



**REGULAR COUNCIL MEETING AGENDA
CARSTAIRS MUNICIPAL OFFICE
MONDAY, JUNE 8, 2026, 7:00 P.M.**

Page

1. CALL TO ORDER

2. ADDED ITEMS

3. ADOPTION OF AGENDA

- a) Adoption of agenda of June 8, 2026
Motion: To adopt the agenda of June 8, 2026

4. ADOPTION OF MINUTES

- a) Adoption of minutes of May 25, 2026 (addendum 4.a)
Motion: To adopt the minutes of May 25, 2026



5. BUSINESS ARISING FROM PREVIOUS MEETING

6. DELEGATIONS

In Camera

7. NEW BUSINESS

- a) Provincial Sports & Leadership Award Presentation
b) Richard Dais Scholarship 2026
c) Citizenship Award 2026

8. BYLAWS AND POLICIES

- a) Policy No. 12-048-26 Privacy Management Program (addendum 8.a)



9. COMMITTEE REPORTS

- a) POLICIES & PRIORITIES COMMITTEE
i) Next meeting June 16, 2026
b) MOUNTAIN VIEW REGIONAL WASTE COMMISSION
c) MOUNTAIN VIEW REGIONAL WATER SERVICES COMMISSION

3 - 7

8 - 15

d) MOUNTAIN VIEW SENIORS HOUSING

10. COUNCILOR REPORTS

- a) COUNCILOR BALL
- b) COUNCILOR FRICKE
- c) COUNCILOR ROBERTS
- d) COUNCILOR SELANDERS
- e) COUNCILOR TOLLEY
- f) COUNCILOR WILCOX
- g) MAYOR ALLAN

11. CORRESPONDENCE

12. CAO'S REPORT

13. COUNCILOR COMMENTS

14. PUBLIC QUESTION PERIOD

15. CLOSED MEETING

Section 197 of the Municipal Government Act requires that Council and Council Committees conduct their meetings in public unless the matter to be discussed falls under one of the exceptions to disclosure outlined in Division 2 of Part 1 of the Access to Information Act (ATIA), including but not limited to matters related to business interests, personal privacy, individual or public safety, confidential evaluations or law enforcement. (Sections 19 to 34).

- a) *Section 19-Disclosure harmful to business interests of a third-party-Delegation*
- b) *Section 32-Privileged information*

16. ADJOURNMENT

**MINUTES OF THE REGULAR COUNCIL MEETING
MONDAY, MAY 25, 2026, 7:00 P.M.
CARSTAIRS MUNICIPAL OFFICE**

ATTENDEES: Mayor Allan; Councillors Ball, Fricke, Roberts, Selanders, Tolley and Wilcox; Director of Legislative & Corporate Services Shannon Allison; Deputy CAO and Director of Planning & Development Kirk Williscroft; Manager of Legislative Services Jessica Pryde; CAO Rick Blair & Executive Assistant Kayleigh Van Es

ABSENT: Nil

CALL TO ORDER: Mayor Allan called the meeting of Monday, May 25, 2026, to order at 7:00 p.m.

ADDED ITEMS: **1. Heritage Festival to 6.a Delegation**

ADOPTION OF AGENDA:
Motion 190/26 Motion by Councillor Fricke to adopt the Regular Council Agenda of May 25, 2026, as presented. **CARRIED**

ADOPTION OF PREVIOUS MINUTES:
Motion 191/26 Motion by Councillor Selanders to adopt the Regular Council Meeting minutes of May 11, 2026, as presented. **CARRIED**

BUSINESS ARISING FROM PREVIOUS MEETING: Nil

DELEGATIONS: **1. Heritage Festival-Eileen Martin, Marty Ratz, Alan Riddle**
E. Martin presented a request to Council on behalf of the Carstairs Heritage Festival seeking sponsorship for the 7th annual festival taking place this Saturday. In past years, sponsorship requests have supported bands and lunches.

This year, the Festival is requesting support for a unique Scottish-themed sporting event featuring heavy athletics and Highland Games competitions. E. Martin advised there is currently no formal provincial championship, and this event would serve as the first Alberta Championship, with hopes of establishing Carstairs as its permanent host location.

To facilitate the event, specialized equipment is required. The structure has been constructed at a cost of \$1,785.00.

Councillor Wilcox thanked the Heritage Festival for their work and joked about not being asked to participate in a tug-of-war team.

Councillor Fricke commended the Heritage Festival for their advocacy and fundraising efforts and asked where summer games are typically held. A. Riddle advised there is currently no official championship, and existing events are generally hosted as standalone competitions.

