



Policy Number: 2026 – 05

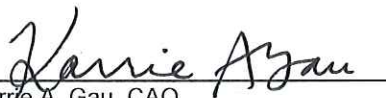
Date of Issue: May 19, 2026

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Motion Number: 2026 – 132

Policy Subject/Title: DELEGATION OF AUTHORITY TO THE ACCESS AND PRIVACY COORDINATOR

Signature of Approval by Authorized Personnel:


Karrie A. Gau, CAO

Supersedes: N/A

Date of Last Update

N/A

Title & No. of Previous Policy if Applicable

POLICY STATEMENT:

In accordance with Section 87(1) and (2) of the *Access to Information Act* (ATIA) and Section 55(1) and (2) of the *Protection of Privacy Act* (POPA):

- (1) *The head of a public body may delegate to any person any power, duty or function of the head under this Act, except the power to delegate under this section.*
- (2) *A delegation under subsection (1) must be in writing and may contain any conditions or restrictions the head of the public body considers appropriate.*

For the purpose of this Policy, the head of the public body refers to the Chief Administrative Officer (CAO).

PROCEDURES:

DUTIES OF THE ACCESS AND PRIVACY COORDINATOR

The CAO hereby delegates the Access and Privacy Coordinator the authority to administer and make decisions under the Town of Wainwright's Access to Information and Privacy Management Programs as follows:

1. Access to Information Administration and Decision Making

- a. Receive, process, and respond to access to information requests

- b. Grant or refuse access to records
- c. Apply time extensions, fee estimates, fee waivers, and time limit calculations
- d. Apply exemptions and conduct harm tests
- e. Prepare and issue decision letters, subject to Section 2.1
- f. Coordinate consultations with third parties and other public bodies
- g. Manage the search, retrieval, and preparation of records for disclosure

2. Privacy Management and Compliance

- a. Oversee and advise on the collection, use, disclosure, retention, and safeguarding of personal information
- b. Ensure compliance with POPA and related regulations
- c. Provide privacy guidance to all municipal departments
- d. Recommend privacy practices, safeguards, and administrative controls, subject to Section 2.2
- e. Maintain privacy management documentation and compliance records

3. Program Administration, Training and Policy Development

- a. Develop, implement, and maintain access and privacy policies, procedures, and training
- b. Provide staff education and awareness on access and privacy obligations
- c. Maintain records related to ATIA and POPA compliance
- d. Coordinate internal audits or reviews of access and privacy practices

4. Privacy Impact Assessments (PIA)

- a. Conduct or oversee Privacy Impact Assessments
- b. Review new or modified programs, systems, or initiatives involving personal information
- c. Recommend mitigation measures and approve PIA submissions
- d. Submit PIA to the Office of the Information and Privacy Commissioner (OIPC) when required

5. Representation Before the Commissioner

- a. Inquire with the Commissioner for advice or recommendations on any matter under the ATIA or POPA
- b. Prepare and submit representations, evidence, and documentation for OIPC reviews, investigations, or inquiries

6. Privacy Breach Response and Reporting

- a. Work with the CAO to coordinate privacy breach investigations as required

- b. Work with the CAO, as required, to determine containment, prepare notification, and mitigation actions
- c. Maintain breach logs and related documentation

DUTIES OF THE CAO

The following authorities are not delegated and must be approved by the CAO prior to implementation:

1. Access to Information Administration and Decision Making

Decision letters which are subject to exemptions under Sections 19 through 32 of ATIA are subject to review and approval by the CAO.

2. Privacy Management and Compliance

The CAO must approve recommended privacy practices, safeguards, and administrative controls.

3. Privacy Breach Response and Reporting

- a. Coordinate privacy breach investigations
- b. Determine containment, notification, and mitigation actions
- c. Report breaches to the OIPC when required

LIMITATIONS

- 1. The head of the public body retains all authorities under ATIA and POPA and may exercise them at any time.
- 2. The head may amend, revoke, or supplement this delegation at their discretion.
- 3. This delegation applies to the position, rather than the individual. Acting or interim appointments carry the same authority.

REVIEW CYCLE:

This policy will be reviewed every three (3) years.