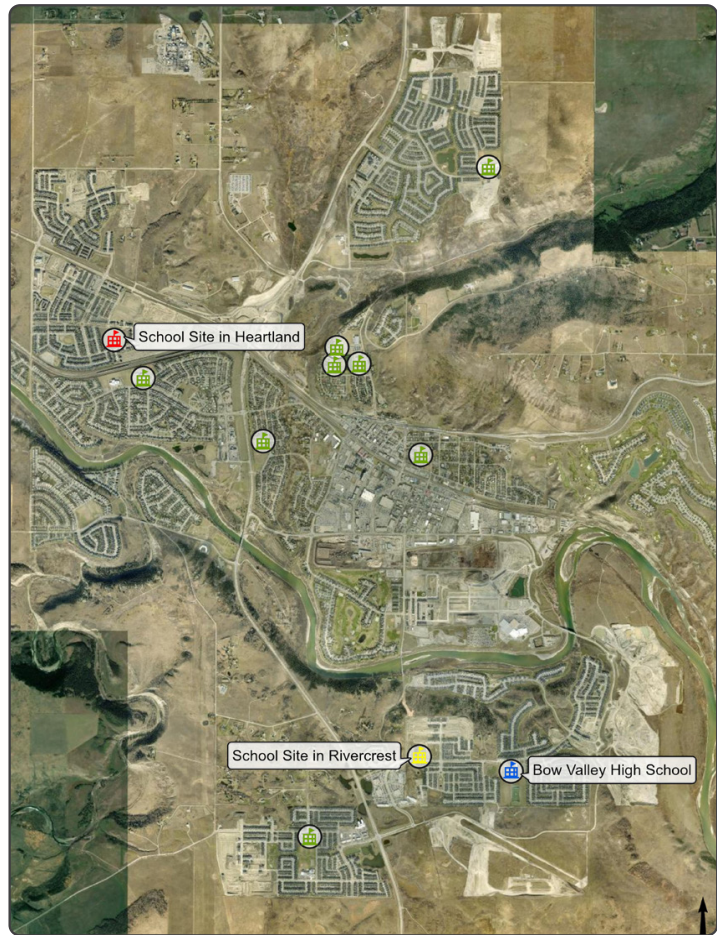
Students living in Heartland are currently designated to Glenbow Elementary School and Mitford School, both roughly a 10-minute drive away. Walking is not a realistic option for most families due to the Canadian Pacific Railway line running through Cochrane, which creates barriers for safe student travel. The average walk from Heartland to Mitford is about 30 minutes, with an additional 15 minutes required to reach Glenbow Elementary.

Heartland alone is projected to generate more than 775 K – 8 students, and neighbouring northwest communities — including

West Hawk and Heritage Hills — are expected to add more than 850 additional K – 12 students over time. More than 200 students from Heritage Hills are already enrolled in K – 8 programming, and with both Heartland and Heritage Hills still building out, more than 800 students are expected to attend a future Heartland K – 5 school. The timeline for West Hawk was uncertain until recently; construction has now begun and is expected to result in additional enrolment pressure from the northwest side of Cochrane.

Existing northwest schools have very limited ability to take on additional students. Glenbow Elementary has already undergone major work — a modernization in 2010 and a smaller renovation in 2013 — and is now fully utilized with no remaining room for modulars or an addition. Elizabeth Barrett Elementary has received modulars in previous years and has space for only four more units (about 100 students) as RVS continues to monitor enrolment. RancheView School can take one more modular, and Fireside School, which opened over capacity in 2017, has little flexibility left to accommodate future growth.

With multiple northwest communities still developing and housing construction showing no signs of slowing, RVS will continue to see increasing enrolment pressure from Heartland and surrounding areas. Without a new school, students will continue to travel farther from their neighbourhoods, school boundaries will become increasingly strained and remaining capacity in nearby schools will continue to shrink.



Solution

A new 840-capacity Heartland K – 5 school will provide much needed permanent space in northwest Cochrane, opening in 2032 with more than 400 students and growing to 700+ within five years. This school will keep younger students closer to home, reduce daily bus travel and traffic at existing schools and ease enrolment pressures.

The added capacity may also allow RVS to remove some modular units currently relied on at nearby schools, improving site functionality over time. Overall, a Heartland school will stabilize catchments, support continued neighbourhood growth and provide a long-term, local solution for families in Cochrane’s northwest.

PRIORITY



Grades 6 – 8 Middle School Heritage Hills, Cochrane

New School Information

The Heritage Hills community is in northwest Cochrane, closely connected to the neighbouring areas of West Hawk, Heartland, West Terrace, West Valley and West Point. RVS is requesting an 820-capacity school, with a core building for 720 students including space for four modular units to reach full build out. The school would include 14 classrooms, five ancillary spaces, an 815 square-meter gymnasium, three science classrooms, a learning commons as well as multiple options for career technology studies.

The school site is split between two landowners. While half of the site has been development ready for several years, the second portion had no clear timeline until 2024/25, when the West Hawk developer began construction on their portion. With both landowners now advancing site preparation, the full parcel is considered shovel ready, allowing RVS to move this project into the Capital Plan.

Impacted Schools

Students from Heritage Hills and West Hawk currently attend Elizabeth Barrett Elementary School and Manachaban Middle School, both of which also serve a significant number of Rocky View County students. These schools already experience traffic congestion, transportation pressure and growing enrolment challenges. A school in Heritage Hills would reduce catchment strain and help stabilize utilization rates at these two sites.

Cochrane Elementary and Middle Schools						
Year	Elizabeth Barrett K – 4	Manachaban 5 – 8	Mitford 5 – 8	RancheView K – 8	Total Enrolment Capacity	Approximate Utilization Rate
Actuals (A) Projected (P)	Current Capacity 542	Current Capacity 560	Current Capacity 604	Current Capacity 857	2,563	
2022 (A)	479 (83%)	559 (100%)	319 (53%)	646 (71%)	2,003	77%
2023 (A)	465 (79%)	537 (96%)	355 (59%)	657 (73%)	2,014	77%
2024 (A)	472 (80%)	518 (93%)	410 (68%)	688 (77%)	2,088	80%
2025 (A)	449 (76%)	477 (85%)	457 (76%)	669 (75%)	2,052	78%
2026 (P)	427 (72%)	470 (84%)	485 (80%)	657 (74%)	2,039	78%
2027 (P)	426 (72%)	443 (79%)	518 (86%)	635 (71%)	2,021	77%
2028 (P)	426 (72%)	444 (79%)	519 (86%)	610 (68%)	1,999	76%
2029 (P)	423 (72%)	429 (77%)	525 (87%)	584 (65%)	1,961	75%
2030 (P)	422 (71%)	399 (71%)	511 (85%)	574 (64%)	1,906	73%

Current capacity is as of Sept. 2025

Need

If this school was approved in the 2028 provincial budget, the earliest opening would be 2033. Opening enrolment is projected at about 300 students (approximately 42 per cent), with utilization expected to increase to 426 students by 2038. Based on current data, it will be few years from the opening when the modular classrooms will be required, though projections can change as the community continues to grow.

More than 150 students currently attending other middle schools in Cochrane would be designated to the Heritage Hills school. The school would provide immediate relief for families in Heritage Hills, West Hawk, and nearby northwest neighbourhoods by reducing busing distances and allowing students to attend school closer to where they live. Today, students from these communities are spread across multiple schools due to space limitations, leading to boundary reassignments, longer travel times and fewer opportunities for students to remain with peers from their own neighbourhoods.

The schools this community is currently designated to are facing significant challenges to support the transportation needs of students, have run out of the parking spaces for buses, creating major safety hazard for the students at drop-off and pick up times.

Challenge

Students in Heritage Hills and West Hawk are currently designated to Elizabeth Barrett Elementary and Manachaban Middle School, both roughly a 15-minute drive away. Walking is not feasible due to the Canadian Pacific Railway line, which creates safety and mobility barriers for families. With development now well underway in West Hawk, additional enrolment from this neighbourhood will soon place further pressure on existing schools.

The northwest of Cochrane continues to grow, and multiple communities — including Heartland, Sunset Ridge and Heritage Hills — remain in various stages of construction. As housing development accelerates, enrolment will continue to rise across the west side. Without a new school, students will be distributed across schools that are already nearing their limits, boundary flexibility will diminish and daily travel distances will continue to increase for many families.

Solution

A new 820-capacity school in Heritage Hills will provide permanent, modern learning space for one of Cochrane's fastest growing areas. The school will reduce pressure on Elizabeth Barrett and Manachaban, shorten bus rides for hundreds of students and improve access to core programming for families in Heritage Hills, West Hawk and nearby northwest communities. Locating a school within these neighbourhoods will support predictable boundaries, minimize long distance commuting for younger students and help RVS keep pace with ongoing residential development across northwest Cochrane.





Kindergarten – Grade 6 School Southbow Landing, Cochrane

New School Information

Southbow Landing is one of Cochrane’s newest and fastest growing communities. Located in the southern portion of Cochrane, south of The Willows, River Ridge, Rivercrest and The Summit of River Heights, and east of the community of Fireside, this neighbourhood alone is projected to bring in more than 1,900 additional students into RVS in the coming years. A new school in Southbow Landing would play a crucial role in supporting long-term enrolment stability, ensuring appropriate grade transitions and reducing pressure on Fireside School and the new Rivercrest School. With Bow Valley High School’s recent renovation, as well as the awarded design funding for Horse Creek high school, RVS would be able to sustain the town’s continued growth and development. The current request is for an 840-capacity K – 6 school, aligning with projected growth patterns and the need to maintain walkable, community-based school access for families.

Impacted Schools

Existing schools in Cochrane are already experiencing enrolment pressures or are projected to reach capacity soon. The proposed school would directly support Fireside School, which is nearing capacity and unable to absorb additional students from Southbow Landing. Rivercrest School will provide some relief but will not fully offset the combined growth of multiple new communities. In addition, Precedence and South Ridge, two other neighbouring communities, already contribute more than 250 students in RVS facilities with another 250 new students to RVS expected in the coming years. Without this additional school, south Cochrane will face capacity challenges in the years to come.



Need

While the need for this school is not imminent, it is an essential part of long-term growth planning within RVS. Cochrane continues to be one of Alberta's fastest growing municipalities. Ensuring public schools remain accessible within neighbourhoods is a key priority for RVS and the families it serves. Fireside, the closest school to Southbow Landing, cannot accommodate future enrolment from this community. The newly approved Rivercrest School is scheduled to open in 2028 with a 60 per cent enrolment and expected continued growth in the years to follow.

Challenge

If funding is approved in the 2029 provincial budget, the earliest realistic opening date for a school in Southbow Landing would be 2034. The timing of the Rivercrest school opening and the possibility of this future facility creates uncertainty for managing the growth in Cochrane's south neighbourhoods. This neighbourhood is designated to Fireside school, which has already increased the allowed modular unit capacity on site. The number of students being bused to that school are causing major concerns to the residents in the neighbourhood as well as to the safety of the students at the pick up and drop-off times.

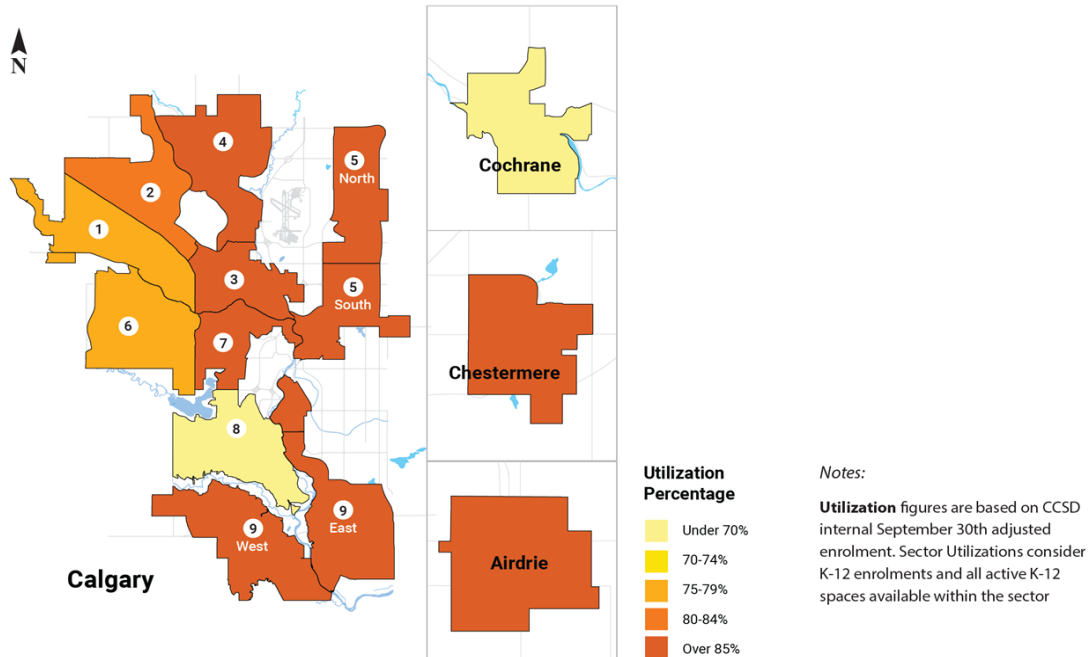
Solution

The Southbow Landing school request aligns with broader divisional planning for Cochrane's long-term growth. When combined with other proposed Cochrane school projects, this school would help ensure viable transitions and balanced enrolment across the town.

CCSD SECTOR UTILIZATION

As CCSD continues to experience growth across our jurisdiction, the utilization changes year-over-year are also examined. The figure below demonstrates that **most** sectors experienced annual growth in utilization rates from one to eight per cent. Furthermore, our district highlights high schools, especially across Calgary and Chestermere, are facing extreme pressure compounded by limited to no options for hosting or alternate accommodations.