Motion 192/26 Motion by Councillor Ball to accept the Heritage Festival Delegation as information and direct administration to facilitate the request of \$1,785.00. **CARRIED**

BYLAWS & POLICIES: **1. Bylaw No. 2068 Tax Rate Bylaw**
S. Allison presented the Tax Rate Bylaw, advising that the proposed tax rates for 2026 are 7.80 for residential, 12.91 for non-residential, and 12.96 for designated industrial properties. S. Allison noted the residential rate decreased from the previous year, while the non-residential and designated industrial rates increased.

Councillor Selanders requested clarification regarding the special vacant residential classification and the difference between residential and non-residential school foundation fund rates. S. Allison advised that the province establishes the school requisition rates. Councillor Selanders further questioned why the non-residential rate is significantly higher.

Councillor Wilcox asked how residential assessment appeals may affect taxation following the appeal period. S. Allison advised that the budgeted surplus provides a cushion for any impacts resulting from the nine outstanding appeals between June and October. S. Allison

noted that if all appellants were successful in receiving the requested reductions, the overall impact would be approximately \$4,000–\$5,000.

Councillor Tolley asked for clarification regarding the appeal process, noting that property owners are required to pay the original tax amount based on the assessment notice and that adjustments would be made if appeals were approved. Councillor Tolley also requested clarification regarding the mill rate decrease. S. Allison advised the residential mill rate decreased by approximately 11%.

Motion 193/26 Motion by Councillor Wilcox to give first reading of Bylaw No. 2068 Tax Rate Bylaw, as presented.

CARRIED

Motion 194/26 Motion by Councillor Tolley to give second reading of Bylaw No. 2068 Tax Rate Bylaw, as presented.

CARRIED

Motion 195/26 Motion by Councillor Roberts to move to third and final reading of Bylaw No. 2068 Tax Rate Bylaw, as presented.

UNANIMOUSLY CARRIED

Motion 196/26 Motion by Councillor Selanders to give third and final reading of Bylaw No. 2068 Tax Rate Bylaw, as presented.

CARRIED

2. Policy No. 12-014-26 Access to Information and Privacy Administration Policy-Amended

The Policy was reviewed at the last Policies & Priorities Committee meeting; it was recommended to bring to Council for ratification.

Councillor Fricke asked whether the policy applies to third-party contractors, such as the Town’s IT provider. J. Pryde advised that the IT contractor does not have access to Town information systems or protected data; however, they may become involved in the event of a security incident or breach response. Councillor Ball noted that the policy does define “contractors.”

Councillor Selanders questioned the removal of a referenced Bylaw number, and it was clarified that this allows updates to the bylaw without requiring corresponding changes to all policies.

Motion 197/26 Motion by Councillor Fricke to adopt Policy No. 12-014-26 Access to Information and Privacy Administration Policy, as amended.

CARRIED

3. Policy No. 12-026-26 Tax Information Disclosure Policy-Amended

The Policy was reviewed at the last Policies & Priorities Committee meeting; it was recommended to bring to Council for ratification.

Motion 198/26 Motion by Councillor Tolley to adopt Policy No. 12-026-26 Tax Information Disclosure Policy, as amended.

CARRIED

4. Policy No. 12-028-26 Records Retention and Disposition Policy-Amended

The Policy was reviewed at the last Policies & Priorities Committee meeting; it was recommended to bring to Council for ratification.

Motion 199/26 Motion by Councillor Roberts to adopt Policy No. 12-028-26 Records Retention and Disposition Policy, as amended.

CARRIED

5. Policy No. 12-035-26 Internet Privacy Policy-Amended

The Policy was reviewed.

Councillor Wilcox requested clarification regarding the policy numbering.

Motion 200/26 Motion by Councillor Wilcox to adopt Policy No. 12-035-26 Internet Privacy Policy, as amended.

CARRIED

6. Policy No. 12-042-26 Privacy Officer Policy

The Policy was reviewed. J. Pryde has been designated as the Privacy Officer for the Town of Carstairs.

Councillor Selanders asked about redundancies in the policy. J. Pryde explained that they were included to maintain formatting and consistency across policies. Councillor Ball agreed and supported keeping them for consistency. The rest of Council concurred.

Motion 201/26 Motion by Councillor Ball to adopt Policy No. 12-042-26 Privacy Officer Policy, as presented.
CARRIED

7. Policy No. 12-043-26 Security Classification System Policy
The Policy was reviewed at the last Policies & Priorities Committee meeting; it was recommended to bring to Council for ratification.

Motion 202/26 Motion by Councillor Selanders to adopt Policy No. 12-043-26 Security Classification System Policy, as presented.
CARRIED

8. Policy No. 12-044-26 Privacy Complaints and Request Handling
The Policy was reviewed at the last Policies & Priorities Committee meeting; it was recommended to bring to Council for ratification.

