



CAPITAL REGION SOUTHWEST WATER SERVICES COMMISSION

Replaces: Bylaw No. 8-99 FOIP Bylaw

Policy Name: 8 – Privacy and Access Management

Related Bylaws and Policies: Bylaw No. 8-99 FOIP Bylaw

Date Approved: March 19, 2026

Chairman: 

Commission Manager: 

To be Reviewed Before: March 19, 2031

Policy Objective:

The purpose of this policy is to assure the public and member municipalities that the Capital Region Southwest Water Services Commission ("CRSWSC") adheres to privacy principles in accordance with the Access to Information Act ("ATIA") and the Protection of Privacy Act ("POPA").

Policy:

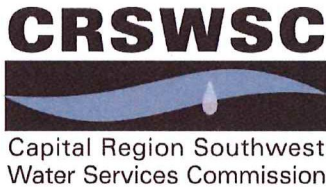
This policy establishes the administrative structure and processes of the CRSWSC in relation to the corporate collection, use, retention and disclosure of personal information as it applies to CRSWSC software, programs, operations and procedures.

Definitions:

Access to Information Act ("ATIA") – The legislative framework that allows access to records held by public bodies in Alberta, balancing the public's right to know information while protecting confidential information required to ensure effective operations of public bodies.

Applicant – A person who makes a request for access to a record under the ATIA.

Personal Information – Recorded information about an identifiable individual. This may include, but is not limited to, an individual's name, address, telephone number, age, gender, race, religion, health information or financial records.



Personal Information Banks – A formal description or inventory of personal information holdings in the custody or under the control of the organization, maintained to support individual rights of access to and correction of personal information.

Privacy Impact Assessment – A formal due-diligence process used to identify, assess, and mitigate privacy risks associated with new or significantly changed programs, services, or systems involving personal information.

Protection of Privacy Act (“POPA”) – The legislative framework governing how public bodies in Alberta may collect, use, and disclose personal information, and requiring appropriate safeguards to protect that information.

Security Classification System – An internal, risk-based framework used to classify information based on sensitivity and to determine the appropriate administrative, physical, and technical safeguards required to protect that information.

Responsibilities and Authorities:

The Capital Region Southwest Water Services Commission Board of Directors is responsible for the review and approval of this policy on or before the review date specified and every 5 years thereafter.

The Commission Manager is responsible for the development, implementation, monitoring, and adherence to this policy.

The Privacy Management Program will be made available to the public, in a manner that does not compromise the security or integrity of the program.

All those involved with the management of the CRSWSC are required to comply with the contents of this policy with the following overarching objectives:

1) Designated Head

- a) For the purpose of the Privacy Management Program, the Designated Head is the Commission Manager of the member municipality which has entered into a Management and Operations Agreement with the CRSWSC to carry out the corporate responsibilities of the CRSWSC.
- b) The Designated Head will identify an employee of the Management and Operations team to act as the CRSWSC Privacy Officer, who is responsible for ensuring compliance with legislation.
- c) The CRSWSC will follow the documented privacy-related procedures of the member municipality that has entered into a Management and Operations Agreement with the CRSWSC, including for identified incidents described under



Section 10(2) and for complaints described under Section 38(2) of POPA. These policies and procedures will be applied proportionately to the volume and sensitivity of personal information in the custody or under the control of the CRSWSC.

- d) Mandatory annual privacy training will be provided to designated members of the Management and Operations team who are responsible for the Privacy Management Program.

2) Collecting Personal Information

- a) The CRSWSC will collect only the minimum amount of personal information necessary to operate its programs and services. The collection, use, retention, and disclosure of personal information will be carried out in accordance with legislation.
- b) The CRSWSC will communicate the purpose for which personal information is collected and will use the information only for the purposes identified or as otherwise permitted by law.

3) Protecting Personal Information

- a) The CRSWSC will take reasonable steps to ensure that all personal information in its custody or under its control is protected in accordance with legislation and is not collected, used, retained, or disclosed except as authorized.
- b) CRSWSC representatives are responsible for complying with applicable policies and procedures to maintain the accuracy, integrity, and confidentiality of personal information.
- c) CRSWSC representatives who knowingly use or disclose personal information for purposes other than those for which it was collected or authorized may be subject to disciplinary action.

4) Access to and Correction of Information

- a) The CRSWSC will respond to written requests for access to records or personal information in its custody or under its control, in coordination with the Privacy Officer and in compliance with legislated timelines and requirements.
- b) Where fees are permitted under legislation, fees charged will be in accordance with legislated requirements. Where additional fees are anticipated, a cost estimate will be provided to the Applicant prior to processing the request.

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- c) Individuals have the right to request correction of personal information held by the CRSWSC, in accordance with POPA legislation.