UTILIZATION BY SECTOR



Sector	2024-2025	Current 2025-2026	Difference	Projected 2026-2027	Projected Difference
1	76%	74%	-2%	74%	0%
2	82%	83%	1%	83%	0%
3	96%	96%	0%	97%	1%
4	101%	101%	0%	101%	0%
5 North	98%	97%	-1%	98%	1%
5 South	98%	98%	0%	100%	2%
6	79%	77%	-2%	76%	-1%
7	105%	104%	-1%	105%	1%
8	73%	69%	-4%	69%	0%
9 West	99%	101%	2%	103%	2%
9 East	96%	96%	0%	97%	1%
Cochrane	58%	66%	8%	74%	8%
Chestermere	103%	110%	7%	112%	2%
Airdrie	95%	99%	4%	101%	2%
OVERALL	92.22%	92.45%	0.23%	93.35%	0.90%

CCSD 2027–2030 CAPITAL PLAN PRIORITIES MATRIX

Capital Plan Year	New Construction Elementary/Junior High	New Construction Elementary	New Construction High School	High Schools – Addition, Enhancement, Modernization	Modernization and Special Education Program	Solution Project
Alberta Education – “Investing in school projects” – Partially Funded Projects						
	Walden EL/JH Carrington EL/JH Cornerstone EL/JH Chinook Gate EL/JH Mahogany EL/JH Cityscape EL/JH			Bishop McNally HS Ambleton HS		
Year 1	<p>1 Southeast (Heartwood) EL/JH</p> <p>3 Belvedere EL/JH</p> <p>4 Glacier Ridge EL/JH</p> <p>5 Pine Creek EL/JH (new)</p> <p>6 Southeast EL/JH</p>	<p>2 Southwest (Silverado) EL</p>			<p>7 St. Monica EL/JH</p> <p>8 St. Bonaventure JH</p>	
Year 2	<p>10 North Central Calgary EL or EL/JH</p> <p>11 Ambleton/Moraine (Starling) EL/JH (new)</p> <p>12 Chestermere EL/JH (new)</p>	<p>9 Cornerstone EL</p>		<p>14 Our Lady of the Rockies HS</p>	<p>15 St. Benedict EL</p> <p>16 St. Jean Brebeuf JH</p> <p>17 St. Catherine EL</p>	<p>13 Cochrane HS & EL/JH</p>
Year 3	<p>18 King’s Heights (Airdrie) Alternative EL/JH</p> <p>21 Elgin Alternative EL/JH</p> <p>22 Airdrie EL/JH (new)</p>		<p>19 Chestermere HS</p> <p>20 Extended Learning Centre</p>	<p>19 St. Gabriel JH/HS</p>	<p>23 St. Andrew EL</p>	

COCHRANE SOLUTION PROJECT – NEW HIGH SCHOOL & ST. TIMOTHY MODERNIZATION – YEAR 2, PRIORITY 13

Address: Southbow Landing Community, Cochrane

Site Readiness and Availability: Site is being monitored for readiness, availability and servicing.

Project Cost: \$74,105,154

Proposed Grade Configuration: Grades K–8, 9–12 (TBC)

Proposed Capacity: 1,200 (new HS), 650* (reconfigured EL/JH)

Community Host School(s): Holy Spirit for grades K–8; St. Timothy for grades 9–12

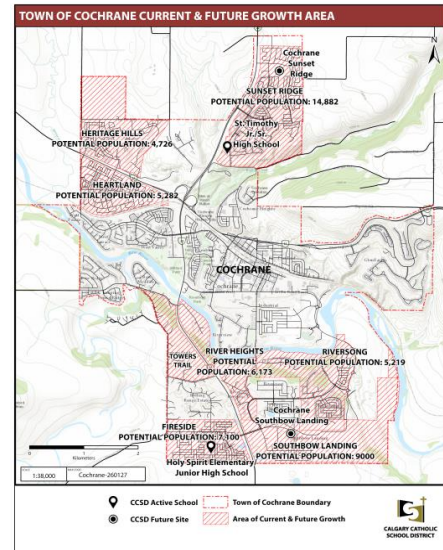
Current Host School(s) Capacity and Utilization: Holy Spirit – 807 capacity (10 modulars), 79% utilization; St. Timothy – 622 capacity (0 modulars), 50% utilization (current utilizations reflected are calculated using adjusted enrolment).

Projected Host School(s) Utilization (2030): Holy Spirit – 108%, St. Timothy – 75% (reflects utilizations if project school not opened, with capacities reflecting core plus additional modulars).

Host School Travel Times: Travel time to Holy Spirit is 8–10 minutes by school bus. The travel time to St. Timothy cannot be determined as no public transportation currently serves the community of Southbow Landing. (Students in junior high and high school currently must be driven as there are no public transit routes serving this community.)

Demographic Information:

- **Enrolment:**
 - 717 K–9 students currently (2025-2026)
 - 954 K–9 students projected within five years (2030)
 - 1,299 projected K–12 students in five years (2030).
- The solution is currently exploring two (2) elements:
 1. On CCSD planned Southbow Landing site, location for new construction of a high school.
 2. Program reconfiguration and modernization to an existing school, St. Timothy, for elementary/junior high student spaces.
- Growth in the town of Cochrane contains eight developing communities (Fireside, Greystone, Heartland, Heritage Hills, River Heights, Rivercrest, Southbow Landing, Sunset Ridge), which accounts for a third of all communities within Cochrane. Cochrane had a growth rate over the last five years at 18.3 per cent.²⁵ This growth, projected over the next five years, shows an estimated overall population increase of 7,200 by 2029.



“As trustee, I am deeply concerned about Cochrane’s rapid growth and the projected rise in student enrolment over the next five years. Our students need access to more programs—trades, mechanics, esthetics, hairdressing and other opportunities—just like those offered at other high schools. A new high school, combined with modernization and reconfiguration of existing space, is urgently needed to relieve capacity pressures and ensure students can learn close to home. Timely investment will support families and secure a strong future for Catholic education in Cochrane.”

—Myra D’Souza, Trustee

Summary:

- The proposal creates a new grades 9–12 high school and repurposes the existing high school as a K–8 school, improving student distribution and providing more equitable access across Cochrane.
- The solution explores the opportunity to provide proximal K–8 student spaces while also providing Cochrane a comparable choice of education at the high school level. This will improve proximity and travel times for students in Cochrane.
- Forecasted growth of the community suggests that Cochrane students will exceed capacity at the K–8 host facility, Holy Spirit, within three to four years, and the grades 9–12 host facility, St. Timothy, will continue to be underserved for high school needs. This project would provide a sustainable framework for future growth.
- As of 2025, Cochrane had a population of 39,397 residents.²⁶ Cochrane has a plan to accommodate 65,644 total future residents.²⁷

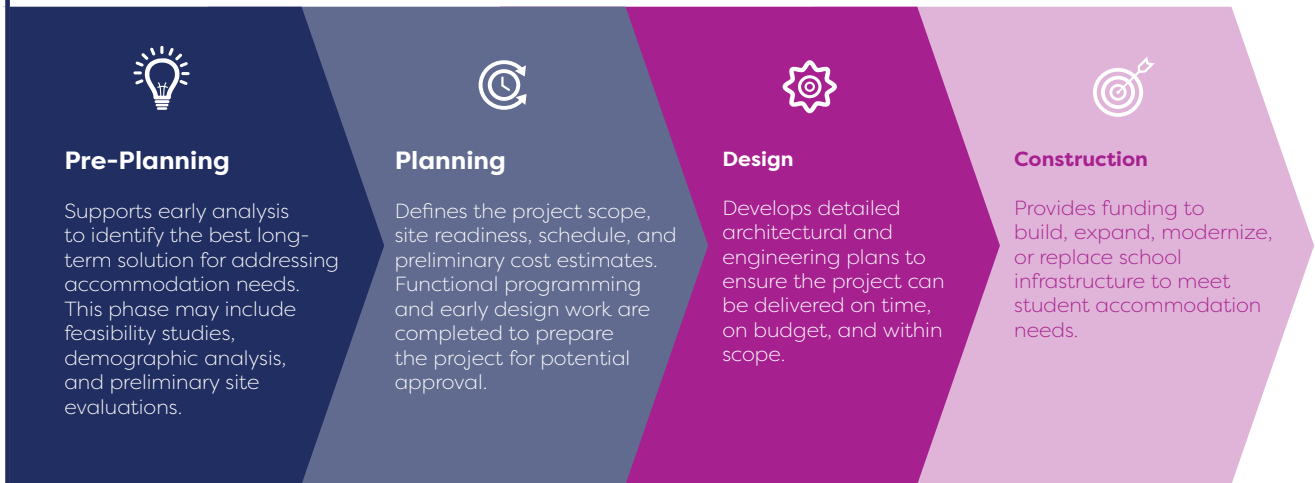
²⁵ Government of Alberta, Regional Dashboard (2025). www.regionaldashboard.alberta.ca

²⁶ Government of Alberta, Regional Dashboard (2025). www.regionaldashboard.alberta.ca

²⁷ Cochrane Growth Strategy – page 21

CAPITAL PLANNING

The Government of Alberta follows a structured capital planning process in which school infrastructure projects progress through successive phases as planning requirements are completed and approvals are granted.



Current Active FrancoSud projects

Pre-Planning

Cochrane	7-12 Secondary school	Catholic
Calgary	École de la Source modernization	Public
Chestermere	K-6 & 7-12 School Complex	Public
Calgary	K-6 in NE	Catholic
Calgary	K-6 in SW	Catholic
Rocky View County	K-6	TBD

Planning

Calgary	École de la Rose sauvage modernization	Public
Canmore	K-6 & 7-12 School Complex	Catholic
Calgary	7-9 in Coral Springs	Public

Design

Calgary	K-6 in Harvest Hills	Public
Calgary	K-9 in Hamptons	Catholic
Calgary	10-12 in Panorama Hills	Public

Construction

Airdrie	7-12 Secondary school	Public
Lethbridge	Gym Expansion at École la Vérendrye	Public



COCHRANE FRANCOPHONE SECONDARY SCHOOL

Southbow Landing - North (Cochrane) | Current total capacity 239 students | ACU 86%

PROJECT TYPE | SCHOOL TYPE

New build | Catholic

YEAR LISTED IN CAPITAL PLAN

2019

STATUS

Currently in Pre-Planning stage

Right-holders in Catchment area (Census 2021)

765 eligible Francophone students
0-18 years old

GRADES | CAPACITY

7-12 | 275 students

Enrollment History & Projection

Year	K	1	2	3	4	5	6	7	8	9	10	11	12	Total
2020-2021	19	24	19	28	24	18	17	15	1	5				170
2021-2022	24	15	25	18	22	22	20	17	14	2	1			180
2022-2023	24	26	17	27	19	29	21	19	13	6	1	1		203
2023-2024	15	24	22	22	20	29	18	27	17	15	7	5	1	210
2024-2025	30	24	22	23	21	24	13	22	11	13	4	7	2	216
2025-2026	20	27	21	21	22	18	23	13	16	5	9	3	7	205
2026-2027	21	27	21	21	22	20	22	15	16	7	9	4	6	211
2027-2028	21	26	22	22	22	21	21	17	16	8	8	4	5	217
2028-2029	22	26	22	22	21	23	19	19	15	9	8	5	4	221
2029-2030	22	25	22	22	21	24	18	21	15	11	7	5	3	224

Demographic Growth and Context

Cochrane is one of Alberta's fastest-growing communities, experiencing sustained and significant population growth over the past decade. The 2021 federal census recorded a population of 32,199, representing a 24.5% increase since 2016 and ranking Cochrane as the fastest-growing municipality in Alberta at that time (and 11th in Canada).

This trend has continued, with municipal data indicating a population of 37,011 in 2024 and approximately 39,397 in 2025. Growth remains consistent at around 5% annually, with projections exceeding 40,000 residents by the end of 2025. This rapid expansion, driven by family migration, proximity to Calgary, and Cochrane's appeal as a mid-sized community, has significantly increased the number of eligible Francophone rights-holders.

Current Situation and Facility Limitations

Despite this growth, Cochrane does not have a dedicated French-language Catholic secondary school. Francophone Catholic students currently attend École Notre-Dame des Vallées (K-12), a facility originally designed as a K-8 school and not equipped to support full secondary programming.

The school lacks essential infrastructure, including purpose-built CTS spaces, adequate science facilities (with the existing lab subdivided to create additional classroom space), a full-sized gymnasium, sufficient outdoor athletic fields, and the physical presence of a true secondary school.

These limitations contribute to low retention rates at key transition points (Grades 6-7 and 8-9), as the facility does not present as a viable long-term secondary option.

Need for a Dedicated Secondary Facility

Given Cochrane's sustained growth and the established Francophone population base identified in the 2021 Census, the need for a dedicated Catholic secondary school (Grades 7-12) is clear.

A new facility would provide accessible, high-quality programming in a modern environment, including specialized classrooms, appropriate athletic facilities, and learning spaces aligned with Alberta Education standards. This would ensure substantive equivalence with English-language Catholic schools in the community.

Site Identification

FrancoSud has collaborated closely with the Town of Cochrane to secure a site for this project. **As the result of a Special Council Meeting held on March 30, 2026, the Town is in support of officially transferring the northern Southbow Landing school site to FrancoSud as soon as planning or design funding is received from the provincial government.**

This site presents a near shovel-ready opportunity, with recent grading completed and servicing infrastructure expected in the near term. Its size aligns well with our operational needs, while its proximity to existing and planned school facilities offers opportunities for shared amenities. Strategically located, the site ensures strong accessibility for students, families, and transportation services. In addition, appropriate zoning is already in place, minimizing potential delays related to land use approvals.

Summary

Site identification is completed and this project must now move forward. Establishing this new school will reduce travel times, improve student retention and provide Francophone Catholic families with a local, viable secondary option. This project represents a sustainable, forward-looking investment that aligns with demographic trends and supports the long-term vitality of the Francophone community in Cochrane.



Town of Cochrane Council Report

Meeting:	Regular Council
Meeting Date:	June 8, 2026
Originated By:	David Singh, Manager, Legislative Services
Title:	Delegation ~ RCMP
Agenda Item:	6a

RECOMMENDED ACTION

That Council accept the RCMP presentation as information.

EXECUTIVE SUMMARY

RCMP Commanding Officer Trevor Daroux, Executive Director Nina Sahasrabuddhe, A/Commr. Wayne Nichols, and Detachment Commander Inspector D. J. Brunner will all be in attendance to present a general service overview and to share the cost of policing and local priorities.

BACKGROUND

COMMUNICATION / PUBLIC ENGAGEMENT

FINANCIAL IMPLICATIONS

LEGISLATION/AUTHORITY

STRATEGIC ALIGNMENT

OPTIONS / IMPLICATIONS

Option 1 (Recommended):

That Council accept the RCMP presentation as information.

ATTACHMENTS

Town of Cochrane Council Report

Meeting:	Regular Council
Meeting Date:	June 8, 2026
Originated By:	Jaylene Robertson, Director, Legislative & Administrative Services
Title:	Privacy, Access and Security Policy
Agenda Item:	7a

RECOMMENDED ACTION

That Council approve the Privacy, Access and Security Policy as presented.

EXECUTIVE SUMMARY

Administration has developed a comprehensive Privacy, Access and Security Policy to establish a formal governance framework for the collection, use, disclosure, protection, and access management of information held by the Town. The policy is intended to ensure compliance with Alberta's *Access to Information Act* (ATIA) and *Protection of Privacy Act* (POPA), while supporting consistent administrative practices, accountability, cybersecurity, records management, and responsible use of emerging technologies, including artificial intelligence (AI).

The policy establishes organizational responsibilities, access request processes, complaint handling procedures, information security requirements, privacy breach response protocols, and governance controls related to data management and AI-enabled systems.

The purpose of the proposed policy is to:

- Establish a municipality-wide framework for privacy, access, and information security governance;
- Ensure legislative compliance with ATIA and POPA;
- Define roles, responsibilities, and accountability for privacy and information management activities;
- Standardize processes for access to information requests, correction requests, complaints, privacy breaches, and records security; and
- Establish safeguards and governance requirements for the use of AI services and data-derived information.

While many of the operational practices contemplated within the proposed policy are already being implemented administratively across the organization, the policy formalizes these practices into a consolidated governance framework to ensure legislative compliance, organizational consistency, and clear accountability under ATIA and POPA.