Motion 203/26 Motion by Councillor Wilcox to adopt Policy No. 12-044-26 Privacy Complaints and Request Handling Policy, as presented.
CARRIED

9. Policy No. 12-045-26 Privacy Risk and Impact Management
The Policy was reviewed.

Motion 204/26 Motion by Councillor Fricke to adopt Policy No. 12-045-26 Privacy Risk and Impact Management Policy, as presented.
CARRIED

10. Policy No. 12-046-26 Privacy Breach Management Policy
The Policy was reviewed.

Motion 205/26 Motion by Councillor Tolley to adopt Policy No. 12-046-26 Privacy Breach Management Policy, as presented.
CARRIED

11. Policy No. 12-047-26 Mandatory Privacy Training and Awareness Policy
The Policy was reviewed.

Councillor Selanders asked for clarification on whether mandatory training applies to contractors or volunteers, and what their scope or “purview” would be, as well as how compliance requirements apply to volunteers.

Motion 206/26 Motion by Councillor Ball to adopt Policy No. 12-047-26 Mandatory Privacy Training and Awareness Policy as presented.
CARRIED

NEW BUSINESS: Nil

COMMITTEE REPORTS:

- 1. Policies & Priorities Committee**
 - Minutes of the meeting May 19, 2026 were attached.
 - Councillor Selanders asked whether the permit listings include denied permits. K. Williscroft advised that they do not, noting that there have been no denied permits this year, and none in previous years that he could recall.
- 2. Mountain View Regional Waste Commission**
 - Next meeting in July 27, 2026.
- 3. Mountain View Regional Water Services Commission**
 - Councillor Roberts gave verbal report of the meeting on May 13, 2026. Strategic Planning meeting scheduled for September 2026.
- 4. Mountain View Seniors’ Housing**
 - Special Board Meeting May 26,2026; Next meeting June 25, 2026.

Motion 207/26 Motion by Councillor Selanders to accept all Committee Reports as information.
CARRIED

COUNCILLOR REPORTS:

- 1. Councillor Ball**
 - Provided a verbal report.
 - Completed POPA training course.
 - May 19, 2026, attended Policies and Priorities Committee meeting.

- Looking forward to Heritage fest.

2. Councillor Fricke

- Provided a verbal report.
- May 12, 2026, Completed POPA training course.
- May 12, 2026, attended dinner meeting with CESD Board and Administration.
- May 19, 2026, attended Policies and Priorities Committee meeting.

3. Councillor Roberts

- Provided a verbal report.
- Completed POPA training course.
- May 12, 2026, attended dinner meeting with CESD Board and Administration.
- May 13, 2026, attended Mountain View Regional Water Commission meeting.
- May 19, 2026, attended Policies and Priorities Committee meeting.
- May 22-23, 2026, attended and volunteered at Mountain View Aggie days.

4. Councillor Selanders

- Provided a verbal report.
- Completed POPA training course.
- May 22, 2026, attended Mountain View Aggie Days.

5. Councillor Tolley

- Provided a verbal report.
- May 12, 2026, attended dinner meeting with CESD Board and Administration.
- May 19, 2026, attended Policies and Priorities Committee meeting.

6. Councillor Wilcox

- Provided a verbal report.
- Completed POPA training course.
- May 12, 2026, attended dinner meeting with CESD Board and Administration.
- May 19, 2026, attended Policies and Priorities Committee meeting.
- May 19, 2026, attended Inter-agency meeting.
- May 21, 2026, attended Parkland Library Board meeting.
- May 22, 2026, met with Library Manager to go over Bill 50
- May 23, 2026, attended Mountain View Aggie Days.

7. Mayor Allan

- Provided a verbal report.
- Completed POPA training course.
- May 12, 2026, attended dinner meeting with CESD Board and Administration.
- May 19, 2026, attended Policies and Priorities Committee meeting.

Motion 208/26

Motion by Councillor Wilcox to accept all Councillor Reports as information.

CARRIED

CORRESPONDENCE:

Nil

CAO'S REPORT:

- May 12, 2026, attended dinner meeting with CESD Board and Administration.
- May 13, 2026, met with Jason Drent regarding pick-up/drop-off locations at Carstairs Elementary School.
- May 13, 2026, met with ISL regarding Administration building Expansion.
- Setting up meetings for landowners for the proposed annexation.
- Open house June 2, 2026 at the Community Hall.
- Informed Council of the need for motions related to programming, commissioning, and PLC work for both the new and old reservoirs, as these items were not included in the contract bid.

Motion 209/26

Motion by Councillor Ball to authorize \$40,000 from Operation Stabilization Fund for the commissioning and programming for the PLC at the new water reservoir.

