



AGENDA

Regular Council Meeting

3:00 PM - Monday, June 8, 2026
Joint Council Chambers

	Page
1. CALL TO ORDER	
2. ADOPTION OF AGENDA	
3. ADOPTION OF MINUTES	
3.1. May 25, 2026, Regular Council Meeting Minutes	6 - 12
Regular Council - 25 May 2026 - Minutes - Pdf	
4. DELEGATIONS	
4.1. High River Ratepayers Community Group	13 - 16
20260608 High River Ratepayers Community Group Delegation Request	
HRRCG Delegation Submitted Documentation	
5. PUBLIC COMMENTS	
The public is welcome to provide comments regarding items on the agenda discussed at this meeting.	
Comments must be concise and limited to a maximum of 3 minutes, exclusive of time required to answer questions from Council.	
If you are not able to attend the meeting and wish to provide public comments, please email legislativeservices@highriver.ca by 10:00 a.m. on the day of the meeting and a member of the Legislative & Advisory Services Team will read your comments during this section.	
In order to ensure procedural fairness, Council requests that the public refrain from speaking to items that have been or will be heard through a public hearing process.	
6. BUSINESS	

6.1. **Access to Information Bylaw 4663/2026**

17 - 21

[RFD-24-46 - Pdf](#)

Recommendation:

WHEREAS the provincial *Freedom of Information and Protection of Privacy Act* has been rescinded by the province and new legislation split the single act into two, the *Access to Information Act* and the *Protection of Privacy Act*;

BE IT RESOLVED THAT Council give First Reading to Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT Council give Second Reading to Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT all Council give Unanimous Consent to proceed with Third and Final Reading of Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT Council give Third and Final Reading to Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT Council rescind Bylaw 4469/2016 Fees and FOIP Head for Freedom of Information and Protection of Privacy Bylaw.

6.2. **Privacy Management Program Policy POL-0100**

22 - 150

[RFD-25-23 - Pdf](#)

Recommendation:

WHEREAS the provincial *Freedom of Information and Protection of Privacy Act* has been rescinded by the province and new legislation split the single act into two, the *Access to Information Act* and the *Protection of Privacy Act*, together referred to as "ATIPP";

AND WHEREAS Municipalities must have a Privacy Management Program in place by June 11, 2026.

BE IT RESOLVED THAT Council adopt the Privacy Management Program Policy POL 0100, as presented.

6.3. **Community Art Policy Update**

151 - 180

[RFD-26-38 - Pdf](#)

Recommendation:

WHEREAS Council adopted the Community Art Policy on March 24, 2025;

AND WHEREAS the Community Art Policy was reviewed and required amendments, including a funding accountability report;

BE IT RESOLVED THAT Council adopt the updated Community Art Policy POL-0105 as presented.

6.4. **Film Production Policy**

181 - 204

[RFD-26-37 - Pdf](#)

Recommendation:

WHEREAS the Town wishes to continue to offer a film friendly community to film production;

WHEREAS the existing Film Procedure was approved by Administration July 4, 2017.

BE IT RESOLVED THAT Council approve the Film Production Policy as presented.

6.5. **Changes to Assured Income for the Severely Handicapped (AISH) Program**
[RFD-26-46 - Pdf](#)

205 - 212

Recommendation:

WHEREAS the Government of Alberta has announced changes to the Assured Income for the Severely Handicapped (AISH) program, which will include transitioning to the new Alberta Disability Assistance Program (ADAP), effective July 1, 2026;

WHEREAS the announcement of the transition to the new program, which occurred in the Fall of 2025, lacked information and clarity, has resulted in confusion and concern for current AISH recipients as well as for those who provide formal and informal support to those receiving AISH;

WHEREAS the letters regarding ADAP went out to officially introduce ADAP to existing AISH recipients the week of May 25, 2026;

BE IT RESOLVED THAT the Town of High River's Mayor and Council advocate that the Government of Alberta undertake further meaningful and expansive consultation to broaden their understanding of the realities impacting current AISH recipients and make the necessary adjustments to increase the likelihood of success and reduce the likelihood of harm;

AND FURTHER THAT advocacy communications include the following specific points:

- That the Government of Alberta re-open the Income Support office in High River.
- That the Government of Alberta consider grandfathering in the new ADAP program to new applicants and offer the new program to those AISH recipients who are already working or self identify of wanting supports to gain employment.
- That the Government of Alberta compensate existing rural programs (i.e., FCSS offices) to support the success of the transition.

7. **COUNCILLOR / BOARD & COMMITTEE REPORTS**

Feedback and Important Information from Councillors regarding Internal and External Board and Committee Meetings.

8. **BOARD & COMMITTEE MINUTES**

8.1. **Sheppard Family Park Society Board**

[20260529 Correspondence from Sheppard Family Park Society](#)
[SFP Meeting Minutes - March 24, 2026](#)
[SFP Meeting Minutes - April 28, 2026](#)

213 - 219

9. **COUNCIL CORRESPONDENCE REQUIRING ACTION**

- 9.1. **Invitation to attend and speak at the Canadian Grand Masters Fiddling Competition 2026** 220 - 222
[20260608 Canadian Grand Masters Fiddling Competition 2026 Invitation](#)

Recommendation:

BE IT RESOLVED THAT Mayor and Council will notify Administration of availability to attend and speak at the event on August 29, 2026.

10. CLOSED MEETING

Council will be closing its meeting pursuant to Section 197(2) of the *Municipal Government Act*, Section 20 of the *Access to Information Act* and Section 9(1)(b) and 9(1)(d) of the *Access to Information Act Regulation*.

10.1. **Labour Item - Council Remuneration**

11. ADJOURNMENT



MINUTES

Regular Council Meeting

3:00 PM - Monday, May 25, 2026
Joint Council Chambers

PRESENT: Mayor Craig Snodgrass, Councillor Michael Nychyk, Councillor Jenny Jones, Councillor Jamie Barton, Councillor Cathy Couey, Councillor Garth Brookwell, and Councillor Vicky McGonigle

EXCUSED:

STAFF PRESENT: Chris Prosser (Chief Administrative Officer), Reiley McKerracher (Director of Municipal Services), Sonja Coleman (Director of Corporate Services), Chris Bruce (Director of Community Services), Jody Hipkin (Manager of Legislative and Advisory Services), Sheron Ward (Advisor, Legislative & Advisory Services), Jordan Pack (Manager, Financial Services), Sarah Peck (Senior Planner), Khalid Mohammed (Manager, Planning & Development), Karen Drummond (Manager, Communications and Engagement), and Bal Sharma (Technician, Desktop Support)

MEDIA: There were no members of the media in attendance.

PUBLIC: There were 10 members of the public at large in attendance.

1. CALL TO ORDER

Mayor Snodgrass called the Regular Meeting of Council to order at 3:00 p.m.

2. ADOPTION OF AGENDA

Resolution #85-2026

Moved by Councillor Jamie Barton

BE IT RESOLVED THAT Council adopt the agenda for the Regular Council Meeting on May 25, 2026, as presented.

Carried

3. ADOPTION OF MINUTES

3.1 May 11, 2026, Regular Council Meeting Minutes

Resolution #86-2026

Moved by Councillor Garth Brookwell

BE IT RESOLVED THAT that Council adopt the May 11, 2026, Regular Council Meeting Minutes, as amended to adjust the update provided by Councillor Couey regarding the funding approval for High Country Lodge in Diamond Valley. The credit should go to the Town of Diamond Valley that passed the resolution, not Westwinds Community.

Carried

4. PUBLIC COMMENTS

Carol MacMillan, resident, submitted a comment via email to all of Council, the email was read by Councillor McGonigle, and the correspondence will be included in today's Meeting Minutes. [20260524 Email Correspondence from C. MacMillan](#)

Maureen Moncrieff, resident, followed up the email with questions

Mayor Snodgrass provided comments as best as time allowed because the information has already been provided during the budget deliberation process. Council also provided other projects that are included in the budget which are also contributing to the increased property taxes.

Chris Prosser, Chief Administrative Officer, and Mayor Snodgrass shared several projects that are driving the property tax increase.

Iris Priebe, resident, asked questions regarding Item 5.1 Bylaw 4661/2026 - 2026 Property Tax Bylaw and shared her comments with Council. [20260525 Questions / Comments from I. Priebe](#)

5. BUSINESS

5.1 Bylaw 4661/2026 - 2026 Property Tax Bylaw

Resolution #87-2026

Moved by Councillor Jenny Jones

WHEREAS pursuant to the *Municipal Government Act*, RSA 2000, c. M-26 and any amendments thereto (MGA), Sections 353, 354 and 369 require a municipality to pass a property tax bylaw each year that determines the rates for the year;

AND WHEREAS Council adopted the Town of High River's 2026 Operating and Capital Budget estimates on February 9, 2026;

AND WHEREAS Council adopted amendments to the Town of High River's 2026 Operating Budget estimates on April 27, 2026;

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Agenda Item #3.1.

AND WHEREAS based on the budget estimates adopted and amended by Council, municipal revenues and transfers from sources other than taxation are estimated at \$19,149,233;

AND WHEREAS the amount required to be raised by general municipal taxation for municipal operating and capital purposes is \$17,540,697;

BE IT RESOLVED THAT Council give First Reading to Bylaw 4661/2026, the 2026 Property Tax Bylaw;

AND THAT Council give Second Reading to Bylaw 4661/2026, the 2026 Property Tax Bylaw;

AND FURTHER THAT all Council give unanimous consent to proceed with Third and Final Reading of Bylaw 4661/2026, the 2026 Property Tax Bylaw.

Carried

Resolution #88-2026

Moved by Councillor Michael Nychyk

BE IT RESOLVED THAT Council give Third and Final Reading to Bylaw 4661/2026, the 2026 Property Tax Bylaw.

Carried

5.2 Subdivision and Development Authority Bylaw

Resolution #89-2026

Moved by Councillor Cathy Couey

WHEREAS pursuant to Section 623 of the *Municipal Government Act*, RSA 2000, c. M 26, a council must by bylaw establish a subdivision authority and a development authority to exercise subdivision and development powers and duties on behalf of the municipality

AND WHEREAS Council wishes to repeal Bylaw 4415/2014 and replace it with a new bylaw that maintains Administration as the Subdivision Authority and assigns Council the authority to decide on development applications involving variances;

BE IT RESOLVED THAT Council give First Reading to Bylaw 4662/2026, the Subdivision and Development Authority Bylaw;

AND THAT Council give Second Reading to Bylaw 4662/2026, the Subdivision and Development Authority Bylaw;

AND FURTHER THAT all Council give Unanimous Consent to proceed with Third and Final Reading of Bylaw 4662/2026, the Subdivision and

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Development Authority Bylaw;

Carried

Resolution #90-2026

Moved by Councillor Michael Nychyk

BE IT RESOLVED THAT Council give Third and Final Reading to Bylaw 4662/2026, the Subdivision and Development Authority Bylaw;

AND THAT Council repeal Bylaw 4415/2014.

Carried

6. COUNCILLOR / BOARD & COMMITTEE REPORTS

Councillor Couey shared that Westwinds Communities has secured \$850,000 through Alberta Affordable Housing partnership to support the development of a high-quality, affordable 10-unit townhouse project in partnership with the Town of Okotoks named Kennedy Terrace, and the High River connection is that it has been named after Sandi Kennedy, who was a long-time resident High River, Town Councillor in Okotoks, a member of Westwinds Communities as well as a strong community advocate in both communities.

Councillor McGonigle shared the High River Library is finishing up their plan of service and thanks residents for their input via the survey.

The Museum of the Highwood has their annual AGM on May 27, 2026, at 6:00 pm.

Mayor Snodgrass shared that he attended the Greater Calgary Regional Table meeting last week in Cochrane and that this is the former, or what remains of the, Calgary Metropolitan Regional Board (CMRB). Mayor Snodgrass recommends the Town of High River remain involved in the group and that an alternate to Mayor Snodgrass is appointed in the event Mayor Snodgrass is not available. There is a terms of reference for the group that are high level and primarily related to economic development and advocacy.

7. COUNCIL CORRESPONDENCE REQUIRING ACTION

7.1 Ratification of Request from Joe Clark Run Club

Resolution #91-2026

Moved by Councillor Jamie Barton

BE IT RESOLVED THAT Council approved the donation of 12 daily recreation passes to the Joe Clark Run Club prior to the Council meeting.

Carried

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8. COUNCIL CORRESPONDENCE FOR INFORMATION

8.1 Marigold Conference Reflections and Update on Bill 28

9. CLOSED MEETING

9.1 Move into a Closed Meeting

Resolution #92-2026

Moved by Councillor Jenny Jones

BE IT RESOLVED THAT Council recess the Regular Council Meeting on May 25, 2026, at 4:09 p.m. and move into a closed meeting pursuant to Section 197(2) of the *Municipal Government Act*, Section 20 of the *Access to Information Act* and Sections 9(1)(b) and 9 (1)(d) of the *Access to Information Act Regulation*.

Carried

9.2 Labour Item - 2026 Community Bursaries

The following individuals were present for the Labour Item - 2026 Community Bursaries:

Mayor Snodgrass
Councillor Nychyk
Councillor Jones
Councillor Barton
Councillor Couey
Councillor Brookwell
Councillor McGonigle
Chris Prosser (Chief Administrative Officer)
Reiley McKerracher (Director of Municipal Services)
Sonja Coleman (Director of Corporate Services)
Chris Bruce (Director of Community Services)
Jody Hipkin (Manager, Legislative & Advisory Services)
Sheron Ward (Advisor, Legislative & Advisory Services)
Karen Drummond (Manager, Communications and Engagement)
Bal Sharma (Technician, Desktop Support)

9.3 Move out of Closed Meeting

Resolution #93-2026

Moved by Councillor Garth Brookwell

BE IT RESOLVED THAT the Regular Council Meeting move out of the closed meeting on May 25, 2026, at 4:13 p.m.

Carried

9.4 2026 Community Bursary Program Recipients

Regular Council
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Resolution #94-2026

Moved by Councillor Vicky McGonigle

WHEREAS the Town of High River adopted the Community Bursary Program Policy on January 11, 2021;

AND WHEREAS the Community Bursary Program Policy requires each school division, Christ the Redeemer Catholic Schools and Foothills School Division, to make a recommendation regarding the successful recipient of the bursary;

AND WHEREAS Christ the Redeemer Catholic Schools has recommended Jeanne Faith Bleis as the successful recipient for 2026;

AND WHEREAS Foothills School Division has recommended Hanna Gwilt as the successful recipient for 2026;

BE IT RESOLVED THAT Council award Jeanne Faith Bleis from Christ the Redeemer Catholic Schools and Hanna Gwilt from the Foothills School Division the Community Bursaries for 2026 in the amount of \$1,000 each, subject to receiving proof of enrollment from each recipient.

Carried

9.5 Move into a Closed Meeting

Resolution #95-2026

Moved by Councillor Jamie Barton

BE IT RESOLVED THAT Council recess the Regular Council Meeting on May 25, 2026, at 4:15 p.m. and move into a closed meeting pursuant to Section 197(2) of the *Municipal Government Act*, Section 20 of the *Access to Information Act* and Sections 9(1)(b) and 9 (1)(d) of the *Access to Information Act Regulation*.

Carried

9.6 Labour Item

The following individuals were present for the Labour Item:

Mayor Snodgrass
Councillor Nychyk
Councillor Jones
Councillor Barton
Councillor Couey
Councillor Brookwell
Councillor McGonigle
Chris Prosser (Chief Administrative Officer)

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9.7 Move out of Closed Meeting

Resolution #96-2026

Moved by Councillor Cathy Couey

BE IT RESOLVED THAT the Regular Council Meeting move out of the closed meeting on May 25, 2026, at 4:59 p.m.

Carried

10. ADJOURNMENT

The Regular Council Meeting on May 25, 2026, was adjourned at 5:00 p.m.

Mayor/Deputy Mayor

Chief Administrative Officer

Regular Council
May 25, 2026

Agenda Item #4.1.

Archived: May 20, 2026 12:26:19 PM

From: [Town of High River](#)

Sent: May 20, 2026 6:54:41 AM

To: [THR Legislative Services](#)

Subject: John Turner has submitted a LAS | Town of High River Delegation Request Form.

Sensitivity: Normal

[EXTERNAL EMAIL] WARNING: This e-mail originated outside of the Town of High River. Do not click on any links or attachments unless you recognize the sender.

A resident has submitted a LAS | Town of High River Delegation Request Form. Here are the details:

Please confirm you are submitting a Delegation Request

Yes

Date of Request:

2026-05-20

Requested Council Meeting:

2026-05-25

Topic of Delegation:

Annual Budget Schedule

Full Name:

First Name: John

Last Name: Turner

Organization Name

High River Ratepayers Community Group

Email Address:

Redacted pursuant to Section 20(4)(b)(i) of the Access to Information Act.

Individuals Presenting to Council (Names and Titles):

John Turner, Steve Crowe, Carol MacMillan

Purpose of Presentation (Please choose one):

Request Action

Summary of Delegation:

Improvements for the mutual benefit of ratepayers and town council.

Please submit all supporting documents via email to legislativeservices@highriver.ca

Yes

The Town has a computer and screen available for presentations. Do you require specific technical requirements for your presentation?

Agenda Item #4.1.

No

Is/Has this matter gone before an appeal board?

No

As a result, please indicate if you have you spoken on this topic before?

No

Please click below to consent to the collection and use of personal information.

Yes

Thanks,

High River Ratepayers Community Group

Let it be known by the Council of the Town of High River that:

The High River Ratepayers Community Group is a non-partisan group whose mission it is to advocate on behalf of High River's ratepayers and voters to town council for the mutual benefit of all. To that end we are here today in response to the Town of High River's ask for input to their Annual Budget Schedule process by May 29th.

WHEREAS, 2026 Operating and Capital Budget documentation clearly reveals that Payroll consumes \$0.99 of every \$1.00 collected from (property) Taxes and is 47.8% of the total annual budget and,

That the Annual Budget Schedule process claims "Departments create plans and budgets..." and,

That RFD-26-7 2026 Operating & Capital Budgets document contains hundreds of pages of unusable data but no evidence of planning and,

Accountability for the value of our property tax dollars is the right of every ratepayer in High River.

Be it resolved by this council, that effective immediately council initiate the following standard reporting procedure:

Publish all 2026 department budget plans. To include but not limited to:

- **A brief overview** of the plan, key objectives and budget allocations.
- **Current** operations, department goals and alignment with organizational strategy.
- **Total budget** request, comparison to previous years and justification for changes.
- **Expected funding** streams with supporting assumptions and calculation methods.
- **Detailed categorization** (payroll, contract services, supplies, equipment, technology) with line-item justification.
- **Capital investment** needs with ROI analysis and RACI interdependencies with Capital Projects.
- **Resource allocation** plan i.e. how budget will be distributed across staff, projects and initiatives.
- **Performance measures** and Key Performance Indicators (KPI) for success measures tied to budget spending and departmental outcomes.
- **Staffing plan** – current and proposed headcounts, roles, compensation and benefit costs
- **Risk assessment and contingencies** – budget challenges and mitigation strategies.
- **Timeline and Milestones** – implementation schedule and key decision points.
- **Assumptions and dependencies** – key assumptions underlying projections and RACI interdependencies with other departments/functions e.g. Asset Management Team.

High River Ratepayers Community Group

Be it further resolved by this council, that

Quarterly departmental results reviews will be published within four weeks of last month of quarter month end closing and presented four (4) times annually at special evening council meetings. To include but not limited to:

- Departmental activity versus plans,
- Department costs to date versus budget,
- Explanation of variances and scope/budget changes.
- Q&A from the public gallery

Strategic Plan – Mutual Benefit

Town of High River

The Town of High River is a leader, partner and steward of excellent municipal services.

The Town of High River provides the foundation for an inclusive, engaged and thriving community.

HRRCG

Financial management is a centre of excellence for the Town of High River.

Value for taxes.

Accountability.

Transparency.

Town council

????



REQUEST FOR DECISION

TO: Mayor and Council

FROM: Jody Hipkin, Manager of Legislative and Advisory Services

SUBJECT: Access to Information Bylaw 4663/2026

Date:	April 10, 2024
Meeting Date:	June 8, 2026

RECOMMENDATION: **WHEREAS** the provincial *Freedom of Information and Protection of Privacy Act* has been rescinded by the province and new legislation split the single act into two, the *Access to Information Act* and the *Protection of Privacy Act*;

BE IT RESOLVED THAT Council give First Reading to Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT Council give Second Reading to Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT all Council give Unanimous Consent to proceed with Third and Final Reading of Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT Council give Third and Final Reading to Bylaw 4663/2026 the Access to Information Bylaw;

AND THAT Council rescind Bylaw 4469/2016 Fees and FOIP Head for Freedom of Information and Protection of Privacy Bylaw.

CHIEF ADMINISTRATIVE OFFICER'S COMMENTS: Administration supports the proposed recommendation.

IMPLICATIONS OF RECOMMENDATION

GENERAL:

The adoption of Bylaw 4663/2026 the Access to Information Bylaw updates the Town's former Bylaw 4469/2016 Fees and FOIP Head for Freedom of Information and Protection of Privacy Bylaw to align with the updated provincial legislation.

The Government of Alberta adopted the the *Access to Information Act* and the *Protection of Privacy Act* June 11, 2025, and gave municipalities one year to implement a Privacy Management Program. Administration has developed the Town's Privacy Management Program and it will be presented to Council as a Privacy Management Program Policy for adoption.

Agenda Item #6.1.

The Privacy Management Program Policy provides transparency for members of the public to understand their rights regarding personal information including how their personal information is being used, protected, and disclosed in alignment with the legislation.

ORGANIZATIONAL:

The Privacy Management Program was developed in consultation with privacy expert consultants, information and templates provided by the Office of the Privacy Commissioner, and our in-house expertise in this area.

If the Privacy Management Program Policy is adopted, Administration will proceed with rolling out training across the organization to raise awareness of the Policy and how their role supports the policy. We are considering two levels of training; one being very basic to raise awareness of how to protect personal information that is in the Town's possession, and a second level to help those that may be involved in collecting personal information and responding to Access to Information requests.

FINANCIAL:

There are no direct financial implications to adopting the Access to Information Bylaw 4663-2026.

POLICY:

The Town's compliance with the *Access to Information Act* and *Protection of Privacy Act* supports the safety and security of personal information that is collected and stored to provide municipal services.

Strategic Plan

Safety & Security

The Town of High River provides community support, protection and emergency services.

IMPLEMENTATION:

Implementation of the Privacy Management Program is partially complete as many of the requirements were pre-existing under the former legislation. However there are a number of areas that are new, such as performing Privacy Impact Assessments on any changes related to how personal information is managed.

BACKGROUND:

The *Access to Information Act* and the *Protection of Privacy Act* were adopted by the Government of Alberta on June 11, 2025 and municipalities were given one year to develop, adopt and implement a Privacy Management Program, being June 11, 2026.

The Town currently has Bylaw 4469/2016 Fees and FOIP Head for Freedom of Information and Protection of Privacy in place, however with the new legislation, that Bylaw requires updating.

The Access to Information Bylaw 4663/2026 references the correct *Access to Information Act* and the *Protection of Privacy Act*. As required, the Bylaw designates the Head, or Privacy Officer, and provides the basis to support the requirement for a Privacy Management Program as detailed under Section 25 of the *Protection of Privacy Act*.

Additional details will be provided when the Privacy Management Program Policy is presented to Council.

Report / Document: Attached: Available:

KEY ISSUE(S)/CONCEPT(S):

Council to adopt the Access to Information Bylaw 4663/2026.

DESIRED OUTCOMES:

The adoption of the Access to Information Bylaw 4663/2026.

COUNCIL'S OPTIONS:

Council has the following options to consider:

1. Council could choose to support the proposed recommendation and adopt the bylaw as presented.
2. Council could choose not to support the proposed recommendation and defeat the motion.
3. Council could choose to refer the proposed recommendation to a Committee of the Whole meeting for further discussion.

RECOMMENDED:

Administration recommends Council adopt the Access to Information Bylaw 4663/2026 as presented.

COMMUNICATIONS:

The Legislative & Advisory Services team will update the website with the new Access to Information Bylaw 4663/2026.

Reviewed by:

Sheron Ward, Advisor, Legislative & Advisory Services
Jody Hipkin, Manager of Legislative and Advisory Services
Sonja Coleman, Director of Corporate Services
Chris Prosser, Chief Administrative Officer

Status:

Approved - 01 Jun 2026
Approved - 01 Jun 2026
Approved - 02 Jun 2026
Approved - 03 Jun 2026

TOWN OF HIGH RIVER
ALBERTA
BYLAW 4663/2026

BEING A BYLAW OF THE TOWN OF HIGH RIVER, IN THE PROVINCE OF ALBERTA, CANADA, TO DESIGNATE THE HEAD AND SET FEES AND CHARGES FOR THE PURPOSES OF THE *ACCESS TO INFORMATION ACT*.

WHEREAS The *Access to Information Act*, RSA 2024, Chapter A-1.4, and amendments thereto, requires that the governing body of the municipality designate a Head for the purposes of the Act;

AND WHEREAS Pursuant to the *Access to Information Act*, RSA 2024, Chapter A-1.4 the Municipality may set any fees payable to the Municipality for services under the Act and Regulations;

NOW THEREFORE The Council of the Town of High River duly assembled rescinds Bylaw 4469/2016 and enacts as follows;

SHORT TITLE

1. This Bylaw may be cited as the "Access to Information Bylaw".

DEFINITIONS AND INTERPRETATIONS

2. "Act" means the Access to Information Act, RSA 2024, Chapter A-1.4;
3. "Applicant" means a person who makes a request for access to a record under Section 6(1) of the Act.
4. "Head" means the Privacy Officer or individual that oversees the Privacy Management Program.
5. "Town of High River" includes any board, committee or commission, panel agency or corporation that is created or owned by the Town of High River and all members or officers of which are appointed or chosen by the Town of High River.

DESIGNATED HEAD

6. The Manager of Legislative & Advisory Services for the Town of High River is appointed as Head for the purposes of the Act. In the event of the absence of the Manager of Legislative & Advisory Services, the Chief Administrative Officer shall act as Head.

FEES AND CHARGES

7. Where an Applicant is required to pay a fee for services, the fee payable shall be in accordance with the current Town of High River Rate Bylaw (General), which may, from time to time, be amended by Council.

REPEALS

8. Bylaw Number 4469/2016 is hereby repealed.

GENERAL

9. This Bylaw comes into force and effect on the date of Final Reading.

READ A FIRST TIME THIS ____ DAY OF _____, 2026.

MAYOR/DEPUTY MAYOR

CHIEF ADMINISTRATIVE OFFICER

READ A SECOND TIME THIS ____ DAY OF _____, 2026.

MAYOR/DEPUTY MAYOR

CHIEF ADMINISTRATIVE OFFICER

READ A THIRD TIME THIS ____ DAY OF _____, 2026.

MAYOR/DEPUTY MAYOR

CHIEF ADMINISTRATIVE OFFICER

SIGNED AND PASSED THIS ____ DAY OF _____, 2026.

MAYOR/DEPUTY MAYOR

CHIEF ADMINISTRATIVE OFFICER



REQUEST FOR DECISION

TO: Mayor and Council
FROM: Jody Hipkin, Manager of Legislative and Advisory Services

Date:	March 10, 2025
Meeting Date:	June 8, 2026

SUBJECT: Privacy Management Program Policy POL-0100

RECOMMENDATION: **WHEREAS** the provincial *Freedom of Information and Protection of Privacy Act* has been rescinded by the province and new legislation split the single act into two, the *Access to Information Act* and the *Protection of Privacy Act*, together referred to as "ATIPP";

AND WHEREAS Municipalities must have a Privacy Management Program in place by June 11, 2026.

BE IT RESOLVED THAT Council adopt the Privacy Management Program Policy POL 0100, as presented.

CHIEF ADMINISTRATIVE OFFICER'S COMMENTS:

The Chief Administrative Officer Comments section is for exclusive use by the CAO to provide any additional comments deemed necessary.

IMPLICATIONS OF RECOMMENDATION

GENERAL:

The Town collects and manages a significant amount of data, including personal information regarding, and that belongs to, individuals and organizations. The protection and access to this information was previously governed by the *Freedom of Information and Protection of Privacy Act* (FOIP) however is now governed by the *Access to Information Act* and the *Protection of Privacy Act*, together referred to as "ATIPP". This legislation allows individuals and organizations to access information within the care and control of the Town, while also providing the legislated governance that ensures personal information is adequately protected.

ORGANIZATIONAL:

The organizational implications include training and awareness of the information contained within the Privacy Management Program Policy. While staff have an awareness of FOIP, this Policy provides additional information and lays the foundation for the two new acts being the *Access to Information Act* and the *Protection of Privacy Act*. While staff do not need to know the details of each act, they do need to understand what information is protected and how, as well as their role to ensure information is properly collected and protected.

FINANCIAL:

There are no direct financial implications to adopting the Privacy Management Program Policy as there are operational budgets to support the implementation of the Policy.

POLICY:

At the time of this report, Administration assumes Council will have adopted Bylaw 4663/2026 the Access to Information Bylaw, and the Privacy Management Program Policy is the supporting policy to guide the Town's management of personal information.

The Privacy Management Program Policy meets the legislated requirements of Section 25 of the *Protection of Privacy Act* and includes attached procedures including:

- Personal Information Security
- Access to Personal Information
- Personal Information Bank
- Privacy Impact Assessment

Strategic Plan

Organizational Excellence

The Town of High River is a leader, partner and steward of excellent municipal services.

IMPLEMENTATION:

The implementation of the Privacy Management Program Policy will include continued training and awareness. As this policy is the first that introduces the two new acts, the *Access to Information Act* and *Protection of Privacy Act*, training and awareness will focus on relating the former FOIP requirements to the newly introduced requirements under the two new acts.

Once the Policy is adopted, it will be shared with staff with additional information to support comprehensive understanding of the Policy including what information is classified as personal information and how to ensure its security, as well as what information is available to community members including the process to access that information.

BACKGROUND:

The protection and access to this information was previously governed by the *Freedom of Information and Protection of Privacy Act* (FOIP) however is now governed by the *Access to Information Act* and the *Protection of Privacy Act*, together referred to as "ATIPP".

The *Access to Information Act* and the *Protection of Privacy Act* were adopted by the Government of Alberta on June 11, 2025 and municipalities were granted one year to develop, adopt and implement a Privacy Management Program, being June 11, 2026.

The Privacy Management Program Policy is intended to meet the requirements of the *Protection of Privacy Act*.

The key purposes of a Privacy Management Program include the following:

- Promote accountability by establishing clear roles, responsibilities, and processes for managing privacy risks.
- Foster trust with Albertans, employees, and partners by demonstrating a commitment to privacy.

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- Specify safeguards to protect personal information, data derived from personal information and non-personal.
- Enable risk management tools to identify, assess, and mitigate privacy risks proactively.
- Support Business Objectives by integrating privacy into business operations, enabling innovation while respecting individuals' rights.

The Town's Privacy Management Program Policy addresses the following:

- How the Town responds to requests for personal information or correction of personal information.
- How the Town responds to privacy incidents and/or privacy complaints.
- How privacy management relates to records and information management.
- How to complete a privacy impact assessment and what triggers the requirement.
- Mandatory training for employees.

Report / Document:

Attached:

Available:

KEY ISSUE(S)/CONCEPT(S):

Council consideration of the Privacy Management Program Policy POL 0100.

DESIRED OUTCOMES:

Council adoption of the Privacy Management Program Policy POL 0100, as presented.

COUNCIL'S OPTIONS:

Council has the following options to consider:

1. Council could choose to support the proposed recommendation.
2. Council could choose to not support the proposed recommendation and defeat the motion.
3. Council could choose to refer the proposed recommendation to a Committee of the Whole meeting for further discussion.

RECOMMENDED:

Administration recommends the passing of the Privacy Management Program Policy POL 0100, as presented.

COMMUNICATIONS:

If Council passes the Privacy Management Program Policy POL 0100, Administration will continue with training and awareness to support the effective management of access to and protection of personal information. The Policy will also be available on the Town of High River's website.

Reviewed by:

Sonja Coleman, Director of Corporate Services

Sheron Ward, Advisor, Legislative & Advisory Services

Jody Hipkin, Manager of Legislative and Advisory Services

Chris Prosser, Chief Administrative Officer

Status:

Approved - 02 Jun 2026

Approved - 03 Jun 2026

Approved - 03 Jun 2026

Approved - 03 Jun 2026

POLICY MANUAL
Privacy Management Program



Policy Number: POL 0100	Division: Legislative and Advisory Services
Effective Date:	Date for Review:
Revision Date:	Supersedes/Repeals:
Related Policy or Procedure Number(s):	Related Policy or Procedure Name(s): <ul style="list-style-type: none"> • Records and Information Management Policy • Routine Disclosure Administrative Directive • Environmental Site Assessment Administrative Directive
External Sources:	Council Resolution Number:

PURPOSE

The primary purpose of this Privacy Management Program (PMP) Policy (Policy) is to ensure the proper collection, use and disclosure of Information, including Personal Information, the Town holds align with relevant legislation, regulations and Town bylaws and policies.

This Policy is the overarching Framework that includes how the Public can access Information, the rights associated with Personal Information, the use of Personal Information at the Town, and what to expect from the Town.

This Policy is based on the following principles:

Open and Transparent: The Town strives to proactively disclose any Information that is not found to be harmful to personal privacy and/or harmful to business interests of a Third Party. Administration strives to provide access to Information outside of the *Protection of Privacy Act* along with *Protection of Privacy Regulation* and *Protection of Privacy (Ministerial) Regulation*, and *Access to Information Act* and *Regulation* (together referred to as ATIPP) whenever possible.

Timely, Consistent and Efficient: The Town is committed to providing the Public with access to Information the Town has in a timely and efficient manner. If the Information contains Personal Information, the Town must follow the *ATIPP*. Whenever possible the Town will make every effort to deliver any requested Information prior to the deadlines set out in the *Access to Information Act*.

Organizational Accountability: The Town holds itself accountable to a high standard of response to all Access to Information Requests.

POLICY STATEMENT

The Town is a people first community and therefore is committed to ensuring that the collection, use and disclosure of Personal Information and Third Party Information meets the requirements established in ATIPP.

Accordingly, the Town implements and maintains policies that:

1. Adhere to the legislative requirements for the collection, use and disclosure of Personal Information in accordance with ATIPP.
2. Allow individuals the right to access Personal Information about themselves that the Town holds, subject to limits and exceptions in ATIPP.
3. Allow individuals to Request a correction of their own Personal Information the Town has, subject to limits in ATIPP.
4. Control the collection, use and disclosure of Personal Information and Third Party Information the Town has in its custody or under its control.
5. Control how Data derived from the Personal Information, Non-personal data, and Synthetic data, that the Town holds, is created, used, and disclosed.
6. Allow for resolution of complaints to the Town under ATIPP and for the OIPC to conduct an independent review of decisions made by the Town.
7. Seek opportunities to automatically and easily provide documents to the Public. This includes only using the Access to Information Form where the Information contains Personal Information and/or Third Party Information and Information that is not released under Proactive Disclosure or Routine Disclosure.
8. Regularly provide training to Workers regarding how the Town manages information in line with ATIPP.
9. Ensure external contractors manage Data, Information and Personal Information, in accordance with this Policy and that the Town has access to that Data, Information and Personal Information, as requested.
10. Adhere to processes for creating, maintaining and publishing Personal Information Banks as set out in ATIPP.
11. Submit a Privacy Impact Assessment to the Office of the Information and Privacy Officer (OIPC) for approval, when required, prior to implementing a change in Information Systems, administrative practices and policy proposals that relate to the collection, use or disclosure of Personal Information.
12. Provide for delegation of responsibilities as per ATIPP in the Privacy Management Program Procedure Manual.
13. Ensure that if the Town uses surveillance systems, that the Town ensures the Personal Information collected by surveillance is both lawful and justifiable in promoting a safe environment for all citizens while protecting Workers and Town Property. The use of surveillance will balance an individual's right to privacy protection, understanding privacy protection measures

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will be part of the use of surveillance systems(s). This ensures the Public, as well as Workers and Contractors, have an expectation of consistency.

DEFINITIONS

The following are some commonly used definitions within the Town. While many are directly influenced by ATIPP and the *Interpretation Act* the definitions in these Acts may have been altered for consistency and to meet our organizational needs.

“Access to Information Act” means the *Access to Information Act* and its successors that governs how the Town allows access to any Record in its custody or under its control to others, subject to certain limitations.

“Access to Information Form” means the form to be used to request access to information, that is available electronically or in paper format.

“Administrative Directive” means an official, mandatory instruction, or guideline, issued by the Chief Administrative Officer to govern procedures, manage operations, or implement specific mandates.

“Applicant” means an individual or organization that makes a Request for access to a Record under Section 7(1) of *Access to Information Act*.

“Artificial Intelligence” means a machine-based system that, for explicit or implicit objectives, infer from the input it receives how to generate outputs (such as predictions, content, recommendations, or decisions) that can influence physical or virtual environmental. Different artificial intelligence systems vary in their levels of autonomy and adaptiveness after deployment. (Source OECD AI Principles, April 2025)

“Access to Information Coordinator or ATI Coordinator” means the individual that receives and processes Access to Information Requests as delegated by the Privacy Officer.

“ATIPP” means the *Protection of Privacy Act* along with *Protection of Privacy Regulation* and *Protection of Privacy (Ministerial) Regulation*, and *Access to Information Act* and *Regulation* and any amendments thereto and successors.

“Audit” means financial or other formal or systematic examination or review of a program, portion of a program or activity.

“Authorized User” means an individual who has been granted access to the Town’s Information Assets or Information Systems. Authorized Users may be internal such as Workers or may be external such as Contractors, consultants or service providers working on behalf of the Town; members of Council, boards and committees appointed by Council, other governmental organizations and approved researchers.

“Automated System” means any system, software or process that uses computation as whole or part of a system to determine outcomes, make or aid decisions, inform policy implementation, collect data or observations, or other interact with individuals and/or communities. Automated systems include, but are not limited to, systems derived from machine learning, statistics, or other data processing or artificial intelligence technique, and exclude passive computer infrastructure. (Source: National Archives (USA), Office of Science and Technology Policy, May 2025).

“Business Day” means a day other than:

- a. a Saturday or Sunday;
- b. a day when the Town of High River offices are closed due to a holiday, including:

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- ii. New Year's Day, Alberta Family Day, Good Friday, Easter Monday, Victoria Day, Canada Day, Labour Day, Thanksgiving Day, Remembrance Day, Christmas Day and Boxing Day, or when a holiday date falls on a Saturday or Sunday, the day (typically the Friday or Monday preceding or directly after) that is provided in lieu of that holiday.

"Commissioner" means the Information and Privacy Commissioner of Alberta, appointed by the Lieutenant Governor in Council on the recommendation of the Legislative Assembly of Alberta.

"Confidentiality" means the state of keeping or being kept private; ensuring Record(s) are limited to Authorized Users only.

"Contractor" means an individual, organization or entity engaged by the Town on a temporary basis for the purpose of completing a specific scope of work.

"Data" means generally facts, concepts or instructions in a formalized manner which should be appropriate for communication, interpretation or processing by human or Electronic means.

"Data derived from Personal Information" means Data:

- a. created by Data matching, and
- b. that identifies any individual whose Personal Information was used in the Data matching.

"Data matching" means linking Personal Information between two or more databases or other electronic sources of Information.

"Electronic Record" means a record that exists at the time a Request is made or that is routinely generated by the Town that can be a combination of texts, graphics, Data, audio, pictorial or other information represented in a digital form that is created, maintained, archived, retrieved or distributed by a computer system.

"Environmental Site Assessment" means information that is collected to identify soil, groundwater, or building contamination to assess the environmental condition.

"Executive Council" means the Premier of Alberta along with the Cabinet Minister who are appointed from the 87 elected members of the Legislature of Alberta.

"High-sensitivity Information" means:

- a. biometric information about an individual;
- b. financial information about an individual;
- c. personal information respecting a minor, senior or vulnerable individual.

"Independent Adjudicator" means a judge of the Court of King's Bench designated by the Minister of Service Alberta and Red Tape Reduction or other Minister as designated from time to time to be an Independent Adjudicator to investigate complaints and other items brought to the OIPC that are not a review of an order by the Commissioner under the *Access to Information Act*.

"Information" means the Data that is collected, processed, analyzed, interpreted, classified or communicated to serve a useful purpose, present facts or represent knowledge.

"Information Assets" means Information recognized as having value for the purpose of enabling the Town to perform its business functions, thereby satisfying a recognized business requirement. There are many types of Information Assets. Information Assets can include Data and intellectual property.

“Information Security” means how the Town protects the Confidentiality, Integrity and availability of Information, Information Systems and Information Assets from unauthorized access, collection, use, disclosure or destruction, damage caused by malicious attacks, misuse or unintentional actions.

“Information Systems” means any set of components that are used to handle Information. Information Systems include applications, services or any other assets that handles Information.

“Integrity” means overall completeness, accuracy and consistency, ensuring no corruption or unauthorized modification when referring to Data, Information or Information Systems.

“Intellectual Property” means the legal right to ideas, inventions, and creations created on behalf of the Town.

“Leadership” means the Chief Administrative Officer, together with Directors, Managers, and Supervisors, employed by the Town.

“Minister” means the Minister determined under section 16 of the *Government Organization Act* as the Minister responsible for this Act.

“Non-personal Data” means data, including data derived from Personal Information, that has been generated, modified or anonymized so that it does not identify any individual, and includes Synthetic data and any other type of Non-personal data identified in the regulations of the *Protection of Privacy Act*.

“Office of the Information and Privacy Commissioner or OIPC” means the Office of the Information and Privacy Commissioner of Alberta.

“Personal Information” means recorded Information about an identifiable individual, a group of individuals, or an organization, including:

- a. the name, home or business address, home or business telephone number, home or business email address, or other contact Information, except where the individual has provided the Information on behalf of the individual's employer or principal in the individual's capacity as an Worker or agent;
- b. the race, national or ethnic origin, colour or religious or political beliefs or associations;
- c. the age, gender identity, sex, sexual orientation, marital status or family status;
- d. an identifying number, symbol or other particular assigned to the individual, individuals or organization;
- e. an individual's fingerprints, other biometric Information, blood type, genetic Information or inheritable characteristics;
- f. Information about health and health care history, including Information about the individual's physical or mental health;
- g. Information about education, financial, employment or criminal history, including criminal records where a pardon has been given;
- h. anyone else's opinions about the individual, individuals or organization; and
- i. the personal views or opinions, except if they are about someone else.

“Personal Information Bank” means a collection of Personal Information under the control of the Town that is organized or retrievable by an individual's name or by an identifying number, symbol or other element that identifies that individual.

“Privacy Breach” means an unauthorized access and/or unauthorized disclosure of Personal Information that is in the custody or under the control of the Town. It can also mean lost Personal Information. This can be by an individual internal to the Town or external to the Town.

“Privacy Impact Assessment or PIA” means a process that the Town uses to review the impact of a proposed new, or proposed significant change to, an existing practice, program, project or service may have on the Personal Information and/or Third Party Information the Town holds if it involves collection, use or disclosure of that Personal Information and/or Third Party Information. The PIA is to first identify these risks, then eliminate or mitigate the risks to an acceptable level.

“Privacy Management Program” means this Policy and the Privacy Management Program Procedure Manual, which is a program established under *Protection of Privacy Act*.

“Privacy Officer” means the individual designated by the Town who:

- a. fulfills the responsibilities outlined in ATIPP; and
- b. serves as the Designated Head pursuant to Bylaw 4663/2026 and any amendments thereto and successor bylaws.

“Proactive Disclosure” means the routine or automatic release of certain types of administrative and operational records rather than a formal request under Routine Disclosure or a Request under the *Access to Information Act*.

“Procedure” means the procedures included in the Privacy Management Program Procedure Manual, that may be updated from time to time by Administration, that detail how Administration manages the following portions of the Privacy Management Program:

- a. Personal Information Security;
- b. Access to Personal Information;
- c. Personal Information Bank; and
- d. Privacy Impact Assessment.

“Project” means a temporary endeavor with a defined beginning and end, undertaken to create a unique product, service, or result, which may include a new, or substantial change in an existing, administrative practice, program, project or service.

“Protection of Privacy Act” means *Protection of Privacy Act* and its successors that governs how the Town collects, uses and discloses any Personal Information.

“Public” means of or concerning the people as a whole.

“Real Risk of Significant Harm” means a Privacy Breach of Personal Information that could result in any of:

- a. bodily harm;
- b. humiliation;
- c. damage to reputation or relationships;
- d. loss of employment;
- e. business or professional opportunities;
- f. identity theft;
- g. negative effects on insurability;
- h. negative effect to an individual's credit record;
- i. damage to or loss of property; or
- j. other legal harms or financial losses.

“Record” means any form in which Information is contained or stored including any written, graphic, digital, photographic, audio, or other medium, including Electronic Record, but does not include any software, or other mechanism used to store or produce the Record. Record will mean Records in plural when required.

“Request” means a request for Access to Information of the Town under *Access to Information Act*.

“Risk” means the possibility of an uncertain outcome.

“Routine Disclosure” means the release of certain types of administrative and operational Records in response a formal Requests to the Town but not under the *Access to Information Act*.

“Surveillance System” means a technology system of keeping watch or observing or detecting.

“Synthetic Data” means artificial data created to maintain the structure and patterns of real data without being linked to any individual in the original data set.

“Third Party” means an individual, a group of individuals, or an organization other than an Applicant or the Town.

“Third Party Information” means information from an individual, group of individuals or an organization other than the Applicant or the Town, in accordance with Section 19 of the *Access to Information Act*. This Third Party Information may:

- a. reveal trade secrets of a Third Party; or commercial, financial, labour relations, scientific or technical information of a Third Party;
- b. information that is supplied, explicitly or implicitly, in confidence; and
- c. the disclosure of which could reasonably be expected to:
 - i. significantly harm the competitive position or interfere significantly with the negotiating position of the Third Party;
 - ii. result in similar information no longer being supplied to the Town when it is in Public interest that similar information continue to be supplied;
 - iii. result in undue financial loss or gain to any person or organization; or
 - iv. reveal information supplied to, or the report of, an arbitrator, mediator, labour relations officer or other person or body appointed to resolve or inquire into a labour relations dispute.

“Town” means the Town of High River.

“Town Office” means the offices located at:

Town of High River
309B Macleod Trail SW
High River, AB
T1V 1Z5

“Worker” means an individual employed by the Town and contractors, elected officials, and third parties that perform a service for the Town as an appointee, volunteer or student or under a contract or agency relationship.

ROLES & RESPONSIBILITIES

The key positions for the purpose of this policy include:

Administration - the administrative and operational arm of the Town, comprised of the various departments and business units and includes all Workers who operate under the Leadership and supervision of the Chief Administrative Officer.

Chief Administrative Officer or CAO - principal staff person responsible for organizational performance who is appointed to the position of Chief Administrative Officer in accordance with the *Municipal Government Act* for the Town.

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Council - the elected decision-making body for the Town.

Information Technology - the division of the Town that oversees software, hardware, networks and data storage.

Leadership - the Chief Administrative Officer, together with Managers, Directors, Supervisors and Leads employed by the Town.