BACKGROUND

The Province of Alberta has modernized provincial privacy and access legislation through the implementation of the *Access to Information Act* (ATIA) and *Protection of Privacy Act* (POPA) which replaced the *Freedom of Information and Protection of Privacy Act* (FOIP). Municipalities are required to maintain the core principles of access to information and protection of personal information through the new legislation while expanding data governance, operational requirements and organizational privacy accountability. This includes establishing appropriate administrative, technical, and physical safeguards to protect personal information in the custody and control of the municipality. Under FOIP, municipalities were expected to comply with privacy requirements. Under POPA, municipalities must not only comply but also maintain a formal

Privacy Management Program that demonstrates how compliance is achieved, monitored, and continuously improved.

The proposed policy consolidates privacy, access, security, complaint management, breach response, and AI governance requirements into a single corporate framework. The policy applies to:

- All Town employees, contractors, volunteers, and service providers;
- All recorded information, regardless of format; and
- All facilities, systems, and equipment used to manage Town information.

The policy also establishes the role of the Town of Cochrane Head and Privacy and Access Officer (PAO), delegated by the Chief Administrative Officer, to oversee implementation, compliance, training, privacy impact assessments, breach management, and response coordination.

Key Policy Components:

Privacy and Access Governance

The policy establishes principles relating to:

- Collection limitation;
- Transparency and openness;
- Right of access;
- Accuracy of information;
- Safeguards and confidentiality; and
- Compliance and complaint resolution.

The policy further requires annual review of policies, ongoing employee training, audit logging, monitoring, and maintenance of personal information inventories and personal information banks.

Privacy Impact Assessments

The policy requires Privacy Impact Assessments (PIAs) for new or significantly modified systems, services, technologies, or practices involving personal information.

Artificial Intelligence Governance

The policy introduces governance controls related to AI services, including:

- Restrictions on use and disclosure of personal information;
- Human oversight and validation requirements;
- Notification obligations where AI contributes to decision-making;
- Classification of high-risk and low-risk AI activities; and

Mandatory PIAs for high-risk AI implementations.

Access to Information Processes

The policy establishes procedures for:

- Formal access requests;
- Correction or amendment requests;
- Severing and withholding information;
- Third-party consultations;
- Timelines for responses; and

- Fee administration.

Information Security

The policy establishes administrative, physical, and technical safeguards, including:

- Confidentiality agreements;
- Role-based access controls;
- Security requirements for service providers;
- Breach reporting requirements; and
- Information retention standards.

COMMUNICATION / PUBLIC ENGAGEMENT

Upon approval, Administration will:

- Finalize associated procedures, forms, and templates;
- Implement employee awareness and training programs;
- Establish supporting operational standards and registries;
- Integrate governance requirements into applicable operational practices; and
- Coordinate implementation oversight through the Privacy and Access Officer.

FINANCIAL IMPLICATIONS

While many of the practices contemplated by the policy are currently being performed within existing operational resources, implementation of a comprehensive Privacy Management Program (PMP) will create ongoing administrative obligations related to privacy governance, access to information administration, privacy impact assessments, breach response, training, monitoring, records management, and compliance reporting.

Administration anticipates that additional staffing capacity, technology solutions, or specialized expertise may be required in future years to maintain long-term program sustainability and compliance with legislative requirements.

LEGISLATION/AUTHORITY

Access to Information Act, Statutes of Alberta, 2024

Protection of Privacy Act, Statutes of Alberta, 2024

STRATEGIC ALIGNMENT

The proposed policy supports:

- Good governance and accountability;
- Legislative compliance;
- Cybersecurity and risk management;
- Responsible information management; and
- Public trust and transparency.

OPTIONS / IMPLICATIONS

Option 1 (Recommended):

That Council approve the Privacy, Access and Security Policy as presented.

Implication: Approval of the policy will provide the Town with a standardized administrative framework aligned with current provincial legislative requirements and organizational governance objectives.

Option 2:

That Council provide Administration with further direction.

Implication: Without a formalized privacy, access, and security governance framework, the Town may face Legislative non-compliance risks and we will miss the June 11, 2026 deadline required within the legislation.

ATTACHMENTS

Privacy, Access and Security Policy

	<h1 style="text-align: center;">Town of Cochrane Policy</h1>
<p>Policy Title: Approval Date: Department:</p>	<p>Privacy, Access and Security Policy Legislative Services</p>

Policy Statement

The Town of Cochrane is committed to providing full informational accountability and to protecting the privacy of individual citizens and its employees. To that end, Cochrane has implemented a privacy and access program to meet the following goals and principles.

1. Reason for Policy

The *Alberta Access to Information Act* ("ATIA") ensures individual right of access to information and protects the personal information of the public, and employees of public bodies operating in Alberta. The Town of Cochrane ("Cochrane") is bound by the requirements of the *Protection of Privacy Act* ("POPA") and collects, uses, and discloses personal information in accordance with its provisions. This policy establishes the principles and processes for managing Cochrane information in compliance with ATIA and POPA.

1.1. Scope

This policy applies to:

- 1.1.1. All individuals performing services for Cochrane, including all permanent and temporary employees, elected and appointed officials, students, volunteers, and all persons under a contract or agency relationship.
- 1.1.2. All recorded information, in any form or medium (paper, digital, audio-visual, graphic) created or received in the course of carrying out Cochrane's mandated functions and activities; and
- 1.1.3. All facilities and equipment required to collect, manipulate, transport, transmit, or keep Cochrane information.

1.2. Goals and Principles

Cochrane is committed to providing full informational accountability and to protecting the privacy of individual citizens and its employees. To that end,

Cochrane has implemented a privacy and access program to meet the following goals and principles:

1.2.1. PROGRAM ACCOUNTABILITY

Cochrane designates a position and individual who is accountable for implementing and maintaining access to information and privacy for information under the custody or control of Cochrane.

1.2.2. OPENNESS

Cochrane develops and follows access, privacy and security policies and practices that are compliant with legislation. Such policies and practices are publicly available.

1.2.3. COLLECTION OF PERSONAL INFORMATION

Cochrane collects personal information only for authorized purposes and collects the least amount of personal information with the highest degree of anonymity required for the authorized purpose.

1.2.4. IDENTIFYING PURPOSES

When collecting personal information directly from an individual, the individual is informed of the purpose for which the information is collected.

1.2.5. LIMITED USE, AND DISCLOSURE OF PERSONAL INFORMATION

Personal information is only used and disclosed in accordance with the purpose for which it was collected, unless alternate use or disclosure is authorized or required by law, or with the knowledge and consent of the subject individual.

1.2.6. ACCURACY

Cochrane makes all reasonable efforts to ensure that both general information and personal information created or received by Cochrane is accurate and complete. Individuals who believe there is an error or omission in their personal information have a right to request correction or amendment of the information.

1.2.7. RIGHT OF ACCESS

Individuals have a right of access to all information, including personal information about themselves, that is in Cochrane's custody or control, subject to limited and specific exceptions.

1.2.8. SAFEGUARDS

Cochrane protects personal information in its custody or control by deploying security measures and practices to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction.

1.2.9. COMPLIANCE CHALLENGES

Individuals are encouraged to bring any concerns or issues regarding privacy and access at Cochrane to the Privacy and Access Officer for discussion and response. The Privacy and Access Officer will investigate and respond to the individual. Individuals may appeal to the Information and Privacy Commissioner of Alberta to review or investigate Cochrane right of access or correction responses, or any

policies or practices that they feel are not in compliance with legislative requirements.

1.3. Quality Controls and Assurance

1.3.1. POLICY REVIEW AND ASSESSMENT

Cochrane reviews and assesses Privacy, Access and Security policies annually to ensure that they are effective and align with legislative, regulatory or Cochrane functional developments and changes.

1.3.2. TRAINING AND COMMUNICATION

- a) All Cochrane employees are provided with regular training resources to ensure they adequately understand and can implement all aspects of the Privacy, Access and Security program. Training is ongoing and refreshed or expanded upon in regular intervals in accordance with the roles and responsibilities of employees.
- b) Training resources are reviewed annually to ensure that they are effective and align with legislative, regulatory or Cochrane functional developments and changes.

1.3.3. PRIVACY, ACCESS, AND SECURITY MONITORING AND ASSESSMENT

- a) Systems, circumstances, practices or repositories that pose a potential risk or gap in standards relating to the privacy, accessibility, usability, integrity, retention, continuity, and security of Cochrane information are identified, monitored and assessed to determine the extent of the risk and the mitigation required.
- b) Cochrane will identify all systems collecting personal information and will establish requirements for audit logging, monitoring and review of electronic systems that collect, use, disclose or store personal information, data derived from personal information and non-personal data.

1.3.4. PERSONAL INFORMATION INVENTORY, PERSONAL INFORMATION DIRECTORY, AND PERSONAL INFORMATION BANKS

- a) Cochrane is committed to the responsible management, protection and transparency of personal information in its custody or under its control. In support of this commitment Cochrane supports the development and maintenance of a personal information inventory.
- b) A personal information inventory is a comprehensive list of all personal information held by Cochrane. It includes data storage locations, categories of personal information categories of individual whose personal information it holds, the purposes for collection, use and disclosure and the sensitivity and security classification of this personal information. The personal information inventory may be incorporated in records management systems and processes.

- c) Cochrane creates and maintains a directory of the personal information banks under its custody and control.
- d) Cochrane publishes the directory of its personal information banks, either in printed or electronic form, and makes it available to the public.
- e) The personal information bank directory includes:
 - (i) the title of the personal information bank;
 - (ii) the location of the personal information bank;
 - (iii) a description of the types of personal information;
 - (iv) a description of the categories of individuals whose personal information is included;
 - (v) the authority for collecting the personal information;
 - (vi) the purposes for which the personal information was collected or compiled; and,
 - (vii) the purposes for which the personal information may be used or disclosed.
- f) If personal information is used or disclosed for a purpose other than the one described in the directory, Cochrane
 - (i) keeps a record of the purpose and connects that record to the personal information; and,
 - (ii) updates the directory to include the new purpose in the next publication of the directory.

1.3.5. PRIVACY IMPACT ASSESSMENTS

- a) Privacy Impact Assessments (PIAs) are completed for any systems, programs, services, projects or practices that introduce significant new or expanded collection, use, disclosure, processing or security exposure of personal information.
- b) The introduction of, or change to, a system, program, service, project or practice is considered significant if:
 - (i) the loss of, unauthorized access to or unauthorized disclosure of the personal information involved could result in significant harm;
 - (ii) it involves highly sensitive information;
 - (iii) it involves personal information of a significant percentage of the Cochrane's service population;
 - (iv) there is data matching of personal information with an external electronic information repository;
 - (v) it is part of a common or integrated service or program;
 - (vi) the technology used is innovative; or

- (vii) the administrative, technical, or physical measures and systems being proposed represent an additional risk to the privacy of individuals.
- c) Any projects or changes of such nature are reported to the Privacy and Access Officer or designate, who is responsible for completing the PIA in conjunction with the project manager.
- d) PIA content standards follow requirements set by the Office of the Privacy Commissioner of Alberta. The PIA is completed and submitted to the Office of the Privacy Commissioner of Alberta before the project is implemented where possible.

1.4. Terms and Definitions

1.4.1. AI Inference - The process by which a trained AI model takes input data and produces an output, based on conclusions and reasoning.

1.4.2. Artificial Intelligence Service (AI Service) - Computer programs and applications that complete tasks and generate information that normally requires human intelligence such as evaluation, problem-solving, reasoning, and decision-making, using machine-based learning. Also considered an automated system.

1.4.3. Authorized Representative - Any person who can exercise the rights or powers of an individual. This includes the right of access to an individual's personal information and the power to provide consent for disclosure of such information. This may include:

- a) An executor or administrator of the estate of an individual who is deceased, for purposes of administering the estate
- a) A guardian or trustee of a dependent adult, according to appointment under law
- b) An agent under a personal directive, in accordance with the directive
- c) An individual who is acting under specific provisions of a power of attorney
- a) A guardian of a minor under 18 years of age, excluding mature minors, if the exercise of the rights or powers of the guardian would not be an unreasonable invasion of the personal privacy of the minor
- b) An individual acting with the written authorization of an individual

1.4.4. Collection -To gather, acquire or obtain personal information about an individual, from any source, including third parties.

1.4.5. Common or integrated service or program - A program or service planned, administered, delivered, managed, monitored or evaluated by Cochrane working

collaboratively with one or more other public bodies or another public body working on behalf of Cochrane or Cochrane and one or more other public bodies.

1.4.6. Confidentiality - A condition or status in which collection, use, or disclosure of information is restricted to specific persons for specific purposes. When and how the collection, use and disclosure restrictions are applied and maintained are defined by legislation and policy.

1.4.7. Consent -Informed agreement by an individual to the use or disclosure of their own personal information held by a public body, which can be revoked by the individual at any time.

1.4.8. Custody or Control -Custody is the effective physical possession of information; control is responsibility and accountability for making decisions about the handling of information, regardless of whether Cochrane has custody of the information. Cochrane has control over any information that any of its officials, employees, or service providers has created or received as part of their mandated functions and activities, regardless of the location of the information or the time of collection, use, or disclosure.

1.4.9. Data Derived from Personal Information - Data created or derived from data matching that identifies individuals whose personal information was used in the data matching process. May include AI Inferences.

1.4.10. Data Matching - Linking of personal information between 2 or more databases or other electronic sources of information.

1.4.11. Disclosure - Giving access to or making the personal information in Cochrane' custody or control available to a person or organization external to Cochrane.

1.4.12. Employee - All individuals performing services for Cochrane, including all permanent and temporary employees, elected and appointed officials, students, volunteers, and all persons under a contract or agency relationship

1.4.13. External Networked Source - Interconnected computer networks, such as the internet, that contain information for which Cochrane has little to no control over content creation, integrity or disclosure.

1.4.14. High Sensitivity Information- Personal information about an individual that is:

- a) Biometric information
- b) Financial information
- c) Personal information about a minor, senior or vulnerable person

1.4.15. Individual - Any person, living or deceased, regardless of residency, citizenship, or status. In addition, the authorized representative of the individual.

1.4.16. Large Language Model (LLM) - The language model of an AI Service that has been trained using vast amounts of data to learn patterns and language that generate human-like inferences.

1.4.17. Law Enforcement - Policing, including criminal intelligence operations, security or administrative investigation that leads or could lead to a penalty or sanction.

1.4.18. Mature Minor - An individual under the age of 18 who has the capacity to make their own decisions about significant matters affecting them, demonstrated by their independence, psychological stability, intellectual capacity, and/or life situation. In the case of privacy, the guardian of a mature minor would not be considered their authorized representative.

1.4.19. Notification - An explanation of policies, procedures, consequences, and risks related to the collection, use or disclosure of an individual's personal or personal employee information. Cochrane must properly inform and notify individuals and employees that personal information is being collected, the purposes for which it is being collected, and who may be contacted at Cochrane if an individual has questions about the management of their personal information.

1.4.20. Non-personal Data - Data, including data derived from personal information and synthetic data, that has been generated modified or anonymized so that it does not identify any individual.

1.4.21. Personal Employee Information - Personal information collected, used, or disclosed solely for the purposes of establishing, managing, or terminating an employment or volunteer relationship.