CARRIED

Motion 210/26

Motion by Councillor Roberts to authorize \$55,000 from the Operational Stabilization Fund for programming and a new PLC at the old reservoir.

CARRIED

- Update on the appeal for 693 10th Ave. The cleanup order was extended for removal for June 15, 2026; however, it was requested to extend to July 30, 2026.

Regular Council Meeting – May 25, 2026,

Councillor Fricke confirmed this would be the last time for forgiveness.

Motion 211/26

Motion by Councillor Selanders to extend the appeal period for the cleanup order for 693 10th Ave to July 30, 2026.

CARRIED

- Senior's housing Golf tournament notification, need to put a team together.
- Carport on Mainstreet has been demolished

Motion 212/26

Motion by Councillor Tolley to accept CAO's Report as information.

CARRIED

COUNCILLOR COMMENTS:

1. Councillor Tolley

-Lots of positivity regarding 4H.

2. Councillor Ball

-Found interest in a Tim Horton's news story hiring locals.

3. Councillor Fricke

-Received a complaint regarding garbage at the Golf Course.

-Update regarding the new Minister of Seniors, Community and Social Services.

-HSSEF Golf Tournament inquiry.

4. Mayor Allan

-Received concerns regarding the dog park and off-leash areas.

-Received complaint regarding garbage in Mandalay.

Motion 213/26

Motion by Councillor Fricke to accept Councillor Comments as information.

CARRIED

PUBLIC QUESTION PERIOD:

Nil

CLOSED MEETING:

Section 197 of the Municipal Government Act requires that Council and Council Committees conduct their meetings in public unless the matter to be discussed falls under one of the exceptions to disclosure outlined in Division 2 of Part 1 of the Access to Information Act (ATIA), including, but not limited to, matters related to business interests, personal privacy, individual or public safety, confidential evaluations, or law enforcement. (Sections 19 to 34).

1. Section 19-Disclosure Harmful to Business Interest of a Third Party

Motion 214/26

Motion by Councillor Wilcox that Council close the meeting to the public to discuss Business Interests of a Third-Party, as per Section 19, of the ATIA, at 8:11 p.m.

CARRIED

Motion 215/26

Motion by Councillor Ball to come out of the Closed Meeting session at 8:37 p.m.

CARRIED

NEXT MEETING:

Monday, June 8, 2026, at 7:00 p.m.

ADJOURNMENT:

Motion 216/26

Motion by Councillor Roberts to adjourn the meeting of May 25, 2026, at 8:38 p.m.

CARRIED

Dean Allan, Mayor

Rick Blair, CAO



Town of Carstairs

Program: Privacy Management Program
Policy No. 12-048-26

Date: Month XX, XXXX

Adopted by: Council

Purpose:

The Town of Carstairs is committed to protecting personal information in its custody or under its control in accordance with the Protection of Privacy Act (POPA) and its supporting regulations, and in a manner that supports the Town’s broader legislative responsibilities respecting access to information, records management, and municipal administration.

This Privacy Management Program (PMP) establishes a coordinated framework of policies, procedures, roles, definitions, and practices that supports compliance with applicable privacy-related legislation and Town bylaws, and ensures that personal information is managed throughout its lifecycle in a manner that is proportionate to the nature, sensitivity, and volume of information held by the Town. This includes maintaining an understanding of the personal information in the Town’s custody or control through documented information inventories and data mapping practices.

Legislative Authority:

This Privacy Management Program is established under the authority of the Protection of Privacy Act, Statutes of Alberta, 2024, c. P-28.5, including sections 25 and 26, which require public bodies to establish and maintain a Privacy Management Program and to conduct Privacy Impact Assessments where required.

This Program is also established under and supports compliance with the Access to Information Act, Statutes of Alberta, 2024, c. A-1.4, which governs access to records in the custody or under the control of the Town of Carstairs and informs the management of personal information contained within those records.

This Program further supports the Town of Carstairs’ general authority and administrative responsibilities under the Municipal Government Act, Revised Statutes of Alberta, 2000, c. M-26.

This Privacy Management Program is intended to support and operationalize the Town of Carstairs bylaws and policies related to privacy and access to information. In the event of a conflict between this Program and a bylaw, the provisions of the bylaw shall prevail.

Council authorizes Administration to make non-substantive administrative updates to the Privacy Management Program as required to maintain legislative compliance and operational effectiveness.

Scope:

This Privacy Management Program applies to all Town of Carstairs departments, programs, and municipal operations, and to all employees, elected officials, contractors, volunteers, and third-party service providers acting on behalf of the Town. It applies to all personal information in the custody or under the control of the Town of Carstairs, regardless of format, including physical and electronic records.