Mayor - the individual elected to the position of Chief Elected Official in accordance with the *Local Authorities Election Act* or, in circumstances where the Mayor is not available, this shall include the Deputy Mayor.

Municipal Clerk - the individual in the Leadership role that directly oversees the Legislative and Advisory Services division for the Town.

Privacy Officer - the individual appointed by bylaw to oversee the Privacy Management Program.

<p style="text-align: center;">Mayor and Council</p> <ul style="list-style-type: none"> • Give direction. • Approve this policy and any amendments. • Review this policy once per Term of Council and direct the CAO to arrange for any required revisions once per Term of Council. • Ensure appropriate resources are allocated during the Town’s budget process to facilitate this policy. 	<p style="text-align: center;">Chief Administrative Officer (CAO)</p> <ul style="list-style-type: none"> • Ensure Administration understands and implements this policy. • Manage organizational resources and processes in relation to this policy. • Facilitate the administrative/political interface relating to this policy. • In the event of absence of the Privacy Officer, be the Privacy Officer.
<p style="text-align: center;">Leadership</p> <ul style="list-style-type: none"> • Support the successful implementation of this policy. 	<p style="text-align: center;">Municipal Clerk</p> <ul style="list-style-type: none"> • Retain the original copies of this policy in the Town’s Policy Manual. • Arrange for the posting of this policy on the website.
<p style="text-align: center;">Privacy Officer</p> <ul style="list-style-type: none"> • Privacy Officer for the Town as per Bylaw 4663/2026 and any amendments thereto or successors. • Recommend any amendments to this policy. • Update the attached Privacy Management Program Procedure Manual, as needed to meet legislative and regulatory requirements. • Provide training to Workers on this policy. • Support other departments facilitating and implementing this policy. • Provide recommendations to Council regarding practices, processes and timelines for both statutory and non-statutory requirements as outlined in <i>ATIPP</i> 	<p style="text-align: center;">Information Technology</p> <ul style="list-style-type: none"> • Provide the technical aspects of receiving and retaining technical safeguards for the Information Administration receives electronically. • Provide the technical aspects for Electronic transactions. • Provide the technical aspects for saving, storing and eliminating documents electronically.

<p>and any regulations or any other pertinent legislation.</p> <ul style="list-style-type: none"> • Delegate individual(s) within Legislative and Advisory Services to respond to Requests. • Review this policy annually to monitor and assess effectiveness of the Town's program controls. • Update this policy as needed. 	
<p style="text-align: center;">Administration</p> <ul style="list-style-type: none"> • Adhere to this policy and participate in training. • Actively protect Information each person in Administration has in their possession or that comes into their possession. • Consider any Information received electronically as a potential to breach the Town's technical safeguards. • Identify further opportunities to provide Proactive Disclosure and Routine Disclosure of documents to the Public. 	

PRIVACY MANAGEMENT PROGRAM OVERVIEW

Authority

14. Authority to grant or deny access to Information that isn't part of Proactive Disclosure is the responsibility of the Privacy Officer, and the individuals designated by the Privacy Officer or individuals trained by the Privacy Officer, including the ATI Coordinator. The Privacy Officer and ATI Coordinator may consult with division and department heads or authors of Records to respond to Requests and determine what is released to an Applicant.
15. Routine Disclosure and Environmental Site Assessment requests are excluded from this Privacy Management Program and are subject to their related Administrative Directives being:
 - a. Routine Disclosure Administrative Directive; and
 - b. Environmental Site Assessment Administrative Directive.

Proactive Disclosure and Accessing Information

16. Methods of Proactive Disclosure include:
 - a. posting the Information on the Town website;
 - b. posting the Information on the Town's social media channels;
 - c. advertising in paper copy, electronically and audio such as radio.
17. Examples of Proactive Disclosure are:
 - a. Council agendas, recordings and minutes;
 - b. contact Information for various departments and areas at the Town;
 - c. posting of upcoming events.
18. The Information under Proactive Disclosure can be found on the Town website, including contact Information for additional Information such as email addresses and phone numbers for specific areas of the Town, and the Town general telephone number, or individuals may visit

one of the Town locations to make inquiries.

19. Anyone can be an Applicant and make a Request by submitting an Access to Information Form. The policy, procedure and process for a Request will follow ATIPP, as amended from time to time, and any direction given by the OIPC. A Request is managed in accordance with this Policy.
20. The Town will make available to the Public without a Request any manual, handbook or guideline used by Workers for decision-making processes that affect the Public. This may be subject to a fee in accordance with the Town's Rate Bylaw, as amended from time to time.

Any Information under the *Access to Information Act* that the Town is authorized or required to refuse access may be excluded from these manuals, handbooks or other guidelines.

[Privacy Management Program Procedure Manual](#)

21. This Privacy Management Program includes several components that are attached to this Policy as the Privacy Management Program Procedure Manual. Council recognizes the associated Procedures listed below are to guide Administration in the management of the Privacy Management Program and that they may be subject to change. For that reason, Council delegates the authority to the Privacy Officer to amend the Procedures as needed to meet legislative and regulatory requirements. The Privacy Management Program Procedure Manual includes:
 - a. Personal Information Security;
 - b. Access to Personal Information;
 - c. Personal Information Bank; and
 - d. Privacy Impact Assessment.

Personal Information Security

22. The Town ensures it collects only necessary Information. Access to this Information, which may include Personal Information, is limited to the Authorized Users. These Authorized Users may only use this Information for the reason it was collected and for consistent purposes as in ATIPP.
23. The Town regularly evaluates the security of Personal Information it has. In addition to reasonable security arrangements for this Personal Information, it also includes the full lifecycle of the Personal Information including how it is collected, used, stored, disclosed and confidentially destroyed.

Access to Personal Information

As a public entity, the Town is committed to transparency and any person or organization may request information, including Personal Information, subject to redaction as required according to ATIPP to protect the privacy of an identifiable individual or organization other than the Applicant.

Personal Information Bank

24. The Privacy Officer maintains the directory of Personal Information Banks for the Town.
25. Each Personal Information Bank shall include:
 - a. the title and location of the Personal Information Bank;
 - b. a description of the kind of Personal Information and the categories of individuals whose Personal Information is included;

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- c. the authority for collecting the Personal Information; and
- d. the purposes for which the Personal Information was collected or compiled and the purposes for which it is used or disclosed.

Privacy Impact Assessment

26. When the Town is considering a new or significant change to an existing practice, program, project or service that relate to the collection, use and disclosure of Personal Information and/or Third Party Information the Town holds, the Town will conduct and document a thorough risk assessment, risk management and risk mitigation process called a Privacy Impact Assessment. This Privacy Impact Assessment is to ensure that the Town identifies then eliminates and/or mitigates any Risks to bring those Risks to an acceptable level to keep the Personal Information and/or Third Party Information secure. If these Risks cannot be eliminated or mitigated to an acceptable level, the Town cannot proceed with that change at that time.

Public Concerns

- 27. Public concerns or questions about privacy and confidentiality, or about the way a Request is handled, can be directed to the Privacy Officer by calling 403-652-2110 or emailing atipp@highriver.ca.
- 28. The Government of Alberta also maintains a website with free access to *Protection of Privacy Act* and *Access to Information Act* (as well as other legislation) at [http://www.servicealberta.ca/under Protection of Privacy Act and Access to Information Act](http://www.servicealberta.ca/under%20Protection%20of%20Privacy%20Act%20and%20Access%20to%20Information%20Act).

Related Information

Access to Information Act
Protection of Privacy Act
Access to Information Act Regulation
Protection of Privacy Regulation
Protection of Privacy (Ministerial) Regulation
Interpretation Act

APPROVAL

Date of Council Approval:

Resolution Number of Council Approval:

PRIVACY MANAGEMENT PROGRAM PROCEDURE MANUAL

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1. [Personal Information Security](#)
2. [Access to Personal Information](#)
3. [Personal Information Bank](#)
4. [Privacy Impact Assessment](#)

Appendices

[Appendix A – Delegation Table of provisions of the *Access to Information Act* and *Regulation*](#)

[Appendix B – Delegation Table of Provisions of the *Protection of Privacy Act* and *Regulation*](#)

[Appendix C – Information Request to the Town](#)

[Appendix D – Access to Information Form](#)

[Appendix E – Correction of Personal Information Form](#)

[Appendix F – Contents of Notice of Privacy Breach to each of the following Parties](#)

[Appendix G – Personal Information Bank](#)

[Appendix H – Privacy Impact Assessment Template](#)

PROCEDURE 1 – PERSONAL INFORMATION SECURITY

Commitment to Privacy

1. All Authorized Users of the Town must know and follow this Procedure to safeguard the Personal Information and Third Party Information of the Town they have access to or in their possession.
2. The Town has Information Security to protect the Town's Information Systems, the Personal Information and Third Party Information in these systems against unauthorized access, collection, use, disclosure and destruction. Information Security, Information Systems and other systems, procedures and processes are audited and reviewed regularly to ensure proper administration, effectiveness, and appropriateness.
3. The Town's Information Systems are designed to ensure individual passwords to the electronic systems are kept private and confidential.

Scope and Exceptions

4. Authorized Users are responsible for management of Information of the Town, including Personal Information and Third Party Information. This applies throughout the Information lifecycle. The Information lifecycle is from creation or acquisition through to actioning, classifying and storing through to secure disposition and/or secure permanent retention. Retention is determined by the Records Management Policy at the Town, as amended from time to time.
5. All Authorized Users must comply and only use the Town's authorized hardware and software.
6. This Procedure applies to all Information Assets and Information Security, existing or coming into existence after passing of this Policy.
7. Management of Information Systems is the responsibility of the Information Services division of the Town.
8. This Procedure applies to all Electronic Records and hard copy Information.
9. This Procedure does not apply to Information owned by external parties. These external parties are responsible for governing the collection and use of their own Information.
10. This Procedure does not replace or supersede any current legislation or municipal bylaw.
11. The Town will inform either before or when collecting Personal Information what the purpose for collection of that Personal Information and how it will be used by the Town. Additionally, the Town will only use that Personal Information for consistent purposes such as:
 - a. when a person fills out a form at one of the Town offices and submits it to the appropriate area of the Town, each form will have a statement at the top or bottom indicating that this is collected under the *Access to Information Act* and/or *Protection of Privacy Act* on how that Information will be used and how it could be accessed via the *Access to Information Act*;

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- b. when a person fills out a form online, each form will have the statement under the *Access to Information Act and/or Protection of Privacy Act* on how that Information will be used and how it could be accessed via the *Access to Information Act*.
12. All communication will be retained as required by law and maintained via the Town's Record and Information Management Policy. This retention will include confidential destruction of Record(s).
13. The Town will retain Personal Information and Third Party Information only for as long as it is required for the purposes it was originally collected. This length of time will vary depending on the reason this Personal Information and Third Party Information was collected. When Personal Information and Third Party Information is no longer required for the purpose it was collected, the Town will securely dispose of that Personal Information and Third Party Information as further detailed in the Records and Information Management Policy.
14. Disclosure for research or statistical purposes has very specific exceptions. The Town will use the templates put forward by the Province of Alberta under Protection of Privacy Resources titled Agreement for Access to Personal Information for Research or Statistical Purposes. This template may be amended from time to time and the Town will use the most recent version for the agreement.

Communication to the Town

15. ATIPP requires that Personal Information and Third Party Information be safeguarded, retained, and disposed as required by the law, or released to others in certain situations specified, by consent of the individual owner of that Personal Information or Third Party Information.
16. If a person chooses to provide the Town with Personal Information in a communication, the Town will use that information to respond to the message and to help the Town provide the requested information or service.
17. Communications to the Town, including communications directly to Mayor and/or Council, to any appointed members of Town Boards and/or Committees or individuals in Administration, that are anonymous may be discarded by the Town as the content and context cannot be confirmed.

Any messages received by Mayor and/or Council, to any appointed members of Town Board(s) and Committee(s) or individuals in Administration that are harassing or threatening could be logged and actions may include involving law enforcement.

18. Each form of communication may be subject to ATIPP exceptions. All communication sent and received by the Town is Town property and may be accessed without further consent of the author.
19. Note: Unsolicited public input or feedback in the form of letters, emails, etc. may become public Record, such as publishing in a Council Agenda Package that is also posted on the Town's website for public view. Communication to Council by a resident of the Town or another person is included in Town Council Agenda under Correspondence. The Town is not required to redact Personal Information such as name and address (including email address) from such communication.
20. If the Town is required to provide Personal Information or Third Party Information in response to a legal inquiry or order, the Request is first validated. Validating a Request may include requiring law enforcement to provide written documentation of the Request and the authority of the Request, then only is the required information disclosed.

Using Town's Online Services

21. When registering for online services such as a utilities account or property tax account, the customer will be assigned an identification number such as an account number. This number allows the individual to access their account and pay amounts owing.
22. The Town may need the customer's account number to respond to a customer specific query regarding their account or making changes to their account such as updating payment information, mailing information, name changes.

Automated Systems and Artificial Intelligence

23. The Town will give notice when collecting Personal Information and/or Third Party Information if the Town intends to use this information to generate content, make decisions, recommendations or predictions.

Please note any Personal Information and/or Third Party Information in the possession of the Town prior to the proclamation of the *Protection of Privacy Act* of June 11, 2025 may be used in artificial intelligence and automated systems without this new notice.

Surveillance

24. Surveillance will be utilized as a tool to ensure both the Public and Workers' safety and security, including potential for injury and damage.
25. Surveillance Systems will not monitor areas where the Public and Workers have a reasonable expectation of privacy such as showers and restrooms.
26. Only authorized Workers will have access to the Surveillance System controls and its reception equipment. The storage devices are stored securely and located in a controlled access area. Authorized individuals are determined based on the location of the Surveillance System and the Authorized individuals will be documented for each Surveillance system.
27. Records created by the Surveillance System shall be dispositioned in alignment with the Records and Information Management Policy.
28. The Public will be notified of surveillance at a Town-owned property by clearly written signs prominently displayed at locations with Surveillance Systems. This ensures the Public has ample warning that surveillance is or may be in operation before entering any area under surveillance.
29. Unless the Public has otherwise been made aware of surveillance camera(s) at a Town-owned property, the main entrance of the area will display a notice similar to following notice:

Surveillance cameras may be operating in this area to deter and/or detect criminal activity and for the security of the public and employees, including injury and damages. The collection of recorded camera images is authorized under Section 4 of Protection of Privacy Act. If you have any questions about this surveillance, contact the Privacy Officer at atipp@highriver.ca or 403.652-2110.

30. If the Surveillance System is for monitoring an Worker for person-down situation, the alerts will be automated and may include contacting emergency services directly. In these situations, the

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Personal Information may be collected and used under the *Health Information Act H-5 RSA 2000 and Regulation* and any successors.

31. If the Surveillance System has been installed for public safety or deterrence purposes but detects possible criminal activity or non-compliance, the Surveillance System may be requested by law enforcement and similar for compliance and/or enforcement.
32. If Surveillance System data is requested by law enforcement or similar, the Town will comply once the Town has validated the credentials of the requesting agency. The Town will also document such Request.

Creation of Non-personal Data

33. The Town may create Non-personal Data for:
 - a. research and analysis;
 - b. planning, administering, delivering, managing, monitoring and evaluating program(s) and service(s).
34. This Non-personal Data will be created in accordance with:
 - a. generally accepted best practices;
 - b. requirements including prescribed requirements:
 - i. for creation of Synthetic data;
 - ii. respecting the creation of any type of Non-personal Data identified in the regulations.
35. The Town, when creating Non-personal Data may only use Personal Information already in the custody or under the control of the Town, or Data derived from Personal Information already in the custody or under the control of the Town.
36. Each time the Town creates Non-Personal Data, the Town must retain a Record as prescribed requirements of the:
 - a. description of the Personal Information or Data derived from Personal Information to create the Non-personal data;
 - b. purpose for creating the Non-personal Data;
 - c. method used for creating the Non-personal Data;
 - d. assessment to ensure that the identity of any individual who is the subject of Non-personal Data cannot be identified or re-identified from the Data;
 - e. quality assurance process to:
 - i. verify/review effectiveness of method(s) used to create Non-personal Data,
 - ii. ensure method(s) to create Non-personal Data can be replicated for audit purposes,
 - iii. identify and account for potential bias in Non-personal Data,
 - iv. ensure completeness and accuracy of the Non-personal Data if this Non-personal Data is going to be used to inform decisions about programs or services.
37. Before using or disclosing any Non-personal Data, the Town must conduct an assessment to:
 - a. ensure that all of the non-Personal Data does not identify any individual in the non-Personal Data and cannot be used to re-identify any person in the Non-personal Data;
 - b. identify the security classification of the non-Personal Data; and
 - c. assign the level of risk of re-identification and the security measures taken to reduce that risk.
38. The Town may disclose Non-personal Data to:
 - a. another public body for any purpose;
 - b. a person other than a public body provided that:

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- i. disclosure is for one or more of:
 - I. research and analysis;
 - II. planning, administering, delivering, managing, monitoring or evaluating a program or service;
 - ii. the Privacy Officer approved the conditions:
 - I. of Security and Confidentiality;
 - II. prohibiting any actual or attempt to re-identify the Non-personal Data;
 - III. prohibiting any further use or disclosure of Non-personal Data without the authorization of the Town;
 - IV. of destruction of the Non-personal Data at the earliest reasonable time after it has served its purpose of research and analysis; and/or planning, administering, delivering, managing, monitoring or evaluating a program or service, unless the Town has given specific express authorization contrary to this;
 - V. that the person has signed an agreement with the Town to comply with the approved conditions, the *Protection of Privacy Act*, any *Protection of Privacy Regulations*, and any of the Town's policies and procedures relating to Non-personal data.
39. The Town may give express authorization to use the Non-personal Data if the Privacy Officer has approved the conditions relating to the prohibition of any subsequent use or disclosure of the Non-personal Data without the express authorization of the Town only if:
- a. the subsequent use or disclosure is for one or more of:
 - i. research and analysis;
 - ii. planning, administering, delivering, managing, monitoring or evaluating a program or service; and
 - b. the Privacy Officer approves the conditions relating to:
 - i. security and confidentiality;
 - ii. prohibiting any actual or attempt to re-identify of the Non-personal Data;
 - iii. prohibiting any further use or disclosure of the Non-personal Data without the authorization of the Town;
 - iv. destruction of the Non-personal Data at the earliest reasonable time after it has served its purpose, unless the Town has given specific express authorization.
 - c. that the person has signed an agreement with the Town to comply with the approved conditions, the *Protection of Privacy Act*, any *Protection of Privacy Regulations*, and any of the Town's policies and procedures relating to Non-personal Data.
40. The Town will protect Non-personal Data it creates against unauthorized access, collection, use, disclosure or destruction.

Data Matching

41. The Town may carry out Data matching to create data from Personal Information for:
 - a. research and analysis;
 - b. planning, administering, delivering, managing, monitoring and evaluating program(s) and service(s).
42. Any Data matching must include security arrangements. Any Data derived from Data matching must also be protected against unauthorized access, collection, use, disclosure or destruction.
43. The Town cannot initiate collecting Personal Information directly from the individuals for Data matching but may use the Personal Information already in the Town's custody and/or control. Additionally, the Town may collect Personal Information from another public body for the

purposes of Data matching.

44. The Town can only retain and use the Data from Data matching for the purposes it was created and for as long as reasonably necessary to enable the Town to carry out that purpose.
45. As soon as reasonably possible after the Town has finished using the Data from Data matching, the Town must either securely destroy the Data from the Data matching or transform it into Non-personal data.
46. If another public body disclosed Personal Information to the Town for the purposes of Data matching, the Town may disclose the data derived for the purpose it was created from that Personal Information to that other public body.
47. Data derived from Personal Information cannot be disclosed under a formal Request under the *Access to Information Act*.

Disclosure for Research or Statistical Purposes

48. The Town may disclose Personal Information for research and/or statistical purposes only if:
 - a. the research:
 - i. cannot be accomplished reasonably unless the information is provided in an individually identifiable form, or
 - ii. has been approved by the Commissioner,
 - b. any Data matching is not harmful to the individuals the information is about and public interest benefits from the Data matching;
 - c. Privacy Officer has approved the conditions relating to:
 - i. security and Confidentiality,
 - ii. removal or destruction of individual identifiers at the earliest reasonable time,
 - iii. prohibits any further use or disclosure of the information in an individually identifiable form without the express authorization of the Town,
 - d. person or organization (called the researcher) to whom the information is disclosed has signed an agreement to comply with the approved conditions in the *Protection of Privacy Act*, any regulations and any Town policies and procedures related to the Confidentiality of personal Information.
49. The agreement between the researcher and the Town will follow the agreement template called Agreement for Access to Personal Information for Research or Statistical Purposes, as amended from time to time, made available by the Government of Alberta, *Protection of Privacy Act* Resources, and other Resources for public bodies.

The agreement will also include:

- a. the researcher must ensure that identifiable Personal Information is not used for an administrative purpose directly affecting that individual;
- b. if the researcher fails to meet the conditions of this agreement, the agreement may be immediately cancelled, and the researcher may be guilty of an offense under *Protection of Privacy Act* Section 60(1).

Online Questionnaires

50. The Town occasionally invites public comment through questionnaires for public input, planning and evaluation. When the Town utilizes a third party service provider for online questionnaires or surveys, the Town will confirm where the Information is being stored

electronically as the storage is subject to the laws of where that third party service provider resides. For this reason, the Town prefers storing information in Canada, whenever possible.

51. The Town will complete a Privacy Impact Assessment to identify, eliminate and mitigate risks associated with questionnaires and the Personal Information collected via questionnaires.
52. Prior to proceeding with any online questionnaire, the Town will assess:
 - a. the Information that will be collected and used, if it is Personal Information and/or Third Party Information;
 - b. where and how the Information will be stored, then:
 - c. assess the risk of a breach and either eliminate that risk or mitigate that risk.
53. All contracts where Personal Information and/or Third Party Information is accessible by Third Party service providers will include requirements of the Third Party service provider to:
 - a. securely handle the Personal Information and Third Party Information;
 - b. monitor and report any breach of Personal Information and Third Party Information;
 - c. implement breach containment and other remedies if the Third Party service provider breaches or experiences a breach of the Personal Information and/or Third Party Information.
54. The Town intends to provide enough information to allow individuals to make informed decisions on whether to participate and provide their Personal Information or Third Party Information.

Privacy Breach

55. A Privacy Breach is:
 - a. an unauthorized access and/or unauthorized disclosure of Personal Information and/or Third Party Information that is in the custody or under the control of the Town; and/or
 - b. lost Personal Information and/or Third Party Information that is in the custody or under the control of the Town.
56. A Privacy Breach can be by an individual internal to the Town or external to the Town. Some examples of a Privacy Breach are:
 - a. email and/or electronic file sent to wrong client/public body employee or other unintended recipient;
 - b. sharing Personal Information and/or Third Party Information with another Authorized User which is not a consistent use of that Information;
 - c. party external to the Town gaining unauthorized access to the Personal Information and/or Third Party Information held by the Town.
57. Upon discovery of a Privacy Breach, the Authorized User must report it to their manager or, if a contract with the Town, the manager of that contract, and the Privacy Officer. The Authorized User must take all immediate actions to contain the breach and detail the breach.
58. The Privacy Officer will ensure these steps are followed to respond to a Privacy Breach:
 - a. containment;
 - b. initial reporting;
 - c. investigation and evaluation of risk;
 - d. notification;
 - e. additional measures;
 - f. prevention.

59. The above steps may include contacting the Town's Information Technology area, the Town's insurance provider, and RCMP if the incident involves theft or criminal activity.
60. Following a Privacy Breach, the factors outlined below, as well as any other relevant factors, will be considered in determining if there is a Real Risk of Significant harm for any individual whose Personal Information and/or Third Party Information is involved:
- a. type of Personal Information and/or Third Party Information;
 - b. sensitivity of Personal Information and/or Third Party Information;
 - c. likelihood and impact of how the Personal Information and/or Third Party Information may be used.
61. If the Privacy Officer has determined there is a Real Risk of Significant Harm, the Town must give notice, without unreasonable delay, of the incident to:
- a. the individual(s) and/or Third Party(ies) whose information was breached;
 - b. the Commissioner; and
 - c. the Minister of Technology and Innovation.
- Contents of this notification to each party is detailed in [Appendix F](#).
62. Authorized Users who initiate a Privacy Breach may be subject to corrective action. The level of risk of the Privacy Breach, its intent and its impact will determine any disciplinary action. This corrective action may include re-training of the privacy training, and disciplinary action up to and including termination.
63. Authorized Users external to the Town who initiate a Privacy Breach at the Town may have their access removed.
64. Workers who initiate a Privacy Breach at the Town may be subject to termination of their contract.
65. Prevention may lead to a Privacy Impact Assessment for a proposed change of information systems, administrative practices and policy proposals to either eliminate or mitigate the factors that led to the Privacy Breach.

PROCEDURE 2 – ACCESS TO PERSONAL INFORMATION

General Information

1. Any person or organization may contact the Town to request Information from the Town.
2. If unsure whether the request is a Request under *Access to Information Act*, please contact the Privacy Officer at atipp@highriver.ca.
3. The Privacy Officer and ATI Coordinator, or those trained and delegated by the Privacy Officer, will make every reasonable effort to assist Applicants. The Privacy Officer will respond openly, accurately and completely, subject to any Personal Information and Third Party Information exceptions and any other restrictions.
4. The Privacy Officer will provide access to a Record if it can be done using the Town's normal technology, does not unreasonably interfere with Town operations, and as reasonable and practical.

Access to Information Request

5. If responding to a Request contains Personal Information that is subject to the *Access to Information Act*, the individual becomes an Applicant and must submit a Request under the *Access to Information Act*. Only the Privacy Officer has the authority to grant or deny access to Information to satisfy this Request.
6. An individual may make a Request on behalf of another individual if:
 - a. the individual is a minor, by a guardian of the minor provided that the Town determines it would not be an unreasonable invasion of personal privacy of the minor;
 - b. a guardian or trustee that has been appointed for the individual under the *Adult Guardianship and Trusteeship Act*, if exercise of the right or power relates to the powers and duties of the guardian or trustee appointed for the individual;
 - c. an agent has been designated under a personal directive under the *Personal Directives Act* if the directive so authorizes that agent;
 - d. an attorney granted a power of attorney by the individual to the person applying, if the power of attorney so authorizes;
 - e. the individual is deceased, by the individual's personal representative if the exercise of the right or power relates to the administration of the individual's estate;
 - f. there is written authorization of any person to act on the individual's behalf.

Any notice that would be required to be given to the individual directly will be given to the person authorized above.

7. Access to the Request Form is on the Town website, available at the Town Office and in [Appendix D](#) attached. The Request form can be submitted online, or by submitting the Request to atipp@highriver.ca, or delivering the Request to the Town Office.
8. The Request must be in writing, unless the Applicant's ability to read and write English is limited, or the Applicant has a physical disability or condition that impairs the Applicant's ability to make a written Request. If this is the case, the Privacy Officer will accept an oral application and put the information into writing to complete the Request.

Clarification of Access to Information Request

9. The Privacy Officer will review the submitted Request and may contact the Applicant to further understand and clarify the Request if needed. The Applicant will then be advised if payment is required.

Fee for Access to Information Request

10. There is no initial fee for accessing an Applicant's Personal Information or correcting an Applicant's Personal Information at the Town. However, a fee may be charged for items as indicated in the Town's Rate Bylaw.
11. Once the Privacy Officer has confirmed that payment is required as the initial fee, the fee can be paid by calling the Town of High River's Customer Service number at 403-652-2110 to provide a credit card number, or in person with cash, cheque, credit card, or Interac at the Town Office.
12. The Request is not considered received until payment, if required, is received.
13. If the Applicant does not pay the initial fee for a General Request after being informed of the fee, after 30 Business Days the Privacy Officer will consider the Request abandoned and will close the Request.

Confirmation of General Request

14. Once the Privacy Officer has clarified the Request, and the fee, if any, has been paid, the Privacy Officer will send the Applicant a letter confirming their request and the fee paid, if any. This letter includes that the Town has 30 Business Days to respond to the Applicant but will make every reasonable effort to respond prior to the 30 Business Day deadline.

Continuing Request for Information

15. An Applicant can make a Request for a Continuing Request for a period of up to 2 years. The initial fee for a Continuing Request is indicated in the Town's Rate Bylaw. The Privacy Officer may clarify the Request with the Applicant.

Confirmation of a Continuing Request

16. Once the request is clarified and the fee is paid, the Privacy Officer will send the Applicant a letter of confirmation of the Continuing Request. This letter will include the Request and:
 - a. the schedule showing the dates within these 2 years that the Request is deemed received;
 - b. explain why these dates were chosen; and
 - c. that the Applicant may contact the OIPC to review this. The Applicant has 60 Business Days from the date of the letter from the Privacy Officer to ask the OIPC to review. The Applicant must also inform the Privacy Officer that the Applicant has asked the Commissioner for a review.
17. The Privacy Officer will commence the Request as new for each period of the schedule. The Privacy Officer will send a written notification to the Applicant that work has commenced for requesting the Records for that period in the schedule.

Start of the Request

18. The Privacy Officer will then initiate the response of the Town by querying the appropriate areas and/or individuals within the Town for the Records relating to the Request.

Response

19. Once the Record(s) are received by the Privacy Officer these Records will be reviewed. Any Information that is required to be redacted will be, referencing the section of the *Access to Information Act* that requires the redaction.
20. Once the Information is ready for release, the Privacy Officer will release this Information in the matter in which it was requested to be released – any of:
 - a. sending electronically via email or a shared folder;
 - b. viewing the documents in person;
 - c. picking up the documents in person (fee may apply if the copies are above \$10); or
 - d. sending the Applicant copies of the Records by mail (fee applies).
21. If the Applicant asked to review the Record in person, the Privacy Officer may instead give a copy to the Applicant if the Privacy Officer's opinion is that:
 - a. examining the Record would unreasonably interfere with the Town's operations; or
 - b. examining the Record might result in disclosure of Information that the Town should not disclose or has discretion to refuse to disclose; or
 - c. examining the Record could result in disclosure that is prohibited or restricted despite the *Access to Information Act*.
22. If the Town was not able to locate any Records responsive to the Request, the Privacy Officer will send a letter to the Applicant indicating no Records responsive to the Applicant's Request were located with a brief summary of the steps taken to locate responsive Records.
23. Within the release letter, the Privacy Officer will also advise the Applicant that, if the Applicant has any concerns, to contact the Privacy Officer. Additionally, the Applicant may ask the OIPC for a review. The Applicant has 60 Business Days from the date of the letter from the Privacy Officer to ask the OIPC for a review. If the Applicant asks the OIPC for a review, the Applicant must also inform the Privacy Officer that the Applicant has asked the OIPC for a review.
24. If the Town has decided to refuse the Applicant access to all or part of the requested Records, the Privacy Officer will advise with describing the Records withheld and citing the appropriate sections of the *Access to Information Act* that apply. However, if the description and section of the *Access to Information Act* reveals the content of the Record(s), the Privacy Officer will not cite the appropriate section of the *Access to Information Act*.

Accessing Personal Information

25. If the Access to Information Request is to access one's own Personal Information, the Access to Information Request Form is to be used. If more space is required, the description may continue on a separate piece of paper to be attached to the form. Please note the Town will require proof of your identity to access your Personal Information that the Town has within its care and control. This proof of your identity will be kept on file for this process and purpose.
26. If the Access to Information Request is to produce Record(s) relating to Personal Information, fees may be charged for the Record(s) as outlined in the Town's Rate Bylaw.

Correcting Personal Information

27. If an individual believes there is an error or omission to their Personal Information the Town has within its care and control, an individual may make a request to correct their own Personal Information. The Town will validate and confirm the individual's identity prior to proceeding.
28. The Request to Correct Personal Information Form is on the Town website, available at the Town Office and in [Appendix E](#) attached. The Request to Correct Personal Information form can be submitted online, or by submitting the Request to Correct Personal Information to atipp@highriver.ca, or delivering the Request to Correct Personal Information to the Town Office.
29. The Request to Correct Personal Information must be in writing, unless the Applicant's ability to read and write English is limited, or the Applicant has a physical disability or condition that impairs the Applicant's ability to make a written Request. If this is the case, the Privacy Officer will accept an oral application and put the information into writing to complete the Request.
30. Routine updates to correct Personal Information may be handled directly by the relevant program area at the Town in the normal course of business if it is practical and expedites public business.
31. The Town is able to correct factual information, not opinions. The individual must provide proof in support such as a birth certificate, marriage certificate with name change, etc.
32. If the Personal Information to be corrected is for another person, the individual applying for the correction will need to also provide proof of authority to act for that other person, in addition to the items indicated above. This proof of authority includes proof of guardianship, trustee or power of attorney as indicated earlier in this document.
33. The Town will notify any Third Party and/or other public body the Town has provided this Personal Information to within the past year unless the individual requesting the personal information correction, in writing, deems it not necessary.
34. The Town makes every reasonable effort to keep Information accurate and current. Individuals and Third Parties can assist the Town by providing the Town with any changes to their own Personal Information such as phone number, email address and a new address. Individuals can correct their personal Information by utilizing the forms on the Town website, or attending the Town Office during business hours and the information will then be directed to the appropriate department of the Town for updating.
35. If a Request to correct Personal Information contains Information to which the *Health Information Act* applies, the part of the request relating to that Information is deemed to be a request under section 13(1) of the *Health Information Act* and the *Health Information Act* applies.
36. The Town will make Personal Information correction on Records in the Town's custody or under its control, unless:
 - a. there is conflicting information that makes a factual determination impossible;
 - b. the Individual requesting the correction has not submitted adequate proof to support the correction of Personal Information; or
 - c. the Information is opinion.

37. All Personal Information corrections will be annotated with date and signature (either ink or digital, as appropriate) of the Worker making the change. If the requested correction to Personal Information is conflicting and it is not possible to determine or is under challenge, the requested correction to Personal Information will be added close to the Information in the Record under challenge by the individual requesting correction, when possible.
38. A linking mechanism may be used if there isn't adequate ability to track the correction of Personal Information in an electronic medium. This may be an attachment or link to the letter or statement from the individual requesting correction or a copy of the Request to Correct Personal Information Form. The link will be made only to the corresponding parts of the Record being annotated.
39. If another public body collected this Personal Information or created the Record containing this Personal Information, the Town will transfer this Request to correct Personal Information within 15 Business Days.
40. The Town must, within 30 Business Days of receipt of a Request to Correct Personal Information, respond in writing to the individual requesting the correction that the correction or note has been made.

Exception - Disregard a Request

41. The Town may disregard a Request if:
 - a. responding would interfere with Town operations or considered abuse of the Request because it is a repeated Request or the Request is systematic in nature;
 - b. the Request is abusive, threatening, frivolous or vexatious or made in an abusing or threatening manner;
 - c. the Information requested has already been provided to the Applicant;
 - d. the Town has this Information available to the Public without a Request;
 - e. even after receiving further information from the Applicant, the Request is unclear and doesn't allow the Town to locate and identify the Record with reasonable time and effort;
 - f. the Request is overly broad or impossible to understand.
42. The Privacy Officer will write to the Applicant indicating that this Request is closed and the reason why. If the Applicant has already paid the fee for this Request, the fee will be refunded. This letter is sent within 30 Business Days of the Request or receiving the Applicant's response for additional information.
43. The letter to the Applicant will also include that the Applicant can contact the OIPC for a review within 60 Business Days of the closing letter being sent to the Applicant. The Applicant must also inform the Privacy Officer if the Applicant seeks a review by the OIPC.

Exception - Reject a Continuing Request

44. The Privacy Officer may reject a Continuing Request if:
 - a. the situation/event of the Request isn't an ongoing matter and therefore no basis for a Continuing Request; or
 - b. the subject of the Request is dependent on other actions involving the Applicant and the Applicant is receiving the Information routinely; or
 - c. the Privacy Officer determines the Request doesn't meet the requirement of a Continuing Request and instead determines it is a General Request. If the fee for a Continuing Request has already been paid, the Town will refund any overpayment related to the Continuing

Request fee to make this a General Request. The Request will then follow the General Request procedure and timelines.

45. If a Continuing Request is rejected, the Privacy Officer will notify the Applicant by letter. This letter will inform the Applicant of their right to request a review of this decision by the OIPC. The Applicant has 60 Business Days from the date of the rejection letter to submit a review request. If the Applicant chooses to pursue a review by the OIPC, they must also notify the Privacy Officer.

Exception - Access to Information Request Withdrawn or Abandoned

46. During the time the Town is searching for Records and any time prior to the Privacy Officer providing Records related to the Applicant's Request, the Applicant may contact the Privacy Officer indicating the Applicant is withdrawing their Request or abandoning their Request. This may be done by contacting the Privacy Officer by calling the Town at 403-652-2110, sending an email to atipp@highriver.ca, or delivering written notice to the Town Office.
47. The Privacy Officer will respond with a letter back to the Applicant indicating that, due to the Applicant's communication, the Request is either withdrawn or abandoned.

Exception - Transfer to another Public Body

48. The Request may be transferred to another Public Body if the Other Public Body:
- a. produced the Record; or
 - b. first obtained the Record; or
 - c. has the Record in its custody or under its control.
49. Any transfers must occur within 15 Business Days of the Request. If a transfer occurs, the Applicant must be notified in writing by the Privacy Officer where the Applicant first Requested the Record.

Exception - Additional Fees

50. In addition to initial fees, there may be additional fees as detailed in the Fee Schedule in the Town's Rate Bylaw.
51. For a Continuing Request, the Privacy Officer will decide how much of the estimate applies to each installment of the Continuing Request. The estimate will be detailed with each time period of installment showing the date range of the Records and the start date of the installment.
52. If the response by the Town is estimated to be more than \$150, the Town will provide a written estimate of the charges in a detailed breakdown specifying the categories as:
- a. time and cost for searching, locating and retrieving a Record;
 - b. cost to convert a Record into a redactable format;
 - c. cost to reformat audiovisual files into a redactable format;
 - d. cost to produce a copy of a Record;
 - e. time and cost to prepare and handle a Record for disclosure;
 - f. time and cost to supervise an Applicant who wishes to examine an original Record; and
 - g. cost of shipping a Record or a copy of a Record.
53. The response to the Request will pause until the Applicant pays 50% of the estimated additional fees. The Applicant can consider changing the Request to change the amount of

fees assessed.

54. The Applicant has 30 Business Days to respond and:
 - a. pay 50% of the estimated fee once the Privacy Officer has written to the Applicant of such fee, or
 - b. alter the Request to change the amount of fee, or
 - c. apply for a waiver or partial waiver of the fee.
55. If no payment is received, no modification of Request to alter the fee, or no application to waive the fee is received after 30 Business Days, the Privacy Officer may write a letter to the Applicant:
 - a. declaring the Request abandoned, and
 - b. that the Applicant may ask the OIPC to review within 60 Business Days of the letter being sent to the Applicant. The Applicant must also inform the Privacy Officer that the Applicant has sought a review by the OIPC.
56. If the Applicant agrees in writing and pays 50% of the fee, the response to the Request resumes. Once the response to the Request is complete, the Town will then prepare an invoice that includes all the charges as detailed above. Once this invoice is paid in full, the Records will be released to the Applicant. If the amount of the invoice is less than the deposit amount, the balance will be returned to the Applicant.

Exception - Waiver of Fees

57. The Applicant may write to the Privacy Officer to ask for a waiver of the fee or part of the fee if:
 - a. the Applicant cannot afford or;
 - b. for any other reason deemed fair to excuse payment.
58. The Privacy Officer has the discretion to waive the fee. The Privacy Officer has 30 Business Days to respond to the Applicant in writing as to the decision to waive all or a portion of the fee or to require the full fee.
59. If a request to waive the fee is because the Applicant cannot afford the fee, further Information will be required by the Privacy Officer.
60. If the Privacy Officer refuses to waive the fee, the Privacy Officer will write to the Applicant indicating that the Applicant has 20 Business Days to consider this and respond to the Privacy Officer in writing. The Applicant can either agree to pay 50% of the estimate or modify the Request to change the amount of fees.
61. If the Applicant does not respond within 30 Business Days, the Privacy Officer will write to the Applicant declaring the Request abandoned. This letter will inform the Applicant of their right to a review of this decision by the OIPC. The letter to the Applicant will also include that the Applicant can contact the OIPC for a review within 60 Business Days of the letter being sent to the Applicant. The Applicant must also inform the Privacy Officer that the Applicant has sought a review by the OIPC.
62. If the Privacy Officer waives part of the fee, the Privacy Officer will write to the Applicant indicating the amount of fee waived. The Applicant can either agree to the revised estimate by responding in writing within 30 Business Days and pay the deposit of 50% or modify the Request to reduce or eliminate the fee assessed.

63. If the Applicant does not respond within 30 Business Days, the Privacy Officer will write to the Applicant declaring the Request abandoned. This letter will inform the Applicant of their right to a review by the OIPC within 60 Business Days of the letter being sent to the Applicant. The Applicant must also inform the Privacy Officer if the Applicant has sought a review by the OIPC.
64. If the Privacy Officer waives the fee, the Privacy Officer will write to the Applicant indicating the fee has been waived and that the Request has resumed. This letter will also include when the Applicant can expect a response.
65. The fee for the Request may be waived if the Information in the Record is of significant Public interest of:
- risk of significant harm to the environment; and/or
 - risk of health or safety of the Public, affected group, or a person or the Applicant; or
 - disclosure, for any other reason, is clearly in the Public interest;
66. If the fee is waived and the Record is of significant Public interest, The Privacy Officer will disclose this Information, without delay but before disclosing and when practical, the Privacy Officer must:
- notify any Third Party the Information relates to and give that Third Party an opportunity to make representations relating to the disclosure; and
 - notify the Commissioner.
- If it isn't practical to notify the Third Party and the Commissioner for a., and b. directly above, the Privacy Officer must give written notice of the disclosure to the Third Party and the Commissioner in the form set out in Schedule 2 of the *Access to Information Regulation*.
67. For a Continuing Request, if the Applicant fails to pay 50% the estimated amount of the installment within 30 Business Days of the date of the schedule where the Request is considered received, the Request will be considered abandoned and will halt. The Privacy Officer will then send a letter to the Applicant advising that, due to non-payment, the Request is deemed abandoned. This letter to the Applicant will also include that the Applicant can contact the OIPC for a review of this decision within 60 Business Days of the letter being sent to the Applicant. If the Applicant asks the OIPC to review this decision, the Applicant must also inform the Privacy Officer that the Applicant has sought a review by the OIPC.
68. Any fees, other than the initial fee, will be refunded if it is found that the actual fees are less than the estimated fees.

Exception - Additional Time

69. Privacy Officer may extend the time for responding by another 30 Business Days if:
- the Applicant agrees; or
 - a large number of Records are requested and more time is required to process the Request. The Town can also extend a second time for the large number of Records; or
 - the Town is considering giving access to a Record containing Information that may be harmful to the business interests of a Third Party, or that may compromise a Third Party's personal privacy, this legislated extension of time permits the Town to consult with the Third Party and the Third Party to respond; or
 - multiple concurrent Requests have been made by the same Applicant or 2 or more Applicants working for the same organization or working in association with each other.
70. If the time is extended for one of the reasons immediately above, the Privacy Officer must advise the Applicant in writing:

- a. with the reason for the time extension;
- b. indicating when to expect a response; and
- c. that the Applicant may ask the OIPC to review. The letter to the Applicant will also include that the Applicant can contact the OIPC for a review within 60 Business Days of this letter being sent to the Applicant. The Applicant must also inform the Privacy Officer that the Applicant has sought a review by the OIPC.

71. If the Commissioner is acting as Privacy Officer of the Town and indicates an extension, the Applicant will be advised they can seek a review by an Independent Adjudicator.

72. The Privacy Officer may advise of a further extension after the extension in b. above. If so, the Privacy Officer must also include in that letter when to expect a response and that the Applicant may ask the Commissioner to review the extension. The letter to the Applicant will also include that the Applicant can contact the OIPC for a review of this decision within 60 Business Days of the letter being sent to the Applicant. The Applicant must also inform the Privacy Officer that the Applicant has sought a review by the OIPC.

Exception - Time Extension - Third Party Review

73. If there are any Record(s) involving Third Party Information that may be considered to be released, the Privacy Officer must give notice to each Third Party.

74. This notice to the Third Party will include:

- a. that a Request has been made for a Record that may have Information which would affect the interests or invade the personal privacy of the Third Party;
- b. a copy of:
 - i. the Record, or
 - ii. a portion of the Record containing the Information in question, or
 - iii. a description of the Record content.

75. This letter of notice from the Privacy Officer will indicate that the Third Party has the option to either:

- a. release the Record; or
- b. explanation why the Record cannot be disclosed, based on *Access to Information Act*, Section 19(1).

76. The Third Party has 20 Business Days to respond back to the Privacy Officer indicating either

- a. release the Record; or
- b. explanation why the Record cannot be disclosed, based on *Access to Information Act*, Section 19(1).

Please note:

There are no time extensions to the timeline available for Third Party(ies) to respond.

77. The Applicant will also be notified that:

- a. a Record from the Applicant's Request may contain Information that affects the interests or invades the personal privacy of a Third Party;
- b. the Third Party is being given an opportunity to make presentations concerning the disclosure of this Record; and
- c. a decision will be made within 30 Business Days after the date notice was given to the Third Party.

78. If the Town doesn't intend to release this Information, the Town may not contact the Third Party, though by contacting the Third Party this allows the Third Party to either consent to disclose their Third Party Information or provide reasons to not disclose their Third Party Information.

Any individual or organization the Town hires to produce a Record is not considered a Third Party. Any Record produced by those hired by the Town is considered a Town Record, subject to Proactive disclosure, Routine Disclosure and Access to Information.

79. If, after 21 Business Days, the Third Party has not responded to the notice, or the Third Party responds with redaction(s) that do not fully align with the *Access to Information Act* and *Regulations*, the Privacy Officer will advise the Third Party of:
- the pending release with any redactions including reference to applicable section of the *Access to Information Act*;
 - the decision to grant or not grant access that aligns with the *Access to Information Act*; and
 - the Third Party has 20 Business Days from the date of the letter from the Privacy Officer to request a review by the OIPC of the pending release of their Information.
80. If the Third Party asks the OIPC for a review, the Third Party must also advise the Privacy Officer that the Third Party asked the OIPC for a review.
81. If the Third Party asks the OIPC for a review, the Privacy Officer must pause on releasing this information to the Applicant, pending response from the OIPC. During this time, if not already, the response to the Applicant's Request will go past the 30 Business Day timeline. The Privacy Officer must also inform the Applicant:
- the Record(s) cannot be released until the matter is resolved with the OIPC therefore an extension of time; and
 - that the Applicant may request a review by the OIPC within 60 Business Days of this letter sent to the Applicant. The Applicant must also inform the Privacy Officer if the Applicant seeks a review by the OIPC.
82. If the Third Party responds to the Privacy Officer:
- with redactions that align with the *Access to Information Act* and *Regulations* and/or;
 - indicates there are no redactions, to fully release the Information,
83. The Town will proceed to release the Information as indicated by the Third Party. This will include a letter to the Third Party confirming that the Information has been released.
84. If the Third Party provides consent, that consent must:
- be in writing or provided electronically, if electronically, the electronic signature must be reliable for identifying the person and associated with the electronic signature to the record;
 - identify the Third Party who is consenting to the disclosure;
 - identify the Information the Third Party is consenting disclosure of; and
 - be signed by the Third Party.
85. If the Third Party consents to giving access to the Record or part of the Record, the Third Party may not ask for a review by the Commissioner.
86. If, after the Privacy Officer has provided the Third Party with redactions aligning with the *Access to Information Act*, and 20 Business Days to ask the OIPC for a review has passed without the Third Party asking the OIPC for a review, the Privacy Officer will release the Record(s) as

redacted on the 21st Business Day to the Applicant.