1.4.22. Personal Information - Information about an identifiable individual including:

- a) Name
- b) Address, telephone, email, or contact information*
- c) Race
- d) National or ethnic origin
- e) Colour
- f) Religion
- g) Political beliefs or associations

- h) Age
- i) Sex
- j) Marital status
- k) Family status
- l) Identifying numbers
- m) Fingerprints or blood type
- n) Educational, financial, employment, criminal records
- o) Opinions about the individual
- p) Individual's personal views or opinions (except opinions about others)

Business address, telephone, email or other contact information of an employee of a public body, or any individual is not personal information, if it is provided on behalf of the employer in the individual's capacity as employee or agent.

Personal information under ATIA and POPA that is not normally excepted from disclosure:

- a) Opinions contained in work product
- b) Classification, salary range, discretionary benefits, or employment responsibilities of public body employees
- c) Financial and other details of a contract to supply goods or services to a public body
- d) Information about a license, permit, financial or other discretionary benefit granted to an individual by a public body
- e) Information is about an individual who has been dead for 25 years or more
- f) Information is about an individual's enrolment at a school, attendance at a public event, or receipt of an award granted by a public body

1.4.23. Personal Information Bank (PIB) - An information repository that is organized or retrievable by an individual's name or other identifier.

1.4.24. Privacy Impact Assessment (PIA) - A review and explanation of proposed changes in practices, programs or information systems affecting the collection, use, disclosure, or security of personal information under the custody or control of a public body. At the early stages, the PIA will identify practices and risks that should be addressed, amended, or mitigated before implementation of the program or system.

1.4.25. Prompt - A cue, instruction, or question given to an AI Service to elicit a response, action, or creative output.

1.4.26. Reasonable Security Arrangements - Administrative, physical and technical safeguards to protect personal information, data derived from personal information and non-personal data in the custody or under the control of Cochrane that are appropriate and proportional with the security classification level of the information and in the case of non-personal data, ensure to the extent possible, that the identity of the an individual who is the subject of non-personal data cannot be re-identified from the data.

1.4.27. Record - Any electronic record or other record in any form in which information is contained or stored, including information in any written, graphic, electronic, digital, photographic, audio or other medium, but does not include any software or other mechanism used to store or produce the record.

1.4.28. Research - Academic, applied, or scientific research, excluding internal program or quality improvement assessments, that necessitates the use of individually identifying personal information.

1.4.29. Severing - In a right of access request, separating or hiding/redacting information in a document that should or cannot be released so that the remainder of the document can be disclosed.

1.4.30. Significant Harm - Harm that results from the unauthorized access, disclosure, or loss of personal information, including:

- a) Bodily harm
- b) Humiliation
- c) Damage to reputation or relationships
- d) Loss of employment or business or professional opportunities
- e) Identify theft
- f) Diminished insurability
- g) Diminished credit
- h) Loss of property or legal status
- i) Loss of finances

The following factors are also considered in determining the significance of harm:

- a) It is reasonably believed that the information has been or will be misused
- b) The unauthorized access, disclosure of loss was the result of malicious intent
- c) The personal information is sensitive
- d) Existing mitigating factors reduce the risk of significant harm

1.4.31. Third Party - A person, a group of persons or an organization other than the applicant making an access request, or other than the employees and officials of Cochrane.

1.4.32. Use - Use of information by Cochrane employees for an authorized purpose that is authorized by policy or law.

1.5. Roles and Responsibilities

1.5.1. HEAD

1.5.1.1. Unless otherwise delegated, the Head of Cochrane is responsible for all obligations and discretionary decision-making under ATIA and POPA.

1.5.1.2. The Head of Cochrane has been delegated to the Director, Legislative & Administrative Services.

1.5.1.3. The Head has delegated powers, duties and obligations under ATIA and POPA to the Privacy and Access Officer in accordance with the functions and activities set out in 1.5.2., below.

1.5.1.4. The Head has delegated powers, duties and obligations under ATIA and POPA to the Privacy and Access Coordinator in accordance with the functions and activities set out in 1.5.3., below

1.5.2. PRIVACY AND ACCESS OFFICER (PAO)

The PAO is delegated by the Head to be responsible for the overall management and coordination of privacy, security and access to information at Cochrane in accordance with the delegation order. The PAO is responsible for following functions and activities:

Program Management

- a) Ensuring that privacy, access and security program policies and procedures are developed, maintained, and updated, compliant with legislation.
- b) Ensuring that developing and completing quality assurance processes for implementation of Cochrane organization privacy and access management.
- c) Ensuring that training and resources are provided so that Cochrane employees, volunteers and contracted personnel are fully knowledgeable of their privacy and access duties, roles, responsibilities and practices in compliance with policy and legislation.
- d) Representing Cochrane in dealings with third parties, the provincial government, and the Office of the Privacy Commissioner of Alberta, as necessary.

- e) Directing the response to privacy breaches of personal information at Cochrane and its facilities in line with legislation and the Privacy Breach Response Policy.

1.5.3. PRIVACY AND ACCESS COORDINATOR (PAC)

The Privacy and Access Coordinator is delegated to be responsible for the overall function of privacy, security and access to information at Cochrane in accordance with the delegation order. The Privacy and Access Coordinator is responsible for following functions and activities:

Right of Access, Correction, and Complaints

- a) Responding to requests for access to information including, as necessary, assessment of fees, time extensions, disregarding requests, transfer of requests, duty to assist applicants, application of exceptions, third party notifications and public interest disclosure notice.
- b) Responding to request for correction of personal information, including, as necessary, transfer of requests, correcting personal information, annotating personal information, notifying recipients.
- c) Responding to requests for review of the handling of an access request or a privacy complaint including, as necessary, complaint submission, duty to assist the applicant, communicating with the OIPC, investigation, and responding to the applicant.

Privacy and Security Governance

- a) Providing advice, interpretation and implementation of applicable legislation regarding personal information, including release / non-release, collection, use and disclosure of personal information.
- b) Ensuring the security, protection and accuracy of personal information in the custody or control of Cochrane in compliance with legislation and policy.
- c) Completing Privacy Impact Assessments (PIAs) for Cochrane in conjunction with project managers for project-specific personal information systems and practices.
- d) Developing and maintaining a directory of Personal Information Banks and other registries required for identifying and tracking the collection, use, disclosure and security of personal information.

1.5.4. SENIOR MANAGEMENT, TOWN COUNCIL

Senior Management and the Town Council are responsible for ensuring that privacy, access and security policy and practices in Cochrane are aligned with governing mandates, standards, and planning.

1.5.5. INFORMATION TECHNOLOGY MANAGEMENT

IT Management, in coordination with the PAO, for all systems, networks and applications:

- a) implements and deploys privacy and security measures;
- b) completes risk and mitigation assessments;
- c) monitors and detects security threats;
- d) assists in the response to privacy breaches.

1.5.6. MANAGEMENT

Department Managers are responsible for implementing privacy and security policies and practices within their functional areas and are accountable for adherence to all policies by their employees and contracted third parties.

Management:

- a) supports their employee's awareness of and training on privacy and security policies and procedures;
- b) implements privacy and security standards and processes in compliance with policy as they relate to information repositories and operational functions and activities of their area;
- c) provides appropriate resources and facilities as needed to support the implementation of privacy and security policy in the department;
- d) refers all formal right of access requests for information to the Privacy and Access Coordinator;
- e) cooperates and assists in locating and retrieving departmental information relevant to right of access requests;
- f) reports gaps in privacy, access and security policy affecting their areas to the Privacy and Access Coordinator;
- g) reports any new information repositories or data systems that require registration, assessment, and security classification to the Privacy and Access Coordinator or the Privacy and Access Officer.

1.5.7. ALL COCHRANE EMPLOYEES AND SERVICE PROVIDERS

All Cochrane employees and service providers are responsible for implementing privacy and security for all information they create and receive as part of their functions and activities. Employees:

- a) make themselves aware of and adhere to privacy, access and security and standards;
- b) at the time of hire or engagement complete an oath of confidentiality;

- c) capture, manage, access, release and protect information in their custody or control according to privacy, access and security policy;
- d) access, release and protect information in their custody or control according to policy;
- e) refer to the Privacy and Access Coordinator all decisions about collection, use, disclosure, and access that are not clearly directed by policy;
- f) report all suspected breaches to personal information to the PAO immediately upon discovery;
- g) identify and report information security incidents to the appropriate management according to privacy breach procedures.

**A. COLLECTION, USE, DISCLOSURE, DATA MATCHING, AND NON-
PERSONAL DATA**

1. COLLECTION OF PERSONAL INFORMATION

1.1. Cochrane collects personal information only if:

- a) the collection is expressly authorized by legislation;
- b) the information is collected for the purposes of law enforcement; or
- c) the information relates directly to and is necessary for an operating program or activity of the public body, including a common or integrated program.

1.2. Cochrane collects personal information directly from the individual, or their authorized representative. Cochrane only collects personal information indirectly from another source in the following circumstances:

- a) the indirect collection is authorized by the individual, other legislation, or the Alberta Information and Privacy Commissioner;
- b) the personal information may be disclosed to Cochrane under the disclosure provisions outlined below;
- c) the personal information is collected in a health and safety emergency, and the individual is unable to provide the information;
- d) direct collection could reasonably be expected to endanger the mental or physical health or safety of the individual or of any other person;
- e) the personal information is about a designated emergency contact;
- f) the personal information is required to determine suitability for an honour or award;
- g) the personal information is required to verify the individuals' eligibility for participation in a program or to receive a benefit, product, or service from Cochrane;
- h) the personal information is collected from public sources for fund-raising;
- i) the personal information is required for a law enforcement purpose;
- j) the personal information is required to collect a fine or debt owed to the public body, or for use in the provision of legal services to Cochrane;
- k) the personal information concerns the history, release, or supervision of an individual under the supervision of a correctional authority;
- l) the personal information is required to inform the Public Trustee or Public Guardian about clients or potential clients;

- m) the personal information is required for enforcing an order under the Maintenance Enforcement Act;
- n) the personal information is required to manage or administer Cochrane personnel;
- o) the personal information is required to support researching or validating claims, disputes, or grievances of aboriginal people;
- p) the personal information is required to plan, manage, deliver, monitor and evaluate a common or integrated program or service.

1.3. When collecting personal information directly from an individual, Cochrane informs the individual of the purpose for which the information is collected, the legal authority for the collection, any intention to input the information into an AI service and contact information of the individual who can answer questions about the collection.

1.4. Notifications are included on the medium or at the location of collection (websites, forms, pamphlets, posters). Notice is not required in circumstances when personal information is collected indirectly, for authorized purposes.

1.5. Cochrane employees collect only the amount and types of personal information as required to complete the stated function or purpose.

2. CONSISTENT PURPOSES

2.1. Cochrane will primarily use and disclose personal information for the purpose for which it was originally collected or for a consistent purpose.

2.2. For a use or disclosure to be for a consistent purpose, Cochrane must determine that the proposed use or disclosure is:

- a) directly connected to the original purpose for collection; and
- b) necessary for operating a program or common or integrated program or service of Cochrane.

2.3. In assessing the consistent purpose, Cochrane must consider:

- a) the nature of the original purpose documented at the time of collection;
- b) whether the new use or disclosure is a logical extension of that purpose;
- c) the expected impact on the individual's privacy.

3. USE OF PERSONAL INFORMATION

3.1. Cochrane may use personal information under the following circumstances:

- a) for the purposes for which it was originally collected or for a use consistent with that purpose;
 - b) with the consent of the individual, when obtained in accordance with consent standards; or
 - c) for a purpose for which the information is disclosed to Cochrane by another public body, under the allowable disclosure provisions.
- 3.2. Cochrane employees use only the amount and types of personal information as required to complete the stated function or purpose.

4. DISCLOSURE OF PERSONAL INFORMATION

- 4.1. Cochrane may disclose personal information for the purpose for which the information was collected or compiled or for a purpose consistent with that purpose;
- 4.2. Cochrane may disclose personal information for an inconsistent purpose only in the following circumstances:

INDIVIDUAL OR PUBLIC INTERESTS

- a) with the consent of the individual, when obtained in accordance with consent standards;
- b) to avert or minimize a risk of imminent harm and danger to the health and safety of any person;
- c) so that the spouse or adult interdependent partner, relative or friend of an injured or deceased individual may be contacted, or to a relative of a deceased individual;
- d) personal information of a minor or parent or guardian of a minor, to a law enforcement agency or to another organization or public body providing services to the minor, if it is clearly in the best interest of the minor;
- e) to an MLA to assist the individual;
- f) if disclosure is not an unreasonable invasion of privacy (Appendix 7.2);

LEGAL OR ENFORCEMENT REQUIREMENTS

- a) to comply with, or in accordance with, an enactment of Alberta or Canada;
- b) in response to a subpoena, warrant or court order;
- c) for law enforcement purposes;
- d) for the supervision of an individual by a correctional authority, or to a lawyer or student-at-law acting for an inmate;
- e) to comply with the Maintenance Enforcement Act, or to the Administrator of the Motor Vehicle Accident Claims Act;
- f) to an Officer of the Legislature if required for their duties;

OPERATIONAL REQUIREMENTS

- a) to an officer or employee of Cochrane if necessary for their duties;

- b) to an officer or employee of another public body if necessary for planning, managing, delivering, monitoring or evaluating a common or integrated program or service;
- c) to enforce a legal right, or to collect a fine or to make a payment, or for court and quasi-judicial proceedings;
- d) to verify an individual's suitability or eligibility for a program or benefit;
- e) to comply with the public interest disclosure provisions;
- f) to the Auditor General or any other prescribed person for audit purposes;
- g) to another public body for the authorized purposes of data matching;

HUMAN RESOURCES

- a) to a union representative, with the consent of the individual;
- b) for the management of personnel;

PUBLIC DISSEMINATION AND RESEARCH

- a) to the Provincial Archives of Alberta or to Cochrane archives or another public body archives for archival preservation purposes;
 - b) for research or statistical purposes, under agreement;
 - c) when the information is available to the public.
- 4.3. Cochrane employees disclose only the amount and types of personal information as required to perform their assigned duties.
- 4.4. If there is no authority for the disclosure, the information cannot be disclosed. If the individual making the request for information wishes, they may make a formal ATIA Request.
- 4.5. Cochrane will not sell personal information under its custody or control in any circumstance or for any purpose.