This Program operates in conjunction with, and is supported by, applicable Town of Carstairs bylaws and policies related to access to information, privacy, records management, information security, and electronic communications.

Definitions:

“**Access Request**” means a request for records made under the Access to Information Act.

“Access to Information Act” or “ATIA” is the Alberta legislation that provides the public with a right of access to records in the custody or control of public bodies, subject to limited and specific exceptions.

“Breach” or “Privacy Breach” means unauthorized or accidental access to, collection of, use of, disclosure of, or loss of personal information.

“Chief Administrative Officer” or “CAO” means the individual appointed by Council as the Chief Administrative Officer of the Town of Carstairs under section 205 of the MGA.

“Complaint” means an expression of concern from an individual regarding the Town of Carstairs’ handling of personal information, including alleged noncompliance with POPA or this Privacy Management Program.

“Custody or control” has the same meaning as under section 4 of ATIA, including records held by Town employees, contractors, or service providers on behalf of the Town.

“Disposition” means the final handling of records, including secure destruction, deletion, or transfer to archives, in accordance with approved records retention and disposition schedules.

“Employee” includes all employees, elected officials, contractors, volunteers, and any other individuals acting on behalf of the Town of Carstairs.

“Municipal Government Act” or “MGA” means the Alberta legislation, Revised Statutes of Alberta, 2000, c. M-26, that governs the incorporation, governance, powers, and administration of municipalities and municipal authorities in Alberta.

“Office of the Information and Privacy Commissioner” or “OIPC” is an independent Officer of the Legislature of Alberta responsible for overseeing compliance with access to information and privacy requirements.

“Personal information” has the same meaning as defined in section 1 of the Protection of Privacy Act, including information about an identifiable individual.

“Personal Information Inventory” means a structured and maintained record that identifies and describes the personal information holdings of the Town of Carstairs, including the type of personal information, the purpose for which it is collected, legal authority, location, access, use, disclosure, retention, and disposal practices.

“Privacy Impact Assessment” or “PIA” means a documented assessment required under section 26 of POPA that identifies and evaluates potential privacy risks associated with a proposed or modified program, service, or initiative and sets out measures to mitigate those risks.

“Privacy Management Program” is the program required under section 25 of the Protection of Privacy Act and is a structured set of policies, procedures, and controls implemented by a public body to ensure ongoing compliance with personal information protection obligations.

“Privacy Officer” is the person designated by the Town of Carstairs to support accountability under the Privacy Management Program required by section 25 of the Protection of Privacy Act (POPA), including training, compliance, and monitoring.

“Protection of Privacy Act” or “POPA” is legislation that governs how public bodies collect, use, disclose, and protect personal information.

“Public Body” has the same meaning as set out under POPA and includes the Town of Carstairs and its departments and offices.

“Record” has the same meaning as defined in section 1 of the Access to Information Act and includes recorded information in any form.

“Security Classification System” is the framework used by the Town of Carstairs to classify information based on sensitivity and risk, and to apply appropriate safeguards.

“Third-Party Service Provider” refers to an external person or organization that collects, uses, stores, or processes personal information on behalf of the Town.

Roles and Responsibilities:

a. Council

Council is responsible for providing governance oversight and supporting compliance with POPA by ensuring that appropriate privacy-related bylaws, policies, and resources are in

place to manage privacy risks and support the effective operation of the Town of Carstairs' Privacy Management Program.

b. Chief Administrative Officer (CAO)

The Chief Administrative Officer (CAO) is responsible for ensuring the implementation and enforcement of this Privacy Management Program and supporting bylaws and policies, and for promoting a culture of privacy awareness and privacy risk management across the organization.

c. Privacy Officer

Applicable Policy:

- i. *Policy No. 12-042-26 Privacy Officer Policy*

The CAO of the Town of Carstairs has designated the following position as its Privacy Officer:

Title: Manager of Legislative Services

The Privacy Officer is responsible for overseeing the Town's privacy governance and risk management framework and administering this Privacy Management Program in accordance with POPA and applicable Town bylaws and policies.

The Privacy Officer provides advice and guidance to staff and leadership, coordinates and reviews Privacy Impact Assessments where required, oversees the management of access and correction requests, privacy complaints, and privacy breaches, maintains required privacy documentation, coordinates privacy training and awareness, and reports material or unresolved privacy risks to the CAO.

d. Directors and Managers

Directors and Managers are responsible for identifying programs, services, systems, or initiatives within their areas of responsibility that may involve the collection, use, disclosure, or protection of personal information and for ensuring that Privacy Impact Assessments are completed where required.