87. If a Third Party consents to disclosure of their Third Party Information, the Privacy Officer will release this information to the Applicant as soon as practical. There is no need to wait for the 20 Business Day review period to end before providing access to the Applicant.
88. If a Third Party, who the Town contacted as that Third Party Information is part of the response to the Request, asks the OIPC for a review, the time for responding to a Request or part of a Request is automatically extended until the review and inquiry process has been completed.
89. The Third Party may also, after the OIPC has given the decision, ask for an Independent Adjudicator to review the decision. If so, the time for responding to the Request or part of the Request will be automatically extended until this process has concluded. In this scenario, the Town will communicate with the Applicant the time extension and reason for the time extension.
90. After the Privacy Officer gives access, the letter will include that the Applicant can ask the OIPC to review. The Applicant has 60 Business Days from the letter being sent to the Applicant to request a review by the OIPC. The Applicant must also inform the Privacy Officer if the Applicant seeks a review by the OIPC.

Exception - Time Extension - Unplanned Operational Closure or Interruption

91. If the Town has an unplanned operational closure or interruption due to an emergency, disaster, or unforeseen event during a Request, the time for responding to a Request is automatically extended. With this the Town must:
 - a. notify the Commissioner as soon as practical of the unplanned operational closure or interruption due to an emergency, disaster, or unforeseen event and the anticipated end, and when possible, the date when the emergency, disaster, or unforeseen event that resulted in the unplanned operational closure or interruption has ended or when normal operations have resumed.
 - b. notify the Applicant as soon as practical of the unplanned operational closure or interruption due to an emergency, disaster, or unforeseen event and the anticipated end.
92. Once and when normal operations resume, notify the Applicant as soon as practical when:
 - a. normal operations resume;
 - b. when a response can be expected or when a decision can be expected on releasing the Information, and
 - c. that the Applicant may ask the OIPC to review. The letter to the Applicant will also include that the timeline for the Applicant to contact the OIPC for a review is 60 Business Days of this letter being sent to the Applicant. The Applicant must also inform the Privacy Officer that the Applicant has sought a review by the OIPC.
93. If a Third Party is also engaged in this Request, the Third Party will be notified as soon as practical when:
 - a. normal operations resume,
 - b. when a decision can be expected on releasing the Information, and
 - c. the Third Party may ask the OIPC to review this extension.

Other Exceptions to Disclosure

94. Information may not be disclosed if it is:
 - a. harmful to individual(s) or Public safety;

- b. a confidential evaluation for employment or Worker evaluation process;
 - c. harmful to law enforcement;
 - d. about a workplace investigation;
 - e. revealing the identity of a person requesting advice about making a disclosure, made a disclosure, submitted a complaint of reprisal or whose complaint has been referred to the Labour Relations Board pursuant to the *Public Interest Disclosure (Whistleblower Protection) Act*;
 - f. harmful to intergovernmental relations;
 - g. about local body confidences;
 - h. revealing advice from officials;
 - i. harmful to economic and other interests of the Town;
 - j. revealing testing procedures, tests and audits;
 - k. disclosing privileged Information;
 - l. harmful to conservation of heritage sites;
 - m. already available to the Public or will be within 60 Business Days. The Privacy Officer will notify the Applicant when this is disclosed. If this Information is not disclosed within 60 Business Days, the Privacy Officer must consider this a Request on the last Business day of this period.
95. The Privacy Officer or those trained and delegated by the Privacy Officer will thoroughly document any decision to not disclose due to any of these discretionary exceptions.
- The Town will consider the three-part harms test of:
- a. a reasonable expectation of probable harm;
 - b. the harm must be damage or detriment, not just inconvenient; and
 - c. a casual connection between disclosure and anticipated harm.
96. Disclosure cannot proceed if disclosure includes disclosing business interest of a Third Party that:
- a. would reveal trade secrets of a Third Party, or commercial, financial, labour relations, scientific or technical Information of a Third Party;
 - b. that is supplied to the Town in confidence implicitly or explicitly; and
 - c. the disclosure could reasonably be expected to:
 - i. significantly harm the competitive position or interfere significantly with the Third Party's negotiating position,
 - ii. result in similar Information no longer being supplied to the Town when it is in the Public interest that similar Information continue to be supplied to the Town,
 - iii. result in undue financial loss or gain to any person or organization, or
 - iv. reveal Information supplied to or the report of, an arbitrator, mediator, labour relations officer of other person or body appointed to resolve or inquire into a labour relations dispute.
97. However, disclosure may proceed if:
- a. the Third Party consents to the disclosure;
 - b. an enactment of Canada or Alberta authorizes or requires the Information to be disclosed;
 - c. the Information relates to a non-arm's length transaction between the Town and another party;
 - d. Information is in a Record that is in the custody or under the control of the archives of the Town and has been in existence for 50 years or more.
98. The Town will not disclose Information about a Third Party that was collected on a tax return or collected for the purpose of determining tax liability or collecting a tax. This Information may be disclosed if:
- a. the Third Party consents to the disclosure;
 - b. an enactment of Canada or Alberta authorizes or requires the Information to be disclosed;

- c. the Information relates to a non-arm's length transaction between the Town and another party;
 - d. the Information is in a Record that is in the custody or under the control of the archives of the Town and has been in existence for 50 years or more.
99. The Privacy Officer will refuse to disclose Personal Information if it is an unreasonable invasion of the Third Party's personal privacy.
100. A Third Party may request Information not be disclosed, however it is not considered an unreasonable invasion of a Third Party's personal privacy and may be disclosed if:
- a. the Third Party has consented or requested the disclosure;
 - b. there are compelling circumstances affected anyone's health or safety and written notice of disclosure is given to the Third Party;
 - c. an Act of Alberta or Canada authorizes or requires the disclosure;
 - d. the Information is about the Third Party's classification, salary range, discretionary benefits or employment responsibilities as an officer, Worker, or member of the Town;
 - e. the Information reveals financial and other details of a contract to supply goods or services to the Town;
 - f. the Information is about a licence, permit or other similar discretionary benefit granted to a Third Party by the Town relating to commercial or professional activity, or real property, including a development permit or building permit, and disclosure is limited to the name of the Third Party and nature of the license, permit or other similar discretionary benefit.
 - g. the Information reveals a discretionary benefit of a financial nature grant to the Third Party by the Town;
 - h. the Personal Information is about someone who has been dead for 25 years or more;
 - i. the Record reveals attendance or participation in a Public event or activity relating to the Town, including a sporting event, cultural program or club or a field trip; or receipt of an honour or award granted by or through the Town.
101. Disclosure of Personal Information is an unreasonable invasion of a Third Party's privacy if it:
- a. relates to a medical, psychiatric or psychological history, diagnosis, condition, treatment or evaluation;
 - b. is an identifiable part of law enforcement record except if necessary to dispose of law enforcement matter or to continue an investigation;
 - c. relates to eligibility for income assistance or social service benefits or determining benefit levels;
 - d. relates to employment or educational history;
 - e. is Information collected on a tax return or gathered for the purpose of collecting a tax;
 - f. consists of an individual's bank account Information or credit card Information;
 - g. contains personal recommendations or evaluations, character references or personnel evaluations;
 - h. contains Third Party's name or a unique identifier of the Third Party that appears with the Third Party's name and the disclosure would reveal Personal Information about the Third Party or indicates the Third Party's racial or ethnic origin, or religious or political beliefs or associations.
102. To determine whether the disclosure of Personal Information is an unreasonable invasion of a Third Party's Personal Information, the Town must consider all relevant circumstances including if disclosing:
- a. is helpful for showing the Town activities for Public scrutiny.
 - b. will promote Public health and safety or protecting the environment;
 - c. is relevant to fairly determining the Applicant's rights;
 - d. assists in researching or validating claims, disputes or grievances of aboriginal people;
 - e. exposes the Third Party unfairly to financial or other harm;
 - f. Personal Information that was supplied in confidence;

- g. Personal Information that is likely inaccurate or unreliable;
 - h. will unfairly damage the reputation of any person in the Record the Applicant Requested; and
 - i. Personal Information that was originally provided by the Applicant.
103. The Town must refuse to disclose a record that was submitted to or prepared for submission to the Executive Council of Alberta, the Treasury Board of Alberta or a committee of the Executive Council of Alberta or Treasury Board of Alberta.
104. The Privacy Officer must refuse disclosing Information that is in a law enforcement record and the disclosure would be an offense under an Act of Canada.
105. The Privacy Officer must refuse to disclose any record that isn't the Town's that is:
- a. Information or a record that is subject to any type of legal privilege, including solicitor-client privilege or parliamentary privilege,
 - b. Information prepared by or for:
 - i. the Minister of Justice,
 - ii. an agent or lawyer of the Minister of Justice, or
 - iii. an agent or lawyer of a public body,in relation to a matter involving the provisions of legal services; or
 - c. Information in correspondence between:
 - i. the Minister of Justice,
 - ii. an agent or lawyer of the Minister of Justice, or
 - iii. an agent or lawyer of the Town,and any other person relating to a matter involving the provision of advice or other services by the Minister of Justice or by the agent or lawyer.
106. The Privacy Officer must refuse to disclose Information that is protected by another Act of Alberta if and as referenced in that Act.
107. Personal Information may be disclosed to Workers when Workers are carrying out a financial or other formal or systematic examination or review of a program or a portion of a program or activity. This activity by Workers are sanctioned by statute, regulation or public policy relating to the Town.

Meetings in Absence of the Public

108. Mayor and Council may hold meetings or portions of meeting in the absence of the Public if the subject is one or more of the following:
- a. security of the property of the Town;
 - b. proposed pending acquisition or sale of a property by or for the Town;
 - a. personal Information of an individual, including a Worker;
 - b. labour relations or Worker negotiations;
 - c. a law enforcement matter, litigation or potential litigation including matters before administrative tribunals affecting the Town.

Except if another Act:

- d. authorizes the Town to hold the meeting in the absence of the Public; and
- e. specify the matters that may be discussed at those meetings.

109. The Town may disclose Information to other individuals and organizations if:
- a. the Information does not contain Personal Information or Third Party Information or that Personal Information and/or Third Party Information is redacted as outlined earlier in this document;
 - b. that individual or organization consented to the sharing of that Information; either by disclosure notice when they provided that Personal Information or when the individual or organization has consented to the sharing of this Information when the Town asked and the Personal Information and/or Third Party Information can be reasonably severed.
 - i. If an individual has consented, that consent must be:
 - I. in writing, be signed by the individual giving consent; or
 - II. Electronic:
 1. follow the rules the Town has established for electronic consent;
 2. the purpose for consent is set out in the rules for electronic consent;
 3. the Town has stated it will accept electronic consent;
 4. the electronic consent is:
 - a. accessible therefore useable for subsequent reference;
 - b. is capable of being retained by the Town;
 - c. can be authenticated allowing the individual who gives consent to be identified;
 - d. meets the Information Technology standards of the Town;
 5. includes the electronic signature of the individual giving consent;
 6. the electronic consent is consistent with *Electronic Transactions Act* by ensuring the electronic signature is reliable for the purpose of identifying the person and associating the electronic signature with the relevant Record reliably for the purpose the Record was created;
 7. the electronic signature with the consent is reliable for the purpose for which consent is given.
 - c. the Personal Information or Third Party Information must not be capable of identifying the individual or Third Party to whom it pertains to;
 - d. the person chooses to provide the Town with Personal Information in a communication, the Town will use that Information to respond to the message and to help the Town provide the requested Information or service;
 - e. Public input or feedback in the form of letters, emails, etc. will become Public Record, such as publishing in a Council Agenda Package that is also posted on the Town's website for Public view.
110. A minor may not consent unless the Town has determined that, on reasonable grounds, that the minor has the capacity to understand the Information relevant to providing consent and appreciates the consequences of providing consent.
111. Consent is no longer valid if the individual notifies the Town that the individual is withdrawing their consent from that date forward.
112. The Town is required to provide Personal Information in response to a legal inquiry or order, it is first validated then only the required Information is disclosed. Personal Information will only be released to a Third Party where the Town is required to under the *Access to Information Act* and *Regulation*, has written consent by the individual or organization, or when required or permitted to do so by law.

PROCEDURE 3 – PERSONAL INFORMATION BANK

Personal Information Bank

1. *Protection of Privacy Act* regulates the specific purposes for which the Town may collect Personal Information and Third Party Information. When this Personal Information and Third Party Information is collected into related sets of Information, it is called a Personal Information Bank.
2. The Town will inform either before or when collecting the Personal Information what the Town uses the Personal Information for. This includes:
 - a. the purpose for which the Information is collected;
 - b. reference the legal authority that allows for this collection;
 - c. the Privacy Officer contact Information for any individual who has questions about the collection of their Personal Information; and
 - d. any intention the Town has to use this Information to generate content or make decisions, recommendations or predictions.
3. The Town can only use that Personal Information or Third Party Information for consistent purposes within the Town. Consistent purposes means the Information:
 - a. has a reasonable and direct connection to the purpose for which it was collected; and
 - b. is necessary to perform the functions of the Town such as an authorized or integrated program or service.
4. If the Town uses or discloses this Personal Information for a purpose not included in the reason for the Personal Information Bank, the Town must:
 - a. keep a Record of that different purpose and either attach or link that Record to the Personal Information; and
 - b. ensure that purpose is included in the next publication of the Personal Information Bank directory.
5. The Town publishes the directory of Personal Information Banks the Town has. The Town will publish this electronically or in paper format. The Town must keep this Personal Information Bank directory as current as practical and ensure the Public has access to it. This directory of Personal Information Banks of the Town includes for each Personal Information Bank:
 - a. its title and location;
 - b. the description of the kind of Personal Information and the categories of individuals whose Personal Information is included;
 - c. the authority for collecting this Personal Information; and
 - d. the purpose or why the Personal Information was collected or compiled and purpose or why it is used or disclosed.
6. The Legislative and Advisory Services division maintains the Personal Information Bank for the Town.
7. Legislative and Advisory Service will ensure the directory of Personal Information Banks is kept as current as possible.

The Personal Information Bank is attached in [Appendix G](#).

PROCEDURE 4 – PRIVACY IMPACT ASSESSMENT

Privacy Impact Assessment

1. The Town uses software that contains Personal Information and/or Third Party Information.
2. The contract the Town has for the software shall include appropriate safeguards for Personal Information and Third Party Information and contractual notices if there is a breach, including reporting of the breach, contain the breach, assess the breach and remedies the software provider must do to correct the potential outcomes from the breach.
3. The Town will prepare a Privacy Impact Assessment (PIA) when there is a Project or any new or substantial change to an existing administrative practice, program, project or service that involves the collection, use or disclosure of Personal Information and/or Third Party Information the Town holds.
4. The Town will follow the Protection of Privacy Act PIA Template issued by the Office of the Information and Privacy Commissioner of Alberta. This template may be amended from time to time.
5. Where the Protection of Privacy Act PIA Template issued by the Office of the Information and Privacy Commissioner of Alberta refers to a public body, this will mostly mean the Town.
6. The Town will use the PIA Submission Assessment Tool to determine if the Town needs to submit the PIA to the OIPC.
7. A link to the Privacy Impact Assessment Template is attached in [Appendix H](#).

Appendix A – Delegation Table of provisions of the *Access to Information Act and Regulation*

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
Right of Access				
Authority to declare request abandoned	10(1)	√		
Authority to grant continuing request	11(2)		√	√
Duty to assist applicants	12(1)		√	√
Duty to document decisions and actions respecting an access request	Regulation 5(4)		√	√
Duty to provide access to a record	12(2)		√	√
Authority to decide on content of response/grant or refuse access	13, 14(1)		√	√
Authority to refuse to confirm or deny the existence of a record	14(2)		√	√
Authority to decide how access will be given	15 Regulation 6		√	√
Authority to extend time limit	16(1), (2), (3), (9)		√	√
Authority to transfer a request for access	17		√	√
Authority to disregard requests	9		√	√
Exceptions				
Authority to withhold information harmful to business interests of a third party	19		√	√
Authority to withhold information harmful to personal privacy	20		√	√
Authority to withhold information harmful to individual or public health or safety	21 Regulation 8(1), (3), (5)		√	√

Agenda Item #6.2.

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
Authority to withhold confidentiality evaluations	22		√	√
Authority to withhold information harmful to law enforcement	23		√	√
Authority to withhold information harmful to a workplace investigation	24		√	√
Authority to withhold information that reveals the identity of a person who has requested advice or made a disclosure/complaint pursuant to the <i>Public Interest Disclosure Act</i>	25		√	√
Authority to withhold information harmful to intergovernmental relations	26	√		
Authority to withhold Cabinet and Treasury Board confidences	27	√		
Authority to withhold local public body confidences	28	√		
Authority to withhold advice from officials	29		√	√
Authority to withhold information/records about audit by Chief Internal Auditor	29(3)	√		
Authority to withhold information harmful to economic interests of a public body	30		√	√
Authority to withhold testing procedures, tests and audits	31		√	√
Authority to withhold privileged information	32(1), (2)		√	√
Authority to withhold information harmful to conservation of heritage sites or endangered species	33		√	√

Agenda Item #6.2.

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
Authority to withhold information that is or will be available to public	34		√	√
Third Party Intervention				
Duty to give third party notice	35		√	√
Authority to decide whether to give access to third party information	36(1)		√	√
Duty to give notice of decision	36(4) - (6)		√	√
Public Interest				
Authority to disclose information in the public interest	37(1)		√	√
Duty to give notice to third party, Commissioner	37(3), (4)		√	√
Reviews and Complaints				
Authority to ask the Commissioner for advice	49(1)	√		
Authority to require Commissioner to examine original record on site	50(4)	√		
Authority to receive requests for review	59(1)	√		
Right to make representations to the Commissioner	71(3), (5)	√		
Duty to discharge burden of proof	63	√		
Duty to comply with Commissioner's Order	66	√		
General Provisions				
Allowing a guardian to exercise the rights or powers of a minor	86(1)(e)		√	√
Authority to specify categories of records available without a formal request and require a fee	90		√	√
Duty to make manuals available	91	√		

Agenda Item #6.2.

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
Fees				
Authority to assess and collect fees	96		√	√
Authority to waive fees	96(5)	√		
Duty to give notice of decision to grant or refuse waiver request	96(6)	√		
Right of Access				
Establishing process for receiving access requests	2(a), (b)	√		
Assuring process for access is made public	Regulation 3(1)	√		

Appendix B – Delegation Table of Provisions of the *Protection of Privacy Act and Regulation*

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
Collection, Correction, Protection of Personal Information				
Authority to set aside collection requirements	5(3), (4)	√		
Authority to decide on requests for correction of personal information	7(1)		√	√
Duty to correct, annotate or link personal information, duty to notify previous recipients	7(3), (4)		√	√
Duty to give notice to individual requesting correction	7(7)		√	√
Authority to transfer a request for correction	8		√	√
Duty to ensure protection of personal information by making reasonable security arrangements	10(1) Regulation (MIN) 2, 3	√		
Duty to notify the affected individual when there exists a significant risk of harm	10(2) Regulation (MIN) 4	√		
Duty to ensure protection of data	20	√		

Agenda Item #6.2.

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
derived from personal information				
Duty to ensure protection of data derived from non-personal data	24	√		
Use and Disclosure of Personal Information				
Establishing rules for electronic consent	Regulation 2(4)(a)	√		
Establishing rules for oral consent	Regulation 2(5)(a)	√		
Authority to disclose to guardian of a minor	54(1)(e)		√	√
Authority to disclose to relative or adult interdependent partner of deceased individual	13(1)(s)		√	√
Authority to disclose to avert imminent danger to health or safety	13(1)(cc) Regulation 1(1)(b)	√		
Authority to approve conditions for disclosure for research and statistical purposes and for administration of research agreements	15	√		
Authority to disclose to guardian of a minor	54(1)(e)		√	√
Review and Complaints				
Authority to ask the	28(1)	√		

Agenda Item #6.2.

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
Commissioner for advice				
Authority to require Commissioner to examine original record on site	29(4)	√		
Right to make representations to the Commissioner	41(6),(8)	√		
Duty to comply with Commissioner's Order	44	√		
General Provisions				
Duty to publish a directory of the body's personal information banks and keep it current	57(2), (5)	√		
Duty to record uses or discloses of personal information not included in directory	57(4)	√		
Collection, Accuracy and Retention of Personal Information				
Establishing controls over the collection, use and disclosure of personal information	2(a)	√		
Authorizing routine correction of personal information	2(b)	√		
Ensuring authorized purpose of collection	4	√		
Assuring proper collection and notification	5	√		

Agenda Item #6.2.

Duty, power or function of Head	Section reference	Retained by Head	Delegated to: Legislative and Advisory Services Assistant	Delegated to other person(s): in absence of Legislative and Advisory Services Assistant - to Legislative and Advisory Services Coordinator
Assuring accuracy of personal information	6(a)	√		
Applying retention standards	6(b)	√		
Use and Disclosure of Personal Information				
Assuring appropriate uses	12	√		
Assuring appropriate purposes of data matching	17	√		
Assuring appropriate uses of data derived from personal information	18	√		
Assuring appropriate purposes of disclosure of data derived from personal information	19	√		
Assuring appropriate purposes for creation of non-personal data	21 Regulation (MIN) 5(1)	√		
Assuring appropriate use and disclosure of non-personal data	22, 23 Regulation (MIN) 5(2)	√		

Appendix C – Information Request to the Town

Is the information available on the Town's website → direct to where the information is

Is the information available via Routine Disclosure → direct to fill in the Routine Disclosure form

Please A fee may apply if the information is to be printed, mailed or provided on a storage device as per the Town's Bylaw at the time.	note:
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If not,
this is an Access to Information Request
Here are the steps without any of the exceptions noted earlier.

1. If General Information Request
 - a. Individual submits an Access to Information Request form to the Town's Privacy Officer, requesting Information the Town has.
 - b. Privacy Officer (or those trained and delegated by the Privacy Officer) validate and clarify the Access to Information Request.
 - c. Applicant pays initial fee.
 - d. Privacy Officer (or those trained and delegated by the Privacy Officer) confirm in a letter to the Applicant the Record(s) being requested, fee paid and when the Applicant can expect a response.
 - e. Privacy Officer (or those trained and delegated by the Privacy Officer) query the appropriate area(s) of the Town for the Record(s).
 - f. Record(s) received by the Privacy Officer (or those trained and delegated by the Privacy Officer).
 - g. Privacy Officer (or those trained and delegated by the Privacy Officer) review the Record(s), withhold as per *Access to Information Act*, and apply any redactions according to the *Access to Information Act*.
 - h. Privacy Officer (or those trained and delegated by the Privacy Officer) release the Record(s) to the Applicant.
2. If General Information Request Continuing Request
 - a. Individual submits an Access to Information Request form to the Town's Privacy Officer, requesting Town Information ongoing manner for up to 2 years.
 - a. Privacy Officer (or those trained and delegated by the Privacy Officer) validate and clarify the Access to Information Request.
 - b. Applicant pays initial fee.
 - c. Privacy Officer (or those trained and delegated by the Privacy Officer) confirm in a letter to the Applicant the Records being request, fee paid, and schedule of when the Request is considered received, when a response can be expected and the reasons for the scheduled timing.
 - d. Privacy Officer (or those trained and delegated by the Privacy Officer) query the appropriate area(s) of the Town for the Record(s) for each new period of the schedule.
 - e. Record(s) received to the Privacy Officer (or those trained and delegated by the Privacy Officer).
 - g. Privacy Officer (or those trained and delegated by the Privacy Officer) review the Record(s), withhold as per *Access to Information Act* and apply any redactions according to the *Access to Information Act*.
 - f. Privacy Officer (or those trained and delegated by the Privacy Officer) release the Record(s) to the Applicant.
3. If Personal Information Request

- a. Individual submits an Access to Information Request form to the Town's Privacy Officer, requesting one's own Personal Information.
 - b. Privacy Officer (or those trained and delegated by the Privacy Officer) validate and clarify the Access to Information Request, including proof of identity from the Individual.
 - c. Privacy Officer (or those trained and delegated by the Privacy Officer) confirm in a letter to the in the Records being requested.
 - d. Privacy Officer (or those trained and delegated by the Privacy Officer) query the appropriate area(s) of the Town for the Record(s).
 - e. Record(s) received to the Privacy Officer (or those trained and delegated by the Privacy Officer).
 - f. Privacy Officer (or those trained and delegated by the Privacy Officer) review the Record(s) withhold as per *Access to Information Act* and apply any redactions according to the *Access to Information Act*.
 - g. Privacy Officer (or those trained and delegated by the Privacy Officer) release the Record(s) to the Applicant.
4. If Correcting Personal Information Request
- a. Individual submits a Request to Correct Personal Information form to the Town's Privacy Officer, requesting correction to one's own Personal Information.
 - b. Privacy Officer (or those trained and delegated by the Privacy Officer) validate and clarify the Request to Correct Personal Information, including proof of identity from the Individual requesting their Personal Information for correction.
 - i. If this is to correct another person's Personal Information, this will include proof that the individual submitting for the correction can legally act for that other person.
 - c. If the Personal Information to be corrected is factual, not conflicting and accompanied by proof, this correction will be made. This correction will include:
 - i. indicating when and who made the correction along with their signature; and
 - ii. attaching or linking to the correction the form and/or the proof of individual or legal authority.
 - d. Privacy Officer (or those trained and delegated by the Privacy Officer) will also notify any Third Party and/or other public body who has been provided this Personal Information within the past year for that Third Party and/or other public body's correction of Personal Information unless the individual making the correction indicates not to.
 - e. If the Correction of Personal Information:
 - i. is an opinion;
 - ii. the individual has not submitted adequate proof to support the correction of Personal Information;
 - iii. there is conflicting information making factual determination impossible;

the Town will not make the correct but add it to the file as an annotation, or linking mechanism if annotation isn't available.
 - f. The Town must respond to the individual requesting correction of Personal Information that the correction of Personal Information has been made or has been noted within 30 Business Days after receiving the request to correct Personal Information.

Appendix D – Access to Information Form

Access to Information Request Form

The personal information collected on this form will be used to respond to your access to information request. This collection is authorized by section 4 (c) of the *Protection of Privacy Act*. For questions about the collection of personal information, contact the Access to Information Coordinator of the public body that has collected the information you are requesting.

See instructions below for completing this form

About you	Last Name		First Name	
	Name of Company or Organization (if applicable)			
	Mailing Address			
	City/Town/Village		Province	Postal Code
	Telephone Number (daytime)		Telephone Number (Evening)	
	Email Address			
About your request	1. What kind of information do you want to access?		<input type="checkbox"/> General information (An initial fee of \$25 is required – see instructions for explanation of fees.) <input type="checkbox"/> Your own personal information (No initial fee is required for personal information.)	
	2. To which public body are you making your request?		(Please fill in the name of the public body that has the records you wish to access. For a complete listing of public bodies, consult the Directory of Public Bodies on the Find an ATI Coordinator website at https://www.alberta.ca/lookup/find-an-ati-coordinator.aspx .)	
	3. Do you want to:		<input type="checkbox"/> receive a copy of the record? OR <input type="checkbox"/> examine the record?	
About the information you want to access	1. What records do you want to access?		Please give as much detail as possible. (If you want access to your own personal information, be sure to give all your previous names. For another person's information, you must attach proof that you can legally act for that person.)	
	2. What is the time period of the records?		Please give specific dates. (See instructions for details.)	
Your Signature	Signature			Date
	Where to send your request			
Send your completed request form, and initial fee if applicable, to the ATI Coordinator of the public body that has the records you wish to access. For contact information, consult the Directory of Public Bodies on the Find an ATI Coordinator website at https://www.alberta.ca/lookup/find-an-ati-coordinator.aspx .				
FOR OFFICE USE ONLY				
Date Received		Request Number		
		Comments		

Classification: Public

Access to Information Request Form

You can access many public body records without making a request under the Access to Information Act. To determine whether you need to make a request under the Act or if you need help completing the form, contact the ATI Coordinator of the public body to which you are making the request.

How to make a request

To obtain access to a record, a request must

- be in writing;
- be submitted to the public body the applicant believes has custody or control of the record;
- provide enough detail to enable the public body to locate and identify the record within a reasonable time with reasonable effort; and
- be accompanied by a fee where a fee is required under this Act.

The public body should respond to the request within 30 business days from receiving the request, unless the time to respond to a request has been extended for additional reasonable purposes.

About you

In this part of the form enter:

- your last name, first name and preferred title, if any;
- the name of the company or organization you are representing, if applicable;
- your complete mailing address and contact information so that the public body can contact you about the request;
- an e-mail address, if any, where correspondence may be sent.

About your request

If you need help to find out what records a public body has, contact the ATI Coordinator for the public body.

1. What kind of information do you want to access?

Check general or personal information.

A request for general information is information other than your own personal information (see below). For example, it would include information about a third party.

- There is an initial fee of \$25.00.
- For a request to a government department, make the cheque payable to the Government of Alberta.
- For a request to a public body that is not a government department, please consult with the ATI Coordinator for payment information. Do not include your credit card information in the mail or fax.
- Additional fees may apply. If the total cost of processing your request is more than \$150, you are asked to pay a 50% deposit.
- The records are provided when the fee is paid in full.

A request for personal information is recorded information about an identifiable individual. A request for personal information can only be made for your own personal information or for personal information of an individual you are entitled to represent.

- There is no initial fee for accessing your own personal information.
- If the cost of photocopying is more than \$10, you will be notified of the fee.

Classification: Public

Continuing request

You may indicate in a request that the request, if granted, continues to have effect for a specified period of up to 2 years. Contact the ATI Coordinator of the public body if you are making a continuing request.

- The initial fee is \$50.00.
- You must pay any additional costs as the information becomes available.

2. To which public body are you making your request?

Enter the name of the public body that you believe has the records that you are requesting.

3. Do you want to receive a copy of the record or examine the record?

Check the appropriate box, indicating whether you want to receive a copy of the record or examine the record.

About the information you want to access

1. What records do you want to access?

- Be as specific as possible in describing the records.
- If you need more space, continue your description on a separate sheet of paper and attach it to this request form.

If requesting your own personal information, give:

- your full name;
- any other names that you have previously used; and
- any identifying number that relates to the records, such as your employee number, case number or other identification number.

If requesting another person's information, give:

- the person's full name;
- any old or name that person may have used on the records;
- any identifying numbers for the person, if you know them; and
- proof that you have authority to act for that person (e.g. guardianship or trusteeship order, power of attorney).

2. What is the time period of the records?

Enter the specific dates or date ranges of the records you want to access (e.g. if you want records for the period January 1, 2023 to August 31, 2024 or you want records from January 2024 to present etc.)

Your signature Sign and date the form.

Where to send your request

Send your completed form, and initial fee if applicable, to the ATI Coordinator of the public body that has the records you wish to access.

Appendix E – Correction of Personal Information Form

Request to Correct Personal Information

Personal information on this form is collected under Alberta's *Protection of Privacy Act* and will be used to respond to your request. See instructions for completing this form.

Contact information	Last Name			Middle Name			First Name			
	Mailing Address		Street		City/Town/Village		Province		Postal Code	
	Telephone Number (daytime) () () ()			Telephone Number (evening) () () ()			Company or Organization			
	E-mail Address									

Request information	<p>1. Whose information do you want to correct?</p> <p><input type="checkbox"/> Your own personal information</p> <p><input type="checkbox"/> Another person's information (Please attach proof that you can legally act for the person.)</p>
	<p>2. To which public body are you making your request? (Please fill in the name of the public body that has the records you want corrected. For a complete listing of public bodies, consult the Directory of Public Bodies on the ATIA website at https://www.alberta.ca/lookup/find-an-ati-coordinator.aspx)</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>

Request details	<p>1. What personal information needs to be corrected? (Please give as much detail as possible. Be sure to give the complete name that is in the records if it is different from the name given above.)</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div>
	<p>2. What correction do you want to make and why? (Please attach any documents that support your request.)</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div>

Your signature	Signature		Date	

Where to send your request	Send your completed request form to the privacy contact of the public body that has the records you want corrected. For contact information, consult the Directory of Public Bodies on the ATIA website at https://www.alberta.ca/lookup/find-an-ati-coordinator.aspx .	
	FOR OFFICE USE ONLY	
Date Received	Request Number	
	Comments	

Request to Correct Personal Information

Instructions

You can correct information in many public body records without making a request under the *Protection of Privacy Act* (POPA). To determine whether you need to make a request under the Act or if you need help completing the form, contact the privacy coordinator of the public body to which you are making the request.

Contact information

In this part of the form enter:

- your last name, middle name, and first name
- your complete mailing address and daytime and evening telephone numbers so that public body can contact you about the request; and
- an e-mail address or mailing address, if any, where correspondence may be sent.

Request information

1. Whose information do you want to correct?
Indicate whether you want your personal information or another person's information to be corrected.

Your personal information

If you want your information to be corrected, you will have to provide proof of your identity.

Another person's information

If you want the information of another person to be corrected, you will have to provide proof that you have the authority to act for that person. For example, you might provide proof that you are the person's guardian or trustee or that you have power of attorney for the person.

2. Enter the name of the public body that you believe has the records that you want corrected.

Request details

1. What records contain the information that you want corrected?
 - Be as specific as possible in describing the records. The more specific your request, the more quickly and accurately it can be answered.
 - If you need more space, please continue your description on a separate sheet of paper and attach it to this form.

If you want a correction made to your own personal information, please be sure that you give:

- your full name;
- any other names that you have used on the records; and
- any identifying number that relates to the records, such as your employee number, case number or other identification number.

If you want a correction made to another person's information, please give:

- the person's full name;
- any other name that person may have used on the records; and
- any identifying numbers for the person if you know them.

2. What correction do you want made? What is incorrect about the information that is currently on the record? Please be specific.

Your signature

Sign and date the form.

Where to send your request

Send your completed form to the privacy coordinator of the public body that has the records you want corrected. For contact information, consult the Directory of Public Bodies available on the ATIA website at:

<https://www.alberta.ca/lookup/find-an-ati-coordinator.aspx>.

Appendix F – Contents of Notice of Privacy Breach to each of the following Parties

Privacy Breach Notification Communication Contents In writing from the Town	Individual(s) and/or Third Party(ies) whose Personal Information was subject to Privacy Breach	Commissioner	Minister of Technology and Innovation
1. Town's name as giving notice;	√	√	√
2. Description of the circumstances of the Privacy Breach;	√	√	√
3. Date or time period when the Privacy Breach is believed to have occurred;	√	√	√
4. Date the Privacy Breach was discovered;	√	√	√
5. General description of type of Personal Information that was subject to the Privacy Breach;	√	√	√
6. Description of steps the Town has taken to reduce the risk of harm to individual's affected by this Privacy Breach;	√		
7. Contact information of the person at the Town who can respond, on behalf of the Town to questions about the Privacy Breach; and	√	√	
8. Notice of the individual(s) right to request a review by the Commissioner	√		
9. How the Privacy Breach was discovered and if applicable, physical location of the Privacy Breach;		√	
10. Date or time period when the Privacy Breach ended or is thought to have ended;		√	
11. General description of the Town's assessment of the risk of harm to individuals and/or Third Party(ies) from the Privacy Breach;		√	
12. Number or estimate of number of individual(s) and/or Third Party(ies) who are subject to a		√	√

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Privacy Breach Notification Communication Contents In writing from the Town	Individual(s) and/or Third Party(ies) whose Personal Information was subject to Privacy Breach	Commissioner	Minister of Technology and Innovation
Real risk of significant harm as a result of the Privacy Breach;			
13. Steps the Town has taken to reduce the harm of those subject to the Privacy Breach;		√	
14. Measures the Town has taken to prevent subsequent similar Privacy Breach;		√	
15. Example of the notice provided to individual(s) whose Personal Information has been subject to the Privacy Breach for whom there exists a Real risk of harm;		√	
16. Any other information the Town considers relevant.	√	√	√

Appendix G – Personal Information Bank

[Insert link]

Appendix H – Privacy Impact Assessment Template

[Insert link]



DIRECTORY OF PERSONAL INFORMATION BANKS

Introduction

The Access to Information Act and the Protection of Privacy Act each came into force for local government bodies on June 11, 2025. The Protection of Privacy Act governs how the Town collects, uses and discloses of personal information. The Access to Information Act governs how the Town allows access to others of any Record in its custody or under its control, subject to certain limitations.

All areas (departments, committees, boards, commissions, etc.) of the Town are subject to the Access to Information Act and the Protection of Privacy Act. The Privacy Officer has the role and responsibility to oversee the Access to Information Act and Protection of Privacy Act at the Town.

Privacy Officer ATIPP@highriver.ca
403-652-2110

Directory of Personal Information Banks by Department

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
Various	Various	General	Resident Inquiry Bank	Various Departments and Divisions	Name, address, telephone number, email address and other personal information included by the originator within the context of the correspondence	Individual with concerns and/or recommendations, or requesting information	Used to assist in responding to resident requests received in-person, by phone or email with respect to Town facilities and operations	Section 4(c) of Protection of Privacy Act
Various	Various	General	Outlook - Contacts	Various Departments and Divisions	Name, address, telephone number and email address	Personal and Business Contacts, Staff Members	Contacts and daily business within the Town of High River	Section 4(c) of Protection of Privacy Act
CO	Corporate Services - Donna Brinkworth	Communications	Photo/Video Release Form	Communications Department	Name, signature, phone number and address; or in the case of a child: child's name and parent's signature	Individuals who have been photographed or recorded on video	Used by Communications for photos or videos that may appear on the website, print materials and other mediums used for promotional and educational purposes with permission	Section 4(c) of Protection of Privacy Act
CAO	Communications	Corporate Services	Customer Request Form	Communications Department	Name, email, phone number	Individuals who have questions that staff are not able to answer at the Home and Lifestyle Show	To allow for follow-up by the department to which the question pertains	Section 4(c) of Protection of Privacy Act
CS	Financial Services	General	General Receivables	Accounts Receivable Department	Name, address, telephone number, fax number	Individuals who have had a receivable account related to RCMP false alarms, tax certificates, tax mortgage fees, waste and recycling, engineering (subdivision Planning, Utility Line Assignments), Planning and Development (Sign Permits, Certificates of Compliance) Insurance Claims, Fire Department, Parks and Cemetery, Transit, etc.	Accounts Receivable administration	Section 4(c) of Protection of Privacy Act
CS	Legislative & Advisory Services	Corporate Services -Jody Hipkin	General Appeal Board File	Legislative Services and Municipal Enforcement Departments	Subject property address, grounds for appeal, name, address and telephone number	Appellant and other parties related to the appeal	To process an appeal to the General Appeal Board	Section 4(c) of Protection of Privacy Act