5. RESEARCH DISCLOSURE

- 5.1. Personal information may be disclosed for statistical or research purposes, only if:
- a) research cannot reasonably be accomplished in a non-identifiable form or is approved by the OIPC;
 - b) data matching resulting from the disclosure is not harmful to the individuals the information is about and the benefits are clearly in the public interest;
 - c) Cochrane has approved conditions relating to security and confidentiality, removal or destruction of individual identifiers, and prohibition of any subsequent use or disclosure without authorization; and
 - d) all of the conditions are set out in a written research proposal and agreement

6. DATA MATCHING AND NON-PERSONAL DATA

- 6.1. Cochrane
 - a) Data matches personal information between two or more information sources to create new data derived from personal information; and
 - b) creates non-personal data from identifiable personal information; only for the purposes of:
 - c) research and analysis; or
 - d) planning, managing, delivering, monitoring or evaluating a program or service.
- 6.2. For the purposes of data matching, Cochrane:
 - a) does not collect personal information directly from the individual;
 - b) may collect personal information from another public body;
 - c) may use personal information under its custody and control.
- 6.3. Cochrane implements human oversight, auditing and validation measures for systems used for creating data derived from personal information or non-personal data to ensure the accuracy and reliability of the data.
- 6.4. Cochrane retains and uses data derived from personal information only for the purpose for which it was created and as long is reasonably necessary to enable Cochrane to carry out that purpose.
- 6.5. Cochrane discloses data derived from personal information only
 - a) to the other public body from which data matched personal information was collected, for the purpose it was created;
 - b) to the Office of Statistics and information for the purposes of The Office of Statistics and Information Act.
- 6.6. Cochrane uses non-personal data for any purpose and discloses non-personal data to anyone other than another public body only under agreement containing the required conditions, including prohibiting re-identification of individuals.
- 6.7. Cochrane is not restricted from disclosing reports, summaries or other publications containing non-personal data that is aggregate or statistical form.

7. CONSENT STANDARDS

- 7.1. Cochrane can only request the consent of the individual for use or disclosure of their personal information, not for collection.
- 7.2. Individual consents for use or disclosure of personal information must include:
 - a) the identity of the individual or authorized representative providing the consent;

- b) the purpose for which the information is being disclosed and how it can be used;
 - c) the personal information to which the consent relates;
 - d) the identity of the third party to whom the information will be disclosed;
 - e) an acknowledgement that the individual providing the consent has been made aware of the reasons why the information is needed and the risks and benefits to the individual of consenting or refusing to consent;
 - f) the date the consent is effective and the date, if any, on which the consent expires; and
 - g) a statement that the consent may be revoked at any time by the individual providing it.
 - h) an attestation affirming the consent or revocation by the individual or authorized representative.
- 7.3. A consent or revocation of consent is authenticated by the signature of the individual providing consent. Signatures are in writing either manually or electronically.
- 7.4. Electronic signatures are considered valid only if the level of electronic authentication is sufficient to confirm the identity of the individual who is granting or revoking the consent.
- 7.5. Oral consent is not routinely accepted by Cochrane. Should oral consent be implemented, Cochrane will ensure the consent adheres to the requirements of the POPA Regulation, including a recording of the consent.

8. RESEARCH PROJECT AGREEMENTS

- 8.1. Researchers are required to submit a Research Proposal for consideration and approval by the PAO.
- 8.2. Cochrane discloses personal information for research purposes only if the recipient signs an agreement.

9. NON-PERSONAL DATA BEST PRACTICES AND REQUIREMENTS

- 9.1. Cochrane develops and implements standards and techniques:
 - a) to locate and remove direct and indirect identifiers in personal information to create non-personal data; and
 - b) to ensure to a reasonable standard that individuals cannot be re-identified within the non-personal data by unauthorized users.
- 9.2. When creating non-personal data, and before it is used or disclosed, Cochrane:
 - a) verifies the effectiveness of methods used;

- b) ensures that methods used can be replicated for audit purposes;
 - c) identifies the occurrence and source of potential bias in the data; and
 - d) ensures accuracy and completeness of data if it is used to inform decisions about programs or services.
- 9.3. Cochrane will assess and record the risk and mitigations of risks of its de-identification standards and techniques resulting in re-identification. As part of this assessment Cochrane considers:
- a) whether the non-personal data can be matched with other public or internal datasets or sources;
 - b) whether the number of de-identified individuals in an aggregate or cell associated with specific attributes is too small;
 - c) whether there are too many other attributes associated with the de-identified individual;
 - d) whether geolocation data (place and time) are included as attributes associated with the de-identified individual.
- 9.4. Whenever non-personal data is created from personal information under its custody or control, and before it is used, Cochrane records and maintains in a register:
- a) a description of the personal information or data derived from personal information used to create the non-personal data;
 - b) the purpose for creating the non-personal data;
 - c) the method used for creating the non-personal data;
 - d) the security classification of the data; and
 - e) the assessment completed to ensure that the identity of the individual who is the subject of the non-personal data cannot be identified or re-identified from the data.

10. Artificial Intelligence

10.1. Collection, Use and Disclosure

- 10.1.1. When Cochrane makes use of generative artificial intelligence applications and processes (AI services), personal information is only collected, used, and disclosed in compliance with legislation and policy. The personal information activities may include:

INDIRECT COLLECTION

- a) accessing and compiling personal information from external networked sources or external datasets in response to prompts, either directly or through large language models (LLMs).
- b) creation or generation of new personal information as inferences by AI services as a response to user prompts.

DIRECT COLLECTION

- c) collecting information from individuals in conversations or engagements through an AI chatbot service.

USE

- d) accessing and compiling personal information from internal sources and datasets in response to prompts, either directly or through LLMs.
- e) use of prompts, internal information and datasets, and generated inferences containing personal information to train internal large language models (LLMs).

DISCLOSURE

- f) disclosure of prompts and generated inferences containing personal information to external parties.
- g) Cochrane considers information about individuals extracted by an AI service from external networked sources, including the internet, as personal information.
- h) Cochrane only uses AI services that do not disclose internally generated personal information in prompts or internal information sources to an external LLM for AI training purposes.
- i) Cochrane considers inferences generated by an AI service containing personal information as data derived from personal information.

10.2. INFORMATION ACCURACY AND INTEGRITY

- 10.2.1. Cochrane does not use or distribute inferences generated by AI services about or affecting individuals before they are reviewed for accuracy and integrity and verified by competent and qualified employees.
- 10.2.2. Inferences generated by AI services for Cochrane use include citations and references to sources detailed enough to verify the veracity and completeness of the information.

10.3 NOTIFICATION

- 10.3.1. Cochrane notifies individuals that AI Services have and are being used to:
 - j) collect personal information in conversations or direct engagements with individuals; or
 - k) generate information or knowledge that contributes to decision-making about the individual.
- 10.3.2. Notifications contain all the elements of a collection notice with the addition of a statement that information or knowledge from AI services has contributed to decision-making about the individual.
- 10.3.3. Upon request, Cochrane provides:

- l) the name and description of the AI services used; and
- m) citations of the sources used by the AI Services to generate inferences that contributed to decision-making about the individual.

10.3.4. This notification may not be provided in cases where one of the circumstances or conditions which require or allow Cochrane to withhold the information apply.

10.4. REGULATION OF USE

10.4.1. Cochrane controls and regulates the use of AI for specified purposes based on the risk to individuals.

10.4.2. Cochrane considers the following activities using AI services as high-risk:

- a) health assessment and diagnosis;
- b) human resource performance evaluation and recruitment;
- c) safety components and controls for critical equipment and infrastructure;
- d) assessment of individuals requesting access to essential human services;
- e) predictive profiling;
- f) biometrics-based recognition and identification, including images.

10.4.3. Cochrane employees complete high-risk AI activities only with the approval of the Privacy and Access Head, who evaluates the risk on a case-by-case basis.

10.4.4. All new high-risk AI activities require a Privacy Impact Assessment, which may require an Algorithmic Impact Assessment, before they are initiated.

10.4.5. Cochrane considers the following activities using AI services as low risk:

- a) content generation and editing;
- b) computer and program coding;
- c) information indexing and search;
- d) spam and malware filtering;
- e) audit logging and monitoring;
- f) recommendations for routine or transactional activities.
- g)

10.4.6. Cochrane employees complete low-risk AI activities as required for their role based on their effectiveness for the purpose.

10.4.7. Where practical and effective for purpose, Cochrane implements mitigating conditions and activities that mitigate the risks associated with AI services, such as:

- a) limiting an AI service to a small-scale information system and LLM model to support a narrowly defined purpose or function;
- b) completing pre-implementation testing and monitoring of AI services performance for the identified purpose;
- c) implementing human oversight to ensure the accuracy and reliability of the AI services;
- d) continuously monitoring the effectiveness of AI services for the activity.

B. RIGHT OF ACCESS AND CORRECTION OF INFORMATION

Subject to limited and specific exceptions, individuals have a right of access to information that is in the custody or control of Cochrane. Further, individuals have a right to request correction or amendment of information about themselves. This policy is intended to define a process for facilitating requests for access to personal information, or to correct or amend personal information.

1. RECEIVING AND FACILITATING REQUESTS

- 1.1. Requests for access to Cochrane information can be made by any individual or organization (the applicant), regardless of location or status. A public body may not make a request to another public body.
- 1.2. Cochrane responds to right of access requests openly, accurately and completely and will:
 - a) engage with applicants to allow them to clarify their request so it can be processed
 - b) respond to questions in plain language, and,
 - c) assist applicants in adjusting requests so they can be processed.
- 1.3. Cochrane does not deny access to information based on the applicant's reason or purpose for the request.
- 1.4. Requests for information under ATIA may contain personal information of the applicant, which will be protected and managed in accordance with POPA.
- 1.5. Once the applicant has met the requirements to make a request, Cochrane has 30 business days to respond, unless the request has been abandoned, disregarded or transferred, or if the time limit is extended in accordance with ATIA.

2. EXCLUDED RECORDS

- 2.1. Some records that are in the custody or control of Cochrane are excluded from the ATIA and do not have to be considered relevant or released as part of a right of access request. However, Cochrane may choose to release this information as part of a request under specified circumstances. Excluded records include:
 - a) records designated by Cochrane as available without a request;
 - b) court and administrative support records created or received by the courts of Alberta, including justices of the peace;
 - c) records created or received by officers of the Alberta Legislature, including the Office of the Information and Privacy Commissioner, Ethics Commissioner, Auditor General, and the Public Interest Commissioner;

- d) records and copies of records from a provincial or public body registry office, including the Personal Property Registry, Corporate Registry, Motor Vehicles Registry, Land Titles Office, and the Vital Statistics Registry;
 - e) Cochrane records that have already been made public by other means;
 - f) records in the custody or control of the federal, provincial or territorial government and their agencies;
 - g) personal or constituency records of an elected or appointed member of the governing body of Cochrane;
 - h) health records created or received by a Cochrane doctor or nurse;
 - i) a question used on an examination or test only if release does not jeopardize a standardized or continuing evaluative process.
- 2.2. These excluded records can only be used or disclosed with the consent or permission of the individual or organization:
- a) Records from private sector donors that are preserved in Cochrane archives for historical research purposes.
- 2.3. Data derived from personal information and non-personal data cannot be released in response to a right of access request.

3. DISREGARDING REQUESTS

- 3.1. Cochrane disregards a right of access request only in exceptional circumstances when:
- a) the information requested is already available to the applicant or to the public;
 - b) after initial requests from Cochrane for clarification, the applicant has not provided enough detail to make it comprehensible or to locate the requested information;
 - c) the request has been made repeatedly, as part of a pattern of conduct that is systematic, regular and deliberate;
 - d) the applicant makes use of abusive, threatening, or harassing language or actions during the application or facilitation process; or
 - e) the request is abusive, threatening, frivolous or vexatious.
- 3.2. The applicant is informed of the reasons for disregarding the request and the right to ask the Commissioner to review Cochrane's decision.

4. SEARCHES FOR RELEVANT RECORDS

- 4.1. Cochrane makes every effort to identify and retrieve for review all records in its custody or control that are relevant to an applicant's request. This will include information in any location and format and on any devices, accounts and platforms not owned by Cochrane, that was created or received by employees and contractors to support their functions as Cochrane officials.

- 4.2. The search for records relevant to an applicant's request includes all electronic records that can be accessed or produced using normal computer hardware, software and technical expertise and would not unreasonably interfere with its operations. This includes:
 - a) reports or extracted data sets from existing databases that can be constructed and generated using existing software and expertise, but does not include the creation of information that is an analog summary, analysis, consolidation or digest of existing information that did not exist prior to the request;
 - b) emails, text messages, and social media posts sent or received on any account or platform that were created or received to support functions and activities of Cochrane.
 - 4.3. Cochrane Privacy and Access officials responsible for responding to a request are authorized to access and retrieve for review any personal or general information on any device or platform that is required to identify, retrieve records relevant to a request.
5. REVIEWING AND WITHHOLDING INFORMATION
- 5.1. Cochrane only withholds information relevant to the request when it is determined that mandatory or discretionary or exceptions to the right of access apply to the records requested.
 - 5.2. Cochrane must refuse to disclose information in response to a right of access request if the release would be:
 - a) harmful to business interests of a third-party business;
 - b) an unreasonable invasion of a third party's personal privacy; or
 - c) harmful to provincial Cabinet and Treasury Board confidences, as long as the information is in a record for less than 15 years or result in the release of a record that was submitted to or prepared for submission to the Executive Council, the Treasury Board or one of their committees, or was created on or on behalf of any of the above.
 - 5.3. Cochrane may refuse to disclose information in response to a right of access request if the disclosure could reasonably be expected to:
 - a) threaten anyone's safety or mental or physical health; interfere with public safety; or cause an applicant to do immediate and grave harm to themselves or others;
 - b) reveal confidential evaluations conducted pre-hire or pre-contract award;
 - c) harm a law enforcement matter;
 - d) harm a workplace investigation;
 - e) harm inter-governmental relations;

- f) reveal local public body confidences, including drafts of bylaws, resolutions, legal instruments and the substance of deliberations of in-camera meetings;
 - g) reveal advice, proposals, recommendation, analyses or policy options developed by or for the public body;
 - h) cause harm to the economic interests of Cochrane or the Alberta Government;
 - i) reveal information relating to testing or auditing procedures;
 - j) reveal legally privileged information;
 - k) cause harm to conservation of heritage sites; or
 - l) reveal information that is already or will be made available to the public within 60 business days.
6. PUBLIC HEALTH AND SAFETY OVERRIDE
- 6.1. Cochrane discloses without delay, to the public, a group of people, an individual, or an applicant, any information that Cochrane has about a risk of significant harm to the environment or to the health and safety of the public, a group of people, an individual or an applicant.
 - 6.2. Before disclosing the information, Cochrane must, where practicable, notify any third party to whom the information relates, give the third party an opportunity to make representations relating to the disclosure and notify the Commissioner.
7. THIRD PARTY REVIEWS
- 7.1. Cochrane notifies and requests advice from affected third parties when it is unclear whether the relevant records hold information that, if released, would be:
 - a) harmful to business interests of a third-party business;
 - b) an unreasonable invasion of a third party's personal privacy.
8. REQUESTS FOR CORRECTION OR AMENDMENT OF PERSONAL INFORMATION
- 8.1. Individuals may request correction or amendment of their own personal information in the custody or control of Cochrane.
 - 8.2. Cochrane will not amend professional opinions that are made by employees that have the competency to make them.
9. RIGHT OF ACCESS INTAKE
- 9.1. Requests to access information where there is clearly no requirement or allowance to withhold or sever any of the requested information are provided as soon as possible outside of the right of access process.
 - 9.2. Requests for access to information from an individual applicant that may involve review and severing must be in writing to the Privacy and Access Coordinator. Oral applications are accepted if the applicant has a physical

disability or if their command of English is limited. These special applications must be completed through the Privacy and Access Coordinator.