Directors and Managers shall cooperate with the Privacy Officer and are responsible for implementing approved privacy risk mitigation measures as part of program design, implementation, and ongoing operations.

e. Employees and Authorized Users

All employees, elected officials, contractors, volunteers, and other authorized users acting on behalf of the Town of Carstairs are responsible for considering privacy requirements in the performance of their duties, complying with POPA, this Privacy Management Program, and all applicable bylaws and policies, and consulting with the Privacy Officer when planning or modifying activities that involve personal information.

Privacy Management Framework:

This Privacy Management Program is supported by documented procedures, operational guidelines, and tools that translate policy requirements into consistent practices. Procedures may be maintained separately from this Program and are implemented, monitored, and updated by the Privacy Officer in collaboration with departments, based on risk, complexity, and legislative requirements.

a. Collection, Use, and Disclosure

Applicable Bylaw:

- i. *Bylaw No. 2069 Access to Information and Privacy Head and Fees Bylaw*

Applicable Policies:

- ii. *Policy No. 12-014-26 Access to Information and Privacy Administration Policy*
- iii. *Policy No. 12-026-26 Tax Information Disclosure Policy*
- iv. *Policy No. 12-035-26 Internet Privacy Policy*

The Town of Carstairs collects, uses, and discloses personal information only where authorized by legislation and for legitimate municipal purposes, in accordance with POPA and ATIA, and in a manner that is fair, transparent, and consistent with approved bylaws and policies.

Collection, use, and disclosure practices are informed by documented information inventories and are limited to what is necessary to achieve identified and authorized purposes.

Collection, use, and disclosure practices are supported by documented procedures that address lawful authority, notice requirements, use limitation, disclosure decision-making,

approval and escalation processes, and documentation of disclosures, including disclosures to third parties, service providers, and other public bodies, as well as disclosures through formal access request processes where required.

b. Records Retention and Disposition Policy

Applicable Bylaw:

- i. *Bylaw No. 2070 Records Retention and Disposition Bylaw*

Applicable Policy:

- ii. *Policy No. 12-028-26 Records Retention and Disposition Policy*

Applicable Procedure:

- i. *Records Retention and Disposition Procedure*

Records, including records containing personal information, are managed throughout their lifecycle and are retained only for the periods authorized by approved retention schedules and necessary to satisfy legislative, operational, legal, accountability, and historical requirements.

Records disposition, including secure destruction or transfer to archival custody where applicable, is carried out in accordance with the Records Retention and Disposition Bylaw, approved retention schedules, and supporting policies. Records held by third parties on behalf of the Town remain subject to these requirements.

Documented procedures support records classification, retention scheduling, secure storage, and authorized disposition, including segregation of duties, approval processes, and documentation of destruction activities.

No records may be destroyed, altered, or disposed of where a records hold exists, including where records are required for an access request under ATIA, a correction request, a privacy complaint or investigation, litigation, audit, or other legal or regulatory matter.

Disposition activities are documented to support accountability and compliance, including the authority for destruction and the date and nature of records disposed of.

c. Security Classification and Safeguards

Applicable Policy:

- i. *Policy No. 12-043-26 Security Classification System*

Applicable Procedure:

- i. *Information Classification and Handling Procedure*

The Town of Carstairs applies a standardized security classification system to ensure that information is protected against unauthorized access, use, disclosure, modification, or destruction, and that safeguards are proportionate to the sensitivity and risk associated with the information.

Information is classified based on sensitivity and risk at the time it is created or received and throughout its lifecycle, including public, internal, confidential, and restricted information.

Classification determines appropriate access controls, storage requirements, transmission methods, and disposal practices, in accordance with section 10(1) of the Protection of Privacy Act and approved Town policies.

The Town applies reasonable administrative, technical, and physical safeguards to protect personal information, including role-based access controls, secure handling practices, and access review processes, and reviews those safeguards periodically in response to risk, operational change, or legislative requirements.

Suspected or actual misclassification, unauthorized access, use, disclosure, or loss of information is managed in accordance with the Town's incident and privacy breach management practices.

Security classification and safeguard requirements are supported through mandatory training and ongoing awareness activities under the Town's Privacy Management Program.

Safeguard procedures address access management, authentication, physical security, system controls, secure transmission, incident logging, and contractor access, and are reviewed periodically based on risk, technology changes, and operational needs.

d. Personal Information Inventory and Information Mapping

The Town of Carstairs maintains a Personal Information Inventory to support accountability, transparency, and effective privacy risk management under its Privacy Management Program.

The Personal Information Inventory identifies and documents the personal information collected, used, disclosed, and retained by the Town across its programs, services, and systems. The inventory includes, where applicable, the legal authority for collection, the purpose of use, categories of individuals, data elements, storage locations, access controls, retention requirements, and disclosure practices, including disclosures to third-party service providers.