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Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CS	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Subdivision and Development Appeal Board File	Legislative Services and Planning Departments	Name, address, telephone number, email address, signature, grounds for appeal, disclosure information, tax roll number, payment information and legal description of the subject property. (Note: the Town does not collect tax roll numbers of other parties and it may not collect the signatures of other parties, depending on what those parties submit in writing to the Board.)	Appellant, applicant, adjacent property owners and other parties related to the appeal	To process an appeal to the Subdivision and Development Appeal Board	Part 2.7 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CS	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Property Assessment Complaint File	Legislative Services and Assessment Departments (High River Complaints Only)	Roll number, subject property address, legal land description, name, email address, address, signature, reasons for complaint and payment information, registered owner's name and signature, agency contact information, signature of agent or representative, reasons for appeal, disclosure information	Complainant, registered owners, agents, representatives, and other parties related to the assessment complaint	To process an appeal against an assessment to the Assessment Review Board	Section 460 of the <i>Municipal Government Act</i> and Section 4(c) of the Protection of Privacy Act
CS	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Access to Information Requests	Legislative Services Department	Name, address, telephone number, fax number, email address, mailing address, description of information requested, banking information	Individuals submitting requests under the Access to Information Act or their representatives	To respond to and process requests for information	Section 4(c) of Protection of Privacy Act
CS	Legislative & Advisory Services	Corporate Services -Kent Blair	Information Requests - Managed Outside of Access to Information Act	Legislative Services Department	Name, address, telephone number, fax number, email address, mailing address, description of information requested and reasons for request	Individuals Submitting requests for information that does not fall under the Freedom of Information and Protection of Privacy Act	To respond to and process requests for information	Section 4(c) of Protection of Privacy Act
	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Special Ballot Request	Legislative Services Department	Name, address, mailing address, telephone number and email address	Individuals who require a special ballot	For processing special ballot requests	Section 116 of the Election Act; Section 4(c) of the Protection of Privacy Act
	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Nomination Paper and Candidate's Acceptance (this is a public document)	Legislative Services Department	Name, address for notices and document service, signature, telephone number	Nominee, nominator, witness, official agent	For administration of election process	Section 61 of the Election Act; Section 4(c) of the Protection of Privacy Act
CS	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Application for Registration of Notice of Intent to Become a Candidate for Municipal Office	Legislative Services Department	Name, address, email, telephone number	Candidate, agent	For administration of election process	Section 4(c) of Protection of Privacy Act
CS	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Statement of Scrutineer	Legislative Services Department	Name, Address	Scrutineers, Candidates	For administration of election process	Section 4(c) of Protection of Privacy Act
CS	Legislative & Advisory Services	Corporate Services -Jody Hipkin	Campaign Worker Identification	Legislative Services Department	Name, address	Campaign workers	For administration of election process	Section 4(c) of Protection of Privacy Act
CAO	Planning & Development	General	Cannabis Consumption Proposed Sites: Adjacent Property Owners Notification - KHALID MOHAMMED	Legislative Services Department	Property address; Proposed Consumption Area address; Tax Roll Number; primary owner name; secondary owner name; primary owner address; secondary owner address.	Property owners whose properties are adjacent to several sites in the Town for possible use as public consumption sites for Cannabis consumption, proposed by staff to Town Council in relation to the draft 2018 Cannabis Consumption Bylaw.	For notification of property owners in relation to the public hearing process for the Cannabis Consumption Bylaw.	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
MS	Public Works	Community Infrastructure	Customer Service Files	Parks, Roads and Water Services Departments	Name, address, phone number, email, nature of concern	General public, homeowners, residents, homeowner associations, businesses, contractors	Required for further information and or follow up; to investigate an incident or area of concern noted by the caller; or for reference	Section 4(c) of Protection of Privacy Act
CS	Human Resources	Community Infrastructure	Internal Staff Files	Parks & Human Resources Department	Name, address, phone number, email, emergency contact forms, Access to Information forms, staff evaluations describing work ethic and feedback, disciplinary letters, doctor's notes, course/testing grades and marks	Internal employees	Internal use only; used for reference	Section 4(c) of Protection of Privacy Act
CS	Information Services	Community Infrastructure	Security Report Files	Parks Department	Name, license plate numbers, person location information, notes on substance use or paraphernalia	Residents and non-residents using and or occupying Parks space at any given time of day	To inform the Parks department of any Parks related offences, vandalism or issue that the security guard on duty feels should be relayed to Parks Operations staff	Section 4(c) of Protection of Privacy Act
MS	Parks & Recreation	Community Infrastructure	Agreement Files	Parks Department	Name, address, phone number, email, insurance information, grant information, memorial information,	Homeowners, contractors, event organizers	To assist administration with contact information and provide details pertaining to an event, function, field or diamond booking	Section 4(c) of Protection of Privacy Act
	Finance		Cemetery Files	Parks Department	Name/full legal name, address, phone number, email, age, sex, date of birth, date of death, time of death, place of death, burial permit, company name, will, power of attorney	Cemetery lot owner, deceased person, alternate contact, funeral home businesses, monument suppliers, solicitor/ lawyer, credit card info and cheques	To maintain contact regarding the lot, maintenance concerns, and further interest if there are no burials interred in lot; to track deceased information for records, data, and statistics; to contact funeral home for questions regarding the family and information which may be required to perform a burial; to maintain communication regarding monuments and installation concerns or future maintenance; Lawyer/solicitor documents are kept for reference, lawsuits and inquiries.	Cemeteries Bylaw, Cemeteries Act & Regulation (Alberta); Section 4(c) of the Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
MS	Programming		Community Service Files	Parks Department	Name, address, phone number, email, tasks assigned and number of hours, age	Individuals who have been charged with a criminal offence and are required to complete community work; emergency contacts	To track attendance, the time that the individual worked and the nature of the task in order to report back to their parole officer	Section 4(c) of Protection of Privacy Act
MS	Public Works	Roads, Solid Waste	Canadian Pacific Railway Complaints Tracking	Roads Department	Name, phone number, email address, location/complaint information	Individuals who witness and or experience issues with the railway tracks and crossings	For action and follow-up on issues related to Canadian Pacific Railway tracks and crossings and for reporting purposes	Section 4(c) of Protection of Privacy Act
MS	Public Works	Roads, Solid Waste	Truk Haul Approvals	Roads Department	Name, phone number, company name, email address	Individuals who need to go off a truck route or haul overweight or overdimensional loads	To administer and track permitting for overweight or overdimensional loads and approve travel off truck routes	Traffic Bylaw No. B-14/2016; Section 4(c) of the Protection of Privacy Act
MS	Public Works	Roads, Solid Waste	Visitor Log & Key Sign Out Sheet	Parks, Roads and Water Services Departments	Name, company, Town of High River contact, time in, time out, access pass number, keys borrowed	Visitors passing beyond front reception area or requiring entry into restricted areas	To track what keys and passes have been shared and to track people in the event of evacuation or emergency	Section 4(c) of Protection of Privacy Act
MS	Public Works	Treatment & Utilities	Dewatering Permit Applications	Water Services Department	Name, position, phone number, email, company name, company mailing address	Individuals requesting permission to dewater standing water/ground water into storm water system	To track who has been granted permission to pump standing/ground water into storm water system, track approximate amounts of water being pumped into the storm water system and dates dewatering will happen	Drainage Bylaw No. B-03/2014; Section 4(c) of the Protection of Privacy Act
MS	Public Works	Treatment & Utilities	Industrial Monitoring Program Files	Water Services Department	Name, phone number, email address, physical address, mailing address, conversation notes, and correspondence with Industrial Monitoring Technicians	Business owners, industrial, commercial, and institutional customers	To administer the industrial monitoring program to prevent over strength effluent from entering the sanitary sewer (wastewater) system and follow-up on public education and issues related to the wastewater system	Sewer Bylaw No. B-11/2015; Section 4(c) of the Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
MS	Public Works	Treatment & Utilities	Private OG Separator Tracking	Water Services Department	Name, email, physical address, mailing address, inspection and maintenance documents	Business owners and employees	To track compliance with Drainage Bylaw No. B-03/2014 (cleaning and maintenance of a storm water Interceptor)	Drainage Bylaw No. B-03/2014; Section 4(c) of the Protection of Privacy Act
MS	Public Works	Community Infrastructure	Water Services	Request for Repair Letters	Water Services Department	Homeowners	For action or follow-up regarding private water or sanitary line repairs required by homeowner	Sewer Bylaw No. B-11/2015; Waterworks Bylaw No. B-30/2016; Section 4(c) of the Protection of Privacy Act
MS	Public Works	Community Infrastructure	Care & Compassion Registration	Waste & Recycling Department	Name, mailing address, email address, telephone number, names and birthdates of children	Individuals calling with concerns and or recommendations for staff regarding programs; individuals applying for waste & recycling exemptions (i.e. diaper exemption)	Administration of Waste & Recycling programs	Section 4(c) of Protection of Privacy Act
MS	Parks & Recreation	Parks and Recreation (Bob Snodgrass Rec Complex)	Facility Rental Contract / Permit	Bob Snodgrass Recreation Complex	Contact number; renter's name, address, telephone number; notes regarding the event and staff user ID	Individuals renting Bob Snodgrass Recreation Complex facilities	A contract between Bob Snodgrass Recreation Complex and renters of the facility	Section 4(c) of Protection of Privacy Act
MS		Parks and Recreation (Bob Snodgrass Rec Complex)	Kids Connection Participant Files	Bob Snodgrass Recreation Complex	Participant's name; date of birth, daily time in and time out of program, parent name, mailing address, telephone number, email address; payment information (information from a cheque or credit card), payment plan application; room or group name; incident/accident report, details, name of staff member notified, name of person who observed the accident/incident, name of first aider, staff member's signature and parent's signature	Program participant, parent	Administration of the Kids Connection Program and to verify attendance	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Client Fitness Appraisal Form	Bob Snodgrass Recreation Complex	Client's name; health related information for the assessment of the applicant; signature of parent (if applicable) and witness' name	Fitness client, parent, witness	To develop an exercise program for the client	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Client Fitness Appraisal Form	Bob Snodgrass Recreation Complex	Client's name; health related information for the assessment of the applicant; signature of parent (if applicable) and witness' name	Fitness client, parent, witness	To develop an exercise program for the client	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Dryland Training Forms	Bob Snodgrass Recreation Complex	Client's name, date of birth, address, telephone number (home and work), email address, fax number and occupation; emergency contact name and telephone number; witness' name; health/fitness information of the client	Dryland Training client, emergency contact, witness	Administration of personal training at Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Bob Snodgrass Recreation Complex Waiver Release	Bob Snodgrass Recreation Complex	Participant's name and signature; witness' name and signature	Participant, witness	Administration of personal training at Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
MS	Community Services	Bob Snodgrass Rec Complex	Day Camp Participation File (3 Forms may be filled out: Registration Form; Participation Form; Ability Form)	Bob Snodgrass Recreation Complex	Participant Form: Participant's name, age, date of birth, gender, medical conditions and/or medications, allergies, learning disability or medical condition, medication required, participant pick-up information, parent or guardian name, relationship to participant, telephone number; emergency contact name, relationship to participant and telephone number; parent or guardian signature; witness signature; includes release, waiver of claim and assumption of risk for programs.	Medical Form: Participant name, description of medical condition(s), medication name, how medication shall be administered, when medication is to be taken (in an emergency and at specific times), medical record for dany camp leader to complete, parent/guardian name, parent/guardian signature. Ability Form: Participant name, information on social, physical or learning requirements for leaders to be aware of during program, if participant has an aide coming with them, behaviors/concerns particular to child, is child taking any medications, additional comments, parent/guardian name, parent/guardian signature	Administration of seasonal and summer day camp programming for Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Photo Release Forms	Bob Snodgrass Recreation Complex	Child's name and parent's signature	Individuals who have been photographed	Used for photos or videos that may appear on the website, print materials and other mediums used for promotional and educational purposes with permission	Section 4(c) of Protection of Privacy Act
	Community Services	Bob Snodgrass Rec Complex	Personal Training Client Information Sheet	Bob Snodgrass Recreation Complex	Client's name, address, telephone number, email address, fax number, occupation, health/fitness information; exercise information; emergency contact name and telephone number; witness' name; list preferences (of trainer and days of the week)	Client, emergency contact, witness	Administration of personal training at Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
	Community Services	Bob Snodgrass Rec Complex	Nutrition Coaching Client Information Sheet	Bob Snodgrass Recreation Complex	Client's name, date of birth, address, telephone number, email address, fax number, occupation, current medications; emergency contact name and telephone number	Client, emergency contact	Administration of nutrition coaching at Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Child Care Sign In/Out Sheet	Bob Snodgrass Recreation Complex	Visitor's badge number; parent's name; child's name, age, allergy alert and daily time in/out of program	Individuals who have used child care services at Bob Snodgrass Recreation Complex; children	To provide security and safety within the child care program	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Annual Pass Payment Plan	Bob Snodgrass Recreation Complex	Name of pass type (corporate, annual or Staff); starting date of pass; expiry date of pass; cost of pass; name of passholder; name of purchaser; address; birthdate; family name or organization name; telephone number; and email address.	Individuals applying for the annual pass payment plan	Administration of annual pass program at Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Town of High River's Employee Membership Application	Bob Snodgrass Recreation Complex	Name, address, telephone number, email address; information from a credit card or cheque for payment; signature; date of birth and gender	Employee and other individuals utilizing the Bob Snodgrass Recreation Complex annual pass	Administration of annual pass program at Bob Snodgrass Recreation Complex.[Note: this uses the same application form as for other non-employee members.]	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Executive Membership Pass Contract	Bob Snodgrass Recreation Complex	Membership pass card number and signature	Participants in the Executive Membership program	Administration of the executive membership program at Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
MS	Community Services	Bob Snodgrass Rec Complex	Corporate Membership Discount Contract	Bob Snodgrass Recreation Complex	Business name, contact person, address, telephone number, fax number, and email address; business designate authorized name and signature; name, email address; information from a credit card or cheque; date of birth and gender	Employees of corporate entity; individuals utilizing the Bob Snodgrass Recreation Complex pass	Administration of the corporate membership discount program for Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Participant Support Program Application	Bob Snodgrass Recreation Complex	Name, signature, address, telephone number, email address; documentation to support social program eligibility; payment information including credit card information; date of birth and gender; signature of individual assisting with the application, their relationship to the applicant, position/agency name, telephone number.	Participant in the program, individual using the pass, individual assisting with the application, staff member who verified the income	Administration of programming for Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Public Incident Investigation Report	Bob Snodgrass Recreation Complex & Recreation Department	Name, address, telephone number, age, date of birth; time of incident, location of incident, date and time incident was reported, description of incident, type of treatment provided; next of kin name and telephone number; witness' name, age, address, telephone number, relationship to patron involved in the incident; date submitted and team leader signature	Patrons, employees advised of incident, next of kin, individual submitting incident report, team leader, witness	Administration of programming for Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Major Accident Report	Bob Snodgrass Recreation Complex	Name, address, telephone number, gender; name of parent or guardian, address and telephone number; medical history; description of injury; responder's treatment; family doctor's name; witness to accident's name, signature and telephone number; signature of lifeguard on duty; date, time, location and cause of accident	Patron, parent or guardian, family doctor, witness, lifeguard on duty	Administration of programming for Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	High River Receipt	Bob Snodgrass Recreation Complex	Staff username, transaction number; invoice number; participant name, credit card number (partial - last four digits); authorization code from merchant; reference number; GST number; bar code (Note: bar code can be scanned re: transaction number)	Staff, participant	Administration of programming for Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	MEND Healthy Growth Check (Pre and Post Program)	Bob Snodgrass Recreation Complex	Participant name, address, phone number, email address, social data, medical questionnaire, physical activity questionnaire, parental questionnaire, child's questionnaire	Participant, child, parent/caregiver	Administration of MEND 7-13 programming for Bob Snodgrass Recreation Complex	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Recreation Software System	Bob Snodgrass Recreation Complex	Name, phone number, birthdate, address, telephone number; facility financial activity, payment information and registration history; next expiry date; email (if customer chooses to have receipt emailed); attendance history (if signed up and checked in for a class and number of scans to use facility; for family memberships each person is scanned individually for client attendance history); emails stored that are sent from the system (e.g. non-payment, membership to expire)	Customers	Internal records to support client customer account	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
MS	Community Services	Bob Snodgrass Rec Complex	Waitlists	Bob Snodgrass Recreation Complex	Name, phone number	Customers	Internal records to support client customer account and waitlist	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Cancellation Form	Bob Snodgrass Recreation Complex	Name, phone number, address, signature; customer ID barcode	Customers	Internal records to support customer cancellation agreement and acknowledgement	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Hold/Extension Form	Bob Snodgrass Recreation Complex	Name, phone number, address, signature, barcode for card, hold start date and re-activation date	Customers	Internal records to support customer hold/extension agreement and acknowledgement	Section 4(c) of Protection of Privacy Act
MS	Community Services	Bob Snodgrass Rec Complex	Recreation Management System	Bob Snodgrass Recreation Complex	Customer name, phone number, birthdate, address, telephone number; facility financial activity, payment information and registration history	Individuals who have done the following recreation-related activities: applied for a Bob Snodgrass Recreation Complex pass; registered for a program; bought products or services; booked a facility; used online services for customers; used personal training; or used childcare services.	Administration of recreation-related activities	Section 4(c) of Protection of Privacy Act
MS	Community Services	Recreation, Culture & Social Sustainability	Ed Eggerer Athletic Park	Recreation Department	Name, address, telephone number, email address	Facility users	Contact list of users of the Athletic Park for billing and business purposes	Section 4(c) of Protection of Privacy Act
MS	Community Services	Recreation, Culture & Social Sustainability	Special Events Held on Town of High River Owned Lands	Recreation Department	Name, phone number, email address, mailing address	Event organizer, committee members, contractors	To track completed conditions and legal requirements to ensure events are safe for public. Also, contact information in case of emergency during event.	Section 4(c) of Protection of Privacy Act
MS	Community Services	Recreation, Culture & Social Sustainability	Arena Bookings	Recreation Department	Name, business name, address, telephone number and email address	Facility users	Contact list of users of the arenas for billing and business purposes	Section 4(c) of Protection of Privacy Act
MS	Community Services	Recreation, Culture & Social Sustainability	High River's Youth Advisory Committee – MOVE TO COMMUNITY SUPPORT SERVICES UNDER SHELLEY KOOT	Community Development/Social Planning Department	Name, address and telephone number, emergency contact information	Youth members, emergency contact	Used to contact members for special events and meetings and for emergency purposes when attending Town functions	Section 4(c) of Protection of Privacy Act
MS	Community Services	Recreation, Culture & Social Sustainability	Fireworks/Parade Committee – JANELLE K	Community Development/Social Planning Department	Name, address and telephone number, emergency contact information	Youth members, emergency contact	Used to contact members for special events and meetings and for emergency purposes when attending Town functions	Section 4(c) of Protection of Privacy Act
MS	Community Services	Recreation, Culture & Social Sustainability	Family & Community Support Services (FCSS) survey data information – MOVE TO COMMUNITY SUPPORT SERVICES UNDER SHELLEY KOOT	FCSS Department	name, address, phone numbers, DOB, income sources, personal health care numbers, gender, number of people in family, age categories, place of residence, language spoken at home, and household income; Likert-type survey questions	FCSS-funded Program participants	Mandatory reporting to Provincial FCSS program, aggregation of data and analysis to understand program effectiveness for different populations	Section 4(c) of Protection of Privacy Act
MS	Community Services	Recreation, Culture & Social Sustainability	Mayor for a Day Applications	Social Planning/Records	Name, address, phone number and name of school attended by applicant	Community youth applicants	Used to select two youths for the Mayor for a Day program	Section 4(c) of Protection of Privacy Act

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Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
MS	Community Services	Recreation, Culture & Social Sustainability	Youth Engagement Strategy List	Social Planning (Electronic Copy Only)	List of age groups, quadrant of the Town lived in, name of parent/guardian, email addresses of parent/guardian and personal email	Youth (aged 12-24) who participated in the consultation initiatives and who wish to be informed of projects and initiatives that focus on opportunities for youth in High River	Contact list used to inform youth of projects and initiatives focused on opportunities for youth in the Town	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Insurance & Risk Management	Insurance Claims	Insurance & Risk Management Department	Name, address, telephone number, email address, specific details about the claim (property or personal injury), photos of the site; witness statements; claim and file numbers; property details or vehicle details (including license plate numbers); medical records	Individuals with insurance claims, third parties, witnesses	Administration of the insurance program	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Insurance & Risk Management	Facility User Group Insurance Application	Insurance & Risk Management Department	Name, address, telephone number, email address, specific details about the function to be held at Town facility	Individuals renting Town facilities	Administration of insurance program	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Insurance & Risk Management	Volunteer Waivers – THIS ARE HELD BY THE VARIOUS DIVISIONS ORGANIZING VOLUNTEER ACTIVITIES	Insurance & Risk Management Department	Name, age, address and signature	Volunteers	Administration of insurance program	Section 4(c) of Protection of Privacy Act
	Corporate Services	Insurance & Risk Management	Insurance Benefits for Council Members	Insurance & Risk Management Department	Name, relationship between insured and beneficiary, signature	Insured individuals and beneficiaries	Administration of insurance program	Section 4(c) of Protection of Privacy Act
	Corporate Services	Financial Services - Accounts Receivable	General Receivables	Accounts Receivable Department	Name, address, telephone number, fax number	Individuals who have had a receivable account related to RCMP false alarms, tax certificates, tax mortgage fees, waste and recycling, engineering (subdivision Planning, Utility Line Assignments), Planning and Development (Sign Permits, Certificates of Compliance) Insurance Claims, Fire Department, Parks and Cemetery, Transit, etc.	Accounts Receivable administration	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Financial Services - Accounts Receivable	Builder Credit Application – THIS MAY BE PLANNING UNDER KHALID MOHAMMED	Accounts Receivable Department	Name, title, company name, phone, fax, email address, banking information, reference information	Builder's applying for credit with the Town, references	To grant 'on account' privilege	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Utility Administration	Utility Database	Utility Administration Dep	Property owner name, address and/or telephone, utility account number, historical utility billing data including consumption, connection/disconnection dates, customer ID, notes on customer activity and banking information for the payment plans	Utility customers	To produce bi-monthly utility invoices for the property owner	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Utility Administration	Utility Account Maintenance	Utility Administration Department	Name, address, phone number, email address, banking information	Utility customers	To set up and cancel utility accounts and update database information	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Utility Administration	Pre-authorized Payment Database	Utility Administration Department	Names, addresses, bank account numbers	Utility customers	To set up pre-authorized payment	Section 4(c) of Protection of Privacy Act

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Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CS	Corporate Services	Assessment and Taxation	Assessment Roll	Assessment Department	Roll number, legal description, municipal address of each property (vacant and improved parcel), type of improvement on the parcel, assessment class, liability code, linear property information, taxable status and school declaration of the home owner	Property owners	To produce the annual assessment roll for the Town of High River	Section 4(c) of Protection of Privacy Act
CS	Corporate Services	Assessment and Taxation	Assessment Roll Database	Assessment Department	Property owner name, mailing address and/or telephone number; assessment roll number; use of land; land title changes including property owner name, address; sale price of the property; lease information on commercial and industrial properties including the owner name and telephone number; lessee name; rates paid for the lease	Property owners, lessees	To help determine the typical market value of commercial and industrial properties and to produce the annual assessment roll	Sections 295, 302(1) & 303 of the <i>Municipal Government Act</i> ; Section 4(c) of the Protection of Privacy Act
CS	Corporate Services	Assessment and Taxation	Tax Roll Database	Taxation Department	Legal description; assessment of property; property owner name, address and/or telephone number; tax roll number; customer ID; notes on customer activity and banking information for the Monthly Tax Payment Plan; land title information; mortgage numbers; school support declaration	Property owners	To produce a tax notice for property owners	Sections 328 & 329 of the <i>Municipal Government Act</i> ; Section 4(c) of the Protection of Privacy Act
CS	Corporate Services	Information Technology	My High River Accounts	Information Technology Department	General Staff: Email address, name, telephone number. Utilities: Utility account numbers, mailing address, name, pre-authorized banking information, invoice history (water meter readings, charges, past due amounts, payment amounts made towards bills, etc) Utilities: Utility account numbers, mailing address, name, pre-authorized banking information, invoice history (water meter readings, charges, past due amounts, payment amounts made towards bills, etc) Taxation: Tax roll numbers, mailing address, name, tax amounts owing, payment plan amounts Assessment: Tax roll numbers, dwelling information such as year built, square footage, improvements, fireplaces, etc., Assessment amounts Municipal Enforcement: Business/animal license numbers, all other license information is stored elsewhere but retrieved by THR Recreation: Encrypted PerfectMind password, all other recreation information is stored elsewhere but is retrieved by THR	Individuals who create a THR Account	Information stored to facilitate logins, payments and notifications; to facilitate bill display, account balances and payment notifications; to facilitate tax notice display, balances and payment notifications; to facilitate assessment notice display and property information for owners; to display expiry dates, amounts owing and business/animal information; to display Bob Snodgrass Recreation Complex account information such as names of members	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CAO	Growth and Protective Services	High River Fire Department	Fireground Tactical Worksheet and Fire Data Management Software	High River Fire Department	Incident number; location of incident, description of incident and actions taken; type of call; name, address and telephone number of owner; name, address and telephone number of occupant; make, model, year of vehicle; insurance company and policy number; driver's license number, incident commanders name; motor vehicle crash information: driver name, address, driver's license number; insurance, company name, agent's name, telephone number, insurance policy number	Individuals involved in or witness to an incident	Used for billing purposes	Section 4(c) of Protection of Privacy Act
CAO	Growth and Protective Services	High River Fire Department	Alberta Infrastructure (Firecall and Rescue Information)	High River Fire Department	Date of service; call type; incident number; location of incident; name of attendant; name, address, telephone number (home and business) of driver/owner; registered owner/insurance company agent name and policy number	Driver or registered owner involved in incident, insurance agents	Town of High River for billing purposes.	Section 4(c) of Protection of Privacy Act
CAO	Growth and Protective Services	High River Fire Department	Fire Database (FDM)	High River Fire Department	Name, mailing address, legal land description, inspection date, incident date, list of building fire code deficiencies, insurance information	Owner, occupant, management company representatives or insurance agents	Administration related to Fire Inspection Records, Burn Permits, Fire Investigation Reports	<i>Safety Codes Act, 26(1), 31(1), 34 35, 48; Administrative Items Regulations (A.R. 16/2004) s. 9; Municipal Government Act ; Section 4(c) of the Protection of Privacy Act; Fire Services Bylaw B-19/2007</i>
CAO	Fire & Protective Services	Municipal Enforcement	Voluntary Payment Ticket - Dog Control	Municipal Enforcement Department	File & ticket number; penalty; summons information, offence date & time, dog license number; dog name, breed, sex, owner's name, address, telephone number, date of birth; issuer's signature and badge number	Individuals who has been issued a ticket under bylaw; ticket issuer	To process infractions under bylaw	Bylaw No. B-33/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Voluntary Payment Ticket - Traffic	Municipal Enforcement Department	File & ticket number; penalty; summons information; offence date and time; description of vehicle; license plate or VIN #, registered owner's name, address, telephone number, date of birth and driver's license number & MVID; issuer's signature and badge number	Individuals who have been issued a ticket under bylaw; ticket issuer	To process infractions under Bylaw No. B-14/2016	Bylaw No. B-14/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Voluntary Payment Ticket - Business Licensing	Municipal Enforcement Department	File number; penalty; summons information; offence date and time; name, address and telephone number of the accused; issuer's signature and badge number; name of company, address and telephone number	Individuals who have been issued a ticket under bylaw; ticket issuer	To process infractions of operating a business without a valid business license	Bylaw No. B-52/2005 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Violation Ticket - Various Provincial Acts and Regulations	Municipal Enforcement Department	Ticket number; name, address, date of birth and driver's license number of the accused; place and time of offense; vehicle license number, vehicle make, colour, model and year of the vehicle; Officer's signature and badge number; adjudication information	Individuals issued a ticket under various Provincial Acts and Regulations; ticket issuer, vehicle owner	To process infractions on various Provincial Acts and Regulations listed on the violation ticket	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Lost and Found Dog Record	Municipal Enforcement Department	Date of report; name of caller, home telephone and/or work telephone; tattoo/collar/chip/tag number of dog; dog name, breed, sex	Individuals calling to report a lost or found dog	To assist in locating lost or found dogs	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Officer's Note Book	Municipal Enforcement Department	Notes made by Bylaw and Peace Officers on scene or by phone regarding complaints and violations	Individuals involved in investigation of complaints or violations	To assist Officers with investigations	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CAO	Fire & Protective Services	Community Development	Permit to Parade	Municipal Enforcement Department	Name, address and signature; nature of the parade/procession; name of insurance company, policy number	Individuals applying for permits	Relating to the administration of the Parade Permit Program	Bylaw No. B-14/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Community Development	Application for Permit to Hold a Neighbourhood "Block" Party	Municipal Enforcement Department	Name, address, telephone number and signature; details of the block party; cheque information (held for deposit)	Individuals applying for permit	Relating to the administration of the Block Party Program	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Community Development	Neighbourhood Consent Form for Neighbourhood "Block" Party	Municipal Enforcement Department	Name, address, telephone number and signature	Neighbours consenting to block party	Relating to the administration of the Block Party Program	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Bike Festival Participant Risk Acknowledgement, Release, Waiver of Claim and Assumption of Risk for Program (Element of High Risk)	Municipal Enforcement Department	Child's name, parent's signature (if child is under the age of 18 years) and witness' signature	Participants; parent (if applicable) and witnesses signing forms	Administration of the Bike Festival program	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Photo Release Form - Bike Festival	Municipal Enforcement Department	Child's name and parent's signature	Participants; parents (if applicable)	Used by High River Bike Festival organizers to determine which child's photo will be used for promotional purposes with permission	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Unlicensed Dog List	Municipal Enforcement Department	Name, address and telephone number; dog tag number and listed dog owner's dwelling status	Dog owners	Provided to administrative staff on a monthly basis to track unlicensed dogs	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Traffic Advisory Committee (TAC) Correspondence	Municipal Enforcement Department	Name, address, telephone number and email address	Residents requesting action by the Traffic Advisory Committee	Used by administrative staff to contact residents regarding TAC requests	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Disbursement Report	Municipal Enforcement Department	Name and address of accused; amount of the violation ticket and whether the penalty has been paid	Individuals issued a violation ticket	Used by administrative staff to track violation ticket status	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Outstanding Warrant Report	Municipal Enforcement Department	Name, date of birth and last known address of accused; ticket number	Individuals with an outstanding warrant	Used by administrative staff to track outstanding warrants	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Alberta Justice Report	Municipal Enforcement Department	Name of accused; docket number; action taken and charges	Individuals issued a ticket and appearing before Alberta Justice	Used by Alberta Justice staff at court house and status of tickets	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Notice of Vehicle Seizure - Immobilization - Removal	Municipal Enforcement Department	Name, gender, date of birth, operator's license number, address, telephone number and vehicle identification number (VIN) of driver; name, gender, date of birth, operator's license number, address, telephone number and VIN of registered owner (if different from the driver's information); vehicle information including license plate number, province of issue, VIN, year, make and model; reason for seizure, immobilization or removal; company name, address and telephone number of vehicle impoundment area; name of towing company and signature of representative; police file number; regimental number	Drivers, owners, insurers, towing company representatives	To track seized vehicles by administrative staff and officers	Traffic Safety Act and Section 4(c) of the Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CAO	Fire & Protective Services	Municipal Enforcement	Prosecutor Information Sheet	Municipal Enforcement Department	Investigator's name; accused name and address; offense, offence date and offence location, circumstances of the offence; and witness' name	Investigators, accused individuals, witnesses	A trial file for the Prosecutor	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Correspondence - Failure to Comply with Summons or Voluntary Program	Municipal Enforcement Department	Name and address of the accused; signature of Peace Officer	Accused individuals, Peace Officers	Used to contact the accused regarding a warrant	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Information On Behalf of Her Majesty The Queen	Municipal Enforcement Department	Name and address of informant; name and date of birth of accused; signature of Peace Officer	Informants, accused individuals, Peace Officers	Used to describe what the warrant is for	Sections 506 and 788 of the Criminal Code of Canada and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Request for Justice of the Peace Services Fax Cover Sheet	Municipal Enforcement Department	Police file number; Crown Prosecutor or Presiding Officer's name and telephone number; accused name and location of accused at agency; process information, judicial interim release hearing, telewarrant and apprehension details; fax operator's name and telephone number	Crown Prosecutors, Presiding Officers, accused individuals, fax operators	To request Justice of the Peace Services from the Department of Alberta Justice	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Promise to Appear	Municipal Enforcement Department	Name, address, occupation, signature and date of birth of the accused; substance of the offence; court date, time and location of court; signature of Justice and Releasing Officer in Charge or Peace Officer	Accused individuals, Justices, Releasing Officers, Peace Officers	For trial purposes	Section 498 and 499 of the <i>Criminal Code of Canada</i>
CAO	Fire & Protective Services	Municipal Enforcement	Summons to A Person Charged with An Offence	Municipal Enforcement Department	Name and address of the accused; substance of the offence; court date, time and location of court; signature of Officer and Commissioner of Oaths	Individuals charged with an offence	For trial purposes	Sections 507, 508, 509 and 512 of the <i>Criminal Code of Canada</i>
CAO	Fire & Protective Services	Municipal Enforcement	Notice to Owner Regarding Unightly Premises (Community Standards Bylaw)	Municipal Enforcement Department	File number; name and address of registered owner; description of untidy or unsightly premises and signature of Community Peace Officer	Property owners, Peace Officers	To provide written notice to a land owner regarding unsightly property	Community Standards Bylaw B-09/2012 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Order Regarding Unightly Premises	Municipal Enforcement Department	File number; name and address of registered owner; description of untidy or unsightly premises and signature of Community Peace Officer	Property owners, Peace Officers	To process a written Order under the Town of High River's Unightly Premises Policy	Community Standards Bylaw B-09/2012 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Appeal Notice to Unightly Order	Legislative Services and Municipal Enforcement Department	Subject property address; grounds for appeal; name, address and telephone number of the appellant	Individuals who appeal an unsightly property order	To process an appeal for an unsightly property order	Community Standards Bylaw B-09/2012 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Electronic Complaint Reports - Complaint Database	Municipal Enforcement Department	Name, case number; report synopsis/overview; location of incident; full name; date of birth; address; telephone number; driver's license number; province of issue and motor vehicle identification.	Accused individuals, family of accused, pet owners, complainants, family of complainants, registered owners, vehicle owners, drivers, business owners, renters, witnesses	To process resident's concerns and any infractions of Town bylaws, Provincial Acts or Regulations	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Electronic Complaints Reports - Business Contacts	Municipal Enforcement Department	Business name, address and telephone number	Individuals with concerns or questions	To process resident's concerns and any infractions of Town bylaws, Provincial Acts or Regulations	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CAO	Fire & Protective Services	Municipal Enforcement	Electronic Complaint Reports - Agency Representative Contact Database	Municipal Enforcement Department	Name, title and badge number (if applicable) of RCMP member, SPCA representative or provincial Sherriff	Agency representatives	To process resident's concerns and any infractions of Town bylaws, Provincial Acts or Regulations	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Electronic Complaint Reports - Animal Complaint Database	Municipal Enforcement Department	Animal owner's name and actions taken by Bylaw Officer against the owner contravening the Animal Control Bylaw	Dog owners	Used by Municipal Enforcement staff to process violation tickets or court files	Animal Control Bylaw No. B-33/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Electronic Complaint Reports - Motor Vehicle Database	Municipal Enforcement Department	Registered owner's name; license plate number and province of issue; vehicle identification number; make, model, colour and year of vehicle; insurance company name, insurance policy number and expiry date; notes on the file with regard to violation of various Town bylaws and provincial acts and regulations	Individuals with concerns or questions	To process resident's concerns and any infractions of Town bylaws, Provincial Acts or Regulations	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Electronic Complaint Reports - Supplements Database	Municipal Enforcement Department	Officer's last name or badge number	Peace Officers	To and assist with follow-up on investigations (search engine for reports)	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Municipal Enforcement	Electronic Complaint Reports - Report Tasks Database	Municipal Enforcement Department	Address and/or file number	Individuals involved in investigation	To assist with follow-up on investigations (list of outstanding follow-up items by date, address or file number)	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Customer Care - Louise Albert	Accounts Receivable Database (Animal License Billing)	Municipal Enforcement Department	Name, address, home and work telephone number, email address	Animal owners who have applied for an animal license	Administration of the licensing and regulation of animals	Section 7 and Section 8 of the <i>Municipal Government Act</i> , Section 4(c) of the <i>Protection of Privacy Act</i> and Animal Control Bylaw No. B-33/2016
CAO	Fire & Protective Services	Customer Care - Louise Albert	Accounts Receivable Database (Business License Billing)	Municipal Enforcement Department	Owner name, address, and telephone number	Business owners who have applied for a business license	Administration of the licensing and regulation of business licensing	Section 7 and Section 8 of the <i>Municipal Government Act</i> , Section 4(c) of the <i>Protection of Privacy Act</i> and Bylaw B-52/2005.
CAO	Fire & Protective Services	Customer Care - Louise Albert	Business License Application (Commercial or Industrial)	Municipal Enforcement Department and Building Inspections	Name of primary contact for business, phone number and email address; name of secondary contact for business, telephone number and email address; two contact names of individuals with access to the business in the event of an emergency or disaster; Calgary Health Region number and/or tenancy number (where applicable)	Individuals applying for business licence or listed as contact for business, individuals with access to the business	Administration of the licensing and regulation of business licensing	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Customer Care - Louise Albert	Business License Application (Home Based)	Municipal Enforcement Department and Building Inspections	Name of primary contact for business, phone number and email address; name of secondary contact for business, telephone number and email address; Calgary Health Region number and/or residential occupation permit number (where applicable)	Individuals applying for business licence or listed as contact for business	Administration of the licensing and regulation of business licensing	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CAO	Fire & Protective Services	Customer Care - Louise Albert	Contractor Registration Sheet or Business License Application	Municipal Enforcement Department and Building Inspections	Business name, address, telephone, fax number, email address; master electrical number and copy of certificate; plumbing certification number and copy of certificate; gas certification number and copy of certificate; owner of company and telephone number; Site Supervisor's name and telephone number; contact name and telephone number for office	Company owners, site supervisors, office contacts	Administration of the licensing and regulation of business licensing	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Customer Care - Louise Albert	Animal License Application	Municipal Enforcement Department and Building Inspections	Animal owner's name, address, telephone number, email address, animal tattoo/microchip number	Individuals applying for animal license	Administration of the licensing and regulation of animals	Animal Control Bylaw No. B-33/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Municipal Services	Safety Codes - Andree Lamoureux	Building Inspections Permit Application - Residential Alteration/Improvement/Accessory	Building Inspections Department	Name, signature, property address, telephone number; legal description; permit number; name of sub-contractors used; credit card information for payment of permits	Property owners, applicants, contractors	Administration of the Building Inspections Program	Section 4(c) of the Protection of Privacy Act and the Safety Codes Act
CAO	Municipal Services	Safety Codes - Andree Lamoureux	Building Inspections Permit Application - Residential New Construction	Building Inspections Department	Project address, legal description; name, address, phone number, email address; date of application; permit number; receipt number; name of sub-contractors; credit card information for payment; drawings, plot plans, real property reports, documents submitted with the application	Property owners, permit applicants, contractors	Administration of the Building Inspections Program	Section 4(c) of the Protection of Privacy Act and the Safety Codes Act
CAO	Municipal Services	Safety Codes - Andree Lamoureux	Building Inspections Permit Application - Commercial/Industrial/Institutional/ Mixed Use	Building Inspections Department	Project address, legal description; name, address, telephone number, email address; date of application; permit number; receipt number; name of contractors; credit card information for payment; drawings, plot plans, real property reports, documents submitted with the application	Property owners, permit applicants, contractors	Administration of the Building Inspections Program	Section 4(c) of the Protection of Privacy Act and the Safety Codes Act
CAO	Fire & Protective Services	Building Inspections - Andree Lamoureux	Demolition Permit Application	Building Inspections Department	Project address, legal description; name, signature, address, telephone number, email address; contractor name; date of application; permit number; receipt number; credit card information for payment	Property owners, permit applicants, contractors	Administration of the Building Inspections program	Section 4(c) of the Protection of Privacy Act and the Safety Codes Act
CAO	Fire & Protective Services	Building Inspections - Andree Lamoureux	Permission to Start Work (Foundation Only) for Commercial	Building Inspections Department	Name and signature, property address, legal description, project description	Permit applicants, property owners	Administration of the Building Inspections Program	Section 4(c) of the Protection of Privacy Act and the Safety Codes Act
CAO	Fire & Protective Services	Building Inspections - Andree Lamoureux	Customer Concern Form	Building Inspections Department	Name, phone numbers (home and business) mailing address, subject property; property owner	Complainants, property owners	Administration of the Building Inspections Program	Section 4(c) of the Protection of Privacy Act and the Safety Codes Act
CAO	Fire & Protective Services	Building Inspections - Andree Lamoureux	Electrical, Plumbing & Gas Trade Registration	Building Inspections Department	Name, registration date and number, driver's licence	Trades people	Administration of the Building Inspections program	Section 4(c) of the Protection of Privacy Act and the Safety Codes Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit	Planning & Development, Economic Development, Assessment and Taxation Departments	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title	Builder, applicant, registered land owner, consultant	To process a development permit	Part 2.3 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Signs)	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title	Applicant, registered land owner, sign company, business, non-profit group, developer	To process sign permits	Part 5 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Home Business)	Planning & Development, Economic Development, Assessment and Taxation Departments	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from registered land owner	Applicant, homeowner, business, registered land owner	To process a home business permit	Part 6.10 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Accessory Suite)	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from the registered landowner; up to date Certificate of Title	Applicant, homeowner, builder, contractor, registered land owner	To process accessory suite permit	Part 6.19 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Urban Hen Registration 2014)	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from the registered landowner; up to date Certificate of Title	Homeowner, renter, applicant, registered land owner	Urban hen registration	Part 7.16 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Work On or Within a Town of High River Street or Within a Road Right of Way)	Planning & Development and Engineering Departments	Name, business name, mailing address, telephone number, fax, email, emergency contact name and number; name of project, development permit, building permit, street address, receipt number; insurance, original letter of authorization from the registered landowner	Applicant, registered land owner, contractor, business	To Work On or Within a Town of High River Street or Within a Road Right of Way	<i>Municipal Government Act</i> and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Stripping and Rough Grading)	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title, indemnification agreement	Applicant, registered land owner, developer	To process stripping and rough grading permit	Part 2.3.1 of Land Use Bylaw No. B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Curb-Cuts, Second Driveway & Driveway Widening)	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title	Applicant, registered land owner, homeowner, contractor, builder	To process curb-cuts, second driveway and driveway widening permits	Part 7.9 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Variance/Relaxation Permit)	Planning & Development Department	Applicant's name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title and site plan or real property report	Applicant, registered land owner, homeowner, business, developer, sign company, builder, survey company, law firm	To process variance/relaxation permits	Part 2.4.4 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Development Permit (Change of Use)	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; permit number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title, letters of support from adjacent landowner for day care applications only	Applicant, registered land owner, business, realtor, architect	To process change of use	Part 2.3.1, 2.3.3 and 2.3.4 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Complaint Worksheet	Planning & Development Department	Reference number; date received; name, address, telephone number; property address, legal description; description of complaint; department referred to; action comments on the complaint	Complainant, resident, business, property owner	To investigate potential Land Use Bylaw infractions	Part 2.8 of Land Use Bylaw B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Request for Property Information	Planning & Development Department	Name, business, phone number, address, original letter of authorization from the registered landowner	Realtor, lawyer, homeowner, business, individuals	To fulfill requests for property information	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Subdivision Applications	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; application number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title	Applicant, developer, registered land owner, property owner	Administration of the subdivision application process	Section 4(1) and (2) of the <i>Subdivision and Development Regulation (AR 188/2017)</i> , Section 653(1) and (2) of the <i>Municipal Government Act</i> and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Amendment to the Land Use Bylaw / Land Use Map	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; application number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title	Applicant, land owner, property owner, consultant	Administration of amendment request applications	Part 2.2 of Land Use Bylaw No. B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Community Area Structure Plan / Neighbourhood Structure Plan/Area Redevelopment Plan	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; municipal address and legal description of site; application number; receipt number; original letter of authorization from registered landowner; up to date Certificate of Title	Applicant, registered land owner, consultant	To apply for Community Area Structure Plan / Neighbourhood Structure Plan/Area Redevelopment Plan	Town Plan 6.1 and MGA 633(1) and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Planning & Development - Khalid Mohammed	Encroachment Agreement	Planning & Development Department	Name, business name, mailing address, telephone number, fax, email; legal description and registered plan number; address of site; application number; receipt number; original letter of authorization from registered landowner; Real Property Report, up to date Certificate of Title, registered documents	Applicant, registered land owner, homeowner, builder, contractor	To apply for encroachment	Part 7.23 & various parts of Land Use Bylaw No. B-01/2016 and Section 4(c) of the Protection of Privacy Act
CAO	Fire & Protective Services	Corporate Properties/AMSQ - LAS With Jody Hipkin	Corporate Properties (Leases)	High River Main Street Square and Corporate Properties Department	Name, telephone number, mailing address and financial information	Parties to a lease of Town facilities	To process lease agreements for Town owned facilities	Section 4(c) of Protection of Privacy Act
CAO	Fire & Protective Services	Corporate Properties/AMSQ - LAS With Jody Hipkin	Corporate Properties (Real Estate)	Corporate Properties Department	Name, telephone number, mailing address and financial information	Parties involved in the purchase or sale of Town owned properties	To process the sale of Town owned property	Section 4(c) of Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources - Sonja Coleman	Employee Database	Human Resource Department	Employee name, employee number, mailing address, telephone number, date of birth, social insurance number; performance reviews; training session history information; employee history and years of service; retirement / LAPP service; salary and vacation entitlement information; driver's abstract (if required); criminal record history; employee emergency contact information, next of kin; dependant names and date of birth for each child; registered retirement savings plan information	Employees of the Town	Record keeping of current and former employees to administer health benefits, salary increments, pension program and RRSP contributions	Section 4(c) of Protection of Privacy Act

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Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CS	People and Organizational Effectiveness	Human Resources - Sonja Coleman	Employee Competition Files	Human Resource Department	Applicant's name, address, phone number, email address; resume, reference name, address, telephone number; interview notes; questions and answers; reference information collected and driver's abstract	Individuals who have applied for or interviewed for a position at the Town	To find suitable candidates for various positions with the Town of High River	Section 4(c) of Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources - Sonja Coleman	Employee Photos	Human Resource Department	Photos of employees during special events and celebrations	Employees of the Town	For employee picture board and special internal events	Section 4(c) of Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources - Sonja Coleman	Exit Interview Notes	Human Resource Department	Interviewee name	Individuals who have had an exit interview with the Town	To gather exiting employee's feedback as part of the Human Resource program	Section 4(c) of Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources - Sonja Coleman	Payroll Database	Payroll Department	Employee name, employee ID, address, telephone number, date of birth, social insurance number; current and historical salary; rate of pay; benefits; exception reporting and time entry; earnings and deductions; banking information; email address; tax information	Employees on Town payroll	Administration of the Town's payroll program	Section 4(c) of Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Workers Compensation Board Claim Forms (Employer's Report)	Health, Safety & Security Department	Claim number and type; name, address, telephone number, email address, social insurance number, Alberta Health Care number, date of birth, gender; employer information including Worker's Compensation Board (WCB) account number; date and time of injury; name and telephone number of the person notified of the injury; description of what occurred to cause the injury; time lost and return to work information including pre-accident rate of pay; wage information including date of hire; rate of pay at the time of the accident; earnings information contact name and telephone number	Individuals who have been injured at work and persons notified of the injury	To determine entitlement to compensation and for determining employers' premium rates	Workers' Compensation Act; Policy 01-05-Part II Recording and Reporting Accidents; and Section 4(c) of the Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Workers Compensation Board Forms (Worker Physical Demands Analysis)	Health, Safety & Security Department	Claim number; employee name; employer contact information, telephone number and activity to be undertaken	Individuals who have been injured at work	To determine entitlement to compensation and for determining employer premiums	Workers' Compensation Act; Policy 01-05-Part II Recording and Reporting Accidents; and Section 4(c) of the Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Workers Compensation Board Tracking Database	Health, Safety & Security Department	Name; department; type of injury; month of injury; lost time days; whether claim was accepted or not	Individuals who have been injured at work	To determine entitlement to compensation and for determining employers' premium rates	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Incident Reporting	Health, Safety & Security Department	Date, time and location of the incident; name of person and department the incident was reported by; name of the person who the incident was reported to; name, address, telephone number of person involved in the incident including witnesses and property owner name; conditions and description at the time of the incident; driver history information (if applicable) including name, driver's license number, number of years driving experience and number of collisions in the past three years; particulars of injured person including name, address and telephone number; name of person who administered first aid; name of person who transported the injured to medical aid; name of person investigating the incident; name of person responsible for implementing actions	Individuals involved in an incident, individuals assisting or transporting an injured person, individuals reporting or investigating incident, individuals responsible for implementing actions, individuals identified on the incident report form	Administration of the Town of High River's Health and Safety Program	<i>Occupational Health and Safety Act</i> and Section 4(c) of the Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Workers Compensation Board Claim Forms (Worker's Report)	Health, Safety & Security Department	Claim number; name, address, telephone number, email address, social insurance number, Alberta Health Care number, date of birth, gender of injured employee; date and time of injury; name and telephone number of the person notified of the injury; description of what occurred to cause the injury; list of persons who witnessed the accident; return to work information including pre-accident rate of pay; wage information including date of hire; rate of pay at the time of the accident	Individuals who have been injured, individuals notified of the injury, individuals who witnessed accident	To determine entitlement to compensation and for determining employers' premium rates	<i>Workers' Compensation Act</i> ; Policy 01-05-Part II Recording and Reporting Accidents; and Section 4(c) of the Protection of Privacy Act
	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Workers Compensation Board - Cheque Total Received Database	Health, Safety & Security Department	Name of employee, claim number, department, payment start and end date, payment amount.	Individuals who have received WCB cheques	To administer the Health and Safety program and provide WCB reporting on cheque amounts received to Finance and departments	<i>Workers' Compensation Act</i> Policy -4-09-I Benefit Payments; and Section 4(c) of the Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Workers Compensation Board - Cheque Total Received Database	Health, Safety & Security Department	Name of employee, claim number, department, payment start and end date, payment amount.	Individuals who have received WCB cheques	To administer the Health and Safety program and provide WCB reporting on cheque amounts received to Finance and departments	<i>Workers' Compensation Act</i> Policy -4-09-I Benefit Payments; and Section 4(c) of the Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Safety Training Matrix Database	Health, Safety & Security Department	Name, job title, employee number, department, status, hire date, orientation date and courses taken, date and expiry dates	Individuals who enroll in employee training	Administration of the Health and Safety program, record keeping of required and taken employee training	<i>Occupational Health and Safety Act</i> and Section 4(c) of the Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Audiometric Testing Database	Health, Safety & Security Department	Name, department, status, audio testing historical dates and required dates	Individuals who request audiometric testing	To administer the Health and Safety program, record audiometric testing dates and ensure recall at required intervals	<i>Occupational Health and Safety Act</i> and Section 4(c) of the Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Audiometric Testing Database	Health, Safety & Security Department	Name, department, status, audio testing historical dates and required dates	Individuals who request audiometric testing	To administer the Health and Safety program, record audiometric testing dates and ensure recall at required intervals	<i>Occupational Health and Safety Act</i> and Section 4(c) of the Protection of Privacy Act
CS	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Payroll Updates - WCB Database	Health, Safety & Security Department	Name, department, status, coding, continue benefits/pension while off	Individuals on WCB compensation	To administer the Health and Safety program, provide payroll with coding and hours for people on WCB claims per pay period	<i>Occupational Health and Safety Act</i> and Section 4(c) of the Protection of Privacy Act
	People and Organizational Effectiveness	Human Resources, Health, Safety & Security - Sonja Coleman	Security System - Access/ID	Health, Safety & Security Department	Name, photo and parking pass number; security badge number; security access levels; access dates and times by badge number	Employees and contractors requiring access to Town facilities	Administration of the security program for Town facilities	Section 4(c) of the Protection of Privacy Act
CS	Communications	General	Internal Staff Files	Communications Department	Name, signature, phone number and address; or in the case of a child: child's name and parent's signature	Internal Employees	To inform the Parks department of any Parks related offences, vandalism or issue that the security guard on duty feels should be relayed to Parks Operations staff	Section 4(c) of Protection of Privacy Act
CS	Information Services	General		Parks Department	Name, license plate numbers, person location information, notes on substance use or paraphernalia		Internal Use only; used reference	Section 4(c) of Protection of Privacy Act

Department	Division	Sub-Division	Title	Location	Information	Individuals	Use	Legal Authority
CS	Human Resources	General	Care & Compassion Registration	Parks & Human Resources Departments	Name, address, phone number, email, emergency contact forms, FOIP forms, staff evaluations describing work ethic and feedback, disciplinary letters, doctor's notes, course/testing grades and marks	Individuals calling with concerns and or recommendations for staff regarding programs; individuals applying for waste & recycling exemptions (i.e. diaper exemption)		Section 4(c) of Protection of Privacy Act
MS	Public Works	Roads, Solid Waste & Recycling		Waste & Recycling Department	Name, mailing address, email address, telephone number, names and birthdates of children			Section 4(c) of Protection of Privacy Act



Office of the Information and
Privacy Commissioner of Alberta

Protection of Privacy Act (POPA) PIA Template

Section 26 of the *Protection of Privacy Act* and Section 7 of the *Protection of Privacy (Ministerial) Regulation*.

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Disclaimer:

This document is not intended as, nor is it a substitute for, legal advice, and is not binding on the Information and Privacy Commissioner of Alberta. Responsibility for compliance with the law (and any applicable professional or trade standards or requirements) remains with each organization, custodian or public body. All examples used are provided as illustrations. The official versions of the laws [the OIPC oversees](#) and their associated regulations should be consulted for the exact wording and for all purposes of interpreting and applying the legislation. The Acts are available on the website of [Alberta King's Printer](#).

March 2026

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Introduction

Section 26 of the *Protection of Privacy Act* (POPA) requires a public body to prepare a privacy impact assessment (PIA) in prescribed circumstances and, if required by the regulations, submit it to the Commissioner in accordance with the regulations. In addition, as part of the Commissioner's responsibility to monitor how POPA is administered to ensure that its purposes are achieved, the Commissioner may, as described in section 27(1)(j) of POPA, request a copy of a public body's PIA.

