



ADM-36 Access to Information and Protection of Privacy Policy

Department: Administration

POLICY OBJECTIVE:

To ensure the County of St. Paul No. 19 collects, uses, discloses, protects, disposes, and, where appropriate, preserves information gathered and generated in the course of operating the programs and services of the County in a manner that is consistent with the *Access to Information Act* (ATIA) and *Protection of Privacy Act* (POPA).

1.0 POLICY STATEMENTS:

- 1.1 The County of St. Paul is committed to streamlining services and ensuring that information is available to members of the public, supporting open and transparent government.
- 1.2 The County has a responsibility to protect the Personal Information that is in its Custody or Control.
- 1.3 As a local public body, the County is subject to the ATIA and as such, any person has a right of access to the records in the Custody or Control of the County. This Policy sets out the framework for how the County receives and processes access to information (ATI) requests and ensures that the County makes every reasonable effort in fulfillment of its Duty to Assist as set out in the ATIA and the Access to Information Act Regulations (ATIA Regulations).
- 1.4 This policy shall apply to all County employees, departments and all its records.

2.0 DEFINITIONS:

- 2.1 "Access" means the ability or right of a person to view or obtain copies of Records that are in the Custody or under the Control of the County. This includes the opportunity to inspect, review, and/or reproduce the information contained within such Records, subject to any exceptions outlined in the ATIA.
- 2.2 "Active Disclosure" means information that is routinely posted to the website, social media, community posters, orally, newspapers and other publications.
- 2.3 "Applicant" means a person who makes a written access to information request under ATIA.
- 2.4 "ATIA" means the *Access to Information Act*, SA 2024, c A-1.4, as amended or replaced.

COUNTY OF ST. PAUL NO. 19

Our Mission - To create desirable rural experiences



- 2.5 “ATIA Regulations” means the *Access to Information Act Regulation*, Alta Reg 133/2025 enacted under the *Access to Information Act*.
- 2.6 “Control” means the authority to manage the Record, including restriction, regulating, and administering the use, disclosure or disposition of a Record.
- 2.7 “County” means the County of St. Paul No. 19.
- 2.8 “Custody” means having possession of a Record, physically and/or digitally.
- 2.9 “Duty to Assist” means the statutory duty of the County to make every reasonable effort to assist an applicant of an ATI Request and to respond to each applicant, openly, accurately, and completely, including the prescribed duties set out in the ATIA Regulations.
- 2.10 “Employees” means those employed with the County, regardless of employment status, as well as any person who performs a service for the County as an appointee, volunteer, student, or under a contract or agency relationship.
- 2.11 “Formal ATI Request” means a request made under the *Access to Information Act* (ATIA).
- 2.12 “PM Regulations” means the *Protection of Privacy (Ministerial) Regulations*, Alta Reg 143/2025, as amended or replaced.
- 2.13 “POPA” means the *Protection of Privacy Act*, SA 2024, c P-28.5, as amended or replaced.
- 2.14 “Personal Information” means recorded information about an identifiable individual, including the categories of personal information defined in the ATIA.
- 2.15 “Records” means a record in any form, in which information is contained or stored, including information in any written, graphic, electronic, digital, photographic, audio or other medium, but does not include software or any mechanism that produces records.
- 2.16 “Routine Disclosure” means information that is requested on a regular basis, or material which is publicly available. For a complete listing see Schedule A.
- 2.17 This Policy further adopts the defined terms of the ATIA and POPA, and their associated regulations. To the extent there is any conflict between a defined term in this Policy and any Act or Regulation, the definition in the Act or Regulation shall prevail.

3.0 PROCEDURE:

- 3.1 ATI Requests must be made in writing, using the County’s Access to Information Request Form.
- 3.2 All ATI Requests received by the County must be forwarded directly to the ATIA Coordinator as soon as practicable.
- 3.3 If an ATI Request does not provide enough detail to enable the County to locate or identify a record within a reasonable time with reasonable effort, the County may request

COUNTY OF ST. PAUL NO. 19

Our Mission - To create desirable rural experiences



further information from the Applicant that is necessary to process the ATI Request, and the Applicant shall respond within 30 business days with the information being requested.