The Personal Information Inventory supports compliance with the Protection of Privacy Act by:

- i. Enabling informed decision-making regarding collection, use, and disclosure of personal information;
- ii. Supporting the completion and updating of Privacy Impact Assessments;
- iii. Facilitating timely and accurate responses to access and correction requests under ATIA;
- iv. Assisting in the identification and mitigation of privacy risks;
- v. Supporting breach response and impact assessment activities; and
- vi. Promoting data minimization, retention limitation, and accountability practices.

Departments are responsible for working with the Privacy Officer to ensure that their personal information holdings are accurately reflected in the Personal Information Inventory and are kept current in response to program, system, or legislative changes.

The Personal Information Inventory is maintained by the Privacy Officer and is reviewed periodically as part of the Town's ongoing privacy risk management and program monitoring activities.

e. Privacy Risk Management

Applicable Policy:

- i. *Policy No. 12-045-26 Privacy Risk and Impact Management Procedure*

Applicable Procedure:

- i. *Privacy Impact Assessment (PIA) Procedure*

The Town of Carstairs identifies, assesses, and manages privacy risks throughout the lifecycle of its programs, services, systems, and initiatives, including during planning, implementation, operation, and review. Privacy risk management activities are proportionate to the sensitivity, volume, and use of personal information involved. Privacy risk identification activities are informed by the Town's Personal Information Inventory and related information mapping practices.

Privacy Impact Assessments are conducted where required under section 26 of POPA, including for new initiatives and for significant changes to existing programs, services, or systems involving the collection, use, disclosure, retention, or protection of personal information.

The determination of whether a Privacy Impact Assessment is required, and the appropriate scope of the assessment, is made by the Privacy Officer in consultation with the relevant Director or Manager and the Chief Administrative Officer, where appropriate.

The implementation of initiatives involving personal information may be deferred, modified, or restricted until identified privacy risks have been appropriately assessed and mitigation measures have been implemented in accordance with approved policy.

Completed Privacy Impact Assessments and related documentation are maintained in accordance with the Town's records retention and disposition requirements, and privacy risks and mitigation measures are reviewed periodically and when significant changes occur to ensure continued compliance with POPA.

f. Privacy Breach Management

Applicable Policy:

- i. *Policy No. 12-046-26 Privacy Breach Management Policy*

Applicable Procedure:

- i. *Privacy Breach Management Procedure*

A privacy breach occurs when personal information is collected, accessed, used, disclosed, altered, or destroyed without authorization, whether intentionally or inadvertently.

The Town of Carstairs maintains a coordinated privacy breach management framework to prevent, identify, report, contain, assess, investigate, and remediate privacy breaches involving personal information in its custody or control.

Privacy breaches are assessed in accordance with sections 10(1) and 10(2) of the Protection of Privacy Act, including an assessment of whether the breach presents a real risk of significant harm to affected individuals.

The Privacy Officer coordinates breach response activities, including containment, risk assessment, investigation, and determination of notification requirements, and escalates significant or high-risk breaches to the Chief Administrative Officer for oversight and authorization, where required.

Where required by legislation, notification is provided without unreasonable delay to affected individuals, the Office of the Information and Privacy Commissioner of Alberta, and other parties prescribed by law.

All privacy breaches, including those that do not require notification, are documented and retained in accordance with approved records retention and disposition requirements, and corrective and preventative measures are implemented to reduce the likelihood of recurrence.

Breach management procedures define internal reporting requirements, escalation pathways, roles during breach response, documentation standards, post-incident review activities, and corrective actions to prevent recurrence.

g. Privacy Complaints and Requests

Applicable Policy:

- i. *Policy No. 12-044-26 Privacy Complaints and Requests Handling*

Applicable Procedure:

- i. *Privacy Complaints and Access Requests Procedure*
- ii. *Correction of Personal Information Procedure*

Individuals may submit privacy complaints respecting the handling of personal information under the Protection of Privacy Act, as well as requests for access to records and related inquiries under the Access to Information Act, by contacting the Privacy Officer or designate.

The Town of Carstairs will acknowledge complaints and requests, assess their nature and scope, and respond in accordance with legislated timelines under POPA and ATIA. Where appropriate, reasonable efforts will be made to resolve matters informally and promptly.

The Privacy Officer coordinates the receipt, assessment, investigation, and resolution of complaints and requests and may escalate significant or sensitive matters to the Chief Administrative Officer for oversight or authorization, where required.

Individuals are informed of their right to make a complaint or request a review by the Office of the Information and Privacy Commissioner of Alberta where matters cannot be resolved to their satisfaction.