Section 7(1) of the *Protection of Privacy Act (Ministerial) Regulation* (M-Regulation) requires a public body to prepare a PIA with respect to a new, or a substantial change to an existing, administrative practice, program, project or service that involves the collection, use or disclosure of personal information if one or more of the following factors requiring the submission of a PIA to the Commissioner apply:

- (a) A practice, program, project or service will collect, use or disclose personal information deemed to be of high sensitivity. Section 1 of the M-Regulation deems biometric information about an individual, financial information about an individual, personal information respecting a minor, senior or vulnerable individual to be of high sensitivity.
- (b) A practice, program, project or service will involve the personal information of a significant percentage of the population the public body serves.
- (c) A practice, program, project or service will involve data matching between two or more public bodies. Section 1(f) of POPA defines "data matching" as linking personal information between two or more databases or other electronic sources of information.
- (d) A practice, program, project or service is part of a common or integrated program or service. Section 1(d) of POPA defines "common or integrated program or service" in relation to a public body to mean a program or service planned, administered, managed, monitored or evaluated by (i) the public body working collaboratively with one or more other public bodies, or (ii) another public body working on behalf of (A) the public body, or (B) the public body and one or more other public bodies.
- (e) A practice, program, project or service involves the development or use of innovative technology.

Public bodies are to use this template document when submitting their POPA PIAs to the Office of the Information and Privacy Commissioner (OIPC).

Common Questions

1. What is a PIA?

Generally, a PIA maps the flow of information in a proposed system or practice or project and identifies the legal authority permitting it. A PIA also identifies privacy and security risks and associated mitigating controls.

2. Why is a PIA important, or in some cases, required?

Conducting a PIA prior to implementing a new, or a substantial change to an existing, information system, administrative practice, program, project or service, which will involve the collection, use or disclosure of personal information, assists a public body in identifying and addressing potential privacy and security risks that may occur when processing personal information as part of an electronic information system, administrative practice, data matching or in other circumstances where risks to privacy may result from the processing. It also allows the public body to look at and evaluate information flows to determine if the collection, use and disclosure of the personal information complies with POPA.

3. What if I am not sure if I am required to submit a PIA to the Commissioner?

If a public body is unsure whether it is required to complete a PIA or to complete and submit a PIA to the Information and Privacy Commissioner, the public body should use the [PIA Submission Assessment Tool](#) for assistance.

4. Is a public body required to complete PIAs without submitting them to the Commissioner?

Yes, a public body is required to complete PIAs under section 7(1)(a) of the M-Regulation. However, a public body is not required to submit PIAs conducted under 7(1)(a) of the M-Regulation to the Commissioner, but the Commissioner can request copies of those PIAs under section 27(1)(j) of POPA.

5. Can a public body use this PIA template to complete its own PIA pursuant to section 7(1)(a) of the M-Regulation?

Yes, the OIPC recommends that public bodies use this template for all POPA-related PIAs. For PIAs that must be submitted to the Commissioner under POPA, it is mandatory to use this template. Since the Commissioner can request these PIAs, it is important that the PIAs are completed to meet the PIA requirements under POPA, which is the foundation of this template.

6. What if I am unsure how to answer a question in the PIA template?

This template has a completion guide. The guide assists public bodies in completing this PIA template by providing explanations or clarifications, where necessary, for each question asked in the template and by describing what is expected of the public body in each question. We recommend that you complete the PIA template while consulting the [POPA PIA Template Completion Guide](#).

If you cannot find answers to your questions in the guide, you may contact the OIPC at **780-422-6860** or **1-888-878-4044 (toll free)** or by email at generalinfo@oipc.ab.ca.

7. This template looks so complicated! Do I have to fill it out completely or to this level of detail?

Section 7(3) of the M-Regulation says a privacy impact assessment must provide a level of detail commensurate with the complexity of the practice, program, project or service that the privacy impact assessment relates to. Using this template when preparing a PIA will assist a public body in meeting this requirement. Don't be intimidated! If you have questions, you can refer to the guide or call our office for assistance. The template has been designed such that it is easy to complete.

Not all sections of this template may apply for a specific project. Consider identifying the sections that apply to the project before completing the PIA.

8. Who is authorized to sign off on POPA PIAs?

Given that section 26(1) of POPA requires a public body to prepare a PIA in prescribed circumstances and, if required by the regulations, submit it to the Commissioner in accordance with the regulations, the head of a public body is legally required to sign off on POPA PIAs. However, section 55(1) of POPA authorizes the head of a public body to delegate to any person any power, duty or function of the head under the Act, except the power to delegate under this section. Section 55(2) requires that a delegation under subsection (1) be in writing and may contain any conditions or restrictions the head of the public body considers appropriate. To this end, the Designate of a public body may sign off on the public body's PIA if that Designate has been delegated such a power. A copy of the delegation instrument should be included with the PIA.

Read Before Completing your PIA

IMPORTANT: PIAs that do not have sufficient information will **not** be reviewed by the OIPC. **All sections of this PIA template, whether they apply to your project or not, must be included in your submission. It is important for the OIPC to know that the public body has considered all sections of the PIA template, even though only certain sections may apply to the project under consideration. Do not modify the structure of or reformat the template, including removing any part of the template.**

Note: Consult the [POPA PIA Template Completion Guide](#) while completing the PIA.

The term “**project**” when used in this document means any information system, administrative practice, program or service, or a change to any existing information system, administrative practice, program or service a public body plans to implement that will involve the collection, use or disclosure of personal information and which includes one or more of the factors listed in section 7(5)(a) to (e) of the M-Regulation.

What a public body needs to know and have before submitting a POPA PIA to the OIPC

1. **IMPORTANT: Sections A to H of this PIA template are mandatory sections to be completed for all projects. Otherwise, the PIA will be considered incomplete and not accepted for review.**
2. **These sections are marked with an asterisk (*). The template and the PIA Completion Guide will assist you in determining how to answer the questions for your specific project.**
3. **These are mandatory requirements under POPA (referred to as “MUST” in the law) and OIPC project-specific compliance requirements.**
4. The PIA must include a cover letter signed by the **Head of the public body** (Appendix D).
5. Complete Appendix A if the project involves Data Matching. Otherwise indicate that this section does not apply to your project.
6. Complete Appendix B if the project is a Common or Integrated Program or Service. Otherwise indicate that this section does not apply to your project.
7. Complete Appendix C if the project includes the use of an automated system or other forms of innovative technology. Otherwise indicate that this section does not apply to your project.
8. Complete Appendix E – PIA Submission Checklist for all PIA submissions.

Please submit your PIA and the required supporting documentation to the OIPC via PIA@OIPC.AB.CA

For questions that include check boxes, click on the box () to check or uncheck the box.

A. General Information About the Public Body or Bodies, Existing PIAs, and the Project *

1. Does the public body intend to collect, use or disclose personal information as part of this project?

*Personal information means recorded information about an identifiable individual. Some examples of personal information include an individual's name, home or business address, home or business email address, race, gender identity, fingerprints and financial history. For a complete listing of what is considered personal information, please see **section 1(q) of POPA**.*

- Yes
- No

If yes, proceed to question 2.

If no, there is no requirement under POPA to submit a PIA to the Commissioner for this project.

2. Does the project involve any of the following? *(The first five options are the only prescribed circumstances for which a public body is required to submit PIAs to the Commissioner under section 7(5) of the M-Regulation)*

Select all that apply

- A practice, program, project or service will collect, use or disclose personal information deemed to be of high sensitivity *(section 1 of the M-Regulation deems biometric information about an individual, financial information about an individual, personal information respecting a minor, senior or vulnerable individual as personal information that is deemed to be of high sensitivity. See the PIA Completion Guide for more information).*
- A practice, program, project or service will involve the personal information of a significant percentage of the population the public body serves.
- A practice, program, project or service will involve data matching between two or more public bodies *(section 1(f) of POPA defines "data matching" as linking personal information between two or more databases or other electronic sources of information.)*
- A practice, program, project or service is part of a common or integrated program or service *(section 1(d) of POPA defines "common or integrated program or service" in relation to a public body to mean a program or service planned, administered, managed, monitored or evaluated by (i) the public body working collaboratively with one or more other public bodies, or (ii) another public body working on behalf of (A) the public body, or (B) the public body and one or more other public bodies.)*
- A practice, program, project or service involves the development or use of innovative technology.
- None of the above **(If you select this option**, you are not required to submit a PIA to the Commissioner)
- The loss of, unauthorized access to or unauthorized disclosure of the personal information could result in significant harm.

3. Name and contact information of the public body

Provide the names and contact information for the public body participating in this PIA.

Name of public body	Name and title of head of public body	Mailing Address of public body	Email Address of head of public body	Telephone number of head of public body

4. Is this a joint PIA with any other public body?

Yes

No

If yes, complete the table below for each additional participating public body:

Public body	Name and title of head of public body	Mailing Address	Email Address	Telephone Number	Role of Public Body in this PIA

5. Contact information of the person(s) who can answer questions regarding this PIA.

This individual is responsible for communication with the OIPC during the PIA processing and review process.

Please complete the table below

Name of contact person	Role of contact person	Mailing address	Email address	Phone number

6. Name or title of the project

Every project should have a name or title for ease of reference.

7. Is this PIA related to an existing PIA that has been reviewed by the OIPC?

- Yes
- No

If yes, please provide the OIPC file number(s) for any related PIAs (if the file is still being processed by the OIPC, please provide the date of submission of the PIA):

8. Is this PIA an amendment to a previously submitted PIA to the OIPC?

- Yes
- No

If yes, please provide the OIPC file number(s) for the existing PIA(s) (if the file is still being processed by the OIPC, please provide the date of submission of the PIA):

9. Public body reference file number for this PIA (if applicable)

10. Project implementation date for the project considered for this PIA (MM/DD/YYYY)

11. Does this project include any of the following?

Please select all that apply.

- Data matching –Appendix A of this PIA template must be completed.

- Common or integrated program or service –Appendix B of this PIA template must be completed. (A “common or integrated program or service” as described in **section 1(d) of POPA** means a program or service planned, administered, delivered, managed, monitored or evaluated by the public body working collaboratively with one or more other public bodies, **or** another public body working on behalf of the public body and one or more other public bodies.)

- Automated system (e.g. Artificial Intelligence) that will generate content or make decisions, recommendations or predictions; or, another form of innovative technology – Appendix C of this PIA template must be completed, including an Algorithm Impact Assessment (AIA). In addition, ensure that all relevant sections of the PIA template include information regarding the automated system and personal information that will be collected, used or disclosed by the automated system or other innovative technology.
See the [POPA PIA Template Completion Guide](#) for additional information about the purpose and details of what is required in an AIA.

- Cloud computing - Please ensure that all relevant sections of the PIA template include information regarding any cloud computing infrastructure and service providers. In addition, both the H1 and H2 risk tables in section H of the template must be completed.

B. Details About the Project *

- 12. Provide a detailed description and the purpose of the project including how the collection, use and disclosure of personal information are necessary or related to this purpose or the objectives. ***(The project description should include sufficient detail including technical information about the project. Consider attaching a separate document as necessary.)***

- 13. Does the project involve the implementation of an electronic information system (EIS)?
An Information System is defined by the National Institute of Standards and Technology (NIST) as a "discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information." The primary components of electronic information systems typically include hardware, software, database(s) and network(s).

- Yes
- No

If yes, identify the name of the system.

- 14. Are other stakeholders involved in the project that may collect, use or disclose personal information?

- Yes
- No

If yes, identify the stakeholders and describe the role of each stakeholder involved in the project, in the space provided below.
List stakeholders that may collect, use or disclose personal information associated with the project or have an impact on the privacy or security of personal information. (e.g. internal business area stakeholders; external stakeholders such as other public bodies participating in a common or integrated program or service, as well as vendors and service providers).

C. Information About Your Privacy Management Program (PMP) *

In this section, we introduce the PMP, as it may assist the public body in completing the PIA by referencing policies and procedures that may be part of the PMP. Since the PMP addresses privacy governance within the public body, the PMP contains valuable information about how the public body upholds the access and privacy rights of individuals whose personal information is collected, used or disclosed in this project.

Section 25(1) of POPA requires a public body to establish and implement a PMP and make it public or provide a copy of the PMP upon request pursuant to section 25(5). These requirements will come into effect one year after POPA came into force, which is on June 11, 2026.

15. Has the public body established and implemented a Privacy Management Program (PMP)?

Section 6 of the M-Regulation describes what a public body must include in its PMP.

Yes

No

If yes, enclose a copy of the most current PMP and label it “Attachment - Privacy Management Program”. If you have previously submitted a PMP to the OIPC and there has been no change to it since that submission, please provide the OIPC file number for your PMP.

If no, when will the public body finalize and implement its PMP?

The OIPC has developed POPA PMP Guidance, which is available at <https://oipc.ab.ca/popa/pmp/guide>. As of June 11, 2026, section 25 will come into effect.

D. Identify Personal Information Involved and your Authority to Collect, Use or Disclose the Information*

16. List the personal information that is collected, used, or disclosed in this project and describe how the public body uses and/or discloses the information **only to the extent necessary to enable the public body** to carry out the identified purposes in a reasonable manner.

Section 12(4) of POPA requires the public body to use personal information only to the extent necessary to enable the public body to carry out its purpose in a reasonable manner. Similarly, section 13(4) of POPA requires a public body to disclose personal information only to the extent necessary to enable the public body to carry out identified purposes in a reasonable manner. If you require additional space to list the personal information, please attach an appendix with the information.

Personal information (e.g. name, date of birth, mailing address, email, etc.)

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17. Is personal information collected directly from an individual for this project?

- Yes
- No

If yes, provide details regarding how notice is provided to an individual at the time the personal information is collected as part of this project, pursuant to section 5(2) of POPA. Also, provide a copy of the collection notice [enclose with the PIA submission and label it "Attachment 1"].

--

18. Does the project use or disclose any personal information with the consent of the individual pursuant to section 12(1)(b) or section 13(1)(c) of POPA, and the requirements of section 2 of the Protection of Privacy Regulation (the Regulation)?

- Yes
- No

If yes:

- Provide a copy of the policy and procedure(s) that address consent [enclose with the PIA submission and label it "Attachment 2"]. OR if you have provided this information to our office as part of your PMP, identify the policy and procedure(s) that address consent in your PMP submission.

- Provide a copy of the consent form for use and disclosure of personal information involved in the project [enclose with the PIA submission and label it "Attachment 3"].

19. Will any personal information about an individual be collected indirectly?

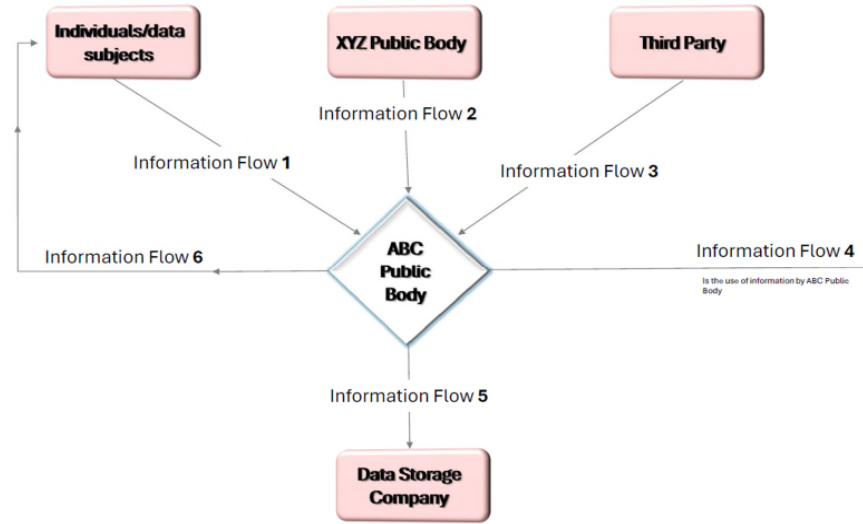
- Yes
- No

If yes, explain **how** personal information will be collected indirectly. Ensure you identify the data flow in the information flow diagram and legal authority table below.

20. Information flow diagram

*An information flow diagram illustrates how personal information is collected, used or disclosed in this project. It identifies the various stakeholders and systems associated with the collection, use or disclosure of personal information. The diagram should clearly label each flow with a number, the direction that information is flowing as well as to whom the information is flowing. Note that a project, depending on its complexity, may have more than one information flow diagram. **Note that a business process flow or network diagram is not an information flow diagram. For additional information regarding the differences between a network, process flow and data flow diagram, please see the POPIA PIA Template Completion Guide.***

See the following information flow diagram example.



**Attach a copy of the information flow diagram(s) for this project [enclose with the PIA submission and label it "Attachment 4"].
 Note: If an information flow diagram is not attached, the PIA will be deemed incomplete and will not be reviewed.**

21. Using the table below, identify and describe the legal authorities and purposes for the collection, method of collection (direct or indirect), use or disclosure of personal information in this project.

A public body is prohibited from collecting (directly or indirectly), using or disclosing personal information except as permitted by sections 4, 12, and 13 of POPA.

Identify each information flow number in your information flow diagram(s) and include the corresponding description of the information in the table below.

Information Flow #	Description of Information Flow (if the flow is a collection, indicate whether it is direct or indirect collection) <i>Explain how the information flows between parties, systems, etc.</i>	Personal Information Involved	Stakeholder Involved in the Collection (direct or indirect), Use and/or Disclosure of personal information	Purpose for Collection, Use and/or Disclosure	Legal Authority for Collection (direct or indirect), Use or Disclosure (cite specific sections of POPIA and any other relevant legislation)
Example flow 1	ABC public body collects personal information directly from the individuals the information is about.	First name, last name, mailing address, email address	ABC public body and individuals	This information is collected from individuals to enroll them into the program provided by ABC public body.	POPIA s. 4(c)
1					
2					
3					
4					
5					
6					

E. Access, Correction, Accuracy, Retention, Disposition *

For the questions that ask you to describe certain processes (e.g. describe how an individual can request access to their personal information), ensure the answer to the question includes a fulsome description of the process, rather than limiting the response to a policy name or reference. In addition, explain how the policy referenced applies to the project.

22. Describe how individuals are made aware of their right to access their personal information that is involved in this project and how they can exercise that right.

Section 6 of the Access to Information Act (ATIA) provides individuals with a right of access to any record in the custody or under the control of a public body, including a record containing personal information about the individuals. Additionally, the right of access enables individuals to know what the public body holds about them in order to assess accuracy or request correction.

23. Does the public body have an access request policy?

- Yes
- No

If yes, and if the public body has provided this information to our office as part of its latest PMP submission, identify the policy and procedure that address access requests in the public body’s PMP submission, below; otherwise, provide a copy of the policy and procedure(s) that address access requests **[enclose with the PIA submission and label it “Attachment 5”]**.

If no, describe the steps that you are taking to develop and implement such a policy and provide a timeline by which the policy will be in place.

24. Describe how individuals are made aware of their right to request correction of their personal information that is involved in this project and how they can exercise that right.

Section 7 of POPIA provides an individual with the right to request the head of the public body that has the information in its custody or under its control to correct their personal information, if the individual believes there is an error or omission in the individual’s personal information.

[Empty rectangular box]

25. Does the public body have a correction request policy?

- Yes
- No

If yes, and if the public body has provided this information to our office as part of its current PMP submission, identify the policy and procedure that address correction requests in the public body’s PMP submission, below; otherwise, provide a copy of the policy and procedure(s) that address correction requests **[enclose with the PIA submission and label it “Attachment 6”]**

[Empty rectangular box]

If no, describe the steps that you are taking to develop and implement such a policy and provide a timeline by which the policy will be in place.

[Empty rectangular box]

26. Describe how the public body will ensure that the personal information involved in this project will be accurate and complete?

Section 6 of POPIA requires the public body to make every reasonable effort to ensure personal information that will be used by a public body to make a decision that directly affects an individual is accurate and complete. Examples of methods that public bodies may use to ensure personal information is accurate and complete are as follows:

- Training and awareness for employees who perform data entry into systems.
- Policies and procedures that govern and describe the activities associated with the integrity of personal information.
- Configuration of input controls within information systems that ensure correct inputs are accepted by the systems.
- Configuration of access controls within information systems that restrict the activities that users may perform on personal information, based on job requirements.
- Capturing and reviewing audit logs of activities in a system to detect and address data integrity issues.
- Implementing IT change management practices that align with industry standards for changes to information systems.

[Empty rectangular box for response]

27. Has the public body established and implemented a record retention and disposition policy for personal information involved in this project? **Section 6 (b) of POPIA** requires that personal information used to make a decision that directly affects an individual be retained for at least one year to enable the individual who is the subject of the information to obtain access to the information, or for a shorter period if agreed to in writing by the individual, the public body, and, as applicable, another body that may be involved in records retention.

Yes

No

If yes, and if the public body has provided this information to our office as part of its current PMP submission, identify the policy and procedure that address record retention and disposition for this project in the PMP submission, below; otherwise, provide a copy of the policy and procedure(s) that address record retention and disposition [enclose with the PIA submission and label it "Attachment 7"].

[Empty rectangular box for response]

If no, describe the steps that you are taking to develop and implement such a policy and provide a timeline by which the policy will be in place.

[Empty rectangular box for response]

28. if you answered "yes" to question 27 and if the project involves the use of an electronic information system to process personal information, describe the steps that the public body has taken to implement the record retention and disposition policy in the electronic information system (considerations in your response should include but are not limited to indicating whether someone has been assigned the responsibility for the public body's record retention and disposition practices, associated policy and processes as well as describing measures that are in place to demonstrate that the public body is adhering to the policy.)

[Empty rectangular box for response]

F. Protection of Information *

Section 10(1) of POPA requires the head of a public body to protect personal information in the custody or under the control of the public body by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction. Section 1(1)(c) of the Regulation defines "reasonable security arrangements" as administrative safeguards, physical safeguards and technical safeguards to protect personal information, data derived from personal information and non-personal data in the custody or under the control of a public body that are appropriate and proportional to the security classification level of the information or data, and in the case of non-personal data, ensure, to the extent possible, that the identity of an individual who is the subject of the non-personal data cannot be re-identified from the data. In addition, the M-Regulation sets out additional requirements for the security classification of personal information.

Information about protecting the personal information involved in the project

29. Has the public body assigned a security classification to the personal information involved in the project?

*Section 2(1) of the M-Regulation requires a public body to assign a security classification level to all personal information, data derived from personal information and non-personal data in the custody or under the control of the public body, based on an internal classification system established by the public body. Section 2(2) of the M-Regulation requires the security classification level assigned to personal information to reflect the sensitivity of the personal information. Note: This is a **HARD REQUIREMENT**. PIA submissions that do not include information regarding the public body's information security classification system will not be reviewed.*

- Yes
- No

If yes, identify and describe the classification level of the information in relation to the public body's information classification system.

If no, the public body must assign a security classification to the personal information involved in the project prior to submitting this PIA.

30. Using the boxes below, describe how the public body will ensure that the personal information involved in this project is protected against such risks as unauthorized access, collection, use, disclosure or destruction **that are appropriate and proportional to the classification of the personal information.**

*Note: This is a **HARD REQUIREMENT**. PIA submissions that do not include information regarding the public body's safeguards will not be reviewed.*

If the project involves a high volume of personal information or highly sensitive personal information, policies and procedures must be documented and attached to this PIA submission as required by section 6(2) of the M-Regulation **[enclose with the PIA submission and label it “Protection of Personal Information Policies and Procedures”]**.

If the policies have been included as part of a PMP submission included in this PIA, include the policy reference (i.e. policy name and page number). However, note that reference to general policies and procedures alone will not be sufficient. Details about how the policies and procedures contribute to the safeguarding of personal information involved **in this project** must also be provided.

- a. Describe the administrative safeguards in place to protect the information involved in the project.

Section 1(2)(a) of the Regulation describes an “administrative safeguard” as a policy, procedure or practice to manage a public body’s conduct that protects the privacy of personal information, data derived from personal information and non-personal data.

(Some examples of administrative safeguards include documented policies and procedures, security and privacy awareness training, confidentiality agreements, contracts and agreements.)

- b. Describe the physical safeguards in place to protect the information involved in the project.

Section 1(2)(b) of the Regulation describes a “physical safeguard” as a method to protect a public body’s physical assets, including electronic information systems, from natural and environmental hazards and unauthorized intrusion.

(Some examples of physical safeguards include locked filing cabinets, alarms on premises, locked server rooms, personal information stored out of reach of the public, temperature monitoring and response system, humidity monitoring and response system, fire detection and suppression systems).

- c. Describe the technical safeguards in place to protect the information involved in the project.

Section 1(2)(c) of the Regulation describes a “technical safeguard” as a method to protect a public body’s electronic data and access to it.

(Some examples of technical safeguards include network security controls, application security controls, systems access controls, etc.)

31. Describe how the public body continuously assesses and monitors the safeguards described in the above question to ensure they are working as expected to protect personal information.

[Empty text box for response to question 31]

32. As it relates to this project, does the public body have a process to ensure its employees are aware of their duty to notify the head of the public body of any loss of, unauthorized access to, or unauthorized disclosure of personal information (**Section 10(2) of POPA**)?

- Yes
- No

If yes, describe how the public body makes its employees aware of their duty to notify the head of the public body of any loss of, unauthorized access to or unauthorized disclosure of personal information (*considerations should include sections of the public body's policies and processes as well as training that ensure employees are aware of the actions to take*).

[Empty text box for response to question 32 if yes]

If no, describe the steps the public body will take to make its employees aware of their duty to notify the head of the public body of any loss of, unauthorized access to or unauthorized disclosure of personal information involved in this project, and provide a timeline by which this will be done.

[Empty text box for response to question 32 if no]

Protection of personal information in information systems

Complete this section if the project involves the implementation of an Electronic Information System (EIS).

33. Does the public body have an access control policy and associated procedure(s) that relate to access to personal information in the EIS?

Note: If the public body is implementing an EIS that processes a high volume of personal information or highly sensitive personal information, this is a HARD REQUIREMENT. PIA submissions that do not include information regarding the public body's access control policy will not be reviewed.

**If the project involves a high volume of personal information or highly sensitive personal information, a documented access control policy must also be attached to this PIA submission (see section 6(2) of the M-Regulation)*

- Yes
- No

If **yes**, and if the public body has provided this information to our office as part of its current PMP submission, identify the policy and procedure that address access to personal information in the EIS in the public body’s PMP submission, below; otherwise, provide a copy of the policy and procedure(s) that address access to the personal information in the EIS [**enclose with the PIA submission and label it “Attachment 8”**].

If no, and the project involves a high volume of personal information or highly sensitive personal information, the public body must develop and document an access control policy prior to submitting this PIA. (see section 6(2) of the M-Regulation)

If **no**, and the project **does not** involve a high volume of personal information or highly sensitive personal information, proceed to question 34.

34. Describe the process for approving access to personal information within the information system.

35. Provide details regarding how access is limited to only those employees who have a defined business requirement to access personal information and how their access is limited to only the amount of information required to perform their job duties.

36. Describe the process for revoking access to the information system in a timely manner when such access is no longer required (e.g. employee changes role or employee leaves the organization).

37. Complete the access table, below:

Position or job title	System user role	Number of staff in this role	Permissions assigned to the role (create, read, write, modify, delete, execute, etc.)	Description of information this user can access and description of the actions the user can take (include examples)
(E.g. School Clerk)	(E.g. Admin Support)	(e.g. 2)	(E.g. read, write, modify)	(E.g. school administrative support staff can only view and modify registration information but has no access to student grades)

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Logging and Auditing Access to the EIS

38. Does the public body have a logging and auditing policy and associated procedure(s) for this EIS?

*Note: If the public body is implementing an EIS that processes a high volume or highly sensitive personal information, this is a **HARD REQUIREMENT**. PIA submissions that do not include information regarding the public body's access control policy will not be reviewed.*

**If the project involves a high volume of personal information or highly sensitive personal information, a documented logging and auditing policy must be attached to this PIA submission. (section 6(2) of M-Regulation)*

- Yes
- No

If **yes**, and if the public body has provided this information to our office as part of its current PMP submission, identify the policy and procedure that address logging and auditing in the public body’s PMP submission, below. Otherwise, provide a copy of the policy and procedure(s) that address logging and auditing [**enclose with the PIA submission and label it “Attachment 9”**].

If **no**, and the project involves a high volume of personal information or highly sensitive personal information, the public body must develop and document a logging and auditing policy prior to submitting this PIA.

If **no**, and the project **does not** involve a high volume of personal information or highly sensitive personal information, describe the process (or if you have documentation include it) by which the public body logs and audits activities associated with access to personal information stored in the EIS.

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39. Does the system capture and maintain audit logs of access to personal information?

- Yes
- No

If **yes**, use the table below to identify the data elements that are captured in the information system’s audit logs.

Audit log data elements	Description	Comments (if applicable)
(E.g. user ID)	(E.g. uniquely identifies a user of the system)	

Audit log data elements	Description	Comments (if applicable)

If no, describe the steps the public body will take to ensure the system captures and maintains audit logs of access to personal information and provide a timeline by which this will be done.

40. Describe the steps taken by the public body to proactively audit access to personal information in the information system.

41. Provide information regarding the audit criteria, the frequency of audits and who conducts the audits.

A public body may consider several factors in determining the frequency to conduct audits, such as the number of users who have access to information in the system, the volume and sensitivity of personal information. Some examples of audit report criteria include, but are not limited to, users accessing the personal information of individuals with the same last name and same physical address, frequently accessed records, frequently failed login attempts, and inactivity audits.

G. Service Providers *

Section 1(h) of POPA states that an “employee” in relation to a public body, includes “a person who performs a service for the public body as an appointee, volunteer or student or under a contract or agency relationship with the public body”. As the public body is ultimately accountable for the actions of its employees in relation to its compliance with POPA, it is important for the public body to enter into contracts or agreements with any third parties that provide services to the

public body to ensure each third party complies with POPA. In this section, you will identify the third parties of the public body, the contracts or agreements that are in place and the responsibilities of the third parties regarding privacy and security of personal information. "Person" is defined in the Interpretation Act, section 28(1)(nn) to include a corporation.

42. Does the public body use service providers, including vendors and contractors, in this project that will have access to personal information or will collect, use or disclose personal information on its behalf? *(The public body must ensure that personal information collected, used or disclosed by the service provider is captured in the information flow diagram and corresponding legal authority table in section D of this PIA.)*

- Yes
 No

If yes, proceed and use the table below to provide additional information about the nature of the relationship.
 If no, proceed to Section H of the template.

Name of third party	Relationship with the Public Body	Description of services provided	Type of agreement or contract that establishes a service provider relationship with public body <i>(Documents referenced below must be provided as part of the PIA submission.)</i>
(E.g. ABC Web Services)	(E.g. Service Provider)	(e.g. web hosting)	(E.g. service agreement)

43. For this project, does the public body have a contractual agreement with its service provider that addresses its duties under POPA as it relates to the service of the service provider, and the privacy and security of personal information under POPA?

Pursuant to section 1(h) of POPA, "employee", in relation to a public body, includes a person who performs a service for the public body as an appointee, volunteer or student or under a contract or agency relationship with the public body. This means that a service provider may be considered an employee of the public body and must comply with POPA.

Note: If the public body engages the services of third-party service providers, this is a HARD REQUIREMENT. PIA submissions that do not indicate that there is a contract or agreement in place with third-party service providers will not be reviewed.

- Yes
 No

If yes, proceed to the next question.

If no, the public body must ensure it has a contractual agreement(s) with its service provider(s) that addresses all its compliance obligations under POPA that will be imposed on the service provider to ensure compliance before submitting the PIA.

44. For this project, will the service provider process access to information requests on behalf of the public body?

- Yes
- No

If yes, describe the steps that the public body has taken to ensure the contractual agreement with the service provider addresses access to information request processing.

If no, proceed to the next question.

45. For this project, has the public body clarified in its contractual agreement(s) with the service provider(s), that the public body maintains control of any information that the service provider(s) accesses, collects or uses in relation to the services which the service provider(s) provides to the public body?

Note: If the public body engages the services of third-party service providers, this is a **HARD REQUIREMENT**. PIA submissions that do not include a copy of associated contracts or agreements will not be reviewed.

- Yes
- No

If yes, provide a copy of the agreement(s) and identify the provisions in the agreement that ensure the public body maintains control of the information. **[enclose with the PIA submission and label it "Attachment 10"]**.

If no, the public body must ensure it has a contractual agreement(s) with its service provider that ensures the public body maintains control of information involved with the project before it submits its PIA.

46. Does the contractual agreement(s) in place with the public body's service provider(s) identify each party's responsibilities related to the privacy and security of personal information?

- Yes
- No

If **yes**, identify the sections of the agreement(s) that describe the privacy and security provisions, including any provisions that pertain to the collection, use, disclosure, protection, retention of personal information and termination provisions.

If **no**, describe the steps the public body will take to meet these requirements and the timeframe by which the public body will meet these requirements.

47. Identify sections of the contractual agreement(s) with the service provider(s) that address(es) ongoing training requirements for the employees of the service provider(s) who have access to personal information involved in this project.

H. Project Risk Assessment and Mitigation *

Complete the following privacy risk assessment and mitigation table for this project. The risks listed under the section are common privacy risks that may exist in projects. The public body is responsible for identifying all other risks that may exist in this project.

48. Did the public body conduct a security threat and risk assessment (STRA), including a vulnerability assessment (VA) and penetration test (pentest) for the project?

- Yes
- No
- N/A

If **yes**, attach copies of the STRA reports including VA and pentest reports and the steps that the public body has taken to address identified security issues **[enclose with the PIA submission and label it "Attachment 11"]**.

If **no or N/A**, provide clarification as to why a STRA including VA and pentest was not completed or deemed necessary for the project.

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H1. General Risks (to be completed for all PIA submissions) *

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
1.	Unauthorized collection of personal information by authorized users (e.g. an employee, contractor, vendor, etc.) contrary to section 4 and 5 of POPA	E.g. personal information is collected by the public body and/or the information system is configured to accept personal information that does not relate directly to and is not necessary for the project.		
2.	Unauthorized use of personal information by authorized users			
3.	Unauthorized disclosure of personal information by authorized users.			
4.	Unauthorized access to personal information by unauthorized users or malicious software (e.g. ransomware)			
5.	Loss of personal information			

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
6.	Loss of custody or control of personal information			
7.	Unauthorized destruction of personal information			
8.	Loss of integrity including unauthorized modification of personal information.			
9.	Unauthorized retention of personal information.			
10.	Lack of notice or proper notice at the time of collection of personal information collected for this project.			
11.	Lack of clarity or failure to provide information regarding access to or correction of information.			
12.	Lack of or inadequate privacy breach management policies and procedures.			
13.	Lack of assessment by the public body of third parties' (e.g. service providers) privacy and security controls regarding the management of personal information on behalf of the public body			
14.	Use or disclosure of personal information for secondary purposes by the public body or its service providers without proper authority.			
15.	Logging and auditing controls of personal information are insufficient or absent, contrary to section 3(2) of the M-Regulation.			

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
16.	Lack of human oversight and validation measures for systems, contrary to section 3(2) of the M-Regulation.			
17.	Failure to conduct a vulnerability assessment to identify and address exploitable security vulnerabilities associated with the implemented system.			
18.	Insert additional risks identified by the public body			

H2. Risks Associated with Cloud Computing

N/A (check this if it does not apply)

Complete this section if the public body is using or intends to use a cloud computing provider to store or manage personal information as part of this project.

Risk number	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
1.	Inadequate segregation and isolation of the public body's cloud environment containing personal information from the cloud provider's other customers in a multi-tenant environment.	E.g., in multitenant cloud environment compromise of one environment could lead to the compromise of other environments due to inappropriate segregation and isolation. In addition, there could potentially be information leakage between environments leading to unauthorized disclosure of personal information.		

Risk number	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
2.	Contracts or agreements are either not in place with the cloud provider or are insufficient.			
3.	The cloud provider does not have a robust privacy and security governance structure.			
4.	Lack of clarity regarding the cloud provider’s responsibility to notify the public body of the breach in a timely manner.			
5.	Vendor or cloud provider lock-out.			
6.	Vendor or cloud provider lock-in.			
7.	Unauthorized access to personal information by foreign governments or states.			
8.	The cloud provider uses personal information for purposes not authorized by POPA.			
9.	The cloud provider discloses personal information for purposes not authorized by POPA.			
10.	Broken authentication and authorization.			

Risk number	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
11.	Use of weak cryptographic algorithms or lack of encryption of data in transit and at rest.			
12.	Insert additional risks identified by the public body.			

H3. Risks Associated with Research

N/A (check this if it does not apply)

Complete this section if the public body intends to disclose personal information for research or statistical purposes as part of this project.

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
1.	Disclosure of personal information for research or statistical purposes is contrary to section 15(a) of POPA.	E.g. the public body fails to assess whether non-identifying data can be used to accomplish the research purpose prior to disclosing individually identifying personal information [s.15(a)(i) of POPA] or the research purpose has not been approved by Commissioner [15(a)(ii) of POPA].		
2.	Disclosure of personal information for research or statistical purposes that is not clearly in the public interest, contrary to section 15(b) of POPA.			

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
3.	Disclosure of personal information for research or statistical purposes that may be harmful to an individual, contrary to section 15(b) of POPA.			
4.	Disclosure of personal information for research or statistical purposes contrary to section 15(c) of POPA.			
5.	Lack of or insufficient research agreement contrary to section 15(d) of POPA and section 4 of the Protection of Privacy Regulation.			
6.	Insert additional risks identified by the public body			

Appendix A. Data Matching

Data matching means linking personal information between 2 or more databases or other electronic sources of information (section 1(f) of POPA). In this section, you will address the public body’s intent to carry out data matching and assess whether the public body meets its obligations under POPA related to data matching.

1. Is the public body carrying out data matching with another public body?
 - Yes
 - No

If yes, complete the rest of Appendix A.

If no, the public body does not need to complete the rest of Appendix A.

2. What is the purpose(s) for the data matching?

Section 17(1) of POPA authorizes a public body to carry out data matching to create data derived from personal information only for specific purposes.

Select all that apply.

- Research and analysis
- Planning, administering, delivering, managing, monitoring or evaluating a program or services
- One or more prescribed purposes.

3. How does the public body obtain personal information to be used for data matching?

Section 17(3) of POPA prohibits public bodies from collecting personal information directly from an individual when the collection is for the purposes of data matching; however, the public body may collect personal information from another public body or use personal information in its custody or under its control for data matching purposes.

Select all that apply

- Collecting from another public body (proceed to question 4 if this is selected)
- Using personal information in the public body’s custody or control (if this is the only option that is selected, proceed to question 7)

4. If the public body is collecting personal information from another public body for the purpose of carrying out data matching, has the public body established a clear governance structure respecting the responsibilities and accountability of each public body involved in the collection of personal information for the purpose of carrying out data matching?

Section 7(2)(g) of the M-Regulation requires a public body to establish a clear governance structure if a public body is collecting personal information from another public body under **section 17(3) of POPA** for the purposes of data matching.

Note: This is a HARD REQUIREMENT. PIA submissions that do not include documentation of the governance structure will not be reviewed.

Note: The governance structure should, at minimum, contain certain requirements as listed in the [POPA PIA Template Completion Guide](#)

- Yes
- No

If yes, attach documentation related to the governance structure **[enclose with the PIA submission and label it “Attachment 12”]**.

If no, the public body must implement a clear governance structure that meets the requirements of the M-Regulation prior to submitting the PIA.

- 5. If the public body is collecting personal information from another public body under section 17(3) of POPA for the purpose of data matching, has the public body entered into an agreement with the other public body from which the public body intends to collect personal information?

Note: This is a HARD REQUIREMENT. PIA submissions that do not include a copy of the agreement will not be reviewed.

Note: The agreement should, at minimum, contain certain requirements as listed in the [POPA PIA Template Completion Guide](#). Public bodies must meet these requirements before submitting their PIAs to the Commissioner for review.

- Yes
- No

If yes, attach a copy of the agreement **[enclose with the PIA submission and label it "Attachment 13"]** and identify the sections of the agreement that address the requirements listed in the [POPA PIA Template Completion Guide](#).

If no, the public body must enter into an agreement with the other public body prior to submitting this PIA.

- 6. For the data matching, is the public body submitting this PIA performing any unique collection, use or disclosure of information that only applies to the public body?

Section 7(4)(b) of the M-Regulation authorizes a public body to prepare a joint PIA to describe the data matching, but requires each participating public body to, in addition to the joint PIA, prepare an addendum to address any unique collection, use or disclosure circumstances that apply to that public body.

Note: If the public body is performing any unique collection, use or disclosure that only applies to the public body, this is a HARD REQUIREMENT. PIA submissions that do not include a copy of the PIA addendum will not be reviewed.

- Yes
- No

If yes, attach a copy of the addendum **[enclose with the PIA submission and label it "Attachment 14"]**

The public body must prepare an addendum for data matching that meets the requirements of section 7(4)(b) of the M-Regulation and must include the addendum when submitting a joint PIA.

If no, proceed to the next question.

7. Describe the security arrangements that are in place to protect personal information associated with data matching.
Section 17(2) of POPA requires the public body to carry out data matching in accordance with the prescribed security arrangements in accordance with **section 3(1) of the M-Regulation**. **Section 3(1) of the M-Regulation** requires public bodies to implement reasonable administrative, physical and technical safeguards to protect personal information against such risks as unauthorized access, collection, use, disclosure or destruction. The security arrangements must be appropriate and proportional with the security classification level of that information or data.
If the security arrangements that have been described elsewhere also apply to the safeguarding of personal information associated with data matching, indicate where in this PIA template and the public body’s policy documents this information is captured.

8. Please complete the following Risk Assessment and Mitigation table for risks related to Data Matching

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
1.	Failure to establish a clear governance structure respecting the responsibilities and accountability of the public body conducting the data matching and those of the public body from which personal information is collected for the purpose of data matching, if personal information is collected from another public body for the purpose of data matching.	e.g. section 7(2)(g) of the M-Regulation requires the establishment of a clear governance structure respecting the responsibilities and accountability of two public bodies involved in data matching if one public body is collecting personal information for another public body for the purpose of data matching.		

2.	Collection of personal information directly from individuals for the purpose of data matching contrary to section 17(3) of POPIA.			
3.	The data matching process or method is not well defined and properly implemented leading to errors in the resulting data.			
4.	Data quality of the source data used for data matching are not adequately assessed and validated leading to data integrity issues in the resulting data.			
5.	Failure to implement reasonable security controls within the data matching environment thereby exposing personal information to potential loss unauthorized access or unauthorized disclosure.			
6.	Failure to establish and implement a data validation or test process to ensure the resulting data set from the data matching process is the desired and accurate outcome.			
7.	Failure to securely remove personal information from the data matching environment upon completion for the data matching process thereby exposing personal information to potential unauthorized access.			
8.	Insert additional risks identified by the public body.			

Appendix B. Common or Integrated Program or Service

A “common or integrated program or service” pursuant to **section 1(d) of POPA** means a program or service planned, administered, delivered, managed, monitored or evaluated by the public body working collaboratively with one or more other public bodies, **or** another public body working on behalf of the public body and one or more other public bodies.

1. Is the project a common or integrated program or service?

- Yes
- No

If yes, complete the rest of Appendix B.

If no, the public body does not need to complete the rest of Appendix B.

2. Is this a new common or integrated program or service or a change to an existing common or integrated program or service?

- A new common or integrated program or service
- A change to an existing common or integrated program or service

a. List the other public body or public bodies with which the public body submitting this PIA is collaborating or for which the public body submitting this PIA is working on behalf of for the purposes of the common or integrated program or service.

b. If this is a joint PIA submission, identify the public body coordinating the submission of this PIA on behalf of the other public body or public bodies?

- c. If this is a change to an existing common or integrated program or service, provide the **OIPC PIA file number** for the existing PIA or identify the date the existing PIA was submitted to the OIPC if it is still being processed by the OIPC and the file number has not yet been issued for the PIA.

- 3. Has the public body, engaging in a common or integrated program or service with one or more other public bodies, established a clear governance structure respecting the responsibilities and accountability of each public body involved in the common or integrated program or service?

Section 7(2)(g) of the M-Regulation requires the public body to have a clear governance structure respecting the responsibilities and accountability of each public body if two or more public bodies are engaging in a common or integrated program or service.

A governance structure is a documented set of rules and processes that identify the roles, responsibilities, and accountability of each public body participating in the integrated program or service.

Note: This is a HARD REQUIREMENT. PIA submissions that do not include documentation of the governance structure will not be reviewed.

Note: The governance structure should, at minimum, contain certain requirements as listed in the [POPA PIA Template Completion Guide](#)

- Yes
- No

If yes, attach documentation related to the governance structure **[enclose with the PIA submission and label it "Attachment 15"]**.

If no, the public body must implement a clear and documented governance structure that meets the requirements of Section 7(2)(g) of the M-Regulation prior to submitting the PIA. The governance structure must have been implemented if the project has been launched or be implemented prior to launching the project if the project is yet to be launched.

- 4. Has the public body engaged in a common or integrated program or service with one or more other public bodies, entered into an agreement with the other public body or public bodies that addresses how each public body involved in the common or integrated program or service complies with POPA?

Note: This is a HARD REQUIREMENT. PIA submissions that do not include a copy of the agreement will not be reviewed.

Note: The agreement should, at minimum, contain certain requirements as listed in the [POPA PIA Template Completion Guide](#) Public bodies must meet these requirements before submitting their PIAs to the Commissioner for review.

- Yes
- No

If yes, attach a copy of the agreement **[enclose with the PIA submission and label it "Attachment 16"]** and identify the sections of the agreement that address the requirements listed in the [POPA PIA Template Completion Guide](#).

If no, the public body must enter into an agreement with the other public body or public bodies prior to submitting this PIA.

5. For the common or integrated program or service, is the public body submitting this PIA performing any unique collection, use or disclosure of information that only applies to the public body?

Section 7(4)(b) of the M-Regulation authorizes a public body to prepare a joint PIA to describe a common or integrated program or service, but requires each participating public body to, in addition to the joint PIA, prepare an addendum to address any unique collection, use or disclosure circumstances that apply to that public body.

Note: If the public body is performing any unique collection, use or disclosure that only applies to the public body, this is a HARD REQUIREMENT. PIA submissions that do not include a copy of the PIA addendum will not be reviewed.

- Yes
- No

If yes, attach a copy of the addendum **[enclose with the PIA submission and label it "Attachment 17"]**.

The public body must prepare an addendum for any unique collection, use or disclosure applicable to the public body that meets the requirements of section 7(4)(b) of the M-Regulation. The addendum must be included with the PIA submission.

6. Please complete the following Risk Assessment and Mitigation table for risks related to common or integrated programs or services.

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
1.	Lack of clear governance for common or integrated program or service contrary to section 7(2)(g) of the M-Regulation.	E.g. governance structure including policies are not in place or are inadequate leading to inconsistencies in the management of the program that creates exploitable privacy and security vulnerabilities.		
2.	Lack of clarity in accountability for different aspects of the program or service.			
3.	Lack of clarity in responsibility for different aspects of the program or service.			
4.	Lack of alignment between the public body's Privacy Management Program and the governance structure of the common or integrated program or service.			
5.	Lack of transparency regarding how individuals' access and privacy rights are upheld.			
6.	Insert additional risks identified by the public body.			

Appendix C. Use of Automated Systems or Other Forms of Innovative Technology

N/A (check if this does not apply)

Complete this section if the public body intends to use an automated system, such as Artificial Intelligence (AI) or other forms of innovative technology that generates content or makes decisions, recommendations.

1. Has the public body completed an Algorithmic Impact Assessment (AIA) for this project?

See the [POPA PIA Template Completion Guide](#) for additional information about the purpose and details of what is required in an AIA.