- 9.3. All requests for access to information or correction that require the formal process are directed to the Privacy and Access Coordinator for response, who formally acknowledges receipt of request.
- 9.4. Applicants making requests for information may be required to provide sufficient information to verify their identity and authorize access to the information. Any such information provided is used for these purposes only.
- 9.5. The Privacy and Access Coordinator acknowledges receipt of the request to the applicant and informs them of the process and the 30-business day timeline involved in responding to the request.
- 9.6. The Privacy and Access Coordinator will engage with applicants to ensure that the request provides enough clarity and detail to identify and locate the requested records within a reasonable amount of time and effort. If the Privacy and Access Coordinator requests further detail and clarification, the applicant must respond within 30 business days, or the request will be considered abandoned.
- 9.7. Within 15 business days after Cochrane receives a request, the Privacy and Access Coordinator may transfer the request and if necessary, the record to another public body if the record was produced by or for the other public body, the other public body was the first to obtain the record or the record is in the custody or control of the other public body. Cochrane Privacy and Access Coordinator will notify the applicant of the transfer.

10. FEES

- 10.1. Information requested is identified as either "personal information" or "general information." Fees for these services based on these designations are charged according to the Fee Schedule (Appendix 7.1).
- 10.2. There is no administration fee for applicants requesting access to their own personal information. However, fees may be charged for reproduction of information, if required, and only when the estimated costs exceed \$10.00.
- 10.3. A \$25.00 administration fee is charged for requests for general information and is non-refundable. A \$50.00 administration fee is charged for continuing general information requests. Additional fees may be charged for reformatting, reproduction, disclosure preparation or transmission of information for general requests, only when the estimated costs exceed \$150.00.
- 10.4. The Privacy and Access Coordinator creates an estimate of the fees and provides it to the applicant. The applicant must decide to either accept the estimated cost, to revise or cancel their application, or to request a

waiver of all or part of the fees. The applicant must respond within 30 business days, or the request will be considered abandoned.

- 10.5. If the applicant requests a waiver of fees, Privacy and Access Coordinator may waive all or part of the fees if a) the applicant cannot afford the payment, b) the records relate to a matter of public interest, or c) for any other reason by which it is deemed fair and reasonable in this particular case. The Privacy and Access Coordinator responds to a request for waiver of fees within 30 business days.
- 10.6. The applicant is required to pay, if applicable, the \$25.00 administrative fee and/or a deposit of 50% of the estimated fees before the records are processed. The request will not be processed until the initial required fees are paid.
- 10.7. Regardless of the fee estimate, Cochrane only charges fees beyond the initial administrative fee that reflect the actual costs incurred.

11. RETRIEVAL AND REVIEW OF RELEVANT RECORDS

- 11.1. After the request intake fee requirements have been met, the Privacy and Access Coordinator or designate retrieves and reviews the requested records to determine where mandatory or discretionary exceptions to the right of access apply.
- 11.2. The Privacy and Access Coordinator or designate identifies and initiates searches functions, business units, employees, and information repositories that may hold records relevant to the request.
- 11.3. The Privacy and Access Coordinator or designate reviews on a line-by-line basis and severs words or portions of the record according to the mandatory or discretionary exceptions to the right of access. The reviewer may consult with appropriate employees to determine the application of severing.

12. THIRD PARTY REVIEWS

- 12.1. If the Privacy and Access Coordinator decided that affected third parties need to be consulted to determine the application of mandatory exceptions, the third parties are identified and contacted as soon as practicable.
- 12.2. The notification to the third party provides:
 - a) a notice that a request has been made for information that would affect them as a third party;
 - b) a copy of the information;
 - c) a request to advise the Privacy and Access Coordinator to either disclose the information or explain why the information should not be disclosed.
- 12.3. The third party must respond to the notification and request within 20 business days.

- 12.4. The Privacy and Access Coordinator also notifies the applicant that a third party has been notified and that a decision about the application of exceptions will be made within 30 business days from the date of notice to the third party.
- 12.5. When the Privacy and Access Coordinator decides on whether or not to disclose the information after consultation with a third party, both the applicant and third party are notified.
- 12.6. The third party may ask the Commissioner to review the decision to disclose the information within 20 business days after the notice of decision is submitted to the third party.

13. RESPONSE TO APPLICANT

- 13.1. Having completed a review of the records, the Privacy and Access Coordinator ensures that information subject to any of the exceptions to access in the Act is severed from the record prior to the record being disclosed to the applicant, with annotations or explanations identifying which exception has been applied to the specific information severed.
- 13.2. The final response will include the requested records, an explanation for all information severed, and that the applicant has a right to review the decision to withhold information with the Information and Privacy Commissioner.
- 13.3. Requested information will be provided in a form that is generally understandable. Cochrane will endeavor to explain the meaning of the content, codes and abbreviations included in the applicant's record to the extent that it is reasonably practical.
- 13.4. The final response with relevant records will not be released to the applicant until all outstanding fees are received, including the remaining 50% of the fee estimate adjusted to the actual costs incurred.
- 13.5. If applicants request to view original records in person, to preserve the integrity of the record and ensure that documents are not removed from Cochrane, a designated Privacy and Access official will be present to supervise during the entire period of consultation.

14. TIME LIMITS FOR RESPONDING TO A REQUEST

- 14.1. Cochrane responds to right of access requests within 30 business days of the receipt of the request.
- 14.2. The 30-business day timeline is suspended for the time between submission of a fee estimate to the applicant and the applicant's acceptance of the estimate, amendment or Cochrane decision to waive of fees.
- 14.3. The response time may be extended for an additional 30 business days, if:
 - a) the applicant agrees to the extension; or

- b) the volume of records is large and more time is needed to process the request; or
 - c) more time is needed to consult with a third party, another public body or another entity;
- 14.4. If the response time is extended, the Privacy and Access Coordinator notifies the applicant of the reasons for the extension, when a response can be expected, and that the applicant may make a complaint to the Commissioner about the extension.
- 14.5. The timelines are automatically extended in:
- a) third party reviews to accommodate time required to complete the process;
 - b) an emergency, disaster or other unforeseen event that results in unplanned operation closure or interruption. In this case, the Privacy and Access Coordinator notifies the Commissioner as soon as possible of the operational closure, the anticipated re-opening, and when the re-opening occurs.
- 14.6. The Privacy and Access Coordinator may extend the date of response for an additional period of time, as required, for the same reasons.
15. CORRECTION OR AMENDMENT REQUEST PROCESSES
- 15.1. Requests from individuals to correct / amend basic information about themselves (e.g. change of name or address) are handled as a routine correction of information, so long as the information is clearly limited to factual corrections that can be verified immediately.
- 15.2. Cochrane employees take reasonable steps to verify the identity of the individual or authorized representative before processing the request. This may involve reviewing a driver's license or other identification.
- 15.3. Formal requests to correct or amend information subject to review must be in writing to the Privacy and Access Coordinator. An individual may request the correction of another person's information only if they have that person's signed consent or they can prove they are the person's legal representative.
- 15.4. All formal requests for correction are directed to the Privacy and Access Coordinator for response, who formally acknowledges receipt of request.
- 15.5. Cochrane responds to formal requests for correction of personal information within thirty (30) business days of receipt of the request.
- 15.6. If corrections or amendments are made, the original information is not deleted but retained and marked as incorrect, for example, by crossing out.
- 15.7. Cochrane informs the applicant in writing of the refusal or acceptance of the request, the reason(s) for the refusal, and any recourse the individual may have to challenge Cochrane's decision.

- 15.8. If the request for correction or amendment is refused, Cochrane annotates the record with reference to the requested correction or amendment. This may be done by linking the record electronically to the annotation information.
- 15.9. The Privacy and Access Coordinator notifies other organizations or agencies to whom the information was disclosed that a correction has been made, or that an annotation has been filed, unless the correction is not reasonably expected to impact on the ongoing provision of services.

16. INDIVIDUAL CHALLENGES TO REQUEST RESPONSES

- 16.1. Individuals are encouraged to bring any concerns or issues concerning responses to requests and compliance with this policy initially to the Privacy and Access Officer for discussion and mediation. Formal complaints regarding a request will be handled in accordance with the Complaint Resolution policy. For all requests, applicants will be advised of their right to request a formal review of the access process and the records by the Office of the Information and Privacy Commissioner of Alberta. Requests for review by the regulator must be made within 60 business days of the release of the records.

C. COMPLAINT RESOLUTION

1. SUBMISSION

- 1.1. Members of the public may submit a complaint in writing to Cochrane for investigation and resolution. Verbal complaints will not be treated as formal complaint submissions by Cochrane.
- 1.2. Complaints may concern any decision, act, or failure to act by Cochrane in a formal access to information request or in the protection of personal information, data derived from personal information, and non-personal data under Cochrane's custody or control or by a Cochrane employee, including:
 - a) a contravention in the creation, collection, use, or disclosure of personal information, data derived from personal information, or non-personal data;
 - b) a refusal, without justification, to a correction of personal information;
 - c) the actual or attempted re-identification, by any person, of non-personal data;
 - d) failure by a Cochrane employee to provide a duty to assist;
 - e) a contravention in the application of a time extension in a formal access request;
 - f) the inappropriate levy of a fee applied in a formal access request.
- 1.3. Complaints related to unauthorized disclosure, use, destruction, loss, removal or modification of personal information will initiate the privacy breach response process, which may proceed in conjunction with the complaint process.

2. PRINCIPLES OF INVESTIGATION AND RESPONSE

- 2.1. The Privacy and Access Officer receives, processes, investigates, and responds to complaints under ATIA and POPA made to Cochrane.
- 2.2. If an investigation is required to establish findings for a complaint, Cochrane uses generally accepted investigative methods to obtain the most effective results while respecting the rights, privacy, and dignity of the complainant and any employees involved. Complaint investigations will, as required, incorporate the following methodologies:
 - a) keep investigation information confidential to protect the privacy of the complainant and any individuals investigated and to maintain the integrity of the investigation;
 - b) use surveillance or monitoring data to establish past or current actions on an as-needed basis;
 - c) examine or confirm the veracity of facts or statements, sometimes using third party witnesses;
 - d) base findings and conclusions on balance of probabilities.

- 2.3. Records created, collected, or processed as part of a complaint investigation are classified according to the Information Security Classification system and will not be provided as part of the complaint response. Requests by the complainant for investigation records associated to the complaint will be treated as a formal access to information request, and records will be handled according to that process.
 - 2.4. The complaint investigation is an administrative rather than a disciplinary process. Once the findings are determined, it is the responsibility of Management and Human Resources to determine the appropriate disciplinary action for employees involved, if any.
3. RESPONSE
- 3.1. Cochrane acknowledges, in writing, receipt of the complaint. All acknowledgements of submission will include:
 - a) reference to the initial complaint;
 - b) an internal assigned file number; and
 - c) the estimated date of response, within 30 business days of the date the complaint was received.
 - 3.2. Cochrane provides responses in writing, containing the findings of the Privacy and Access Head, to all formal complaint submissions.
 - 3.3. Response time is dependent on the need for an investigation and the complexity of the associated investigation.
 - 3.4. The complaint response will include the following:
 - a) the internal assigned file number;
 - b) a copy of the original complaint submission and a list of any records the complainant submitted with the complaint;
 - c) the findings of the Privacy and Access Head and the reason for the findings or a statement of justification; and
 - d) contact information for the Office of the Information and Privacy Commissioner and directions for submitting a request for review to the Commissioner.
4. RECEIVING SUBMISSIONS
- 4.1. The Privacy and Access Officer reviews the submitted complaint to establish if it is submitted under ATIA or POPA and assign an internal file number:
 - a) if the complaint is submitted under ATIA, identify the associated access request number and the employee who processed the request.
 - b) if the complaint is submitted under POPA, identify, if necessary, the associated record(s), employee(s), department(s), information system(s), or events connected to the complaint.

- 4.2. If the scope or nature of the complaint is unclear, the Privacy and Access Officer will contact the complainant to clarify it.
5. ACKNOWLEDGE RECEIPT OF SUBMISSION
 - 5.1. Respond to the complainant, acknowledging receipt of submission, and providing an estimated date of response that is 30 business days from the date received.
6. INVESTIGATION AND ANALYSIS
 - 6.1. The Privacy and Access Officer determines the scope and nature of the complaint according to the parameters established in section C.1.1.3. and records the investigation scope as part of the complaint investigation file.
 - 6.2. Based on the context of the complaint, the Privacy and Access Officer will collect and review any records associated to the complaint event that may provide additional context or relevant information. Records that are reviewed as part of the investigation are logged and indexed as part of the complaint investigation file.
 - 6.3. The Privacy and Access Officer will review the complaint with the Privacy and Access Head and with any employees associated with it. If more than one employee is associated with the complaint, the Privacy and Access Head will engage each employee individually. Interviews will begin with the employee most closely involved in the event. Relevant factual information from the interviews may be recorded as part of the complaint investigation file.
 - 6.4. The Privacy and Access Head will analyze the information from the complaint, associated records, and any interviews conducted to determine the findings of the investigation. Findings are based on a balance of probabilities.
 - 6.5. Record the findings and any related information that informs the findings as part of the complaint investigation file. If it is determined through the findings that remediation actions are required, document the steps that will be taken and the date those actions will be performed.
7. FINAL RESPONSE
 - 7.1. When the findings of the investigation are determined, a final written response will be provided to the complainant according to the parameters set out in section C.3.
 - 7.2. If the findings include remediation actions, the actions that will be performed and a date of completion will be provided to the complainant as part of the findings in the written response.
8. RESOLUTION

Remediation and Prevention

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- 8.1 Depending on the investigation findings and any identified risks regarding the creation, collection, use, disclosure of personal information, data derived from personal information, and non-personal data, the Privacy and Access Officer may identify further administrative, technical and physical safeguards that can be implemented to modify or prevent future contraventions in Cochrane systems, processes, and employee behaviours. This may include employee or user training, introduction of additional security technology, or upgrade to facilities or infrastructure.

D. INFORMATION SECURITY

The information security provisions of POPA require Cochrane to protect personal information, data derived from personal information, and non-personal data in its custody or control by making reasonable security arrangements to protect against unauthorized access, collection, use, disclosure or destruction. This policy outlines administrative, technical and physical safeguards in place at Cochrane to protect confidential information.

a) Safeguards

1.1. ADMINISTRATIVE

- 1.1.1. Cochrane ensures that policies and procedures to facilitate the safeguarding of confidential information in its custody or control are developed and maintained.
- 1.1.2. The need for confidentiality and security of personal information is addressed as part of the conditions of employment for Cochrane employees, beginning with the recruitment stage, and included as part of job descriptions and contracts. All employees are aware of, and appropriately trained with regard to, policies and procedures for safeguarding information.
- 1.1.3. All individuals performing services for Cochrane, including all permanent and temporary employees, elected and appointed officials, students, volunteers, and all persons under a contract or agency relationship on behalf of Cochrane; that collect, use, disclose or have access to confidential information as part of the performance of their duties for Cochrane, will sign a Confidentiality Agreement.
- 1.1.4. Utilizing a system of levelled access by role, only the least amount of information necessary for the intended purpose is used or disclosed, and only to employees with a need to know. If the intended purpose can be accomplished without use or disclosure of identifying information, then the information is made anonymous.
- 1.1.5. Before implementing proposed new administrative practices or information systems that will change or significantly affect the collection, use and disclosure of personal information, Cochrane completes a Privacy Impact Assessment (PIA) that describes how the new initiative will affect privacy, and what measures Cochrane will put in place to mitigate risks to privacy.
- 1.1.6. An agreement or contract is completed and signed between Cochrane and all contracted service providers that require access to the information systems and assets of Cochrane that requires that they meet or exceed Cochrane privacy program standards and policies.
- 1.1.7. Cochrane employees and persons acting on behalf of Cochrane report all violations and breaches of information security as soon as possible to Cochrane's Privacy and Access Officer. This enables the Officer to

take corrective action to resolve the immediate problem and minimize the risk of future occurrence.