All privacy complaints, access requests, and related correspondence are documented and retained in accordance with the Town's Records Retention and Disposition Bylaw and approved retention schedules to support accountability, compliance monitoring, and continuous improvement.

h. Training and Awareness

Applicable Policy:

- i. *Policy No. 12-047-26 Mandatory Privacy Training and Awareness*

Applicable Procedure

- i. *Privacy Training and Awareness Procedure*

Privacy training is mandatory for all employees, Members of Council, contractors, volunteers, service providers, and other authorized users whose duties involve the collection, access, use, disclosure, retention, or protection of personal information or records.

Training addresses legislative obligations under POPA and ATIA, confidentiality expectations, appropriate collection, use, disclosure, retention, and safeguarding of information, breach identification and reporting requirements, and individual responsibilities under the Town's bylaws, policies, and procedures.

Training is completed upon onboarding and refreshed periodically and may be supplemented by role-based or specialized training where duties involve higher privacy risk or exposure.

Records of completed privacy training are maintained to support compliance monitoring and accountability under the Town's Privacy Management Program, and training requirements are reviewed periodically to ensure continued alignment with legislative, policy, and risk changes.

Transparency and Public Availability:

A copy of this Privacy Management Program will be provided upon request and will be made publicly available on the Town of Carstairs website.

Information may be withheld where disclosure could reasonably be expected to compromise the security or protection of personal information.

Review, Assessment, and Updates:

Applicable Procedure

- i. *PMP Review, Monitoring, and Continuous Improvement Procedure*

This Privacy Management Program will be reviewed and updated at least once every three years, and more frequently where required to address changes in legislation, programs, technology, organizational structure, or identified privacy risks.

The Privacy Officer is responsible for ongoing monitoring and periodic reporting on the effectiveness of the PMP, including identifying gaps, risks, and opportunities for improvement. Findings from monitoring, reporting, audits, and privacy incidents will be used to support continuous improvement.

Reviews will ensure that policies, procedures, safeguards, and privacy risk management practices remain current, effective, and aligned with legislative requirements.

All updates, beyond non-substantive administrative updates, to the PMP will be documented, approved by Council and communicated to staff in a timely manner.

Detailed processes for review, monitoring, reporting, and updates are set out in the associated procedures.

Related Legislative Authorities, Bylaws, Policies and Procedures:

a. Legislation

- i. *Protection of Privacy Act (POPA)*
- ii. *Access to Information Act (ATIA)*
- iii. *Municipal Government Act (MGA)*

b. Town of Carstairs Bylaws

- i. *Bylaw No.2069 Access to Information and Privacy Head and Fees Bylaw*
- ii. *Bylaw No. 2070 Records Retention and Disposition Bylaw*
- iii. *Bylaw No. 2071 Electronic Transmission of Documents Bylaw*

c. Town of Carstairs Policies

- i. *Policy No. 12-042-26 Privacy Officer*
- ii. *Policy No. 12-014-26 Access to Information and Privacy Administration*
- iii. *Policy No.12-044-26 Privacy Complaints and Requests Handling*
- iv. *Policy No.12-046-26 Privacy Breach Management*
- v. *Policy No. 12-045-26 Privacy Risk and Impact Management*
- vi. *Policy No. 12-047-26 Mandatory Privacy Training and Awareness*
- vii. *Policy No. 12-043-26 Security Classification System*
- viii. *Policy No. 12-028-26 Records Retention and Disposition*
- ix. *Policy No.12-026-26 Tax Information Disclosure*
- x. *Policy No. 12-035-22 Internet Privacy*
- xi. *Policy No. 12-041-26 Communications and Social Media*
- xii. *Policy No. 11-031-26 Council Tech and Device*

d. Town of Carstairs Procedures

- i. *Records Retention and Disposition Procedure*
- ii. *Information Classification and Handling Procedure*
- iii. *Privacy Impact Assessment (PIA) Procedure*
- iv. *Privacy Breach Management Procedure*
- v. *Privacy Complaints and Access Requests Procedure*
- vi. *Privacy Training and Awareness Procedure*
- vii. *PMP Review, Monitoring, and Continuous Improvement Procedure*

Contact Information:

For privacy questions, access requests, or complaints:

Privacy Officer
Town of Carstairs
Phone: (403) 337-3341

Compliance Note:

This Privacy Management Program fulfills the requirements of section 25 of POPA and section 6 of the Protection of Privacy (Ministerial) Regulation and reflects the Town of Carstairs' size, services, and information holdings.

End of Program

/Carstairs____/XX

Signatures:

M____/XX Policy No. XX-XXX-XX adopted at Council on Month XX, XXXX

Mayor, Dean Allan

CAO, Rick Blair