Yes

No

If yes, **attach a copy of the AIA for this project [enclose with the PIA submission and label it "Attachment 18"]**.

2. Please complete the following Risk Assessment and Mitigation table for risks related to automated systems (e.g. AI) or other forms of innovative technology.

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
1.	Loss of custody or control of personal information in an automated system that is hosted by a third party.	E.g. failure to maintain custody or control of personal information ingested by an AI system due to lack of controls to securely and automatically delete information from the AI system.		
2.	Lack of or insufficient policies and procedures to govern automated systems or other innovative technology implementation.			

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
3.	Lack of clarity on processes and tools in place to ensure accuracy in an automated system's decision making.			
4.	Lack of clarify on how the quality and reliability of an automated system model training data to minimize bias and inaccurate automated decisions including hallucination.			
5.	Automated system inputs are not validated and securely protected, making the inputs vulnerable to tempering.			
6.	Lack of understanding of what automated system training model (static or dynamic) is implemented and how the model is monitored and kept up to date to ensure it works within its defined parameters.			
7.	The automated system model is not well adjusted to the training data (underfitting) leading to broad generalization and inaccurate results (false positives) with new data.			
8.	The automated system model is too adjusted to the training data (overfitting) leading to lack of generalization and possible inaccurate or unsatisfactory results using new data results (false negatives).			

Risk #	Privacy Risk	Description	Risk Mitigation Measures	Policy Reference and Public Body Comments
9.	The automated system is not securely configured, making it vulnerable to compromise.			
10.	Lack of processes for individuals to be made aware of and appeal automated decisions made by automated systems.			
11.	Insufficient logging and auditing controls associated with the automated system or the innovative technology.			
12.	Lack of monitoring of the automated system or other innovative technology system to ensure it is functioning as intended.			
13.	Failure to conduct security vulnerability on the automated system or other innovative technology system to identify and address exploitable security weaknesses.			
14.	Additional risks identified by the public body related to automated systems and/or other forms of innovative technology.			

Appendix D. PIA Cover Letter *

PIA COVER LETTER WORDING

(Customize the areas highlighted in yellow and attach the cover letter on public body official letterhead)

Submitted electronically

DATE

Information and Privacy Commissioner
Suite 410, 9925-109 Street NW
Edmonton, AB T5K 2J8

Dear {INSERT NAME OF THE INFORMATION AND PRIVACY COMMISSIONER};

Re: {INSERT TITLE OF PROJECT} – {INSERT PUBLIC BODY FILE #, IF APPLICABLE}

Please find attached our privacy impact assessment (PIA) for the above-named project. I am making this submission in accordance with section 26(1) of the *Protection of Privacy Act* (POPA).

The PIA is current as of this submission to your office. I understand that as things change in our project, I will update the PIA by highlighting the sections that have changed, assessing the privacy impact of the change and submit an updated version to your office. If there are substantive changes, I will submit a new PIA to your office which will replace any initial submission(s).

Sincerely,

{SIGNATURE OF THE HEAD OF THE PUBLIC BODY}

{INSERT NAME AND TITLE OF HEAD (OR DESIGNATRE) OF PUBLIC BODY AND NAME OF THE PUBLIC BODY}

C:

March 2026

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Appendix E. PIA Submission Checklist *

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Detailed Requirements of the PIA – Mandatory Section of the PIA	
Indicate whether you have completed the following sections of the PIA template. Any sections identified with an asterisk (*) are mandatory.	
Mandatory Section of the PIA Template	Is the section completed and included?
Cover Letter (Appendix D) *	<input type="checkbox"/> Yes
Section A * - General Information about the public body or bodies, existing PIAs, and the project	<input type="checkbox"/> Yes
Section B * - Details About the Project	<input type="checkbox"/> Yes
Section C * - Information About Your Privacy Management Program (PMP)	<input type="checkbox"/> Yes
Section D * - Identify Personal Information Involved and Collection, Use or Disclosure Authority	<input type="checkbox"/> Yes
Section E * - Access, Correction, Accuracy, Retention, Disposition	<input type="checkbox"/> Yes
Section F * - Protection of Information	<input type="checkbox"/> Yes
Section G * - Service Providers	<input type="checkbox"/> Yes
Section H * - Project Risk Assessment and Mitigation	<input type="checkbox"/> Yes

Detailed Requirements of the PIA – Project-Dependent Sections of the PIA	
Indicate whether you have completed the following sections of the PIA template.	
Project-Specific Section of the PIA Template	Has the public body considered and completed the following sections?
Appendix A – Data Matching	<input type="checkbox"/> Yes - completed and included <input type="checkbox"/> N/A - not completed but considered.
Appendix B – Common or Integrated Program or Service	<input type="checkbox"/> Yes - completed and included <input type="checkbox"/> N/A - not completed but considered.
Appendix C – Use of Automated Systems or other Forms of Innovative Technology	<input type="checkbox"/> Yes - completed and included <input type="checkbox"/> N/A - not completed but considered.

Attachments to be enclosed with the PIA	
Indicate whether you have attached the requested attachments (where required) for the project. Any attachments identified with an asterisk (*) are required to be included with your PIA submission.	
Attachment	Has the public body completed and enclosed the following attachments?
Privacy Management Program (PMP)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Protection of Personal Information Policies and Procedures	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Included in enclosed PMP
Attachment 1* – Collection Notice	<input type="checkbox"/> Yes <input type="checkbox"/> Included in enclosed PMP
Attachment 2* - Consent Practices (Policies and Procedures)	<input type="checkbox"/> Yes <input type="checkbox"/> Included in enclosed PMP
Attachment 3* - Consent Form	<input type="checkbox"/> Yes <input type="checkbox"/> Included in enclosed PMP
Attachment 4* - Information Flow Diagram	<input type="checkbox"/> Yes <input type="checkbox"/> Included in enclosed PMP
Attachment 5 - Request to Access Personal Information Practices (Policies and Procedures)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Included in enclosed PMP
Attachment 6 - Correction of Personal Information Request Practices (Policies and Procedures)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Included in enclosed PMP
Attachment 7 - Record Retention and Disposition Practices (Policies, Procedures, Retention Schedule)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Included in enclosed PMP

Attachment	Has the public body completed and enclosed the following attachments?
Attachment 8 * - Access to Personal Information in EIS Practices (Policies and Procedures) (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A <input type="checkbox"/> Included in enclosed PMP
Attachment 9 * – Audit and Logging of Personal Information in EIS (Policies and Procedures) (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A <input type="checkbox"/> Included in enclosed PMP
Attachment 10 * – Contracts and Agreements with Third Parties (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A
Attachment 11 – Third Party and/or Internal Security Testing Results (e.g. vulnerability assessment reports, penetration testing reports, Security Threat and Risk Assessment (STRA) documentation)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Attachment 12 * - Governance Structure for Data Matching (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A
Attachment 13 * – Data Matching Agreement (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A
Attachment 14 * - Data Matching PIA Addendum for Unique Collection, Use or Disclosure by a public body (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A
Attachment 15 * - Governance Structure for Common and Integrated Programs or Services (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A
Attachment 16 * - Common or Integrated Programs or Services Agreement (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A
Attachment 17 * – Common or Integrated Programs or Services PIA Addendum for Unique Collection, Use or Disclosure by a public body (required where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> N/A
Attachment 18 – Algorithm Impact Assessment	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A



REQUEST FOR DECISION

TO: Mayor and Council
FROM: Jocelyn Dunsmore, Community Development Liaison Officer
SUBJECT: Community Art Policy Update

Date: April 27, 2026
Meeting Date: June 8, 2026

RECOMMENDATION: **WHEREAS** Council adopted the Community Art Policy on March 24, 2025;

AND WHEREAS the Community Art Policy was reviewed and required amendments, including a funding accountability report;

BE IT RESOLVED THAT Council adopt the updated Community Art Policy POL-0105 as presented.

CHIEF ADMINISTRATIVE OFFICER’S COMMENTS:
Administration supports the proposed recommendation.

IMPLICATIONS OF RECOMMENDATION

GENERAL:

The proposed recommendation updates the current policy to include a detailed rationale of why the artwork is selected, an internal review of the proposal, and a funding accountability report for successful applicants. It also defines both Feature Use and Incidental Use of Community Art which relates to our Film Production policy as below:

“Incidental Use” means the background, contextual, or non-featured inclusion of Community Art in visual, audio-visual, or digital content, where the Community Art is not the primary subject or focus. Incidental use includes, without limitation, appearance of Community Art in photographs, film, television, streaming productions, documentaries, sound recordings, news coverage, social media, websites, signage, or promotional materials.

“Featured Use” means a use of the Community Art where the artwork is the primary subject of the content or is used for commercial branding, marketing, advertising, merchandising, or other promotional purposes beyond Incidental Use.

ORGANIZATIONAL:

If adopted, the updated policy will provide clear direction for the review of Community Art Proposals as well as the use of community art as it relates to the Film Production Policy.

FINANCIAL:

Agenda Item #6.3.

The Community Art Policy is funded by the Community Art Reserve Fund. This fund receives a portion of film revenue each year. This allows Administration to bring forward a potential agreement to support the tree art community initiative.

The Town's Reserves currently include about \$39,000 committed to funding community art that is not yet allocated to projects and Administration anticipates recommending additional funds [for community art] as part of the 2025 reserve review.

POLICY:

The recommendation is intended to update the current Community Art Policy to strengthen accountability, transparency, and the overall review process. The proposed amendments would require applicants to provide a detailed rationale for the artwork, include an internal review component as part of the proposal evaluation process, and submit a funding accountability report for all successful applications.

Strategic Plan

Vibrant Community

The Town of High River provides the foundation for an inclusive, engaged and thriving community.

Organizational Excellence

The Town of High River is a leader, partner and steward of excellent municipal services.

Responsible Development

The Town of High River considers the impact of development on residents, infrastructure and environment.

IMPLEMENTATION:

If the updated policy is adopted by Council, staff will proceed with updating the website and all documentation associated with the Community Art Policy.

BACKGROUND:

Since the adoption of the new Community Art Policy on March 24, 2025, Administration has identified gaps within the policy related to the proposal review process, including the absence of requirements for applicants to provide a rationale for artwork selection and the lack of reporting and accountability measures.

Administration brought forward and discussed these concerns at the Committee of the Whole meeting held on April 13, 2026, to explore opportunities to strengthen the policy and enhance transparency, consistency, and accountability within the application and review process.

Currently, the policy states Administration receives the application and brings it directly to Council for decision. In the recommended policy, Administration has added a step before coming to Council which is an internal review of the proposal. This is intended to add depth to the recommendation to Council. Administration has also added a requirement to the proposals to include a comprehensive rationale of the artwork in their application.

Agenda Item #6.3.

Further, Administration has also added a reporting requirement for a Funding Accountability Report to be submitted within 60 days of the completed project. This matches the Community Vitality Fund reporting requirement and creates consistency in funding agreements.

Definitions for Featured Use and Incidental Use of Community Art have been included in the revised policy as Administration has received several inquiries from film production companies about the release of community art such as murals. Administration discovered this is a complex inquiry and sought legal advice. The outcome of the advice is to include the definitions of both Featured Use and Incidental Use of Community Art. The Town is only permitted to release copyright and moral rights to any community art that the artist has transferred the right or ownership to the Town.

Report / Document: Attached: Available:

KEY ISSUE(S)/CONCEPT(S):

Consideration of the updated Community Art Policy POL-0105.

DESIRED OUTCOMES:

Council to adopt the updated Community Art Policy POL-0105 as presented.

COUNCIL'S OPTIONS:

Council has the following options to consider:

1. Council could choose to support the proposed recommendation and adopt the updated Community Art Policy.
2. Council could choose to not support the proposed recommendation and not adopt the updated Policy.
3. Council could choose to not support the proposed recommendation and rescind the current Public Art Policy.
4. Council could choose to refer the proposed recommendation to a Committee of the Whole meeting for further discussion.

RECOMMENDED:

Council adopt the updated Community Art Policy POL-0105 as presented.

COMMUNICATIONS:

If adopted, staff will coordinate updates to our website and all associated public information.

Reviewed by:

Khalid Mohammed, Manager, Planning & Development
Reiley McKerracher, Director of Municipal Services
Sheron Ward, Advisor, Legislative & Advisory Services
Jody Hipkin, Manager of Legislative and Advisory Services
Chris Prosser, Chief Administrative Officer

Status:

Approved - 29 May 2026
Approved - 01 Jun 2026
Approved - 02 Jun 2026
Approved - 02 Jun 2026
Approved - 03 Jun 2026

POLICY MANUAL
Community Art



Policy Number: POL-0105	Division: Planning & Development
Effective Date: March 24, 2025	Date for Review:
Revision Date: Jun 8, 2026	Supersedes/Repeals: Public Art Policy POL-06-101-00
Related Policy Number(s): POL-0106, POL-0108	Related Policy Name(s): Decorative Crosswalk and Intersection Policy, Film Production Policy
External Sources:	Council Resolution Number:

PURPOSE

This policy is to:

1. promote opportunities for Community Art in and around public buildings and public outdoor spaces by establishing funding and procedure for current and additional Community Art in High River;
2. promote and facilitate Community Art into new developments and capital improvement projects by community engagement and engaging with local artists; and
3. ensure all Community Art is within the Acceptable Parameters of Community Art for Town residents.

The Town of High River (the “Town”) will ensure that all Community Art on Town property:

- is within the Acceptable Parameters of Community Art as defined by this Policy;
- is placed on Town-owned lands ensuring safety of all peoples and ease of Town operations;
- has an expected life span where it may be removed, dismantled or replaced accordingly;
- has minimal or defined maintenance requirements that are:
 - environmentally sound;
 - accounted for in operations and planning; and
 - based on the expected life span.

POLICY STATEMENT

The Town believes that Community Art is essential to the Town’s identity of fostering a small-town feel, responsible growth, interconnected community, health and well-being, parks and recreation, environment, economic diversification, safety and security, and partnerships. As High River continues to evolve into a highly sustainable, resilient and livable community accessible to all ages and abilities, Community Art promotes sharing social and cultural connections.

Community Art in High River reflects a high quality of life, creates a sense of place and identity for residents, showcasing how we live, work, play and move with sustainable development and a diverse range of residential and economic opportunities.

Through Community Art, artists will be involved in community building while paying homage to history, culture, diversity and inclusion.

This Community Art Policy will enhance the Town's support for arts and cultural development, being a center renowned for its arts, culture, tourism, and film activity.

DEFINITIONS

The following are some commonly used definitions within the Town.

"Acquisition" means the process of proposing, reviewing, and accepting artwork into the Community Art Inventory.

"Administration" means the administrative and operational arm of the Town, comprised of the various departments and business units and includes all employees who operate under the leadership and supervision of the Chief Administrative Officer.

"Applicant" means the individual, organization, collective, or authorized representative bringing forward a Community Art proposal. The Applicant may be the artist or may be acting on behalf of one or more artists. Where the Applicant is not the artist, the Applicant is responsible for ensuring that the artist complies with all applicable obligations under the Policy.

"Banners" means the banners placed on Town light poles for the purposes of acknowledgement and remembrance, season of celebration or cultural recognition. The Town will maintain ownership of the Town banners and return community banners to the community group who owns them.

"Certificate of Completion" means the Certificate of Completion and Transfer of Copyright and Ownership required by the Town and executed by the artist upon completion of Community Art.

"Community Art" means any visual artwork, in any medium, whether fixed or freestanding, permanent or temporary, that is located in a Public Space or on private property that is intended for public viewing. This includes both Public Community Art and Private Property Art.

Examples of Community Art will include, but not be limited to, book bungalows, historical signage, graffiti-style art, murals, sculptures, statues, tree art, art on utilities boxes, cultural or historical artifacts (excluding collections from museums or libraries), pictures and tapestries, landscaping features, street inlays, architectural embellishments. Community Art does not include decorative crosswalks or intersections as these are governed by the Decorative Crosswalk and Intersection Policy.

Community Art shall have three maturity categories:

1. **"Short Term Community Art"** means Community Art that withstands the elements of its environment and is expected to mature and have a life span of approximately 5 years with minimal and environmentally-sound maintenance or no maintenance required. An example of this are the banners the Town puts up.

2. **“Mid Term Community Art”** means Community Art that withstands the elements of its environment for approximately 10 years with minimal and environmentally-sound maintenance or no maintenance required. A current example are the murals on the buildings.
3. **“Long Term Community Art”** means Community Art that withstands the elements of its environment for approximately 11+ years and requires minimal and environmentally-sound maintenance or no maintenance. A current example is the statue of George Emerson.

“Community Art Accountability Report” means the report required to be submitted by an Applicant in accordance with the Community Art Agreement, documenting Completion, outcomes, and use of funds for a Community Art project.

“Community Art Agreement” means the agreement entered into by the Applicant and the Town to support creation of Community Art and may include funding from the Community Art Fund, as approved by Council.

“Community Art Fund” means a fund established by Council to consider Community Art proposals and for the acquisition, including Copyright and Moral Rights, of Community Art.

“Community Art Inventory” means a comprehensive listing describing Community Art.

“Community Art Lifecycle” means once the Public Community Art has completed its expected life span, that Public Community Art may be removed.

“Completion” means the point at which the Community Art project has been fully created, installed (where applicable), and accepted by the Town as meeting the approved proposal and applicable requirements.

“Copyright” means Copyright as defined in the *Copyright Act (Canada)*, and includes all proprietary rights in and to the Community Art, including the exclusive right to reproduce, publish, display, perform, communicate to the public, adapt, modify, authorize others to do the same, and otherwise use the Community Art in any medium, now and in the future.

“Council” means Town of High River Council and shall be the advisory body to approve acquisition of Community Art.

“Decommissioning” means the removal, relocation, alteration, disposal, or retirement of Community Art by the Town, whether temporarily or permanently, for reasons including safety, condition, lifecycle completion, operational needs, redevelopment, or policy considerations.

“Featured Use” means a use of the Community Art where the artwork is the primary subject of the content or is used for commercial branding, marketing, advertising, merchandising, or other promotional purposes beyond Incidental Use.

“Graffiti” means uninvited markings that have been made on any Premises or Property without permission of the Owner.

“Incidental Use” means the background, contextual, or non-featured inclusion of Community Art in visual, audio-visual, or digital content, where the Community Art is not the primary subject or

focus. Incidental use includes, without limitation, appearance of the Community Art in photographs, film, television, streaming productions, documentaries, sound recordings, news coverage, social media, websites, signage, or promotional materials.

“Maintenance” means any upkeep to existing Community Art pieces which can include, but is not limited to, sealing of wood, power washing of statues, repair of any Community Art, and removing any vandalism. Maintenance responsibilities under this Policy apply subject to property ownership and location of the Community Art.

“Moral Rights” has the meaning as set out in the *Copyright Act* (Canada) and generally refers to an artist’s personal rights connected to their artwork, including the right to be recognized as the creator of the work and the right to object to changes or uses that could harm the artist’s reputation.

“Mural” means a painting or other graphic artwork applied to or mounted on a wall, building, or arge flat surface that is intended for public viewing.. Murals do not include advertising billboards.

“Non-Profit” means associations, clubs, or societies that are not charities and are organized and operated exclusively for social welfare, civic improvement, pleasure, recreation, or any other purpose except profit.

“Private Property Art” means visual artwork that is located or installed on property or buildings not owned or operated by the Town with the intent of public viewing.

“Public Community Art” means visual artwork that is located in a Public Space.

“Public Space” means Town-owned and operated property, including, but not limited to, facilities, parks, buildings, streets, sidewalks and boulevards in Town.

“Registered Charity” means charitable organizations, public foundations, or private foundations that are created in Canada that focus on utilizing their resources for charitable activities and have charitable purposes that fall into one or more of the following categories:

- the relief of poverty;
- the advancement of education; and/or
- other purposes that benefit the community.

“Tree Art” means purposefully using a tree to create art or an art installment. Any trees proposed for this must already exist in the Public Spaces and be designated for Tree Art by the Town’s Certified Arborist.

“Term” means the amount of time that Council shall hold office, pursuant to the *Municipal Government Act*.

“Town” means the Town of High River.

“Vandalism” means any deliberate defacing, destruction, installation or damage to Town property or the Public Realm.

ROLES & RESPONSIBILITIES

The key positions for the purpose of this policy include:

Administration - the administrative and operational arm of the Town, comprised of the various departments and divisions and includes all employees who operate under the leadership and supervision of the Chief Administrative Officer, including any employee delegated with the authority to implement programs and policies.

Chief Administrative Officer - principal staff person responsible for organizational performance who is appointed to the position of Chief Administrative Officer in accordance with the *Municipal Government Act* for the Town of High River.

Council - the elected decision-making body for the Town of High River.

Mayor - the individual elected to the position of Chief Elected Official in accordance with the *Local Authorities Election Act* or, in circumstances where the Mayor is not available, this shall include the Deputy Mayor.

Municipal Clerk - the individual in the leadership role that directly oversees the Legislative and Advisory Services division for the Town of High River.

The fundamental roles and responsibilities of Council and Administration involve:

<p style="text-align: center;">Mayor and Council</p> <ul style="list-style-type: none"> • Give direction. • Approve this policy and any amendments. • Review this policy once per Term. • Approve the budget for the Community Art Fund. • Approve the acquisition of Community Art 	<p style="text-align: center;">Chief Administrative Officer (CAO)</p> <ul style="list-style-type: none"> • Ensure Administration understands and implements this policy. • Manage organizational resources and processes in relation to this policy. • Facilitate the administrative/political interface relating to this policy.
<p style="text-align: center;">Administration</p> <ul style="list-style-type: none"> • Implement and adhere to this policy. 	<p style="text-align: center;">Municipal Clerk</p> <ul style="list-style-type: none"> • Retain the original copies of this policy in the Town's Policy Manual. • Arrange for the posting of this policy on the website.
<p style="text-align: center;">Community Development Officer and/or Planning and Development Division</p> <ul style="list-style-type: none"> • Coordinate internal review of proposal. • Coordinate the Community Art Fund. • Coordinate Community Engagement for Community Art. • Coordinate with the appropriate staff liaison for Community Art placement. 	<p style="text-align: center;">Staff Liaison for Community Art Placement</p> <ul style="list-style-type: none"> • For Parks in Town – Parks and Facilities Supervisor. • For Happy Trails – Public Works Manager. • All other public places in High River – Community Development Officer and/or Planning and Development Division.

<ul style="list-style-type: none">• Maintain the Community Art Inventory.• Perform regular inspections of Community Art.• Coordinate maintenance of Community Art.• Coordinate the decommissioning of Community Art in Public Spaces.• Regularly review this policy and recommend amendments.	
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PROCEDURE

The Town will follow all these procedures regarding Community Art.

Guiding Principles

Community Art shall:

- be chosen in a fair and equitable manner involving community engagement, when appropriate;
- support local talent, skills and services;
- support diversity of artist selection, site selection, media, scale and style of artwork;
- be environmentally-sound;
- embrace good design principles (engineering, structural, aesthetic and safety); and
- comply with Town Bylaws.

Acceptable Parameters of Community Art

Acceptable Community Art is respectful to all peoples and considers the safety of all citizens.

Community Art shall be diverse and inclusive with the intent to enhance our community.

Community Art must not:

- present any divisive, offensive, demeaning or derogatory portrayals of any individuals or groups;
- contain anything that is likely to cause offense.
- convey any religious based text;
- promote any business, service or product;
- promote alcohol or other addictive substances; or
- be unsafe to the public.

Inventory

1. The Community Development Officer will form a Community Art Inventory listing for the start of this Community Art Policy. This inventory will list each Community Art with:

- a. title,
- b. location,
- c. artist,
- d. material,
- e. installation date,
- f. expected life span,
- g. responsible party,
- h. Moral and/or Copyright status,
- i. when Community Art is removed from installation.

2. This inventory will be updated when:
 - new Community Art is accepted by the Town,
 - Community Art locations are changed, and
 - Community Art is decommissioned from the Town.
3. The Town may accept Community Art into the Town's Community Art Inventory that has, prior to the passing of this Policy, been placed in Public Spaces. Any such Community Art that has been placed in Public Spaces will be deemed transferred to the Town meaning the Town owns the Community Art and its Copyright.

Additions of Community Art

4. No art or other items may be placed in Public Spaces without the Town's prior consent.
5. Any items of Community Art placed in Public Spaces without the Town's consent will follow the Town's Public Notification Bylaw, once the Town becomes aware of it. If said item(s) are not removed from the Public Space within thirty (30) days, the Town will assess and determine the appropriate action, which may include disposing of the item(s).
6. If any item of Community Art is placed in the Public Space without Town consent and is deemed outside of the Acceptable Parameters of Community Art, it will be removed immediately.
7. When Community Art is accepted by the Town by commission or purchase or donation/gift/bequest, ownership and Copyright transfers to the Town.
8. Public Engagement may be used for identifying new sites for new Public Community Art, especially in new developments.

Acquisition of Public Community Art

9. There are the five (5) ways Public Community Art will be selected:
 - a. Open competition – a competition that is advertised locally and open to any artist interested in submitting a proposal for consideration.
 - b. Invited/Limited competition – a select number of artists are recommended to Town Council who then invite these select artists to submit a Public Community Art proposal for consideration.
 - c. Direct selection – a recommendation for commissioning of an artist for a specific Public Community Art or the direct purchase of art to become Public Community Art.
 - d. An individual or organization may propose a Public Community Art piece.
 - e. Donation/gift/bequest.
10. Any of the above five means will require approval by Council. Proposals are to be submitted to the Community Development Officer or designate, circulated for internal review, and brought forward with a recommendation to a regular meeting of Council.
11. A Community Art Agreement shall be required for any Community Art project approved by Council. The Applicant shall enter into a Community Art Agreement in a form approved by the Town, as amended from time to time.

12. Community engagement may be included in the determination of Public Community Art to enhance the beautification of the Town with the wishes of residents taken into consideration through the following means:
 - a. Open Competition – the Town will advertise on the Town’s website. Any artists interested in submitting a proposal shall respond to the open competition as it outlines.
 - b. Invited/Limited competition – the Town will contact a select number of artists as recommended to Town Council. These artists will be invited to respond and submit a Public Community Art proposal for consideration.
 - c. Direct selection – Town Council will direct Administration to engage with a recommended artist and/or for commissioning a specific Public Community Art piece or project.
 - d. An individual or organization may propose a Public Community Art piece. This proposal would be directed to the Community Development Officer or the designate who would bring it forward to Council.
 - e. Donation/gift/bequest – an individual or organization may wish to gift the Town art for the purposes of Public Community Art. If so, Town Council must agree with the donation/gift/bequest. Upon agreement of this donation/gift/bequest, ownership and Copyright shall transfer to the Town.
13. The Town will not compensate for appraisals of Community Art nor pay the full sum of any appraisal for art being donation/gift/bequest to the Town. If the individual or organization arranging for the donation/gift/bequest to the Town is in disagreement, it will be up to Council to determine the best path forward based, at least partially, on the recommendation of the Community Development Officer and/or designate, which recommendation may include the minimum of two (2) independent art appraisals.
14. All Community Art proposals will be directed to the Community Development Officer or designate who will bring the proposal, with their recommendation, forward to Council.

Community Art Proposals

15. Where an Applicant is not the artist, the Applicant is responsible for ensuring the artist’s compliance with this Policy and any agreements or requirements established by the Town.
16. Any proposal(s) for Community Art shall include:
 - a. Name of the Applicant(s).
 - b. Name of the Artist(s) (if different).
 - c. Name of the proposed Community Art.
 - d. Picture/diagram of the proposed Community Art.
 - e. Description of the project and why the artwork was selected.
 - f. Does the proposed Community Art meet the requirements of Acceptable Parameters of Community Art?
 - g. Materials used for the Community Art.
 - h. Process for creating the Community Art.
 - i. Proposed location and approval if located on private property.
 - j. Location that the Community Art is being made. If the Community Art is being made on site – describe any safety issues and how those will be mitigated including what type of protection barriers and other items will be used to protect the public as well as the artist(s).
 - k. Are the materials safe and environmentally-sound?
 - l. Is the process of the creation of this art safe and environmentally-sound.

m. The expected life span and proposed maintenance for the Community Art.

17. Applicants that receive Community Art funding are required to submit a completed Community Art Accountability Report within 60 days of Completion of the approved Community Art project.
18. Submission of the Accountability Report is a condition of receiving Community Art funding under this Policy. Failure to submit the required report may result in the Town withholding or recovering Community Art funding and may affect the Applicant's eligibility for future funding through the Community Art Fund. The Town of High River reserves the right, at its sole discretion, to decline or deny subsequent funding requests where accountability requirements have not been met.

Transfer to the Town

19. Public Community Art that is commissioned by open competition, invited/limited competition, or direct selection shall vest in the Town upon completion of the Public Community Art project, unless otherwise directed by Council.
20. Public Community Art that is proposed by an individual or organization shall transfer to the Town once the Public Community Art is deemed finalized, unless otherwise directed by Council.
21. Until such time as ownership transfers to the Town, ownership shall remain with the artist or Applicant, unless otherwise determined by Council.
22. Upon completion of the Public Community Art, all rights, title, and interest in and to the Public Community Art, including full and exclusive ownership of all Copyright, shall automatically vest in the Town.
23. Transfer of ownership, Copyright, and waiver of Moral Rights takes effect immediately upon completion of the Public Community Art project, regardless of whether the Certificate of Completion has been executed. Failure or refusal by the artist or the Applicant to execute the Certificate of Completion shall not delay, limit, or invalidate the transfer of rights to the Town.
24. The artist irrevocably waives, in favour of the Town, all Moral Rights in the Community Art to the fullest extent permitted by law.
25. Upon transfer of ownership, the Town has full, unrestricted authority to use, display, distribute, commercialize, modify, relocate, digitize, reproduce in any medium, decommission, and authorize others to use the Public Community Art in any manner the Town deems appropriate, including its appearance in third-party media, including but not limited to films, television shows, documentaries, advertisements, signage, sound recordings, or promotional materials, and the Applicant and artist waive any right to approve of, restrict, or be notified of such use.
26. The Town may make and permit Incidental Use of the Community Art without notice, attribution, approval, or compensation.
27. Upon completion of the Public Community Art project, the artist shall execute the Certificate of Completion. Where the Applicant is not the artist, the Applicant shall ensure that the Certificate of Completion is executed and delivered to the Town.

28. The Certificate of Completion includes a release of claims in favour of the Town relating to the future use, display, representation, modification, relocation, or decommissioning of the Public Community Art.
29. Upon transfer of ownership and/or Copyright to the Town, Public Community Art may be subject to Incidental Use, Featured Use, or Decommissioning at the Town's discretion, as guided by this Policy.
30. Private Property Art Moral Rights may be waived and Copyright may be assigned to the Town upon consent by the artist. This waiver and assignment will be documented in the Community Art Inventory.

Placement of Public Community Art

31. When Public Community Art is accepted by the Town, ownership of the Public Community Art transfers to the Town in accordance with this Policy. The artist(s) or organization may suggest placement; however, the Town retains final decision-making authority over the placement of Public Community Art to ensure it is aesthetically appropriate, safe for the public, and compatible with the Town's operational needs. Community engagement may form part of the placement process, where appropriate.
32. Any Public Community Art to be placed near Happy Trails or Town sidewalk must allow for 1.5 meter clearance to allow passage of pedestrians and cyclists.
33. Private Property Art is the responsibility of the property owner. The Town's authority under this Policy relates to the Incidental Use and/or Featured Use of the artwork and does not extend to ownership or maintenance of the Private Property Art.

Murals

34. Existing murals that the Town is responsible for may be allowed to fade over time and may be replaced, painted over, or otherwise addressed as they meet or exceed their Community Art Lifecycle, or where removal or alteration is required in accordance with this Policy.
35. New murals proposed for installation on Town-owned property are to be mounted on a frame or structure attached to a building, unless otherwise approved by the Town.
36. Murals located on buildings or structures not owned by the Town are considered to be Private Property Art. Responsibility for the underlying building or structure, including maintenance and repair, remains with the property owner.

Tree Art

37. The Parks and Facilities Supervisor or their designate will arrange for tree(s) to be prepared for use for Tree Art by cutting down the tree to a maximum height of 10 feet prior to the artist(s) accessing the tree.
38. Any trees prepared for Tree Art that are not used within two (2) years may be cut down to avoid any safety concerns.
39. No metal is to be drilled into the tree at any time.

40. There shall be minimal maintenance for Tree Art with a preference for the art fading into natural patina from the weather and elements.
41. Tree Art Artist(s) must identify and mitigate any hazards prior to starting their work and throughout their work, including hazards to others as well as themselves.

Safety

42. During Public Community Art creation or installation, the Town may require appropriate insurance coverage or other risk management measures as a condition of approval or installation. Insurance requirements, if any, will be determined by the Town based on the nature, scale, and risk associated with the proposed Public Community Art and will be addressed through the Community Art Agreement or other administrative requirements, as determined by the Town.
43. Public Community Art shall be inspected on regular basis as determined by the Community Development Officer and/or Planning & Development Division based on the maturity category for the Public Community Art.
44. If any Public Community Art becomes a safety concern, it will be removed as soon as possible even if prior to the end of its projected Community Art Lifecycle. If the Public Community Art has deteriorated or diminished to where it is unrecognizable or no longer meets the Acceptable Parameters of Community Art, regardless of its projected Community Art Lifecycle, it will be removed and other Public Community Art may be placed at that location.

Vandalism

45. If Public Community Art has been vandalized, the cost of remedy will be considered versus its Community Art Lifecycle and may be cleaned, repaired, or removed. It will be removed immediately if the vandalism is offensive or causes the Public Community Art to no longer meet the Acceptable Parameters of Community Art.
46. Private Property Art remains the responsibility of the property owner for addressing vandalism, including cleaning, repair, or restoration of the artwork and the underlying building or structure. The Town is not responsible for vandalism remediation of Private Property Art.

Lifecycle and Maturity

47. Public Community Art may continue beyond its intended Community Art Lifecycle as long as it is still seen as a community benefit or be removed earlier than expected if it:
 - becomes a safety concern,
 - deteriorates or diminishes to the point of replacement,
 - no longer fits the definition of Acceptable Parameters of Community Art,
 - no longer fits with placement on Public Property, or
 - is deemed by Council to be removed.
48. The Town has sole discretion to determine when Public Community Art presents a safety concern or no longer meets the Acceptable Parameters of Community Art and may take appropriate action, including decommissioning, regardless of the projected Community Art Lifecycle.

Agenda Item #6.3.

APPROVAL

Date of Council Approval:

Resolution Number of Council Approval:

POLICY MANUAL
Community Art



Policy Number: POL-0105	Division: Community Development
Effective Date: <u>March 24, 2025</u>	Date for Review:
Revision Date:	Supersedes/Repeals: Public Art Policy POL-06-101-00
Related Policy Number(s): <u>POL-0106 and POL-0108</u>	Related Policy Name(s): Decorative Crosswalk and Intersection Policy Film Production Policy
External Sources:	Council Resolution Number:

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PURPOSE

This policy is to:

1. promote opportunities for Community Art in and around public buildings and public outdoor spaces by establishing funding and procedure for current and additional Community Art in High River;
2. promote and facilitate Community Art into new developments and capital improvement projects by community engagement and engaging with local artists; and
3. ensure all Community Art is within the Acceptable Parameters of Community Art for Town residents.

The Town of High River (the "Town") will ensure that all Community Art on Town property:

- is within the Acceptable Parameters of Community Art as defined by this Policy;
- is placed on Town-owned lands ensuring safety of all peoples and ease of Town operations;
- has an expected life span where it may be removed, dismantled or replaced accordingly;
- has minimal or defined maintenance requirements that are;
 - environmentally sound;
 - accounted for in operations and planning; and
 - based on the expected life span.

POLICY STATEMENT

The Town believes that Community Art is essential to the Town's identity of fostering a small-town feel, responsible growth, interconnected community, health and well-being, parks and recreation, environment, economic diversification, safety and security, and partnerships. As High River continues to evolve into a highly sustainable, resilient and livable community accessible to all ages and abilities, Community Art promotes sharing social and cultural connections.

Community Art in High River reflects atthe high quality of life, creates a sense of place and identity for residents, showcasing how we live, work, play and move with sustainable development and a diverse range of residential and economic opportunities.

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Through Community Art, artists will be involved in community building while paying homage to history, culture, diversity and inclusion.

This Community Art Policy will enhance the Town's support for arts and cultural development, being a center renowned for its arts, culture, tourism, and film activity.

DEFINITIONS

The following are some commonly used definitions within the Town.

"Acquisition" means the process of proposing, reviewing, and accepting artwork into the Community Art Inventory.

"Administration" means the administrative and operational arm of the Town, comprised of the various departments and business units and includes all employees who operate under the leadership and supervision of the Chief Administrative Officer, means any employee delegated with the authority to implement programs and policies.

"Applicant" means the individual, organization, collective, or authorized representative bringing forward a Community Art proposal approved by Council to receive Community Art funding. The Applicant may be the artist or may be acting on behalf of one or more artists. Where the Applicant is not the artist, the Applicant is responsible for ensuring that the artist complies with all applicable obligations under the Policy.

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"Banners" means the banners placed on Town light poles for the purposes of acknowledgement and remembrance, season of celebration or cultural recognition. The Town will maintain ownership of the Town banners and return community banners to the community group who owns them.

"Certificate of Completion" or "COC" means the Certificate of Completion and Transfer of Copyright and Ownership required by the Town and executed by the artist upon completion of the Community Art.

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"Community Art" means any visual artwork, in any medium, whether fixed or freestanding, permanent or temporary, that is located in a Public Spaces or on private property that is and/or intended for public viewing. This includes both Public Community Art and Private Property Art in settings intended for free public access or within Town facilities where the public can access on Town land.

Examples of Community Art will include, but not be limited to, book bungalows, historical signage, graffiti-style art, murals, sculptures, statues, tree art, art on utilities boxes, cultural or historical artifacts (excluding collections from museums or libraries), pictures and tapestries, landscaping features, street inlays, architectural embellishments. Community Art does not include decorative crosswalks or intersections as these are governed by the Decorative Crosswalk and Intersection Policy.

Community Art shall have three maturity categories:

1. **"Short Term Community Art"** means Community Art that withstands the elements of its environment and is expected to mature and have a life span of approximately 5 years with minimal and environmentally-sound maintenance or no maintenance required. An example of this are the banners the Town puts up.
2. **"Mid Term Community Art"** means Community Art that withstands the elements of its environment for approximately 10 years with minimal and environmentally-sound maintenance or no maintenance required. A current example are the murals on the buildings.

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3. **“Long Term Community Art”** means Community Art that withstands the elements of its environment for approximately 11+ years and requires minimal and environmentally-sound maintenance or no maintenance. A current example is the statue of George Emerson.

“Community Art Accountability Report” means the report required to be submitted by an Applicant in accordance with the Community Art Agreement, documenting Completion, outcomes, and use of funds for a Community Art project.

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“Community Art Agreement” means the agreement entered into by the Applicant and the Town to support creation of Community Art and may include funding from the Community Art Fund, as approved by Council.

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“Community Art Fund” means a fund established by Council to consider Community Art proposals and for the acquisition, including Copyright and Moral Rights, of Community Art, and the maintenance of Community Art.

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“Community Art Inventory” means a comprehensive listing describing the art in Public Spaces **Community Art.**

“Community Art Lifecycle” means once the Public Community Art has completed its expected life span, that Public Community Art may be removed.

“Completion” means the point at which the Community Art project has been fully created, installed (where applicable), and accepted by the Town as meeting the approved proposal and applicable requirements.

“Copyright” means Copyright as defined in the Copyright Act (Canada), and includes all proprietary rights in and to the Community Art, including the exclusive right to reproduce, publish, display, perform, communicate to the public, adapt, modify, authorize others to do the same, and otherwise use the Community Art in any medium, now and in the future.

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“Council” means Town of High River Council and shall be the advisory body to approve acquisition of Community Art.

“Decommissioning” means the removal, relocation, alteration, disposal, or retirement of Community Art by the Town, whether temporarily or permanently, for reasons including safety, condition, lifecycle completion, operational needs, redevelopment, or policy considerations.

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“Featured Use” means a use of the Community Art where the artwork is the primary subject of the content or is used for commercial branding, marketing, advertising, merchandising, or other promotional purposes beyond Incidental Use.

“Graffiti” means uninvited markings that have been made on any Premises or Property without permission of the Owner.

“Incidental Use” means the background, contextual, or non-featured inclusion of Community Art in visual, audio-visual, or digital content, where the Community Art is not the primary subject or focus. Incidental use includes, without limitation, appearance of the Community Art in photographs, film, television, streaming productions, documentaries, sound recordings, news coverage, social media, websites, signage, or promotional materials.

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“Featured Use” means a use of the Community Art where the artwork is the primary subject of the content or is used for commercial branding, marketing, advertising, merchandising, or other promotional purposes beyond Incidental Use.

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“Maintenance” means any upkeep to existing Community Art pieces which can include, but is not limited to, sealing of wood, power washing of statues, repair of any Community Art, and removing any vandalism. Maintenance responsibilities under this Policy apply subject to property ownership and location of the Community Art.

“Moral Rights” has the meaning as set out in the Copyright Act (Canada) and generally refers to an artist’s personal rights connected to their artwork, including the right to be recognized as the creator of the work and the right to object to changes or uses that could harm the artist’s reputation.

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“Mural” means any painting or other graphic artwork applied to or mounted, executed directly onto a wall, building, or a large free-standing flat surface that is intended for visible to the public viewing, within the and is in the Public Realm in Town. Murals do not include ~~These are not~~ advertising billboards.

“Non-Profit” means associations, clubs, or societies that are not charities and are organized and operated exclusively for social welfare, civic improvement, pleasure, recreation, or any other purpose except profit.

“Private Property ArtSpace” means visual artwork that is located or installed ~~land or on property or buildings not owned or operated by the Town, including properties where art Community Art may be installed with the intent of public viewing, consent of the property owner, ...~~

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“Public Community Art” means visual artwork that is located in a Public Space.

“Public Space” means Town-owned and operated property, including, but not limited to, facilities, parks, buildings, streets, sidewalks and boulevards in Town.

“Registered Charity” means charitable organizations, public foundations, or private foundations that are created in Canada that focus on utilizing their resources for charitable activities and have charitable purposes that fall into one or more of the following categories:

- the relief of poverty;
- the advancement of education; and/or
- other purposes that benefit the community.

“Tree Art” means purposefully using a tree to create art or an art installment. Any trees proposed for this must already exist in the Public Spaces and be designated for Tree Art by the Town’s Certified Arborist/Parks and Facilities Supervisor.

“Term” means the amount of time that Council shall hold office, pursuant to the *Municipal Government Act*.

“Town” means the Town of High River.

“Vandalism” means any deliberate defacing, destruction, installation or damage to Town property or the Public Realm.

ROLES & RESPONSIBILITIES

The key positions for the purpose of this policy include:

Administration - the administrative and operational arm of the Town, comprised of the various departments and divisions and includes all employees who operate under the leadership and

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supervision of the Chief Administrative Officer, including any employee delegated with the authority to implement programs and policies.

Chief Administrative Officer - principal staff person responsible for organizational performance who is appointed to the position of Chief Administrative Officer in accordance with the *Municipal Government Act* for the Town of High River.

Council - the elected decision-making body for the Town of High River.

Mayor - the individual elected to the position of Chief Elected Official in accordance with the *Local Authorities Election Act* or, in circumstances where the Mayor is not available, this shall include the Deputy Mayor.

Municipal Clerk - the individual in the leadership role that directly oversees the Legislative and Advisory Services division for the Town of High River.

The fundamental roles and responsibilities of Council and Administration involve:

<p style="text-align: center;">Mayor and Council</p> <ul style="list-style-type: none"> • Give direction. • Approve this policy and any amendments. • Review this policy once per Term. • Approve the budget for the Community Art Fund. • Approve the acquisition of Community Art 	<p style="text-align: center;">Chief Administrative Officer (CAO)</p> <ul style="list-style-type: none"> • Ensure Administration understands and implements this policy. • Manage organizational resources and processes in relation to this policy. • Facilitate the administrative/political interface relating to this policy.
<p style="text-align: center;">Administration</p> <ul style="list-style-type: none"> • Implement and adhere to this policy. 	<p style="text-align: center;">Municipal Clerk</p> <ul style="list-style-type: none"> • Retain the original copies of this policy in the Town's Policy Manual. • Arrange for the posting of this policy on the website.
<p style="text-align: center;">Community Development Officer and/or Planning and Development Division</p> <ul style="list-style-type: none"> • Propose the budget for the Community Art Fund. • <u>Coordinate internal review of proposal.</u> • Coordinate the Community Art Fund. • Coordinate Community Engagement for Community Art. • Coordinate with the appropriate staff liaison for Community Art placement. • Maintain the Community Art Inventory. • Perform regular inspections of Community Art. • Coordinate maintenance of Community Art. • Coordinate the decommissioning of Community Art <u>in Public Spaces.</u> • Regularly review this policy and recommend amendments. 	<p style="text-align: center;">Staff Liaison for Community Art Placement</p> <ul style="list-style-type: none"> • For Parks in Town – Parks and Facilities Supervisor. • For Happy Trails – Public Works Manager. • All other public places in High River – Community Development Officer and/or Planning and Development Division.

PROCEDURE

The Town will follow all these procedures regarding Community Art.

Guiding Principles

Community Art shall:

- be chosen in a fair and equitable manner involving community engagement, when appropriate;
- support local talent, skills and services;
- support diversity of artist selection, site selection, media, scale and style of artwork;
- be environmentally-sound;
- embrace good design principles (engineering, structural, aesthetic and safety); and
- comply with Town Bylaws.

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Acceptable Parameters of Community Art

Acceptable Community Art is respectful to all peoples and considers the safety of all citizens. Community Art shall be diverse and inclusive with the intent to enhance our community. Community Art must not:

- present any divisive, offensive, demeaning or derogatory portrayals of any individuals or groups;
- contain anything that is likely to cause offense.
- convey any religious based text;
- promote any business, service or product;
- promote alcohol or other addictive substances; or
- be unsafe to the public.

Inventory

1. The Community Development Officer will form a Community Art Inventory listing for the start of this Community Art Policy. This inventory will list each Community Art with:
 - a. title,
 - b. location,
 - c. artist,
 - d. material,
 - e. installation date,
 - f. expected life span,
 - g. responsible party,
 - h. Moral and/or Copyright status.
 - i. when Community Art is removed from installation.
2. This inventory will be updated when:
 - new Community Art is accepted by the Town,
 - Community Art locations are changed, and
 - Community Art is decommissioned from the Town.
3. The Town may accept Community Art into the Town's Community Art Inventory that has, prior to the passing of this Policy, been placed in Public Spaces. Any such Community Art that has been placed in Public Spaces will be deemed transferred to the Town meaning the Town owns the Community Art and its Copyright.

Additions of Community Art

4. No art or other items may be placed in Public Spaces without the Town's prior consent.

5. Any items of Community Art placed in Public Spaces without the Town's consent will follow the Town's Public Notification Bylaw, once the Town becomes aware of it. If said item(s) are not removed from the Public Space within thirty (30) days, the Town will assess and determine the appropriate action, which may include disposing of the item(s).
6. If any item of Community Art is placed in the Public Space without Town consent and is deemed outside of the Acceptable Parameters of Community Art, it will be removed immediately.
7. When Community Art is accepted by the Town by commission or purchase or donation/gift/bequest, ownership and ~~C~~opyright transfers to the Town.
8. Public Engagement ~~will~~may be used for identifying new sites for new Public Community Art, especially in new developments.