- 1.1.8. The minimum retention period for records retention under ATIA and POPA is one (1) year. Personal information that was used to make a decision about an individual will be kept for at least one year after the decision has been made. Beyond that, the retention periods are set according to the business requirements, and applicable bylaws and schedules of Cochrane.

1.2. PHYSICAL

- 1.2.1. All Cochrane records, both on-site and off-site, are held and stored in an organized, safe, and secure manner in accordance with information security standards.
- 1.2.2. Appropriate fire detection and extinguishing devices are located in areas where personal information is stored.
- 1.2.3. Cochrane's records are not accessible by unauthorized persons. In areas where unauthorized persons are present, measures will be taken to ensure that files are not left unattended or accessible.
- 1.2.4. Computers or monitors that are left unattended in reception areas or areas where personal information is processed are secured and logged off, either manually or by default timer.
- 1.2.5. All servers and equipment storing electronic personal information are secured by locked cabinets or rooms within Cochrane when not under direct supervision by an employee of Cochrane.
- 1.2.6. Cochrane records or equipment holding records (e.g. laptop computers) may not be left unattended in a vehicle, even if the vehicle is locked.
- 1.2.7. Visitors are given name tags or badges, and an employee accompanies visitors to private or semi-private areas, to ensure that only authorized individuals are present in secure areas.
- 1.2.8. Appropriate measures are taken to control the distribution of keys or pass codes, and to ensure they are returned or changed after employment or association with Cochrane has ended.
- 1.2.9. Confidential information will be treated with sensitivity. Employees will take care when sharing confidential and personal information if conversations can be overheard or intercepted by unauthorized individuals.
- 1.2.10. Confidential, restricted, or sensitive information that is transmitted by mail or courier will be sealed, marked as confidential, and directed to the attention of the authorized recipient.
- 1.2.11. Cochrane employees will verify the identity and credentials of courier services used for the transportation of personal information.

- 1.2.12. Fax machines and printers that may be used to send or receive confidential information are located in a secure area. Employees use the "safe print" feature and send encrypted faxes when possible. Whenever possible employees will use preprogrammed numbers to send fax transmissions and will review the numbers every 6 months to ensure they are still accurate. All fax transmissions will be sent with a cover sheet that indicates the information being sent is confidential. Reasonable steps are taken to confirm that confidential information transmitted via fax is sent to a recipient with a secure fax machine.
- 1.2.13. Information that is not confidential or sensitive in nature will be destroyed. Confidential or sensitive information is destroyed by shredding. Destruction of records subject to Cochrane's retention and destruction schedule will be documented by listing the records and / or files to be destroyed, the date of destruction, and an employee's signature to confirm that the destruction occurred. The destruction of transitory records does not need to be documented.
- 1.2.14. All information will be deleted using secure data wiping techniques prior to disposal of electronic data storage devices (e.g. surplus computers, internal and external hard drives, diskettes, tapes, CD-ROMS, etc.), or the device(s) will be destroyed.

1.3. TECHNICAL

- 1.3.1. Firewalls, intrusion detection software, or other technical means to protect internal Cochrane networks carrying identifiable personal information is in place to prevent unauthorized use and malicious software.
- 1.3.2. Access to data and application systems to personal information is limited by each Cochrane employee's functional role and need to know. Access privileges to information repositories containing information classified as confidential, highly sensitive or restricted are reviewed periodically to ensure that access continues to match the employee's functions and status.
- 1.3.3. Employees of Cochrane access and use information systems under their assigned User ID. The use of another person's assigned User ID is prohibited. The assigned User ID restricts access to data and application systems to that information based on their functional roles and need to know.
- 1.3.4. Access to Cochrane information systems is controlled and password protected. Passwords are kept confidential at all times, and are not written down, posted publicly, or shared with other employees. Passwords will be changed on a regular schedule. If a computer is left unattended, it will be protected against unauthorized access by manual or automated logout requiring authentication to re-enter the system.

- 1.3.5. Two-factor or biometric authentication is implemented for access to confidential information based on security classification and/or the availability of authentication features.
- 1.3.6. Personal information is not permitted to be sent by e-mail or transmitted over the internet or external networks without the use of appropriate security safeguards, such as encryption and authentication. E-mail messages must also contain a confidentiality notification).
- 1.3.7. To detect unauthorized access and prevent modification or misuse of user data in applications, systems may be monitored to ensure conformity to access policies and standards. Appropriate security controls, such as event logs, will be implemented and reviewed as required to support adequate proactive monitoring of access.
- 1.3.8. Cochrane do not use service providers, including cloud services, that require the storage of personal information outside of Canada.
- 1.3.9. Computer systems that hold critical or sensitive information will be backed up on a daily basis. Backed up information is stored in a secure environment off-site. Information that is intended for long-term storage on electronic media (e.g. tape, DVD, disk) will be reviewed on an annual basis to ensure the data is retrievable, and to migrate the data to another storage medium if necessary.
- 1.3.10. Cochrane monitors AI services and applications to ensure that there is no leakage of internal inferences and other information to external parties.

2. Information Security Classifications

2.1. CLASSIFICATION LEVELS AND ASSIGNMENT

- 2.1.1. Information will be classified according to the degree of harm that may result from unauthorized access, loss, or modification. Classified as:
 - 2.1.2. Restricted
 - a) Confidential
 - b) Internal
 - c) Public
 - 2.1.3. Employees will assign security classification to each repository, file or document as required. Records that are Restricted must be marked as such visibly in the presented record and included as part of the metadata of the record.

2.2. SECURITY ZONES

- 2.2.1. Physical spaces and logical areas within electronic systems and networks are identified as having the status of one of four security zones, based on the functionality of the area:

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- d) RESTRICTED: Used infrequently by a subset of authorized individuals with special status for storing and accessing information on a limited basis.
 - e) INTERNAL: Used regularly by authorized individuals working within the zone for storing and accessing information among them.
 - f) EXTERNAL: Used regularly by a controlled number of unauthorized and authorized individuals for storing, accessing, and transmitting information among them within the zone.
 - g) PUBLIC: Used regularly by both authorized and unauthorized individuals for other, uncontrolled purposes.
- 2.2.2. Cochrane will maintain standards to ensure the integrity of each zone, including definition of perimeters, barriers to access, and security practices and equipment within the zone. Physical Security Zones Requirements Table and the Network Security Zones Requirements Table provide details of standards required for each zone.

3. Audit Logging

3.1. LOGGING REQUIREMENTS

3.1.1. Cochrane ensures that all systems containing personal information, data derived from personal information and non-personal data:

- h) Generate audit logs that record:
 - (i) user access (successful and failed attempts)
 - (ii) creation, modification and deletion of records
 - (iii) data exports, downloads or transmissions
 - (iv) changes to user permissions or roles
 - (v) administrative and privileged activities
- i) Capture sufficient detail, including:
 - (vi) User ID
 - (vii) Date and time
 - (viii) Type of activity performed
 - (ix) System or data accessed

3.2. MONITORING AND REVIEW

3.2.1. Audit logs are actively monitored to detect:

- j) Unauthorized access or anomalous behavior
- k) Bulk access or extraction of information
- c) Data integrity issues
- d) Repeated failed login attempts

- 3.2.2. Formal log reviews occur on a scheduled basis, relative to the information security classification of the information contained within the system and following any suspected or confirmed privacy breach.

3.3. LOG RETENTION AND SECURITY

- 3.3.1. Audit logs are retained in accordance with applicable Cochrane retention schedules, with a minimum retention period of at least 12 months.
- 3.3.2. Audit logs are protected from unauthorized access, alteration or deletion by:
 - a) restricting access to authorized employees only
 - b) storing logs securely and encrypting where appropriate
 - c) implementing mechanism to detect log alteration
- 3.3.3. Individuals with administrative access are not the sole reviewers of logs where practical and reasonable.
- 3.3.4. Contracts with service providers must include logging and monitoring requirements consistent with this policy and rights to access logs for audit and investigation purposes.

3.4. AUDIT AND LOGGING PROCESSES

- 3.4.1. This process is intended to provide operational guidance for implementing, monitoring and reviewing audit logs for systems containing personal information, data derived from personal information and non-personal data.

STEP 1: IDENTIFY AND CLASSIFY SYSTEMS

- 3.4.2 Identify systems containing personal information, data derived from personal information and non-personal data.
- 3.4.3 Classify systems based on the information security classification of the information in the system.

STEP 2: CONFIGURE OR CONFIRM LOGGING

- 3.4.4 Confirm or Enable logging for user authentication events, data access and changes, administrative actions, ensuring logs capture user ID, timestamp, activity performed and data accessed.

STEP 3: ESTABLISH LOG STORAGE

- 3.4.5. Store logs in centralized logging system, if available or at minimum, secure system-specific repositories.
- 3.4.6. Evaluate protections on logs to ensure encryption at rest and in transit and access restrictions.

STEP 4: DEFINE MONITORING PROTOCOLS

- 3.4.7. Implement automated monitoring tools where possible.

3.4.8. Configure alerts for unusual access patterns, privileged account activity, failed login thresholds.

3.4.8 Assign responsibility for monitoring.

STEP 5: CONDUCT REGULAR REVIEWS AND INVESTIGATE ANOMALIES

3.4.9 Perform periodic reviews in accordance with classification of system. For systems containing restricted information, monthly review is required, while confidential information required quarterly reviews.

3.4.10 Document review date, reviewer, finding and action taken.

3.4.11 When suspicious activity is detected, escalate to the PAO and IT Security if required. Preserve relevant logs, initiate the privacy breach response process and document findings.

4 Security in Contracting

4.1 Cochrane ensures contracted service providers (e.g., contractors, consultants, support service providers or business partners) comply with Cochrane's Privacy, Access and Security policies and procedures, or have equivalent policies in place.

4.2 If a contracted service provider requires access to personal information or system affecting the security of personal information as part of their services, the contracted service provider must sign a privacy and security agreement outlining the conditions of access, or have equivalent provisions within terms or use, licensing agreements or contract addendums.

4.3 Until a contract detailing explicit information security provisions has been executed, the contracted service provider is not given access to premises or systems containing confidential business or personal information of Cochrane.

4.4 Information security provisions outlined in contracts with contracted service providers meet or exceed the standards set out in the Privacy, Access and Security policies and procedures. Any related contracted service provisions in addition to the Privacy, Access and Security policies should be made available to Cochrane upon request, including any updates or revisions that occur after execution of the contract.

4.5 All employees of contracted service providers who have exposure to personal information and use Cochrane information assets and systems sign a Confidentiality Agreement. Contracted service providers should remind their employees on termination of their continued responsibility to maintain the confidentiality of Cochrane information.

4.6 Contracted service providers immediately report breaches of confidentiality and privacy to the Cochrane PAO.

4.7 Contracts with service providers that have access to Cochrane information assets and systems include provisions that protect Cochrane operations from circumstances where the information assets or systems

may be compromised. In order to mitigate these situations, disaster recovery and system backup is included in all agreements, to a standard that meets or exceeds that of Cochrane.

- 4.8 Contracts with service providers include provisions for destroying or returning all Cochrane information assets, including hardware, system documentation and information assets upon termination of agreements and in accordance with contract provisions reflecting records retention and data management policy.
- 4.9 To ensure compliance with contracted provisions for information security, Cochrane:
 - a) Requests contractors sign an acknowledgement that they have received, read, and will comply with any Cochrane privacy, access and security policies they are bound to follow under contract; and
 - b) actively monitors contracted service providers with access to information assets or systems for inappropriate access or use and to ensure compliance with contract security provisions.
- 4.10 Cochrane retains the right to inspect the premises and security practices of contracted service providers to ensure compliance with contract provisions and stated policies.
- 4.11 Cochrane avoids using service providers that require the storage or transmission of personal information outside of Canada. If they are retained, Cochrane ensures that they meet the same standards of security and compliance that are required of Canadian service providers, in order to fulfill POPIA's requirement to prevent unauthorized collection, use, access, retention, destruction and disclosure of personal information.

E. PRIVACY BREACH RESPONSE

1. DEFINITION

- 1.1. A Privacy Breach (breach) is an unauthorized disclosure, use, destruction, loss, removal, or modification of information in the custody or control of Cochrane. Events are considered unauthorized by reference to access, privacy and security policy and/or legislation. A breach may be accidental or the result of a deliberate act.

2. DETERMINING LEVEL OF RESPONSE

- 2.1. The severity of the breach determines the nature of the response reporting structure, remedial action, and the investigation process. In the response process, severity is based on:
 - a) the security classification of the information, which takes into account potential and real harm to individuals and organizations;
 - b) the internal and external scope and scale of the breach;
 - c) the known relationship of the recipients to subject individuals; or
 - d) the intentionality of the cause.
- 2.2. Levels are determined when any of the designated classes and circumstances apply as indicated in Step 1 Identifying and Reporting Breach, which incorporates an assessment of the real risk of significant harm as a result of the breach.

3. INVESTIGATION PRINCIPLES

- 3.1. Cochrane uses generally accepted investigative methods to obtain the most effective results while respecting the rights, privacy, and dignity of persons being investigated. Investigations will, as required, incorporate the following methodologies:
 - a) keep investigation information confidential to protect the privacy of individuals investigated and to maintain the integrity of the investigation;
 - b) use surveillance or monitoring data to establish past or current actions on an as-needed basis;
 - c) examine or confirm the veracity of facts or statements, sometimes using third party witnesses;
 - d) inform participants of their status and the progress of the investigation as fully and quickly as possible so long as it does not jeopardize the integrity of the investigation;
 - e) base findings and conclusions on balance of probabilities.

- 3.2. The breach investigation is an administrative rather than a disciplinary process. Once the report is delivered, it is the responsibility of Management and Human Resources to determine the appropriate disciplinary action.

4. IDENTIFYING AND REPORTING BREACH

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4.1. STEP 1: IDENTIFICATION AND REPORTING

- 4.1.1. When a breach level is identified, report the incident to your manager and the PAO within the Step 1 timelines in the Privacy Breach Procedures Table (Appendix 7.2). If unable to determine the level of the breach, contact the PAO immediately.
- 4.1.2. The PAO will open and document the breach recording all information required below, including the initial facts of the breach as far as possible within the timelines available:
 - a) dates of breach and report
 - b) responsive actions taken so far
 - c) nature of the breach: unauthorized collection, use, disclosure, loss, loss of access, or modification
 - d) custody and control of the information breached
 - e) extent and scale: distribution, location and volume of information
 - f) known causes and recipients
 - g) employees, individuals and organizations involved

ASSIGNING RISK LEVEL

- 4.1.3. When a breach has been discovered, determine the level of the incident according to Privacy Breach Procedures Table (Appendix 7.2). The highest level where any one of the classes and characteristics apply is the identified Level of the breach.