5) Personal Information Banks and Security Classification System

- a) In accordance with POPA legislation, the CRSWSC will create and maintain Personal Information Banks to document the personal information in its custody or under its control, including the purpose for which the information was collected. Information about the Personal Information Banks will be made publicly available, in a manner that does not compromise the security, integrity, or confidentiality of the information.
- b) In accordance with POPA legislation, the CRSWSC will establish and maintain a Security Classification System to classify all personal information, data derived from personal information, and non-personal data in its custody or under its control. The Security Classification System will reflect the sensitivity of the information (e.g. low, medium, or high sensitivity) and ensure the application of appropriate administrative, physical, and technical safeguards. The Security Classification System will be reviewed periodically and updated as required to reflect changes in legislative requirements, risk or business practices.
- c) Responsibility for maintaining the Personal Information Banks and Security Classification System will be assigned by the Commission Manager to a designated member of the Management and Operations team from the municipality that has entered into a Management and Operations Agreement with the CRSWSC.

6) Privacy Impact Assessments

- a) A Privacy Impact Assessment must be completed for all new or significantly revised software, services, or programs that collect, use, retain, or disclose personal information. Privacy Impact Assessments will be used to proactively identify and manage privacy risks, document personal information flows, and support compliance with legislative requirements.

CRSWSC Personal Information Bank Directory

Title	Area of Operations	Location of Information	Description of Personal Information	Categories of Individuals	Legal Authority	Purpose of Collection and Use	Classification	Disclosure
Board of Directors & CAO Contact List	Administration	Within CRSWSC Information Technology Infrastructure	Name, Organization, Business Email Address, Business Phone Number	Board Members, CAO	POPA 4(c)	To facilitate CRSWSC business - distribute Board meeting invitations, agenda packages and minutes, corespondance.	Internal	Board member contact information is included in the Board Orientation Manual, accessible to CRSWSC members.
CRSWSC Annual General Meeting Guest List	Administration	Within CRSWSC Information Technology Infrastructure	Name, Organization, Business Email Address, Business Phone Number, Gender, Clothing Size, Dietary Accommodations	Board Members, Mayors, CAO, MLA's, MP's, Employees of member municipalities	POPA 4(c)	To coordinate the Annual General Meeting and banquet.	Internal	The AGM venue receives individual dietary accommodations for catering purposes.
Board Mileage and Honorarium Reports	Administration / Finance	Within CRSWSC Information Technology Infrastructure	Name, Job Title, Organization, Home Mailing Address	Board Members	POPA 4(c)	To process Board meeting honorariums and mileage reimbursement.	Confidential	
CRSWSC Municipality & Emergency Contact Information	Operations	Within CRSWSC Information Technology Infrastructure	Name, Organization, Business Email Address, Business Phone Number	Employees of member municipalities, Contractor representatives	POPA 4(c)	General contact list for use in emergency situations.	Internal	Emergency contacts business information may be shared with those involved in emergency response.
CRSWSC Rural Residents	Operations / Finance	Within CRSWSC Information Technology Infrastructure	Name, Business Name, Legal Land Description	Residents, Businesses	POPA 4(c)	The Rural Resident list is provided by Leduc County for billing purposes, for properties that have existing connections and a separate water meter.	Confidential	
Accounts Payable/Receivable List	Finance	Quickbooks Software	Name, Business Name, Home/Business Address, Home/Business Phone Number, Email Address, Identifying Number (bank account numbers)	Board Members, Vendors, Customers, Employees of member municipalities	POPA 4(c)	To administer and manage financial transactions including billing, reimbursement of expenses and managing pre-authorized payments.	Restricted	
T4/T4A Information	Finance	Within CRSWSC Information Technology Infrastructure	Name, Home Address, Identifying Number (social insurance number), Income	Board Members	POPA 4(c)	For Canada Revenue Agency tax reporting purposes and T4/T4a preparation.	Restricted	
Electronic Fund Transfer (EFT) Information Spreadsheet	Finance	Within CRSWSC Information Technology Infrastructure	Company/Board Member Name, Banking information, Remittance email address.	Suppliers/Vendors, Board Members	POPA 4(c)	To administer and manage financial transactions to pay suppliers and reimburse Board member expenses by EFT.	Restricted	
Contracts and Agreements	All Areas	Within CRSWSC Information Technology Infrastructure	Name, Business Name, Address, Phone Number, Email Address	Vendors, Stakeholders	POPA 4(c)	To bind agreements and contracts between the CRSWSC and another party, such as development agreements, easements, affidavits, caveats, and other legal documentation.	Confidential	Legal proceedings or confirmation of ownership.
Memberships and Training	Administration	Within CRSWSC Information Technology Infrastructure	Name, Business Address, Email Address, Home/Business Phone Number, Gender	Board Members, Employees of member municipalities, Emergency Contacts	POPA 4(c)	To manage membership and registration of participants in professional organizations and professional development opportunities.	Confidential	Information is shared with professional organizations that manage memberships (e.g. Water Environment Federation).