Acquisition of Public Community Art

9. There are the five (5) ways Public Community Art will be selected:
 - a. Open competition – a competition that is advertised locally and open to any artist interested in submitting a proposal for consideration.
 - b. Invited/Limited competition – a select number of artists are recommended to Town Council who then invite these select artists to submit a Public Community Art proposal for consideration.
 - c. Direct selection – a recommendation for commissioning of an artist for a specific Public Community Art or the direct purchase of art to become Public Community Art.
 - d. An individual or organization may propose a Public Community Art piece.
 - e. Donation/gift/bequest.
10. Any of the above five means will require approval by Council. Applications-Proposals are to be submitted to the Community Development Officer or designate, circulated for internal review, and brought forward with a recommendation to a regular meeting of Council.
11. A Community Art Agreement contract shall be required for any Community Art project approved by Council. The Applicant shall enter into a Community Art Agreement in a form approved by the Town, as amended from time to time, used for open competition, invited/limited competition, direct selection, and an individual or organization that brings forward Community Art, the contract is attached as Appendix A.
12. Community engagement may be included in the determination of Public Community Art to enhance the beautification of the Town with the wishes of residents taken into consideration through the following means:
 - a. Open Competition – the Town will advertise on the Town's website. Any artists interested in submitting a proposal shall respond to the open competition as it outlines.
 - b. Invited/Limited competition – the Town will contact a select number of artists as recommended to Town Council. These artists will be invited to respond and submit a Public Community Art proposal for consideration.
 - c. Direct selection – Town Council will direct Administration to engage with a recommended artist and/or for commissioning a specific Public Community Art piece or project.
 - d. An individual or organization may propose a Public Community Art piece. This proposal would be directed to the Community Development Officer or the designate who would bring it forward to Council.
 - e. Donation/gift/bequest – an individual or organization may wish to gift the Town art for the purposes of Public Community Art. If so, Town Council must agree with the donation/gift/bequest. Upon agreement of this donation/gift/bequest, ownership and ~~C~~opyright shall transfer to the Town.

13. The Town will not compensate for appraisals of Community Art nor pay the full sum of any appraisal for art being donation/gift/bequest to the Town. If the individual or organization arranging for the donation/gift/bequest to the Town is in disagreement, it will be up to Council to determine the best path forward based, at least partially, on the recommendation of the Community Development Officer and/or designate, which recommendation may include the minimum of two (2) independent art appraisals.

14. All Community Art proposals will be directed to the Community Development Officer or designate who will bring the proposal, with their recommendation, forward to Council.

Community Art Proposals

15. Where an Applicant is not the artist, the Applicant is responsible for ensuring the artist's compliance with this Policy and any agreements or requirements established by the Town.

~~15.~~ 16. Any proposal(s) for Community Art shall include:

- a. Name of the Applicant(s).
- ~~a.~~ b. Name of the Artist(s) (if different).
- ~~b.~~ c. Name of the proposed Community Art.
- ~~c.~~ d. Picture/diagram of the proposed Community Art.
- ~~d.~~ e. Description of the project and why the artwork was selected.
- ~~e.~~ f. Does the proposed Community Art meet the requirements of Acceptable Parameters of Community Art?
- ~~f.~~ g. Materials used for the Community Art.
- ~~g.~~ h. Process for creating the Community Art.
- ~~h.~~ i. Proposed location and approval if located on private property.
- ~~i.~~ j. Location that the Community Art is being made. If the Community Art is being made on site – describe any safety issues and how those will be mitigated including what type of protection barriers and other items will be used to protect the public as well as the artist(s).
- ~~j.~~ k. Are the materials safe and environmentally-sound?
- ~~k.~~ l. Is the process of the creation of this art safe and environmentally-sound.
- ~~l.~~ m. The expected life span and proposed maintenance for the Community Art.

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~~Please note that if the Town accepts a proposal, the Town will be accepting ownership of the art and have the decision making authority for its placement to ensure it is placed where it is aesthetically pleasing and isn't a safety concern.~~

17. Applicants that receive Community Art funding are required to submit a completed Community Art Accountability Report (A Community Art Accountability Report is due within 60 days of the completion of the approved Community Art project.)

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18. Submission of the Accountability Report is a condition of receiving Community Art funding under this Policy. Failure to submit provide these required report will may result in the Town withholding or recovering Community Art funding and may affect the Applicant's eligibility for future funding through the denial of other funding associated through the Community Art Fund. The Town of High River reserves the right, at its sole discretion, to withhold or reclaim funds and to decline or deny any subsequent funding requests where accountability requirements have not been met. for funding through the Community Art Fund, at its discretion.

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Transfer to the Town

~~16.~~ Public Community Art that is commissioned by open competition, invited/limited competition, or direct selection shall ~~transfer ownership, including Copyright, vest in the Town upon completion of the Public Community Art project, unless otherwise directed by Council.~~ see the Public

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Community Art is deemed finalized. The artist(s) shall own the art until ownership transfers to the Town.

19. Public Community Art that is proposed by an individual or organization shall transfer ownership, including Copyright to the Town once the Public Community Art is deemed finalized, unless otherwise directed by Council.

20. Until such time as ownership transfers to the Town, ownership shall remain with the artist or Applicant. The individual or organization shall own the art until ownership transfers to the Town, unless otherwise determined by Council.

21. Upon completion of the Public Community Art, all rights, title, and interest in and to the Public Community Art, including full and exclusive ownership of all Copyright, shall automatically vest in the Town.

22. Transfer of ownership, Copyright, and waiver of Moral Rights takes effect immediately upon completion of the Public Community Art project, regardless of whether the Certificate of Completion has been executed. Failure or refusal by the artist or the Applicant to execute the Certificate of Completion shall not delay, limit, or invalidate the transfer of rights to the Town.

23. The artist irrevocably waives, in favour of the Town, all Moral Rights in the Community Art to the fullest extent permitted by law.

24. Upon transfer of ownership, the Town has full, unrestricted authority to use, display, distribute, commercialize, modify, relocate, digitize, reproduce in any medium, decommission, and authorize others to use the Public Community Art in any manner the Town deems appropriate, including its appearance in third-party media, including but not limited to films, television shows, documentaries, advertisements, signage, sound recordings, or promotional materials, and the Applicant and artist waive any right to approve of, restrict, or be notified of such use.

25. The Town may make and permit Incidental Use of the Community Art without notice, attribution, approval, or compensation.

26. Upon completion of the Public Community Art project, the artist shall execute the Certificate of Completion. Where the Applicant is not the artist, the Applicant shall ensure that the Certificate of Completion is executed and delivered to the Town.

27. The Certificate of Completion includes a release of claims in favour of the Town relating to the future use, display, representation, modification, relocation, or decommissioning of the Public Community Art.

28. Upon transfer of ownership and/or Copyright to the Town, Public Community Art may be subject to Incidental Use, Featured Use, or Decommissioning at the Town's discretion, as guided by this Policy.

29. Private Property Art Moral Rights may be waived and Copyright may be transferred/assigned to the Town upon consent by the artist. This waiver and assignment will be tracked as part of the documented in the Community Art Inventory.

Placement of Public Community Art

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~~17.30.~~ When Public Community Art is accepted by the Town, ownership of the Public Community Art transfers to the Town in accordance with this Policy. ~~†The artist(s) or organization may suggest its placement; however, the Town retains final decision-making authority over the placement of Public Community Art to ensure it is aesthetically appropriate, safe for the public, and compatible with the Town's operational needs.~~ ~~Community engagement may also form part of the process. The final decision will be made by the Town to ensure safety of all interested parties and considering the operational needs of the Town. If Community Art was for a specific development area, it will remain in its location unless it becomes unsafe or interferes with the Town's operational needs.~~ ~~form part of the placement process, where appropriate.~~

31. Any Public Community Art to be placed near Happy Trails or Town sidewalk must allow for 1.5 meter clearance to allow passage of pedestrians and cyclists.

~~18.32.~~ Where Private Property Community Art is located on Private Property, is the responsibility for the underlying building or land remains with of the property owner. The Town's authority under this Policy relates to the Incidental Use and/or Featured Use of the artwork itself and does not extend to ownership or maintenance of the Private Property Art.

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Murals

~~19.33.~~ Existing murals that the Town is responsible for may will be allowed to fade over time and may be replaced, ~~or~~ painted over, or otherwise addressed as they meet or exceed their Community Art Lifecycle, or where removal or alteration is required in accordance with this Policy.

~~20.34.~~ New murals proposed for installation on Town-owned property are to be mounted on a frame or structure installed on attached to a building, rather than directly on buildings unless otherwise approved by the Town.

~~35.~~ ~~Any~~ Murals located on buildings or structures not owned by the Town are considered to be on Private Property Art. Responsibility for the underlying building or structure, including maintenance and repair, remains with the ~~are the responsibility of the building property owner.~~

~~21.~~ Where a mural on Private Property is accepted as Community Art, the Town's authority under this Policy relates to the artwork itself, including decisions regarding acceptance, placement, documentation, use, and decommissioning, but does not extend to ownership or maintenance of the private building or structure.

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Tree Art

~~22.36.~~ The Parks and Facilities Supervisor or their designate will arrange for tree(s) to be prepared for use for Tree Art by cutting down the tree to a maximum height of 10 feet prior to the artist(s) accessing the tree.

~~23.37.~~ Any trees prepared for Tree Art that are not used within two (2) years may be cut down to avoid any safety concerns.

~~24.38.~~ No metal is to be drilled into the tree at any time.

~~25.39.~~ There shall be minimal maintenance for Tree Art with a preference for the art fading into natural patina from the weather and elements.

~~26.40.~~ Tree Art Artist(s) must identify and mitigate any hazards prior to starting their work and throughout their work, including hazards to others as well as themselves.

Guiding Principles

~~27.1~~ Community Art shall:

- ~~• be chosen in a fair and equitable manner involving community engagement, when appropriate;~~
- ~~• support local talent, skills and services;~~
- ~~• support diversity of artist selection, site selection, media, scale and style of artwork;~~
- ~~• be environmentally sound;~~
- ~~• embrace good design principles (engineering, structural, aesthetic and safety); and~~
- ~~• comply with Town Bylaws.~~

Safety

~~41.~~ Where Public Community Art is created or installed on Town owned property, the Town may require appropriate insurance coverage or other risk management measures as a condition of approval or installation. Insurance requirements, if any, will be determined by the Town based on the nature, scale, and risk associated with the proposed Public Community Art and will be addressed through the Community Art Agreement or other administrative requirements, as determined by the Town.

~~28.42.~~ Public Community Art shall be inspected on regular basis as determined by the Community Development Officer and/or Planning & Development Division based on the maturity category for the Public Community Art.

~~29.43.~~ If any Public Community Art becomes a safety concern, it will be removed as soon as possible even if prior to the end of its projected Community Art Lifecycle. If the Public Community Art has deteriorated or diminished to where it is unrecognizable or no longer meets the Acceptable Parameters of Community Art, regardless of its projected Community Art Lifecycle, it will be removed and other Public Community Art may be placed at that location.

Vandalism

~~44.~~ If Public Community Art has been vandalized, the cost of remedy will be considered versus its Community Art Lifecycle and may be cleaned, repaired, or removed. It will be removed immediately if the vandalism is offensive or causes the Public Community Art to no longer meet the Acceptable Parameters of Community Art.

~~30.45.~~ Where Community Art, including murals, is located Private Property Art, remains the responsibility of the property owner for addressing vandalism, including cleaning, repair, or restoration of the artwork and the underlying building or structure, rests with the property owner. The Town is not responsible for vandalism remediation of Private Property Art and may determine, in accordance with this Policy, whether vandalized Community Art continues to be recognized as Community Art or is decommissioned.

Lifecycle and Maturity

~~34.46.~~ Public Community Art may continue beyond its intended Community Art Lifecycle, as long as it is still seen as a community benefit or be removed earlier than expected if it:

- becomes a safety concern,
- deteriorates or diminishes to the point of replacement,
- no longer fits the definition of Acceptable Parameters of Community Art,
- no longer fits with placement on Public Property, or
- is deemed by Council to be removed.

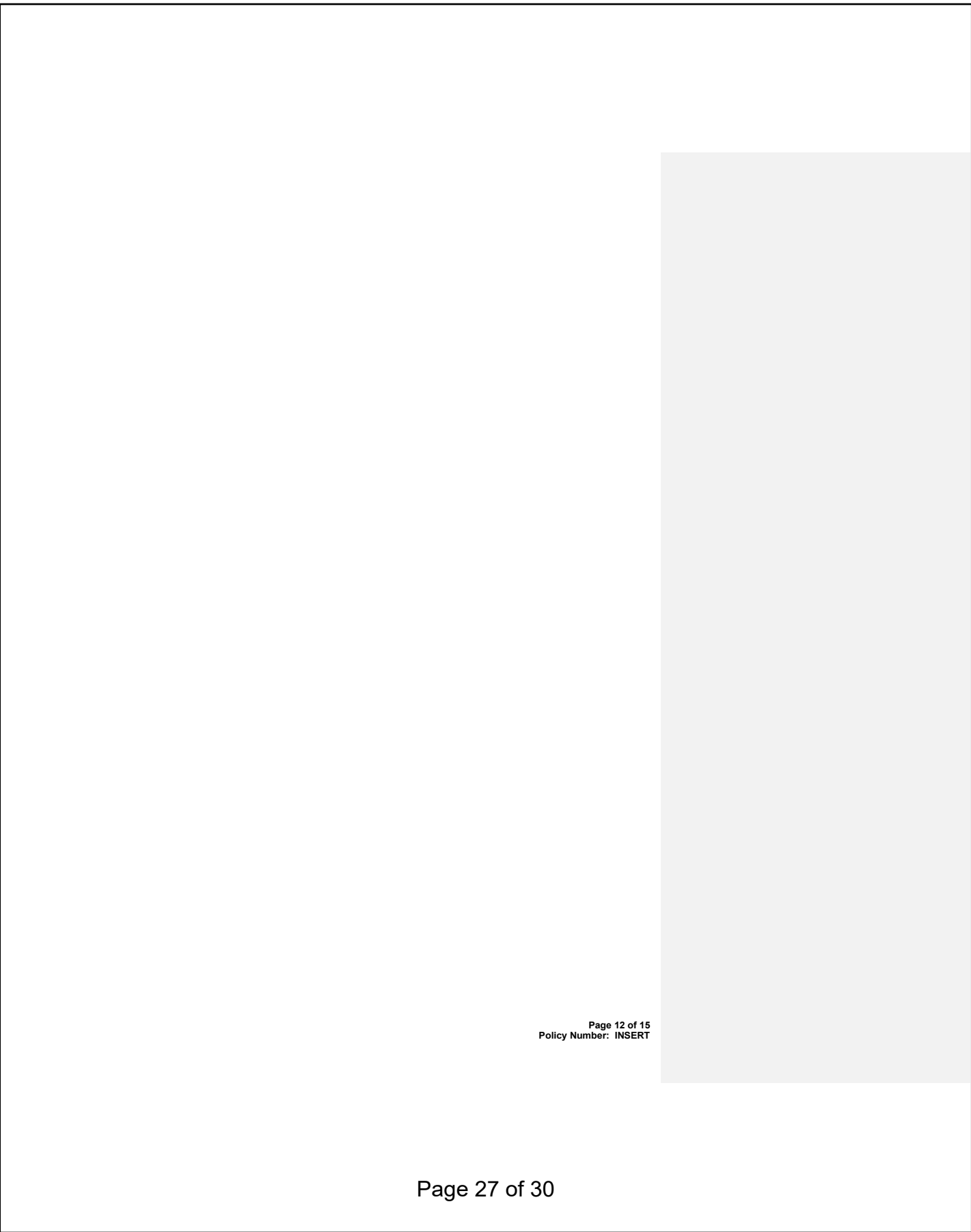
~~47.~~ The Town has sole discretion to determine when Public Community Art presents a safety concern or no longer meets the Acceptable Parameters of Community Art and may take appropriate action, including decommissioning, regardless of the projected Community Art Lifecycle.

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Agenda Item #6.3.



Page 12 of 15
Policy Number: INSERT

Page 27 of 30

Agenda Item #6.3.

APPROVAL

Date of Council Approval:

Resolution Number of Council Approval:

Page 13 of 15
Policy Number: INSERT

APPENDIX A – COMMUNITY ART CONTRACT AGREEMENT

Community Art projects approved by Council will require the Applicant to enter into a Community Art Agreement approved by Administration that reflects this Policy, as amended from time to time.

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TOWN OF HIGH RIVER CONTRACT FOR COMMUNITY ART

This Agreement made this day, _____

BETWEEN:

Town of High River
a Municipal Corporation in
the Province of Alberta
(hereinafter referred to as the "Town")

And

in the _____
in the Province of Alberta
(hereinafter referred to as the "Artist")

WHEREAS the Artist wishes to provide Community Art hereinafter referred to as the "Project" which said project meets the criteria outlined in the Community Art Policy, the description as outlined in the Artist's application form and as specified in this agreement.

NOW THEREFORE, IN CONSIDERATION OF SUCH FUNDING AS THE TOWN IS ABLE TO SUPPLY TO IT, THE ARTIST AGREES:

1. To provide the Project subject to the terms of this agreement.
2. To submit to the Town the Project proposal detailing the budget breakdown and timeline to be provided by the Artist.
3. To submit to the Town a revised timeline if the initial timeline extends.
4. To immediately give notice to the Town if the Artist discontinues or intends to discontinue the Project.
5. If the Artist discontinues the Project they are to remove materials and ensure the safety of the Project and surrounding areas.
6. To provide to the Town project statistics and supplementary data on request.

THE TOWN AGREES:

7. To advise the Artist of any matters which materially affect this Agreement.

Agenda Item #6.3.

~~THE TOWN AND THE ARTIST MUTUALLY AGREE AS FOLLOWS:~~

- ~~8. The Artist has the right to terminate this Agreement upon giving thirty (30) days notice in writing to the Town;~~
- ~~9. The Town shall have the right to terminate the Agreement under any of the following circumstances, by giving sixty (60) days notice in writing to the Artist:
 - ~~I. In the event that Artist fails to perform the duties and obligations which it has undertaken in this Agreement, including the Project;~~
 - ~~II. In the event the Artist discontinues or is about to discontinue its Project;~~
 - ~~III. In the event the Artist is dissolved, amalgamated or merged with another society or becomes bankrupt.~~~~

~~THIS AGREEMENT has been signed by a person or persons duly authorized to do so.~~

~~_____

(Artist Representative)~~

~~_____
THE TOWN OF HIGH RIVER

Chief Administrative Officer~~



REQUEST FOR DECISION

TO: Mayor and Council
FROM: Jocelyn Dunsmore, Community Development Liaison Officer

Date:	April 27, 2026
Meeting Date:	June 8, 2026

SUBJECT: Film Production Policy

RECOMMENDATION: **WHEREAS** the Town wishes to continue to offer a film friendly community to film production;

WHEREAS the existing Film Procedure was approved by Administration July 4, 2017.

BE IT RESOLVED THAT Council approve the Film Production Policy as presented.

CHIEF ADMINISTRATIVE OFFICER’S COMMENTS: Administration supports the proposed recommendation.

IMPLICATIONS OF RECOMMENDATION

GENERAL:

The current Film Procedure was adopted July 4, 2017. Since then, Administration has gained additional experience working within the film industry and recognizes the importance of efficiency in the film permitting process. Administration has updated the procedure and embedded it into a new Film Production Policy for Council's review and approval.

The existing Film Procedure outlines a lengthy process requiring film requests to be submitted 45 days prior to filming. The nature of the film industry is extremely fast paced, and requests change frequently based on many variables. To align the Policy with our current practices, Administration is proposing that all film requests, including both simple and complex productions, be submitted a minimum of seven days prior to filming to allow sufficient time for circulation to internal departments for review and comment. If a request is submitted with less than seven days’ notice, the Town may use its discretion to determine whether the request can be reasonably supported within the available timeframe.

The new Policy includes both Featured Use and Incidental Use of Community Art as it relates to the Community Art Policy. Many film productions have inquired about the legality of murals or other community art within their film production. Defining the use of art clearly outlines when the Town is permitted and not permitted to release copyright and moral rights.

ORGANIZATIONAL:

If Council supports the recommendation, Administration will update the film locations managers that have been working in our area for the last two years.

FINANCIAL:

Agenda Item #6.4.

Administration does not anticipate any financial implications from this revision.

POLICY:

This proposed policy would replace the existing Film Procedure which is included as an attachment.

Strategic Plan

Vibrant Community

The Town of High River provides the foundation for an inclusive, engaged and thriving community.

IMPLEMENTATION:

Should Council support the proposed recommendation Administration will implement the new procedure within the policy presented.

BACKGROUND:

The current Film Procedure was adopted in 2017. The existing Film Procedure outlines a lengthy process of film requests to be received 45 days prior to film. Within the last three years, Administration has not received one film request 45 days in advance. Administration has been able to circulate the film permit requests internally and communicate the comments back to film production within the 7 days suggested in the new policy.

During the last three years, Administration has received several inquiries from film production companies regarding the release of community art such as murals. Administration discovered this is a complex inquiry and sought legal advice. The outcome of the advice is to include the definitions of both Featured Use and Incidental Use of Community Art. The Town is only permitted to release copyright and moral rights to any community art that the artist has transferred the right or ownership to the Town. Featured Use and Incidental Use definitions are below:

“Incidental Use” means the background, contextual, or non-featured inclusion of Community Art in visual, audio-visual, or digital content, where the Community Art is not the primary subject or focus. Incidental use includes, without limitation, appearance of the Community Art in photographs, film, television, streaming productions, documentaries, sound recordings, news coverage, social media, websites, signage, or promotional materials.

“Featured Use” means a use of the Community Art where the artwork is the primary subject of the content or is used for commercial branding, marketing, advertising, merchandising, or other promotional purposes beyond Incidental Use.

Report / Document:

Attached:

Available:

KEY ISSUE(S)/CONCEPT(S):

Council to review and approve the proposed Film Production Policy.

DESIRED OUTCOMES:

The desired outcome is Council adoption of the Film Production Policy to enable Administration to continue supporting the film industry and fostering a film friendly community.

Agenda Item #6.4.

COUNCIL'S OPTIONS:

Council has the following options to consider:

1. Council could choose to support the proposed recommendation.
2. Council could choose to not support the proposed recommendation and defeat the motion.
3. Council could choose to refer the proposed recommendation to a Committee of the Whole meeting for further discussion.

RECOMMENDED:

Council approve the Film Production Policy as presented.

COMMUNICATIONS:

Communications to update the Film Production webpage to include the presented policy if approved.

Reviewed by:

Khalid Mohammed, Manager, Planning & Development
Reiley McKerracher, Director of Municipal Services
Sheron Ward, Advisor, Legislative & Advisory Services
Jody Hipkin, Manager of Legislative and Advisory Services
Chris Prosser, Chief Administrative Officer

Status:

Approved - 29 May 2026
Approved - 01 Jun 2026
Approved - 02 Jun 2026
Approved - 02 Jun 2026
Approved - 03 Jun 2026



TOWN OF HIGH RIVER PROCEDURE

Procedure Number:	ECDEV-PRO-101-00
Procedure Name:	Film Production
Related Policy No:	ECDEV-POL-100-00
Related Policy Name:	Use of Public Realm
Approval Date:	July 4, 2017
Revision Date:	N/A
Procedure Category:	Economic Development
Responsible Department:	Economic Development

Purpose

The purpose of this procedure is to outline consistent processes, requirements and responsibilities to facilitate the support of Film Production within the Town of High River. This procedure will ensure that film organizers and production companies have clear guidelines and open communication with the Town to support filming within the Public Realm.

Definitions

- **Film Production:** means the creation of digital video, a motion picture, movie, theatrical film, television commercials, television series and digital media, including those activities considered necessary in order to record the sounds, scenes, images, parts or segments.
 - **Complex Film Production:** means a Film Production held in the Public Realm which requires additional Town resources or support of Town staff from multiple departments, or a Film Production that requires the closure of a roadway.
 - **Simple Film Production:** means a Film Production held in the Public Realm which requires limited use of Town resources or staff support and does not require the closure of any roadway.
- **Film Producer:** means, in addition to the film production company, it's agents, heirs, successors, assigns and any parent company.
- **Public Realm:** means any Town owned and operated property, including but not limited to parks, streets, sidewalks and boulevards in the Town.
- **Town:** means the Town of High River.

Agenda Item #6.4.

Related Information

- Use of Public Realm Policy ECDEV-POL-100-00
- Fire Protection Bylaw
- IT Process for E-Review
- Amendment Park Bylaw
- Park Control Bylaw
- Land Use Bylaw
- Noise Bylaw
- Rate Bylaw
- Traffic Accommodation Strategy Review Procedure
- Tree Protection Bylaw

Exclusions

- Film Production that takes place on private property and is not part of the Public Realm.

Responsibilities

- The Manager of Economic Development is responsible to ensure that the criteria of this Procedure are met.

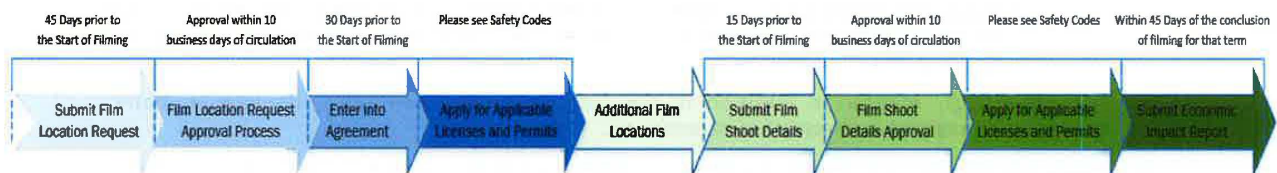
Appendices

- Appendix 1 – Emergency Response Plan
- Business License Application
- Film Production Agreement
- Film Production Neighbourhood Notification Letter
- Film Terms and Conditions Agreement
- Invoice Request Template
- Schedule A - Film Location Request
- Schedule B - Film Shoot Details
- Schedule C - Economic Impact Report
- Site Map
- Traffic Accommodation Strategy

Procedure

This Procedure is intended to be an essential part of any Film Production planning process. Film Producers are encouraged to review the Public Realm Policy.

1. Flow Chart:



2. Film Location Request (Schedule A): All filming events taking place within the Public Realm shall require the Film Producer to submit a Film Location Request for each event, 45 days prior to the start of filming. Completed applications and supporting documentation are to be emailed to Film@highriver.ca.

3. Film Location Request Approval Process:

The following divisions shall be required to review and approve the film location request within 10 business days of circulation by the Economic Development Film Coordinator. The Film Production will be denied when there is a threat to citizen safety or wellbeing. All signatures from the following Town departments and divisions signify approval;

Town Division	Film		
	Approve	Consult	Inform
1 Economic Development	X		
2 Engineering	X		
3 Fire	X		
4 Parks & Recreation	X		
5 Corporate Properties & Risk Management		X	
6 Emergency Management		X	
7 Operations		X	
8 RCMP		X	
9 Safety Codes		X	
10 Communications			X
11 Legislative Services			X
12 Municipal Enforcement			X
13 Planning & Development Services			X

The review and approval process shall determine if the Film Terms & Conditions Agreement or Film Production Agreement will be applicable. Film location requests shall be brought to an internal review meeting for discussion. Approval is conditional based on all applicable requirements being met.

- 4. Film Terms & Conditions Agreement: For a single film location request, when there shall be no disruption to business, traffic patterns or public access, road repair or Town projects, no requirement for Town services, and no alterations to any structures, signage or the like, a Film Terms & Conditions Agreement shall be used. Once the Film Location Request is approved, before any Film Production can take place within the Public Realm, the Film Producer is required to enter into a Film Terms & Conditions Agreement with the Town 30 days prior to the start of filming. The Film Terms & Conditions Agreement shall be valid for the term outlined in the agreement and shall need to be renewed for each subsequent term.
- 5. Film Production Agreement: For multiple film location requests, or film location requests requiring disruption to business, traffic patterns or public access, Town services are needed and alterations to structures, signage or the like is required, a Film Production Agreement shall be used. Once the Film Location Request is approved, before any Film Production can take place within the Public Realm, the Film Producer is required to enter into a Film Production Agreement with the Town 30 days prior to the start of filming. The Film Production Agreement shall be valid for the term outlined in the agreement and shall need to be renewed for each subsequent term.
- 6. Film Shoot Details (Schedule B): Any additional filming events, not included in the original Film Location Request, that are taking place within the Public Realm shall require the Film Producer to submit a film shoot detail for each event, 15 days prior to the start of filming. Completed applications and supporting documentation are to be emailed to Film@highriver.ca.

7. Film Shoot Details Approval Process:

The following departments and divisions shall be required to review and approve the Film Shoot Details within 10 business days of circulation by the Economic Development Film Coordinator. The Film Production will be denied when there is a threat to citizen safety or a threat to citizen wellbeing. All signatures from the following Town departments and divisions signify approval;

Town Division	Film		
	Approve	Consult	Inform
1 Economic Development	X		
2 Engineering	X		
3 Fire	X		
4 Parks & Recreation	X		
5 Corporate Properties & Risk Management		X	
6 Emergency Management		X	
7 Operations		X	
8 RCMP		X	
9 Safety Codes		X	
10 Communications			X
11 Legislative Services			X
12 Municipal Enforcement			X
13 Planning & Development Services			X

8. Film Fees: The Film Producer shall pay fees in accordance with the Town’s Rate Bylaw. A Film Production project code shall be set up by the Town’s Finance Department to track all of the fees and costs associated with the Film Production. Any donations made by the Film Production shall also be tracked under the Film Production’s project code. An invoice shall be sent with the total number of days applied for in the Film Location Request and the Film Shoot Details.

9. Permits and Licenses:

In some instances, additional regulations, licenses and permits are required before the Film Location Request or Film Shoot Details shall be approved. If a permit is required, an inspection will also be required prior to the start of filming. Below is a list of some Town permits and licenses that your Film Production may require (applicable fees apply):

- a. Business License
- b. Film Permit
- c. Film Production Neighbourhood Notification Letter
- d. Building Permit or Occupancy Permit
- e. Fire Permit
- f. Fireworks permit
- g. Noise Exemption Permit
- h. Parks Permit
- i. Road Closure Permit
- j. Signage and/or Banner Permit
- k. Site Inspection Permit
- l. Street Use Permit
- m. Temporary No Parking Permit

10. Insurance:

A Certificate of Insurance for Comprehensive General Liability Insurance coverage shall be required by the Town for filming within the Public Realm. Generally, this insurance shall include:

- a. A minimum of \$2,000,000 (two million dollars) General Liability Coverage per occurrence is required with the Town of High River listed as additional insured. The Town may require this be increased based on the format and content of the film, television production or movie size and requirements;
- b. Where the format and/or content of the Film Production is deemed high risk, additional liability coverage of \$5,000,000 (five million dollars) per occurrence shall be required.
- c. Where vehicles are to be used in the Public Realm, a minimum \$2,000,000 (two million dollars) per occurrence third party automobile Personal Liability and Property Damage "PLPD" insurance is required.

11. Site Map:

A detailed site map (layout) diagram, including Emergency Response Plan details (see section 12) and traffic accommodation strategy (approved by Engineering or Operations), is to be provided in accordance with the Film Location Request and Film Shoot Details.

12. Emergency Response Plan (ERP) and Map:

An emergency response plan, or ERP, is a formal written plan, developed by the applicant of a Film Location Request or Film Shoot Details that identifies potential emergency conditions at the site and prescribes the procedures to be followed to minimize or prevent loss of life and property.

There are four sections to an ERP (see Appendix 1):

- a. Contact List – including internal (Film Production organizers, extras, etc.) and external (vendors, emergency services, etc.) contacts. If possible, include an organizational chart with the contact list.
- b. Risk Assessment and Mitigation – assess the risks/hazards associated with the Film Production and identify the steps being taken to mitigate these hazards. If the Town determines the mitigation measures are not sufficient to address the risk, the applicant will be asked to revise it.
- c. Contingency Plans – outline the basic steps to be taken in the event of the most likely emergency situations, including if/how the Film Production will be cancelled/postponed. The minimum requirement for an ERP is to include contingencies for the following;
 - a. First aid/medical emergency
 - b. Fire
 - c. Lost child/person
 - d. Security incident
 - e. Site evacuation
 - f. Severe weather
 - g. Film Production cancellation/postponement

The ERP shall outline additional contingency plans based on the nature of the event and venue.

- d. Map – identify all Film Production structures, traffic plans, access routes, and emergency locations.

A complete checklist of requirements for the map is below;

- Organizer location
 - Location of organizer
- Emergency Sites
 - First aid station location
 - Lost person/family reunification areas
 - Marshaling/staging area
- Film Production Structures
 - Film Production structures (tents, stages, fencing, etc.)
 - Hazards (including generators, propane, open flame, and fuel storage)
 - Vendors
- Specialized Areas
 - Pyrotechnics (type, locations, storage, and fallout)
- Access/Parking
 - Designated Film Production vehicle parking areas
 - Designated public parking areas
 - Public access points and exits (including accessible and queuing locations)
 - Barricades
 - Flow of traffic
 - Security locations
 - Transit routes
 - Emergency access route

13. *Film Production Neighbourhood Notification Letter:*

A filming neighbourhood notification letter must be provided to the parties directly affected by the filming at least one week prior to the start of filming for each event and shall contain all information of the filming plans. This letter shall be sent to the Town's Communications Division for circulation and public notice. This letter shall include, but not limited to, the following details as required:

- a. identify the Film Production company, type and title of Film Production on the Film Production company letterhead;
- b. provide the name and phone number of the location manager and assistant location manager;
- c. provide dates of/and the duration of filming. For example; 1 day, 2 consecutive days, recurring location for (cite a specific number) of days over (cite a specific number) of months as well as times (for example; 7:00 a.m. to 11:00 p.m.);
- d. state the proposed parking locations of the production unit, including street name, coordinates of street (north, south, east, west), parameters and any other pertinent details;
- e. include the date(s) and times that coning and/or Film Production vehicles will arrive at the location, as well as completion date and time;
- f. propose alternate parking arrangements for any parking permit holders who may be displaced by the Film Production, as it is up to the Film Production company to find suitable alternative parking for residents;
- g. detail any street dressing, gunfire or special effects;
- h. if applicable, the letter should identify that the Film Production company is requesting an exemption to a particular Town Bylaw i.e. the Noise Bylaw;
- i. any road closures, required for temporary traffic control barricades with any assembly and dispersal areas identified, no less than 5 business days in advance of the requested closure/modification; and
- j. all details on disruption to local businesses must also be included.

Agenda Item #6.4.

14. Economic Impact Report (Schedule C): Within 45 days of the conclusion of filming for the film production agreement term, or upon request by the Town, the Film Production company shall submit an economic impact report for the purpose of summarizing money spent in High River and to share this with the public.

Approval

This procedure shall come into force and effect upon adoption by Management of the Town of High River.

Jo Mai
TOWN MANAGER

June 29, 2017
DATE

POLICY MANUAL
Film Production Policy



Policy Number: POL-0108	Division: Planning and Development
Effective Date: Jun 8, 2026	Date for Review:
Revision Date:	Supersedes/Repeals: ECDEV-PRO-101-00
Related Policy or Procedure Number(s): ECDEV-POL-100-00, POL-0105	Related Policy or Procedure Name(s): Use of Public Realm, Community Art Policy
External Sources:	Council Resolution Number:

PURPOSE

The purpose of this policy is to outline consistent processes, requirements and responsibilities to facilitate the support of Film Production within the Town of High River. The policy will ensure that film organizers and production companies have clear guidelines and open communication with the Town to support filming within the Public Realm.

POLICY STATEMENT

Film production provides a unique opportunity for our community to generate revenue, tourism, and attract residents. The Town of High River strives to be a film friendly community for both film production, residents, and business owners.

DEFINITIONS

“Community Art” means any visual artwork, in any medium, whether fixed or freestanding, permanent or temporary, that is located in a Public Space or on private property that is intended for public viewing. This includes both Public Community Art and Private Property Art.

“Film Production” means the creation of digital video, a motion picture, movie, theatrical film, television commercials, television series and digital media, including those activities considered necessary in order to record the sounds, scenes, images, parts or segments.

- **“Simple Film Production”** means a Film Production held in Public Realm which requires limited use of Town resources or staff support and does not require the closure of any roadway.
- **“Complex Film Production”** means a Film Production held in the Public Realm which requires additional Town resources or support of Town staff from multiple departments, a Film Production that requires the closure of a roadway/alleyway, or a full block of parking.
- **“Student Film”** means Film Production for the purpose of a student’s education program and will be charged the non-profit rate.

“Film Producer” means, in addition to the film production company, it’s agents, heirs, successors, assigns and any parent company.

“Featured Use” means a use of the Community Art where the artwork is the primary subject of the content or is used for commercial branding, marketing, advertising, merchandising, or other promotional purposes beyond Incidental Use.

“Incidental Use” means the background, contextual, or non-featured inclusion of Community Art in visual, audio-visual, or digital content, where the Community Art is not the primary subject or focus. Incidental use includes, without limitation, appearance of the Community Art in photographs, film, television, streaming productions, documentaries, sound recordings, news coverage, social media, websites, signage, or promotional materials.

“Moral Rights” has the meaning as set out in the *Copyright Act (Canada)* and generally refers to an artist’s personal rights connected to their artwork, including the right to be recognized as the creator of the work and the right to object to changes or uses that could harm the artist’s reputation.

“Non-profit or not-for profit organizations” means associations, clubs or societies that are not charities and are organized and operated exclusively for social welfare, civic improvement, pleasure, recreation, or any other purpose except profit.

“Private Property Art” means visual artwork that is located or installed on property or buildings not owned or operated by the Town with the intent of public viewing. .

“Public Community Art” means visual artwork that is located in a Public Space.

“Public Realm” means any Town owned and operated property, including but not limited to parks, streets, sidewalks and boulevards in the Town.

“Town” means the Town of High River.

“Rates” means the fees assigned by the current Town of High River Rate Bylaw.

ROLES & RESPONSIBILITIES

The key positions for the purpose of this policy include:

Council - the elected decision-making body for the Town of High River.

Mayor - the individual elected to the position of Chief Elected Official in accordance with the *Local Authorities Election Act* or, in circumstances where the Mayor is not available, this shall include the Deputy Mayor.

Councillor – the individual elected to the position of Councillor in accordance with the *Local Authorities Election Act* for the Town of High River.

Chief Administrative Officer - principal staff person responsible for organizational performance who is appointed to the position of Chief Administrative Officer in accordance with the *Municipal Government Act* for the Town of High River.

Municipal Clerk –the individual in the leadership role that directly oversees the Legislative Services division for the Town of High River.

Agenda Item #6.4.

Administration - the administrative and operational arm of the Town, comprised of the various departments and business units and includes all employees who operate under the leadership and supervision of the Chief Administrative Officer.

<p style="text-align: center;">Mayor and Council</p> <ul style="list-style-type: none"> • Give direction; • Approve this policy and any amendments to it; • Reviewing this policy once per Term. 	<p style="text-align: center;">Chief Administrative Officer (CAO)</p> <ul style="list-style-type: none"> • Ensure Administration understands and implements this policy. • Manage organizational resources and processes in relation to this policy. • Facilitate the administrative/political interface relating to this policy.
<p style="text-align: center;">Municipal Clerk</p> <ul style="list-style-type: none"> • Retain the original copies of this policy in the Town’s Policy Manual. • Arrange for the posting of this policy on the website. 	<p style="text-align: center;">Administration</p> <ul style="list-style-type: none"> • Implement and adhere to this policy.
<p style="text-align: center;">Manager of Planning and Development</p> <ul style="list-style-type: none"> • Ensure that the criteria of this Procedure is met. 	<p style="text-align: center;">Community Development Liaison and/or Planning Department designate</p> <ul style="list-style-type: none"> • Regularly review this policy and recommend amendments. • Facilitate the film permitting process.

PROCEDURE

1. **Film Location Request:** All filming events taking place within the Public Realm will require the Film Producer to submit a Film Location Request for each event, **7 days** prior to the start of filming.
2. **Film Shoot Details:** Any additional filming events, not included in the original Film Location Request, that are taking place within the Public Realm shall require the Film Producer to submit a film shoot details for each event, **7 days** prior to the start of filming.
3. **Film Location Request and Details Approval Process:** The following divisions will be required to E-Review and approve the Film Location Request within **2 business days** of circulation. The Film Production will be denied when there is a threat to citizen safety or wellbeing. Approval is conditional based on all applicable requirements being met.

Town Division	Film		
	Approve	Consult	Inform
Planning and Development	X		
Engineering	X		
Fire & Protective Services	X		
Parks	X		
Legislative Advisory Services		X	
Public Works	X	X	
RCMP			X
Safety Codes		X	

Communications			X
Special Events		X	

4. Film Production Agreement: For complex film requests, a Film Production Agreement shall be used. Once the Film Location Request is approved, before any Film Production can take place within the Public Realm, the Film Producer is required to enter into a Film Production Agreement with the Town 2 days prior to the start of filming. The Film Production Agreement will be valid for the term outlined in the agreement and will need to be renewed for each subsequent term.
5. Use of Community Art: As per the Community Art Policy, Public Community Art may be subject to Incidental Use and/or Featured Use. Private Property Art may be subject to Incidental Use and may only be subject to Featured Use where explicitly stated.
6. Film Fees: The Film Producer shall pay fees in accordance with the Town's Rate Bylaw.
7. Permits and Licenses: In some instances, additional regulations, licenses and permits will be required before the Film Location Request or Film Shoot Details can be approved. If a permit is required, an inspection will also be required prior to the start of filming. Below is a list of some permits and licenses that your Film Production may require (applicable fees apply):
 - a. Film Permit
 - b. Film Production Neighbourhood Notification Letter
 - c. Fire/Burn Permit: Please note, if a permit is required, an inspection will also be required prior to the start of filming.
 - d. Fireworks Permit
 - e. Noise Exemption Approval
 - f. Green Space Access Permit
 - g. Road Closure Approval – Traffic Accommodation Strategy
 - h. Site Inspection Approval
 - i. Street Use Approval
 - j. Temporary No Parking Approval
8. Insurance: A Certificate of Insurance for Comprehensive Liability Insurance coverage will be requested by the Town for filming within the Public Realm. Generally, this insurance will include:
 - a. Liability coverage – \$2,000,000 (two million dollars) with the Town of High River listed as additional insured, is the minimum coverage required. The Town may require this be increased based on the format and content of the film, television production or movie size and requirements;
 - i. Where the format and/or content of the Film Production is deemed high risk, additional liability coverage of \$5,000,000 (five million dollars) per occurrence will be required.
 - ii. Where vehicles are to be used in the Public Realm, a minimum \$2,000,000 (two million dollars) per occurrence third party automobile Personal Liability and Property Damage “PLPD” insurance is required.
 - iii. Non-profit covered under TOHR blanket insurance
9. Site Map: A detailed site map (layout) diagram, including Emergency Response Plan and traffic accommodation strategy, is to be provided in accordance with the Film Location Request and Film Shoot Details.

10. Emergency Response Plan (ERP) and Map: An emergency response plan, or ERP, is a formal written plan, developed by the applicant of a Film Location Request or Film Shoot Details that identifies potential emergency conditions at the site and prescribes the procedures to be followed to minimize or prevent loss of life and property.

There are four sections to an ERP:

1. Contact List – including internal (Film Production organizers, extras, etc.) and external (vendors, emergency services, etc.) contacts. If possible, include an organizational chart with the contact list.
2. Risk Assessment and Mitigation – assess the risks/hazards associated with the Film Production and identify the steps being taken to mitigate these hazards. If the Town determines the mitigation measures are not sufficient to address the risk, the applicant will be asked to revise it.
3. Contingency Plans – outline the basic steps to be taken in the event of the most likely emergency situations, including if/how the Film Production will be cancelled/postponed. The minimum requirement for an ERP is to include contingencies for the following;
 - a. First aid/medical emergency
 - b. Fire
 - c. Lost child/person
 - d. Security incident
 - e. Site evacuation
 - f. Severe weather
 - g. Film Production cancellation/postponement

The ERP can outline additional contingency plans based on the nature of the event and venue.

11. Film Production Neighbourhood Notification Letter: A filming neighbourhood notification letter must be provided to the parties directly affected by filming at least **2 days** prior to the start of filming for each event and needs to contain all information of the filming plans. This letter will be sent to the Town's Communications Department for circulation and Public Notice. This letter should:

- a. identify the Film Production company, type and title of Film Production on the Film Production company letterhead;
- b. provide the name and phone number of the location manager and assistant location manager;
- c. provide dates of/and the duration of filming. For example; 1 day, 2 consecutive days, recurring location for (cite a specific number) of days over (cite a specific number) of months as well as times (for example; 7:00 a.m. to 11:00 p.m.);
- d. state the proposed parking locations of the production unit, including street name, coordinates of street (north, south, east, west), parameters and any other pertinent details;
- e. include the date(s) and times that coning and/or Film Production vehicles will arrive at the location, as well as completion date and time;
- f. propose alternate parking arrangements for any parking permit holders who may be displaced by the Film Production, as it is up to the Film Production company to find suitable alternative parking for residents;
- g. detail any street dressing, gunfire or special effects;

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- h. if applicable, the letter should identify that the Film Production company is requesting an exemption to a particular Town Bylaw i.e. Good Neighbour Bylaw;
- i. any road closures, required for temporary traffic control barricades with any assembly and dispersal areas identified, no less than 10 business days in advance of the requested closure/modification; and
- j. all details on disruption to local businesses must also be included.

12. Economic Impact Report: Within 45 days of the conclusion of filming for the Film Production agreement term, or upon request by the Town, the Film Production Company shall submit an economic impact report for the purpose of summarizing money spent in High River and to share this with the public.

13. Allocation of Revenue: The Town will allocate fifty percent of revenue generated from film to Community Art Reserve.

APPROVAL

Date of Council Approval:

Resolution Number of Council Approval:

POLICY MANUAL

~~TITLE OF POLICY~~ Film Production Policy



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Policy Number: <u>POL-0108</u>	Division: <u>Planning and Development Services</u>
Effective Date:	Date for Review:
Revision Date:	Supersedes/Repeals: <u>ECDEV-PRO-101-00</u>
Related Policy or Procedure Number(s): <u>ECDEV-POL-100-00, POL-0105</u>	Related Policy or Procedure Name(s): <u>Use of Public Realm, Community Art Policy</u>
External Sources:	Council Resolution Number:

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PURPOSE

The purpose of this ~~procedure-policy~~ is to outline consistent processes, requirements and responsibilities to facilitate the support of Film Production within the Town of High River. This ~~procedure-policy~~ will ensure that film organizers and production companies have clear guidelines and open communication with the Town to support filming within the Public Realm.