Level 1 Low:

Internal (I) class information:

The recipients or causes of the breach are internal (an employee or contracted service provider) or external (someone outside Cochrane).

Confidential (C) class information:

The recipients or causes of the breach are internal only and recipients of the breached information do not know or have a relationship with any of the subject individuals involved.

Confidential (C) class information:

The cause of the breach does not appear to be intentional.

Level 2 High:

Confidential (C) class information:

The recipients or causes of the breach are external, involving persons who are not employees or contracted service provider.

Confidential (C) class information:

The recipients or causes of the breach are internal and recipients of the breached information likely know or have a relationship with subject individuals involved.

Confidential (C) class information:

The cause of the breach appears to be intentional.

Restricted (R) class information

The recipients or causes of the breach are internal (an employee or contracted service provider) or external (someone outside Cochrane).

Level 3 Critical:

Restricted (R) class information

The recipients or causes of the breach are external, involving persons who are not employees or contracted service providers.

4.2. STEP 2: CONTAINMENT AND FURTHER REPORTING CONTAINING THE BREACH

- 4.2.1. At this stage, Cochrane uses all available means to ensure that Cochrane information in the custody of unauthorized parties is returned to Cochrane and/or destroyed irrevocably. If the recipient is uncooperative, this may involve legal action.

REPORTING

- 4.2.2. Depending on the level and nature of the breach, IT, Cochrane leadership and the police are informed.

4.3. STEP 3: NOTIFICATION

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER (OIPC) AND GOVERNMENT OF ALBERTA

- 4.3.1. Cochrane informs the Office of the Information and Privacy Commissioner of Alberta of all Level 2 or 3 breaches that involve personal information, using the OIPC online process and any process established by the Ministry of Technology and Innovation.
- 4.3.2. Level 1 breaches are generally not considered severe enough to pose a real risk of significant harm to an individual. However, each incident will be reviewed to confirm this status.

NOTIFICATION OF SUBJECT INDIVIDUALS

- 4.3.3. Cochrane will notify identified subject individuals affected by all Level 2 or 3 breaches. Subject individuals affected by Level 1 will be notified if required by OIPC.
- 4.3.4. Notifications involving large numbers of subject individuals and/or individuals for which contact information is unavailable may require the use of public media.

4.4. STEP 4: INVESTIGATION

INVESTIGATION PROCESS

- 4.4.1. Establish and confirm:
- l) dates of breach and report

- m) responsive actions taken so far
- n) nature of the breach: unauthorized collection, use, disclosure, loss, loss of access, or modification
- o) custody and control of the information breached
- p) extent and scale: distribution, location and volume of information
- q) know causes and recipients
- r) employees, individuals and organizations involved

4.4.2. Investigations establish facts based on evidence collected in documentation, interviews and forensics. Timelines to complete the investigation follow the standards based on level of breach in the Privacy Breach Procedures Table (Appendix 7.2).

FINDINGS

4.4.3. As the outcome of the investigation, PAO will report findings on the causes, continuing risks of the breach and notification activities completed. Findings are based on a balance of probabilities determination.

REPORT DISTRIBUTION

4.4.4. If Police are investigating the breach for criminal enforcement purposes, coordinate activities with officers involved.

4.4.5. Investigative reports are distributed to Leadership and IT, HR, OIPC and the Police as required. Subject Individuals are given a summary of the findings in accordance with Cochrane Collection, Use, Disclosure and Right of Access policies.

4.5. STEP 5: REMEDIATION AND PREVENTION

REMEDIATION

4.5.1. Remediation may have been started when immediate efforts were made to contain the breach. The investigative report will identify any further gaps or weaknesses in information security that directly or indirectly caused the breach and recommend immediate measures to close the gaps. Implementation and effectiveness of the remediation need to be tracked.

PREVENTION RECOMMENDATIONS

4.5.2. The investigative report will identify further administrative, technical and physical security measures that can be implemented to prevent such breaches in the wider systems, processes and behaviours. This could include employee or user training, introduction of additional security technology, or upgrade to facilities.

DISCIPLINE

- 4.5.3.** Depending on the nature and significance of the breach, the role of employees involved, and the information security policy in place, Cochrane can take discipline action against an employee who has violated Cochrane policy or applicable legislation. This will be passed to Leadership and Human Resources for resolution.

2. Related Information

- 2.1 Province of Alberta Protection of Privacy Act, SA 2024, Chapter P-28.5
- 2.2 Province of Alberta Protection of Privacy (Ministerial) Regulation 143/2025
- 2.3 Province of Alberta Protection of Privacy Regulation 132/2025
- 2.4 Province of Alberta Access to Information Act, SA 2024, Chapter A-1.4
- 2.5 Province of Alberta Access to Information Act Regulation 133/2025

3. Definitions

- 3.1 Refer to Definitions under D. TERMS AND DEFINITIONS

4. Exclusions

- 4.1 No exclusions apply to this policy.

5. Special Situations

- 5.1 No special situations apply to this policy.

6. Appendices

- 6.1 Fee Schedule

The following fees are the *maximum* amounts charged to applicants under ATIA Regulation. For requests for personal information of the applicant, only fees for items 3-6 may be charged.

Fee Schedule

1. For searching for, locating and retrieving a record	\$6.75 per 1/4 hr.
2. For converting or reformatting records:	
(a) converting a record into a redactable format	\$0.25 per page
(b) reformatting audiovisual files into a redactable format	Actual cost to public body up to \$20.00 per 1/4 hr.
3. For producing a paper copy of a record:	
(a) photocopies and computer printouts:	
(i) black and white up to 8 1/2" x 14"	\$0.25 per page
(ii) other formats	\$0.50 per page
(b) from microfiche or microfilm	\$0.50 per page
(c) plans and blueprints	Actual cost to public body
4. For producing a copy of a record by duplication of the following media:	
(a) microfiche and microfilm	Actual cost to public body
(b) computer disks	\$5.00 per disk
(c) computer tapes	Actual cost to public body
(d) slides	\$2.00 per slide
(e) audio and video tapes	Actual cost to public body
5. For producing a photographic copy (colour or black and white) printed on photographic paper from a negative, slide or digital image:	
(a) 4" x 6"	\$3.00
(b) 5" x 7"	\$6.00
(c) 8" x 10"	\$10.00
(d) 11" x 14"	\$20.00
(e) 16" x 20"	\$30.00
6. For producing a copy of a record by any process or in any medium or format not listed above	Actual cost to public body
7. For preparing and handling a record for disclosure.	\$6.75 per 1/4 hr.
8. For supervising the examination of a record	\$6.75 per 1/4 hr.
9. For shipping a record or a copy of a record	Actual cost to public body

7.2. Privacy Breach Response Procedures Table

Level	Severity Criteria		Time from Detection	Response	Responsibility	
	Class	Breach Characteristics (if any apply)				
1 Low	I	Internal and external Subject individuals not known to unauthorized recipient Cause of breach was unintentional	2 hrs.	Step 1: Report to Manager, PAO	Employee or Service Provider	
	C		24 hrs.	Step 2: 1) Confirm breach status 2) Contain breach/retrieve information 3) IT incident, inform IT leadership 4) Confirm requirement for notifications to OIPC, GoA, and subject individual(s)	PAO, Employee or Service Provider, IT, HR	
	C					
					Step 3: If required: 1) Notify OIPC, GoA 2) Notify subject individual(s)	PAO
				20 days	Step 4: Investigate Investigative report to: 1) Leadership 2) IT, if applicable 3) HR, if applicable	PAO
				TBD	Step 5: Remediation and Prevention	PAO, Employee or Service Provider, Leadership IT, HR
2 High	C	External Subject individuals likely known to unauthorized recipient Cause of breach intentional Internal	1 hr.	Step 1: Report to Manager, PAO	Employee or Service Provider	
	C		3 hrs.	Step 2: 1) Confirm breach 2) Contain breach/retrieve information 3) IT incident, inform IT leadership 4) Inform Leadership, Communications 5) Inform Police on potential criminal or public safety concerns 6) Inform HR, if applicable	PAO, Leadership, Employee or Service Provider, IT, HR	
	C					
	R			24 hrs.	Step 3: 1) Notify OIPC, GoA 2) Notify subject individual(s)	PAO
		7 days	Step 4: Investigate Investigative report to: 1) Leadership, Communications 2) IT, if applicable 3) HR, if applicable 4) Police, if required 5) OIPC, if required 6) Subject individual(s) on basic findings (not full report)	PAO		

Level	Severity Criteria		Time from Detection	Response	Responsibility
	Class	Breach Characteristics (if any apply)			
			TBD	Step 5: Remediation and Prevention	PAO, Employee or Service Provider, Leadership IT, HR
3 Critical	R	External	Immediately	Step 1: Report to Manager, PAO	Employee or Service Provider
			1 hr.	Step 2: 1) Confirm breach 2) Contain breach/retrieve information 3) Inform Leadership, Communications 4) IT Breach, inform IT leadership 5) Inform Police on potential criminal or public safety concerns 6) Inform HR, if applicable 7) Inform high risk subject individual(s)	PAO, Leadership, Employee or Service Provider, IT, HR
			1 hr.	Step 3: 1) Notify, consult with OIPC on response 2) Notify remaining subject individual(s)	PAO
			3 days	Step 4: Investigate/cooperate with Police and OIPC Investigative report to: 1) Leadership, Communications 2) OIPC, if required 3) Police, if required 4) IT, if applicable 5) HR, if applicable 6) Subject individual(s) on basic findings (not full report)	PAO
			TBD	Step 5: Remediation and Prevention	PAO, Employee or Service Provider, Leadership IT, HR

8. End of Policy

Manager, Legislative Services

Mayor

Town of Cochrane Council Report

Meeting:	Regular Council
Meeting Date:	June 8, 2026
Originated By:	Adam Sullo, Director, Engineering Services
Title:	Mandatory Capital Projects ~ Long-Term Infrastructure Planning Update
Agenda Item:	7b

RECOMMENDED ACTION

That Council receive the Mandatory Capital Projects Long-Term Infrastructure Planning report for information.

EXECUTIVE SUMMARY

The Town of Cochrane is entering a critical phase of growth that will require significant investment in core infrastructure over the next 8–10 years.

This report provides Council with an overview of mandatory capital projects required to support long-term growth and maintain service levels. These projects include major investments in water, wastewater, and operational infrastructure.

Current projections identify approximately \$722M in total capital investment between 2027–2035, including \$334M in mandatory infrastructure and \$388M in base capital spending.

These investments are required to support long-term growth, with infrastructure being planned for a population of approximately 100,000, compared to a projected population approaching 60,000 by 2035.

This report is intended to provide Council with early visibility into upcoming financial pressures, risks, and strategic considerations. Administration will continue to bring forward updates as planning progresses and as key decision points are identified.

BACKGROUND

This report builds on previous capital project updates provided to Council and shifts the focus toward long-term, mandatory infrastructure projects to address community growth.

Historically, the Town’s capital budget has averaged approximately \$25M–\$40M annually, with a notable increase in 2025 due to major project delivery. This has included the full range of capital projects on all forms of infrastructure in the community.

Cochrane is approaching a critical stage in its growth, where the existing infrastructure is reaching capacity and the expansion of this infrastructure will need to support future demand rather than reacting to only immediate needs. The projects outlined in this report represent critical infrastructure investments required to support the Town’s continued growth and long-term service delivery.

These Projects (with completion year) include:

- Existing Water Treatment Plant Expansion (2028)
- New Water Treatment Plant (2033)

- Water Network Upgrades (2033)
- Wastewater Forcemain Twinning (2035)
- New Operations Centre (2032)

These projects will be completed in addition to our annual capital project delivery, and will require more resources to ensure they are delivered on schedule and on budget.

We understand that these are largely utility focused and do not include projects such as transportation improvements and recreation projects. These projects will still be identified and prioritized through future discussions with Council, however, the mandatory projects outlined above represent risk to the Town provided appropriate utility services to our current and future residents.

COMMUNICATION / PUBLIC ENGAGEMENT

The Town will continue to provide updates to Council and coordinate with Communications to ensure consistent messaging to residents and stakeholders as projects advance.

FINANCIAL IMPLICATIONS

There are no immediate financial implications associated with this report.

This report outlines the anticipated scale of capital investment required to support these mandatory projects. The Projects, with their expected budgets are include:

- Existing Water Treatment Plant Expansion - \$23M+
- New Water Treatment Plant (WTP) - \$60M+
- Water Network Upgrades - \$50M+
- Wastewater Forcemain Twinning - \$126M+
- New Operations Centre - \$75M+

These investments total \$334M over a span of 9 years.

It is expected that ongoing capital spending will continue beyond these mandatory projects. Over the same nine year period, an additional \$388 million in investment is anticipated for other capital projects, many of which have not yet been identified.

The project spending associated with both the New Water Treatment Plant (WTP) and the Wastewater Forcemain Twinning alone will bring the Town to exceed it's self imposed debt limit by 2030. Even if the Town were to adopt the higher debt limit permitted under Alberta regulations, it would still exceed that limit by approximately 2034.

Funding the remaining mandatory projects, along with maintaining ongoing capital investment over the next nine years, will require significant increases in reserve contributions. These increases would be in addition to any funding required to maintain or enhance existing service levels within the Town.

All projects, with the exception of the Operations Centre, are eligible to be included in the Town's Off-Site Levy (OSL) Bylaw. Currently, the bylaw includes the Existing WTP Expansion and a portion of the Wastewater Forcemain Twinning project. As additional planning and

development work is completed for the remaining projects, they will be incorporated into future updates of the OSL Bylaw.

Grant opportunities may be available for some of these projects through both the Provincial and Federal Governments. Administration will continue to pursue all available funding opportunities to help offset project costs and reduce the financial impact on taxpayers.

It is important to note that these mandatory projects will be constructed to support a future population of approximately 100,000 residents. At the time of their completion in 2035 the population of the Town will be approaching 60,000 at current projections. This means that approximately 60,000 residents will be paying to operate infrastructure meant for 100,000 people. This will further drive the need for growth in the community to distribute the tax load across more residents and businesses.

Finally, the planning, design, construction and ultimate operation of this infrastructure will require additional staffing resources in the Town. The expenditures outlined in this report reflect the construction costs only. The implications associated with these staffing resources will come in future budgets for further discussion with Council.

Detailed financial implications, including funding approaches and budget impacts, will be brought forward to Council as individual projects progress and formal approvals are required.

LEGISLATION/AUTHORITY

This report is provided for information in accordance with the *Municipal Government Act*.

STRATEGIC ALIGNMENT

This report supports the Town's strategic priorities related to sustainable growth, long-term infrastructure planning, and responsible financial management.

OPTIONS / IMPLICATIONS

Option 1 (Recommended):

That Council receive the Mandatory Capital Projects Long-Term Infrastructure Planning report for information.

Implication: There are no direct implications resulting from this recommendation. This report provides Council with awareness of anticipated long-term infrastructure requirements, with future reports and recommendations to be brought forward as planning progresses.

ATTACHMENTS