

Privacy Management Program Policy

<i>Policy Number</i>	PMP-01
<i>Topic</i>	Privacy Management Program
<i>Authority</i>	Board
<i>Related Documents</i>	Protection of Privacy Act Access to Information Act Access to Information and Protection of Privacy Policy Confidentiality of Patron Records and Personal Information Policy Personal Information Banks Policy Records Management Policy

The Regional Municipality of Wood Buffalo Library Board (WBRL) is committed to protecting personal information and ensuring the right of access to records in accordance with the Protection of Privacy Act (POPA) and the Access to Information Act (ATIA).

WBRL will establish, implement, and maintain a comprehensive Privacy Management Program (PMP) to ensure compliance with legislative requirements and to promote transparency, accountability, and responsible information management across all WBRL operations.

Purpose

The purpose of the Privacy Management Program is to:

- ensure the protection of personal information in the custody or control of WBRL
- support the public’s right to access information under ATIA
- establish consistent privacy and information management practices
- reduce the risk of unauthorized access, use, or disclosure of personal information

Scope

This policy applies to all employees, volunteers, contractors, and Board members of WBRL and to all records, including physical and electronic records, in the custody or control of WBRL.

Program Components

WBRL’s Privacy Management Program includes:

- Policies governing access to information, privacy, records management, and personal information banks
- Procedures for responding to access to information requests
- Processes for conducting Privacy Impact Assessments (PIAs) where required
- Procedures for identifying, managing, and reporting privacy breaches
- Defined roles and responsibilities for privacy and access to information
- Staff training and awareness activities
- Ongoing monitoring and review of privacy practices

The following policies form part of the Privacy Management Program:

- Access to Information and Protection of Privacy Policy
- Confidentiality of Patron Records and Personal Information Policy
- Personal Information Banks Policy
- Records Management Policy

Roles and Responsibilities

Board of Directors

- Approves the Privacy Management Program and related policies

Director (Head of the Public Body)

- Ensures overall compliance with ATIA and POPIA
- Provides leadership and resources for the Privacy Management Program

Privacy Officer / Access to Information Coordinator

- Manages access to information requests
- Oversees privacy compliance and implementation of the PMP
- Coordinates Privacy Impact Assessments and breach response
- Provides guidance and training to staff

Employees and Volunteers

- Comply with this policy and all related procedures
- Protect personal information and report privacy concerns or breaches

Compliance and Accountability

WBRL will monitor compliance with this policy and take appropriate action to address non-compliance. The Privacy Management Program will be reviewed periodically to ensure it remains effective and aligned with legislative and operational requirements.

History

Created: May 2026