POLICY STATEMENT

~~"Policy Statement" means a statement that explicitly declares the plans or intention of the Town of High River in a Council Policy. Film production provides a unique opportunity for our community to generate revenue, tourism, and attract residents. The Town of High River strives to be a film friendly community for both film production, residents, and business owners.~~

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DEFINITIONS

~~"Community Art" means any visual artwork, in any medium, whether fixed or freestanding, permanent or temporary, that is located in a Public Space or on private property that is intended for public viewing. This includes both Public Community Art and Private Property Art.~~

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"Film Production" -means the creation of digital video, a motion picture, movie, theatrical film, television commercials, television series and digital media, including those activities considered necessary in order to record the sounds, scenes, images, parts or segments.

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- **"Simple Film Production"** means a Film Production held in ~~Public~~ Public Realm which requires limited use of Town resources or staff support and does not require the closure of any roadway.
- **"Complex Film Production"** means a Film Production held in the Public Realm which requires additional Town resources or support of Town staff from multiple departments, a Film Production that requires the closure of a roadway/alleyway, or a full ~~street-block~~ of parking.
- **"Student Film"** means Film Production for the purpose of a student's education program and will be charged the non-profit rate.

"Film Producer"- means, in addition to the film production company, it's agents, heirs, successors, assigns and any parent company.

~~**"Incidental Use"** means the background, contextual, or non-featured inclusion of Community Art in visual, audio-visual, or digital content, where the Community Art is not the primary subject or focus. Incidental use includes, without limitation, appearance of the Community Art in photographs, film, television, streaming productions, documentaries, sound recordings, news coverage, social media, websites, signage, or promotional materials.~~

~~**"Featured Use"** means a use of the Community Art where the artwork is the primary subject of the content or is used for commercial branding, marketing, advertising, merchandising, or other promotional purposes beyond Incidental Use.~~

~~**"Incidental Use"** means the background, contextual, or non-featured inclusion of Community Art in visual, audio-visual, or digital content, where the Community Art is not the primary subject or focus. Incidental use includes, without limitation, appearance of the Community Art in photographs, film, television, streaming productions, documentaries, sound recordings, news coverage, social media, websites, signage, or promotional materials.~~

~~**"Moral Rights"** has the meaning as set out in the Copyright Act (Canada) and generally refers to an artist's personal rights connected to their artwork, including the right to be recognized as the creator of the work and the right to object to changes or uses that could harm the artist's reputation.~~

"Non-profit or not-for profit organizations" means associations, clubs or societies that are not charities and are organized and operated exclusively for social welfare, civic improvement, pleasure, recreation, or any other purpose except profit.

"Private Property Art" means visual artwork that is located or installed on property or buildings not owned or operated by the Town with the intent of public viewing.

"Public Community Art" means visual artwork that is located in a Public Space.

"Public Realm"- means any Town owned and operated property, including but not limited to parks, streets, sidewalks and boulevards in the Town.

"Town" means the Town of High River.

"Rates" means the fees assigned by the current Town of High River Rate Bylaw ~~referring to Simple Film, Complex Film, and Student Film production.~~

ROLES & RESPONSIBILITIES

The key positions for the purpose of this policy include:

Council - the elected decision-making body for the Town of High River.

Mayor - the individual elected to the position of Chief Elected Official in accordance with the *Local Authorities Election Act* or, in circumstances where the Mayor is not available, this shall include the Deputy Mayor.

Councillor – the individual elected to the position of Councillor in accordance with the *Local Authorities Election Act* for the Town of High River.

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Chief Administrative Officer - principal staff person responsible for organizational performance who is appointed to the position of Chief Administrative Officer in accordance with the *Municipal Government Act* for the Town of High River.

Municipal Clerk –the individual in the leadership role that directly oversees the Legislative Services division for the Town of High River.

Administration - the administrative and operational arm of the Town, comprised of the various departments and business units and includes all employees who operate under the leadership and supervision of the Chief Administrative Officer.

<p style="text-align: center;">Mayor and Council</p> <ul style="list-style-type: none"> • Give direction; • Approve this policy and any amendments to it; • Reviewing this policy once per Term. 	<p style="text-align: center;">Chief Administrative Officer (CAO)</p> <ul style="list-style-type: none"> • Ensure Administration understands and implements this policy. • Manage organizational resources and processes in relation to this policy. • Facilitate the administrative/political interface relating to this policy.
<p style="text-align: center;">Municipal Clerk</p> <ul style="list-style-type: none"> • Retain the original copies of this policy in the Town's Policy Manual. • Arrange for the posting of this policy on the website. Council • Give direction; • Approve this policy and any amendments to it; • Reviewing this policy once per Term. 	<p style="text-align: center;">Administration</p> <ul style="list-style-type: none"> • Implement and adhere to this policy.
<p style="text-align: center;">Manager of Planning and Development</p> <ul style="list-style-type: none"> • Ensure that the criteria of this Procedure is met. Councillor 	<p style="text-align: center;">Community Development Liaison and/or Planning Department designate</p> <p style="text-align: center;"><u>Regularly review this policy and recommend amendments. Municipal Clerk</u></p> <ul style="list-style-type: none"> • Retain the original copies of this policy in the Town's Policy Manual. • Arrange for the posting of this policy on the website.

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PROCEDURE

1. Film Location Request (Schedule A): All filming events taking place within the Public Realm will require the Film Producer to submit a Film Location Request for each event, ~~45~~ **14-7 days** prior to the start of filming ~~for Complex, and 7 days prior for Simple.~~ Please email your completed application and supporting documentation to Film@highriver.ca.
2. Film Shoot Details: Any additional filming events, not included in the original Film Location Request, that are taking place within the Public Realm shall require the Film

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Producer to submit a film shoot details for each event, 7 days prior to the start of filming.

~~2-3.~~ Film Location Request and Details Approval Process: The following divisions will be required to E-Review and approve the Film Location Request within ~~10~~ **2** business days of circulation ~~by the Economic Development Film Coordinator.~~ The Film Production will be denied when there is a threat to citizen safety or wellbeing. ~~All signatures from the following Town departments and divisions signify approval:~~

Town Division	Film		
	Approve	Consult	Inform
Economic Development Planning and Development	X		
Engineering	X		
Fire & Protective Services	X		
Parks & Recreation	X		
Legislative Services Legislative Advisory Services		X	
Public Works Emergency Management Protective Services	XX	X	
RCMP Operations Public Works		X	X
Safety Codes RCMP		XX	X
Communications Safety Codes		X	X
Planning & Development Services			XX
Municipal Enforcement			X
Planning & Development Services			X

The review and approval process shall determine if the Film Terms & Conditions Agreement or Film Production Agreement will be applicable. Film Location requests shall be ~~brought to an internal review meeting for discussion~~ **circulated internally for comments**. Approval is conditional based on all applicable requirements being met.

~~3. Film Terms & Conditions Agreement:~~ For a single film location request, when there shall be no disruption to business, traffic patterns or public access, road repair or Town projects, no requirement for Town services, and no alterations to any structures, signage or the like, a Film Terms & Conditions Agreement shall be used. Once the Film Location Request is approved, before any Film Production can take place within the Public Realm, the Film Producer is required to enter into a Film Terms & Conditions Agreement with the Town ~~30~~ **5** days prior to the start of filming. The Film Terms & Conditions Agreement will be valid for the term outlined in the agreement and will need to be renewed for each subsequent term.

~~4. Film Production Agreement:~~ For ~~complex film requests, multiple film location requests, or film location requests requiring disruption to business, traffic patterns or public access, Town services are needed and alterations to structures, signage or the like is required,~~ a Film Production Agreement shall be used. Once the Film Location Request is approved, before any Film Production can take place within the Public Realm, the Film Producer is required to enter into a Film Production Agreement with the Town ~~30~~ **5-2** days prior to the start of filming. The Film Production Agreement will be valid for the term outlined in the agreement and will need to be renewed for each subsequent term.

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~~Within the terms of the agreement As per the Community Art Policy, the Town Public Community Art may be subject to Incidental Use and/or Featured Use, dependent on the Town's ownership of Copyright and Moral Rights, as guided by this Policy. Private Property Art may be subject to Incidental Use and may only be subject to Featured Use where explicitly stated.~~

~~4. Film Shoot Details (Schedule B): Any additional filming events, not included in the original Film Location Request, that are taking place within the Public Realm shall require the Film Producer to submit a film shoot details for each event, 15-10 days prior to the start of filming. Completed application and supporting documentation are to be email to Film@highriver.ca.~~

~~6. Film Shoot Details Approval Process: The following divisions will be required to review and approve the Film Shoot Details within 10-2 business days of circulation by the Economic Development Film Coordinator. The Film Production will be denied when there is a threat to citizen safety or a threat to citizen wellbeing. All signatures from the following Town departments and divisions signify approval:~~

Town Division	Film		
	Approve	Consult	Inform
Economic Development Planning and Development	X		
Engineering	X		
Fire	X		
Parks & Recreation	X		
Legislative Services Legislative Advisory Services		X	
Emergency Management Protective Services	X		
Operations Public Works		X	
RCMP		X	
Safety Codes		X	
Communications			X
Municipal Enforcement			X
Planning & Development Services			X

~~7.5. Film Fees: The Film Producer shall pay fees in accordance with the Town's Rate Bylaw. A Film Production project code will be set up by the Town's Finance Department to track all of the fees and costs associated with the Film Production. Any donations made by the Film Production shall also be tracked under the Film Production's project code. An invoice will be sent with the total number of days applied for in the Film Location Request and the Film Shoot Details.~~

~~8.6. Permits and Licenses: In some instances, additional regulations, licenses and permits will be required before the Film Location Request or Film Shoot Details can be approved. If a permit is required, an inspection will also be required prior to the start of filming. Below is a list of some permits and licenses that your Film Production may require (applicable fees apply):~~

- ~~a. Film Permit~~
- ~~b. Business License~~
- ~~e-b. Film Production Neighbourhood Notification Letter~~

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~~d.~~ ~~Building Permit or Occupancy Permit~~

~~e-c.~~ Fire/Burn Permit: Please note, if a permit is required, an inspection will also be required prior to the start of filming.

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~~f-d.~~ Fireworks Permit

~~g-e.~~ Noise Exemption Permit Approval

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~~h-f.~~ Parks Green Space Access Permit Permit Approval

~~i.~~ Road Closure Permit Approval – Traffic Accommodation Strategy

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~~j-g.~~ Temporary Signage and/or Banner Permit Plan

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~~k-h.~~ Site Inspection Permit Approval

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~~l-i.~~ Street Use Permit Approval

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~~m-j.~~ Temporary No Parking Permit Approval

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~~9-7.~~ Insurance: A Certificate of Insurance for Comprehensive Liability Insurance coverage will be requested by the Town for filming within the Public Realm. Generally, this insurance will include:

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a. Liability coverage – \$2,000,000 (two million dollars) with the Town of High River listed as additional insured, is the minimum coverage required. The Town may require this be increased based on the format and content of the film, television production or movie size and requirements;

i. Where the format and/or content of the Film Production is deemed high risk, additional liability coverage of \$5,000,000 (five million dollars) per occurrence will be required.

ii. Where vehicles are to be used in the Public Realm, a minimum \$2,000,000 (two million dollars) per occurrence third party automobile –Personal Liability and Property Damage “PLPD” insurance is required.

iii. Non-profit wording for covered under TOHR blanket insurance

~~10-8.~~ Site Map: A detailed site map (layout) diagram, including Emergency Response Plan details (see section 12) and traffic accommodation strategy (approved by Engineering or Operations), is to be provided in accordance with the Film Location Request and Film Shoot Details.

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~~11-9.~~ Emergency Response Plan (ERP) and Map: An emergency response plan, or ERP, is a formal written plan, developed by the applicant of a Film Location Request or Film Shoot Details that identifies potential emergency conditions at the site and prescribes the procedures to be followed to minimize or prevent loss of life and property.

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There are four sections to an ERP: (see Appendix 1):

1. Contact List – including internal (Film Production organizers, extras, etc.) and external (vendors, emergency services, etc.) contacts. If possible, include an organizational chart with the contact list.

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2. Risk Assessment and Mitigation – assess the risks/hazards associated with the Film Production and identify the steps being taken to mitigate these hazards. If the Town determines the mitigation measures are not sufficient to address the risk, the applicant will be asked to revise it.

3. Contingency Plans – outline the basic steps to be taken in the event of the most likely emergency situations, including if/how the Film Production will be cancelled/postponed. The minimum requirement for an ERP is to include contingencies for the following;

a. First aid/medical emergency

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- b. Fire
- c. Lost child/person
- d. Security incident
- e. Site evacuation
- f. Severe weather
- g. Film Production cancellation/postponement

The ERP can outline additional contingency plans based on the nature of the event and venue.

~~4. Map identify all Film Production structures, traffic plans, access routes, and emergency locations.~~

~~A complete checklist of requirements for the map is below:~~

- ~~• Organizer location

 - ~~◦ Location of organizer~~~~
- ~~• Emergency Sites

 - ~~◦ First aid station location~~
 - ~~◦ Lost person/family reunification areas~~
 - ~~◦ Marshaling/staging area~~~~
- ~~• Film Production Structures

 - ~~◦ Film Production structures (tents, stages, fencing, etc.)~~
 - ~~◦ Hazards (including generators, propane, open flame, and fuel storage)~~
 - ~~◦ Vendors~~~~
- ~~• Specialized Areas

 - ~~◦ Pyrotechnics (type, locations, storage, and fallout)~~~~
- ~~• Access/Parking

 - ~~◦ Designated Film Production vehicle parking areas~~
 - ~~◦ Designated public parking areas~~
 - ~~◦ Public access points and exits (including accessible and queuing locations)~~
 - ~~◦ Barricades~~
 - ~~◦ Flow of traffic~~
 - ~~◦ Security locations~~
 - ~~◦ Transit routes~~
 - ~~◦ Emergency access route~~~~

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~~12-10~~ Film Production Neighbourhood Notification Letter: A filming neighbourhood notification letter must be provided to the parties directly affected by filming at least ~~one week~~ **27 days** prior to the start of filming for each event and needs to contain all information of the filming plans. This letter will be sent to the Town's Communications Department for circulation and Public Notice. This letter should:

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- a. identify the Film Production company, type and title of Film Production on the Film Production company letterhead;
- b. provide the name and phone number of the location manager and assistant location manager;

- c. provide dates of/and the duration of filming. For example; 1 day, 2 consecutive days, recurring location for (cite a specific number) of days over (cite a specific number) of months as well as times (for example; 7:00 a.m. to 11:00 p.m.);
- d. state the proposed parking locations of the production unit, including street name, coordinates of street (north, south, east, west), parameters and any other pertinent details;
- e. include the date(s) and times that coning and/or Film Production vehicles will arrive at the location, as well as completion date and time;
- f. propose alternate parking arrangements for any parking permit holders who may be displaced by the Film Production, as it is up to the Film Production company to find suitable alternative parking for residents;
- g. detail any street dressing, gunfire or special effects;
- h. if applicable, the letter should identify that the Film Production company is requesting an exemption to a particular Town Bylaw i.e. ~~Noise Bylaw~~ Good Neighbour Bylaw;
- i. any road closures, required for temporary traffic control barricades with any assembly and dispersal areas identified, no less than 10 business days in advance of the requested closure/modification; and
- j. all details on disruption to local businesses must also be included.

11. Economic Impact Report ~~(Schedule C)~~: Within 45 days of the conclusion of filming for the Film Production agreement term, or upon request by the Town, the Film Production Company shall submit an economic impact report for the purpose of summarizing money spent in High River and to share this with the public.

~~13.12.~~ Allocation of Revenue: The Town will allocate fifty percent of revenue generated from film to Community Art Reserve.

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APPROVAL

Date of Council Approval:

Resolution Number of Council Approval:



REQUEST FOR DECISION

TO: Mayor and Council
FROM: Shelley Koot, Manager, Community Support Services

Date: May 28, 2026
Meeting Date: June 8, 2026

SUBJECT: Changes to Assured Income for the Severely Handicapped (AISH) Program

RECOMMENDATION: **WHEREAS** the Government of Alberta has announced changes to the Assured Income for the Severely Handicapped (AISH) program, which will include transitioning to the new Alberta Disability Assistance Program (ADAP), effective July 1, 2026;

WHEREAS the announcement of the transition to the new program, which occurred in the Fall of 2025, lacked information and clarity, has resulted in confusion and concern for current AISH recipients as well as for those who provide formal and informal support to those receiving AISH;

WHEREAS the letters regarding ADAP went out to officially introduce ADAP to existing AISH recipients the week of May 25, 2026;

BE IT RESOLVED THAT the Town of High River's Mayor and Council advocate that the Government of Alberta undertake further meaningful and expansive consultation to broaden their understanding of the realities impacting current AISH recipients and make the necessary adjustments to increase the likelihood of success and reduce the likelihood of harm;

AND FURTHER THAT advocacy communications include the following specific points:

- That the Government of Alberta re-open the Income Support office in High River.
- That the Government of Alberta consider grandfathering in the new ADAP program to new applicants and offer the new program to those AISH recipients who are already working or self identify of wanting supports to gain employment.
- That the Government of Alberta compensate existing rural programs (i.e., FCSS offices) to support the success of the transition.

CHIEF ADMINISTRATIVE OFFICER'S COMMENTS:
Administration supports the proposed recommendation.

IMPLICATIONS OF RECOMMENDATION

GENERAL:

Advocacy, regarding the proposed changes to AISH, will help give a voice to those directly impacted and will shine a light on the importance of thorough and comprehensive consultation. AISH supports individuals between

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the ages of 18 - 65 who have a permanent medical condition that substantially limits their ability to earn a living. The conditions vary greatly, therefore how each individual will be impacted will also vary greatly.

While some changes to the program may benefit some and may be beneficial moving forward, it is the process that has caused and will continue to cause undo stress and anxiety to an already vulnerable population. There remain many unanswered questions (or questions not even considered), and therefore it is critical that the implementation is carefully considered, not just for program improvements, but so that each program participant benefits and is seen and heard throughout the process.

Changes to the AISH program:

In May 2026, the 50,000 Albertans currently receiving AISH received generic letters informing them of the program changes. Most individuals currently receiving AISH will have to reapply, or they will automatically be transitioned to the ADAP program by December 31st, 2027, resulting in a loss of \$200/month. The only exceptions are those over 60, those receiving PDD funding, those determined to have severe developmental disabilities (in accordance with the revised definition), people living in continuing care, and those with palliative conditions.

Challenges with Implementation to date:

- The letters are confusing and generic; by failing to address individual circumstances (e.g. having children, deductions for federal pensions/benefits), it is difficult for an individual to understand the impact of the changes.
- Because of the lack of specifics and clarity, the letters are already causing people great anxiety about their financial security. For most individuals, the initial application process was long and difficult, requiring appeals, multiple doctors' visits etc., often taking close to a year. Asking people to go through that again has been described as "re-traumatizing" by one client.
- Reapplication will have a financial impact on individuals as they will have to get new medicals, may require transportation to medical appointments, etc.

The Government of Alberta has stated that they are implementing a Prime Contractor Model to engage "Navigators" to complete employment readiness assessments and to provide wrap around supports. To date, two contracts have been awarded; one for Edmonton and one for Calgary. It is unclear how rural areas will be accommodated or supported, but it is anticipated that the workload of rural organizations and agencies will be impacted.

ORGANIZATIONAL:

The Family and Community Support Services (FCSS) Resource Centre has a long history of supporting community residents, from High River and Foothills County, with completing paperwork, such as subsidy and benefit applications, as well as with the navigation and connection to supports and resources. Staff have a strong working knowledge of local, provincial, and federal programs which are intended to enhance the wellbeing of low-income adults and seniors. As result, the program is well situated to support the needs of residents. That said, in recent years, with the shift to a reliance on technology for applying for the various financial assistance programs, there has been a significant increase in residents requiring support and resources to apply and maintain financial benefits.

The shift to online applications has only worked for those clients who have the following: access to technology (beyond a smart phone), have an email address, have access to reliable internet, have the funds to cover related costs, and comprehend the new language associated with technology (i.e., dropping, dragging, e-signatures, etc.). Based on statistics collected through the FCSS Resource Centre, when the Government moved

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to online applications for Income Supports, staff report seeing an approximate increase of 50% in residents requiring support with financial benefit applications and reporting.

Historically, to support residents who require support, AISH applications have required multiple visits and often involved multiple applications and/or support with appeals. The average AISH application, for the full process, has taken between 7 - 12 months.

FCSS staff have been fielding questions and concerns since the initial announcement in Fall, and have started to receive calls from residents who have received their letters. As stated in the background information, aside from those identified as exempted from re-applying, all other current AISH recipients (approximately 50,000 Albertans) will have to re-apply to the program. This re-application requires new documentation from the doctor, financials, etc. To date, neither clients nor staff have seen the application, however the Government of Alberta shared that new medical reports will be required. It is anticipated that a significant investment of staff time will be required to support those needing to re-apply, including emotional support, support understanding the application, support with completing the application, and support with the transition to the employment readiness component of ADAP. It is important to note that, while the Government will be dealing with applications, our staff will be working directly with the people.

FINANCIAL:

1. It is anticipated staff time will be impacted (as stated in the Organizational section above).
2. Recipients who are involved in other programs geared to low-income (i.e., affordable housing) will be impacted by a reduction in funding.

POLICY:

Assured Income for the Severely Handicapped Act

- The Act has been recently amended, however it is not yet available.

Family and Community Support Services (FCSS) Regulation

- Two of the roles identified for FCSS, as stated in the Regulation, is to 'develop awareness of social needs' and 'provide supports that help sustain people as active participants in the community'.

High River Council's Strategic Vision includes 'People First' and identifies Vibrant Community as one of the five pillars.

Council's Strategic Priorities includes a section for advocacy.

- Advocacy includes speaking or acting on behalf of others to influence decision-makers, raise awareness, and bring about positive societal or systemic change.

Strategic Plan

Vibrant Community

The Town of High River provides the foundation for an inclusive, engaged and thriving community.

IMPLEMENTATION:

With Mayor and Council's support of the proposed recommendation, Administration will draft the advocacy letter, will coordinate the signing, and will forward the letter to the Government of Alberta.

BACKGROUND:

Proposed Changes to the AISH program:

Current: Single AISH (Assured Income for the Severely Handicapped) recipients without children are eligible for \$1,940. If the person receives Canada Pension Disability (CPP-D) and/or the new federal Canada Disability Benefit (CDB), the amounts are deducted dollar for dollar from AISH. Alberta is the only province that deducts the CDB from Provincial disability payments. AISH recipients can earn approx. \$1,000/month from employment before there is any reduction in AISH. In addition to the base amounts, individuals can receive Special Benefits to address additional disability related expenses such as specific dietary needs.

Upcoming Changes: Effective July 1, 2026, AISH will be split into two programs. AISH will continue for those with “severe and prolonged disabilities”. The amount will still be \$1,940 (with deductions for other federal benefits/pensions) but the earning exemption will drop to \$350. A new program, Alberta Disability Assistance Program (ADAP) will be for people with disabilities who are “deemed capable of employment”. They will receive a monthly benefit of \$1,740 (less deductions) with an earning exemption of \$700. Special Benefits that are currently being received by AISH clients will not be available under ADAP.

For those on ADAP, they will be expected to participate in employment supports. There is no information on who will provide the supports, if supports will be available in rural communities, or how they will be offered (e.g. virtual or in person).

There does not appear to be money allocated to increase the availability of employment supports for people with disabilities. There also does not appear to be funding for transportation, work clothes, adaptive devices etc.

Other considerations:

- Advocate the Government of Alberta to re-open the Income Support office in High River (located in Spitzee Crossing). This office did not re-open after the closure during the pandemic. The High River office serviced a large rural area and provided the much needed option for in-person supports.
- Advocate the Government of Alberta to compensate existing rural programs to support the success of the transition.
- Advocate the Government of Alberta to consider grandfathering in the new ADAP program to new applicants and offer the program to those AISH recipients who are already working or self identify of wanting support to work.

From the Government of Alberta website:

The Alberta Disability Assistance Program (ADAP) will empower Albertans with disabilities to pursue fulfilling job opportunities while continuing to receive the financial, health, personal and employment supports they need.

Albertans with disabilities and the organizations that support them have made it clear that they want more support and opportunities to earn a living beyond what is offered by the Assured Income for the Severely Handicapped (AISH) program. They stressed the importance of providing pathways to employment for individuals who are able to work but still require support – something AISH is not designed to provide. ADAP was thoughtfully designed based on input from Albertans with disabilities.

Agenda Item #6.5.

Starting July 2026, the new Alberta Disability Assistance Program will become operational and there will be a single combined application for both ADAP and AISH. Eligible applicants will be placed in the program best suited to their unique situation.

ADAP will help Albertans with disabilities pursue meaningful employment while continuing to receive the financial, health and personal supports they need. ADAP's core benefit rate is among the highest in the country, providing \$300 more per month than most disability programs in Canada.

ADAP will also allow for the highest level of employment income in the country while receiving financial benefits, meaning Albertans on ADAP can earn more from working while continuing to receive the support they need. These financial benefits are in addition to health and personal benefits, which Albertans on ADAP will receive regardless of their employment income.

See Tip Sheet attached.

Report / Document: Attached: Available:

KEY ISSUE(S)/CONCEPT(S):

The planned transition from the Assured Income for the Severely Handicapped (AISH) to the Alberta Disability Assistance Program (ADAP) is raising significant concerns among advocates, economists, recipients, and for those who support recipients. Key issues include, but are not limited to the following:

- Reduction to long-term financial benefits
- Lower employment income exemptions,
- Increased administrative burdens, such as navigating new employment expectations, completing assessment, doctor assessment/s, filing paperwork, etc.

DESIRED OUTCOMES:

That Mayor and Council advocate to the Government of Alberta to undertake further meaningful and expansive consultation to broaden their understanding of the realities impacting current AISH recipients and make the necessary adjustments to increase the likelihood of success and reduce the likelihood of harm.

COUNCIL'S OPTIONS:

The following are the standard options available to Council:

1. Council could choose to support the proposed recommendation.
2. Council could choose to not support the proposed recommendation and defeat the motion.
3. Council could choose to refer the proposed recommendation to a Committee of the Whole meeting for further discussion.

RECOMMENDED:

Administration recommends that Mayor and Council vote in favour of advocacy on behalf of those negatively impacted by the changes to the AISH program.

COMMUNICATIONS:

Agenda Item #6.5.

The Communications team will be provided with information that can be included on the Town's website, directing residents to Provincial information, as well as information where recipients requiring support can call and/or go.

Reviewed by:

Chris Bruce, Director of Community Services
Sheron Ward, Advisor, Legislative & Advisory Services
Jody Hipkin, Manager of Legislative and Advisory Services
Chris Prosser, Chief Administrative Officer

Status:

Approved - 01 Jun 2026
Approved - 02 Jun 2026
Approved - 02 Jun 2026
Approved - 03 Jun 2026

Alberta Disability Assistance Program

Purpose

The Alberta Disability Assistance Program (ADAP) will empower Albertans with severe disabilities to pursue fulfilling job opportunities while continuing to receive the financial, health and employment supports they need.

Albertans with disabilities and the organizations that support them have made it clear that they want more support and opportunities to earn a living beyond what is offered by the Assured Income for the Severely Handicapped (AISH) program. They stressed the importance of providing pathways to employment for individuals who are able to work but still require support – something AISH is not designed to provide. ADAP was thoughtfully designed based on input from Albertans with disabilities.

How it works

Starting July 2026, the new Alberta Disability Assistance Program will become operational and there will be a single combined application for both ADAP and AISH. Eligible applicants will be placed in the program best suited to their unique situation.

ADAP will help Albertans with disabilities pursue meaningful employment while continuing to receive the financial, health and personal supports they need. ADAP's core benefit rate is among the highest in the country, providing \$300 more per month than most disability programs in Canada. ADAP will also allow for the highest level of employment income in the country while receiving financial benefits, meaning Albertans on ADAP can earn more from working while continuing to receive the support they need. These financial benefits are in addition to health and personal benefits, which Albertans on ADAP will receive regardless of their employment income.

In general, an individual with a severe disability that results in them being permanently unable to work will qualify for AISH.

In general, an individual with a severe disability who is assessed as able to work will qualify for ADAP. To be medically eligible for ADAP, the severe disability must be determined to significantly restrict but not prevent a person from being employed.

ADAP clients will be able to apply for an AISH assessment if their medical condition or ability to work changes.

Transition approach

All existing AISH clients will be assured a place in either ADAP or AISH.

Alberta's government will notify all AISH recipients in mid-May with information specific to their situation, including whether they will remain on AISH, transition to ADAP, or be affected by any regulatory changes.

In July 2026, current AISH clients who meet one or more of the below criteria will automatically remain on AISH, unless they choose to transition to ADAP to benefit from ADAP's higher employment income exemptions:

- individuals with a severe and profound developmental disability, or who are deemed eligible for or are receiving Persons with Developmental Disabilities services
- individuals with palliative or terminal medical conditions
- individuals living in continuing care homes
- individuals 60 years of age or older

Current AISH clients who meet the criteria for automatic approval for AISH do not need to take any action – they will be identified by AISH and notified prior to July 2026.

AISH clients who transition to ADAP in July 2026 will receive a \$200 monthly transition benefit that will keep their financial benefit the same as their existing AISH benefit amount until December 31, 2027. During this time, clients can choose to remain on ADAP or apply for AISH.

Alberta's government will cover the cost of one medical assessment for current AISH clients who transition to ADAP in July and later choose to be assessed for AISH. This support is not time-limited and will be available whenever clients choose to access it.

Benefit amount and earned income exemptions

When ADAP launches July 2026, ADAP’s core financial benefit will be \$1,740 per month.

The ADAP employment income exemption for single clients will be \$700 per month, which means that individuals on ADAP will be able to earn up to \$700 per month with no impact to financial benefits.

- Employment income above \$700 per month will be gradually deducted starting with less than a cent per dollar and increasing significantly approaching \$45,000 employment income per year. See the Disability Assistance Benefits Calculator to determine benefits based on your unique situation at Alberta.ca/ADAP
- Albertans on ADAP will be able to earn up to \$45,240 annually in employment income while continuing to receive financial benefits. This will be the highest limit for employment income while receiving financial benefits of any comparable disability income assistance program in Canada.
- Albertans on ADAP will continue to receive the health benefits they need, regardless of employment income.

Client type	Amount clients can earn before impact to financial benefits
AISH Single or Parent	\$350
ADAP Single	\$700
ADAP Parent (1 or more dependent children)	\$1,100
AISH or ADAP Cohabiting Partner	\$1,500

Assured Income for the Severely Handicapped (AISH)

The longstanding Assured Income for the Severely Handicapped (AISH) program will still be there for those with permanent and severe disabilities who are unable to work. As a legislated program, AISH will remain fully funded and available to all eligible Albertans.

AISH and ADAP updates

The AISH General Regulation has been updated and now applies to both AISH and ADAP.

Increased spousal pension income exemption

Starting in July 2026 there will be an increase to the amount of pension income that a spouse or cohabiting partner can receive before impacting benefits. The first \$1,200 of spousal pension income will be fully exempt and 25% of the remaining amount is also exempt.

Allowance for two-client couples living together

Starting the August 2026 benefit period, in households where two adults receive disability income assistance (AISH or ADAP), each partner will receive 88% of the maximum individual benefit to reflect a couple’s shared household expenses and mutual financial responsibility. This approach aligns with how other jurisdictions structure disability benefits and helps ensure supports are distributed fairly.

Recalibrated child benefit rate

Child benefit rates under AISH and ADAP have been recalibrated to reflect other child-related supports including the federal Canada Child Benefit. Monthly child benefits are set at:

- \$300 for the first child
- \$117 for the second
- \$88 for the third
- \$59 for the fourth, and
- \$30 for each additional child.

The recalibrated child benefit rates will increase child benefits for approximately 7,000 families who receive disability income assistance, and will be applied starting the August 2026 benefit period.

More information

Updates will be posted on alberta.ca/alberta-disability-assistance-program.





Sheppard Family Park Society

1201 – 5th St SE,
High River, AB
T1V 1J2

RECEIVED

MAY 28 2026

TOWN OF HIGH RIVER

403-652-6075

info@sheppardfamilypark.ca

www.sheppardfamilypark.ca

May 29, 2026

Town of High River

309B Macleod Trail S.W.

High28, River, Alberta

Attn: Mayor Snodgrass and Town Councillors

Dear Sir/Madam:

Re: Sheppard Family Park Society

I enclose for your information the following documents:

1. Minutes of March 24, 2026 Board Meeting;
2. Minutes of April 28, 2026 Board Meeting.

I trust this will bring you up to date on the activities of the Society.

Yours truly,

Paula Briggs, President, Sheppard Family Park Society



**Sheppard Family Park Society
Board Meeting
March 24, 2026**

Minutes

Present: Mary Ann Dearing, Deb Gardiner, Gayle Sandford, Angela Caldwell, Garth Brookwell, Carol Knox, Ken Perkins, Sam Loken, Al Brander, Mark Helliwell, Paula Briggs, Milton Sundset

Absent: Steve Debiegne, Cathy Couey

1. Welcome and Call to Order

Mary Ann welcomed everyone and called the meeting to order at 7:02 pm. Members in attendance introduced themselves to the group.

2. Election of Officers

Angela called three times for nominations for the position of President. Paula Briggs was declared President.

Angela called three times for nominations for the position of Vice President. Ken Perkins was declared Vice President.

The executive committee is comprised of Paula Briggs (President), Ken Perkins (Vice President), Deb Gardiner (Secretary), Garth Brookwell (Treasurer) and Mary Ann Dearing (Past President).

3. Adoption of Agenda

Mary Ann added Budget under New Business.

Motion: Carol moved that the agenda be adopted as amended. Ken seconded. Carried.

4. Review and Adoption of Minutes

Motion: Paula moved that the minutes of the February 24, 2026 meeting be adopted as circulated. Milton seconded. Carried.

5. Correspondence

- AGLC documents approved for period October 1, 2024 – September 30, 2025.
- Application for Young Canada Works program denied.
- Town of High River Volunteer Appreciation Event – April 20th – register by April 9th. Online registration.
- Meeting scheduled with Khalid, Town of High River, June 4, 2026 1:30 pm to 2:30 pm to discuss the Community Facility Agreement and Maintenance Plans

6. Treasurer's Report

Motion: Garth moved that the Treasurer's Report be adopted as presented. Milton seconded. Carried.

7. Committee Reports

a. Executive Committee

Annually Highwood Centre, Legion and Sheppard Family Park representatives arrange meetings to review each group's financials. The review of Sheppard Family Park's financials was conducted on March 19, 2026 with Tim Whitford (Legion), Michael Prendergast (Highwood Centre), Mary Ann Dearing (Sheppard Family Park) and Deb Gardiner (Sheppard Family Park). The review is now complete.

b. Museum

Museum of the Highwood was successful with the Young Canada Works program for hiring summer staff.

Grand Opening for the art exhibit is scheduled for April 17th

Casino dates are June 30th and July 1st. If you can volunteer, please contact Sam.

c. Rotary

Flag project is underway with 390 already purchased. A display of flags will be installed at the entrance to Sheppard Family Park May 1st. Rotary is working on their bylaws. Expenses for the Lobster Boil have escalated and a decision is to be made whether to proceed or not.

d. Kinsmen

Steve reported on behalf of Kinsmen that work on the disc golf course will begin again in the spring.

e. Anglican Church

Mark Helliwell reported that St Benedict's Anglican Church is prioritizing outreach in a plan to increase the size of the congregation. Last year they increased the number of congregants from 30 to 50.

f. Accessioning

Accessioning is up to date with all items entered into the database. Volunteers manned the table at the Wedding Fair at the Highwood Centre. Limited attendance. We were advised that the event will probably not be planned for 2027.

g. Grounds

Garth reported that when the weather warms up priority will be given to building the privacy fence at the custodian's house and putting the roof on the sign. Carol advised that the sign needs to be flipped so that it is oriented correctly.

Garth reported that Sheppard Family Park site is being considered as part of a Town wildfire mitigation project to house goats in a temporarily fenced area to reduce undergrowth.

h. Machinery

Working on the small tractor to see if it will be able to pull the rototiller.

i. Buildings

a. Munroe Barn

Heating was faulty again but Town crew replaced the faulty part.

b. Little Bow School

Shingles will be replaced in 2026.

j. Gardens

Carol reported that all garden plots have been assigned with 10 on the waiting list. Next step is mapping where the hoses will run to maximize efficiency.

k. Little Bow School

Janet Jack is seeking input for changes to the school program to respond to changes in the Alberta curriculum. Meeting is scheduled for March 26, 2026 at 1:00 pm in the Barn.

l. Custodian

No issues. Continue to have people seeking bookings.

m. Town of High River

Mary Ann asked about the development to the west of the Sheppard Family Park boundary. Garth said that development permits have been issued for 72 units. The details of the permits are available on the Town website under active permits. If residents have a concern about holes, especially from the recent fiber installation, to report it on the Town website under the heading "report a concern".

n. Blacksmith

A vented forge would be an asset to the blacksmith operation, too. Paula will explore options for constructing a vapor hood to allow for the forge to be operated within the building. More investigation will be done about establishing a coal depot at the Park to

Agenda Item #8.1.

see if it is a viable option. It has been determined that we do have space.

7. Unfinished Business

a. Signage for the Machinery

A list of signs and wording needs to be compiled for the metal sign. Garth brought a sample of the signage for the board members to view.

b. Summer Staff

Grant application was denied.

Motion: Paula moved that Sheppard Family Park pay wages from general funds up to \$15,000 for a summer staff position. Milton seconded. Carried.

Hiring committee will consist of Ken, Garth and Paula.

Motion: Al moved that Sheppard Family Park offer the position, paying up to \$20 per hour, to Kennidy Connell. Carol seconded. Carried

8. New Business

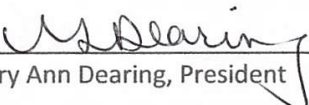
a. Budget

Will be up for discussion at the next meeting.

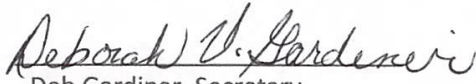
9. Adjournment

Motion: Carol moved to adjourn the meeting. Meeting adjourned at 8:17 pm

Next Meeting: April 28, 2026 7 pm Munroe Barn



Mary Ann Dearing, President



Deb Gardiner, Secretary

Date: April 28, 2026



**Sheppard Family Park Society
Board Meeting
April 28, 2026**

Minutes

Present: Paula Briggs, Mary Ann Dearing, Deb Gardiner, Gayle Sandford, Ken Perkins, Garth Brookwell, Mark Helliwell, Milton Sundset, Cathy Couey, Kenidy Connell

Guest: Gary Briggs

Absent: Steve Debienne, Sam Loken, Al Brander, Carol Knox, Angela Caldwell

1. Welcome and Call to Order

Paula welcomed everyone and called the meeting to order at 7:00 pm. Paula introduced Gary Briggs who is presenting about the Clay Oven Project Proposal.

2. Adoption of Agenda

Motion: Mary Ann moved that the agenda be adopted as presented. Garth seconded. Carried.

3. Guest Speaker: Gary Briggs

Gary presented a design and logistics for building a Clay Oven- Quebec Style on site to be part of the programming opportunities at Sheppard Family Park. The interest was high with some reservations as to how it would work with the school program. Going forward Milton and Garth are going to secure cost estimates for supplies. Gary's construction expertise will make this project a real possibility.

4. Review and Adoption of Minutes

Motion: Milton moved that the minutes of the March 24, 2026 meeting be adopted as circulated. Ken seconded. Carried.

5. Correspondence

- Sunset Drive-In Theatre offer of the fundraising opportunity to man the gate on August 15, 2026. Ken will confirm acceptance with the drive-in
- Darlene @ the Town of High River confirmed that the gopher situation is on the program.
- Paula advised Darlene of the Northern Flicker situation in Sheppard Family Park. Darlene will investigate potential means of deterring the flickers from attacking the Munroe Barn.
- Seniors' Week – Paula accepted an invitation to have a table at the Friendship Centre, June 6th
- Booker Veterinary Services Ltd./Telus Volunteer – wish to volunteer once again at Sheppard Family Park.

May 21st is the proposed date with specific project to be determined. Past projects included washing all the windows inside and out and major yard cleanup.

6. Treasurer's Report

Motion: Garth moved that the Treasurer's Report be adopted as presented. Mary Ann seconded. Carried.

Ken suggested that a memo be added to the display on the financial report to include the maturity dates for the GICs currently held by Sheppard Family Park. The possibility of putting some funds in GICs will be discussed at the May meeting.

7. Committee Reports

- a. **Executive Committee – No report**
- b. **Museum**

Paula has requested the Museum of the Highwood give authorization to Sheppard Family Park to use a small illustration by Ruth Maccoy on business card size promotional

material. Sam is investigating the possibility.

Sam has two summer staff that he is willing to have help at Sheppard Family Park to organize and display artifacts in the lower level of the Munroe Barn.

c. Rotary

Rotary will not be able to continue being responsible for the Potato Planting Project due to manpower shortage. Sheppard Family Park will need to look into alternatives.

d. Kinsmen

Getting busy with BBQ bookings. Garth has booked Kinsmen for both Heritage Day and Threshing Day.

e. Anglican Church

Mark Helliwell reported that St Benedict's Anglican Church is now taking bookings for their hall and other efforts to reach out to the community.

f. Accessioning

Accessioning is into spring cleaning mode. The leather items in the barn are being cleaned.

g. Grounds

Volunteers are getting ready for the first mowing of the season. Mowing times will be coordinated with Gayle so we do not interfere with bookings.

h. Machinery

Sheldon has had the canvas built and will pick it up soon. Roof for the kiosk has been shingled and is ready for installation on a day with little wind.

i. Buildings

a. Munroe Barn

There is a leaky faucet in the lower-level bathroom of the Munroe Barn. Milton will investigate.

b. Little Bow School

The color of the shingles was confirmed at a meeting with Jason from the Town of High River maintenance department. Installation is planned for late April, early May to avoid conflict with the school program.

j. Gardens – No report

k. Little Bow School

Janet held a meeting to discuss some changes to the program. Invitations have been sent to area schools. One booking on June 10th so far.

l. Custodian

No issues. Continue to have people seeking bookings. Ken will connect with Kim at FAIM re the issue of cleaning up on their Thursday bookings.

m. Town of High River

Cathy reported that tax payers could anticipate a 3.5% increase in property tax for 2026. Waste collection will remain an in-house service. The area structure plan for the NE is in the works. 3 new tree art pieces have been approved. They are the first approved outside of George Lane Park.

n. Blacksmith

Paula continues to investigate the coal depot program. The cost to transport the coal to Sheppard Family Park will need to be covered. More research is being done.

7. Unfinished Business

a. Signage for the Machinery

A list of signs and wording needs to be compiled for the metal equipment signs. Kenidy will begin to compile a list. Mary Ann recommended we consult with Barry Warnica for details of equipment if not currently available.

b. Summer Staff

Kenidy Connell was welcomed back for her 5th year. There are lots of plans for projects for summer 2026.

8. New Business

a. Walkabout

Scheduled for May 5th at 6:30 p.m. An email will be sent to board members.

b. Public Access

Cathy Couey reported that some of the neighbours are confused as to permitted access to Sheppard Family Park. It is proposed to install a gate on the southwest corner (on Montieth Drive) and northwest on 12th Avenue. With appropriate signage. We hope this will be more welcoming.

c. Events

i. Green Sweep

May 2, 2026 9:30 am- Noon. Register at Snodgrass Recreation Centre and come to Sheppard Family Park

ii. Little Britches Rodeo Parade

May 16, 2026. Partnering with 4H for our entry. We are covered by insurance

iii. Senior's Week

Table at Friendship Centre to promote SFP

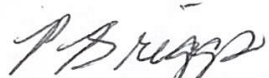
d. Registration Desk

Paula shared some ideas for reconfiguring the layout on the lower level of the Munroe Barn, including a registration desk.

9. Adjournment

Paula adjourned the meeting at 8:52 pm

Next Meeting: May 26, 2026 7 pm Munroe Barn



Paula Briggs, President



Deb Gardiner, Secretary

Date: May 28, 2026

Agenda Item #9.1.

Archived: June 2, 2026 12:01:05 PM

From: [Town of High River](#)

Sent: June 2, 2026 11:59:27 AM

To: [THR Legislative Services](#)

Subject: Barbara Haney has submitted a LAS | Town of High River Event Invitation Request Form for Mayor and Council

Sensitivity: Normal

[EXTERNAL EMAIL] WARNING: This e-mail originated outside of the Town of High River. Do not click on any links or attachments unless you recognize the sender.

A resident has submitted a LAS | Town of High River Event Invitation Request Form for Mayor and Council. Here are the details:

Full Name:

First Name: Barbara

Last Name: Haney

Email Address:

ab.cgmfc.chair@gmail.com

Phone Number:

Redacted pursuant to Section 20(4)(h)(i) of the Access to Information Act.

Mailing Address:

Address 1: Redacted pursuant to Section 20(4)(h)(i) of the Access to Information Act.

City: High River

State / Province: AB

Redacted pursuant to Section 20(4)(h)(i) of the Access to Information Act.

Name of Event:

Canadian Grand Masters Fiddling Competition 2026

Organization Name:

Alberta Committee Canadian Grand Masters Fiddling Association

Event Website:

www.canadiangrandmasters.ca

Event Location

Address 1: Redacted pursuant to Section 20(4)(h)(i) of the Access to Information Act.

City: High River

State / Province: Alberta

Redacted pursuant to Section 20(4)(h)(i) of the Access to Information Act.

Does the Town of High River Sponsor this event?

Yes

Number of people expected to attend:

Agenda Item #9.1.

400 +

Event Date:

2026-08-29

Event Start Time:

12:00 p.m.

Event End Time:

4:30 p.m.

Purpose of the Event:

National Fiddle Contest

Benefit to High River:

Economic, Cultural, Exposure

Is this a Request to Speak at the Event?

Yes

If yes, what time will the speaking start at, and how long will the duration be?

The speaker would deliver a short message of welcome to the audience on behalf of the town council, within the first 15 minutes of the event beginning.

Speaking Topic Details - Please provide any key points the Mayor/Council Member should include when speaking at the event.

Welcome guests from all over the province, country and beyond. Honour to have our town chosen to host the National Fiddling Championships. Guests from Canada, USA and Norway have confirmed their plans to attend at this point. Could mention that the Community Vitality Grant is the MAJOR sponsor of the three days of events for the Canadian Grand Masters Fiddling Competition.

Are there additional speakers? If so, please share these individuals and their roles.

The town representative is the only dignitary being asked to speak at noon on Saturday, August 29th. Other short messages of welcome will come from Randy and I as co-chairs of the Alberta Steering Committee and possibly a member of the National Fiddling Association will speak briefly as well.

What is the name of the individual introducing the speaker?

Calvin Vollrath, MC for the event

Where is the best place to park?

Event is being held at the Highwood Centre. Probably a town lot?

Time of Arrival?

11:45 a.m.

Dress Attire?

Casual

What entrance should be used?

Front

Agenda Item #9.1.

Who will greet Council when they arrive?

Randy Jones, Barb Haney

Will Media be present?

Yes

If yes, what news outlets will be present?

We will invite the High River Times and possible the Western Wheel

Do you require an RSVP with the number of attendees?

Yes

If yes, please advise the date RSVPs are required:

2026-07-02

Please click below to consent to the collection and use of personal information.

Yes

Thanks,