- 3.4 Access to County records will, wherever possible, be made available to the public as Routine Disclosure, in accordance with Section A, or via the County website, verbally, news releases, social media, newspapers or in person at the municipal office, where disclosure is authorized under the ATIA and POPA.
- 3.5 County staff may release records requested in accordance with Schedule A without first consulting the ATIA Coordinator.
- 3.6 If a person makes an ATI Request for their own personal information, County staff shall confirm their identity by reviewing a piece of government-issued identification and/or confirming their mailing address, prior to releasing the requested information.
- 3.7 If an ATI Request is made by a person for the personal information of a third party that is in the Custody or Control of the County, it must be accompanied by an authorization form signed by the third party consenting to disclosure of their personal information.
- 3.8 Fees shall be charged for responding to an ATI Request in accordance with County bylaw and the ATIA.
- 3.9 The ATIA Coordinator may disregard an ATI Request if responding to the request would unreasonably interfere with the operations of the public body on the basis that the request is repeated or systemic in nature, or if the request is made in an abusive, threatening, frivolous, or vexatious manner, or otherwise in accordance with ATIA.
- 3.10 If County staff receive a request for records and, after consulting Schedule A attached to this policy, are unsure of whether the record can be released, they shall contact the ATIA Coordinator for clarification, prior to releasing any information.

4.0 ADMINISTRATION RESPONSIBILITIES

- 4.1 Routine Disclosure requests are to be handled by the responsible department.
- 4.2 Each department will utilize Schedule A to identify records for Routine Disclosure.
- 4.3 ATI Requests will be acknowledged in a reasonable timeframe in accordance with corporate standards and as set out in the ATIA. Requests will be completed in a reasonable timeframe as determined by staff workload, and in accordance with the ATIA. As set out in the ATIA, the County must make every reasonable effort to complete a request no later than 30 business days, unless a time extension is sought under ATIA.

5.0 ATIA COORDINATOR RESPONSIBILITIES

- 5.1 Uphold the duties as required by the ATIA, including the Duty to Assist.

COUNTY OF ST. PAUL NO. 19

Our Mission - To create desirable rural experiences



- 5.2 Assist the Applicant in defining or clarifying information included in the ATI Request, in accordance with the ATIA. Where possible, communications by the ATIA Coordinator should use plain language.
- 5.3 Determine if a fee estimate for the records is applicable, based on the ATI Request's scope and timeframe.
- 5.4 Notify third parties, when necessary, as set out under the ATIA.
- 5.5 Comply with the time limit of 30 business days under the ATIA to respond to the ATI Request where possible, and request time extension(s), as necessary and in accordance with the ATIA.
- 5.6 Coordinate the search of responsive records.
- 5.7 Undertake a line-by-line review of responsive records and redact information in accordance with the ATIA and POPA.
- 5.8 In accordance with the ATIA and POPA, determine whether the applicant will receive full access, partial access, or refuse access to the requested records.
- 6.0 MANAGEMENT AND PROTECTION OF PERSONAL INFORMATION**
- 6.1 Personal Information under the Custody or Control of the County shall be managed by all County departments in compliance with its duties under the POPA and PM Regulations in a manner that is proportional to the volume and sensitivity of the personal information.
- 6.2 Disclosure of Personal Information shall only be for the purposes in which it was collected or compiled, or for a use consistent with that purpose, in accordance with the POPA.
- 6.3 Disposal of Personal Information shall be completed, ensuring the safe and secure disposal of all Personal Information is carried out in accordance with the County's Records Retention Bylaw.

Council Approval: September 11, 2012

Amended: July 23, 2024

Amended: August 11, 2026

COUNTY OF ST. PAUL NO. 19

Our Mission - To create desirable rural experiences



Schedule "A"

AD = Active Disclosure – Posted on Website

ATIA = ATI Request Form must be completed. Referred to ATIA Coordinator

RD = Routine Disclosure – Information is made available to the public without a written ATI Request and can be routinely available for release to the public, following the conditions listed in the chart below

Record Type	Access Method	Responsible Dept.	AD RD ATIA	Condition of Release
Agendas and Minutes of Council, Boards and Committees	Website	Admin	AD	Direct to website. <i>Excludes Closed Session material.</i>
Agreements/Contracts - Development - Easement - Right of Way - Encroachment - Lease(s)	County Office (s)	All	RD ATIA	Only the owner gets a copy. <i>Excludes draft or unsigned Agreements.</i>
Appointments to Committees and Board	Website	Admin	AD	Names can be released after the member is appointed. <i>Excludes personal information, unless member provides consent.</i>
Assessment Roll	County Office	Tax	RD	Property information (without names) can be viewed upon request. Info is provided freely to government officials.
Audited Financial Statements	Website	Finance	AD	Direct to website.
Bids & Tenders Results	County Office	All	RD ATIA	Direct to responsible dept. Only bidder names and summary

COUNTY OF ST. PAUL NO. 19

Our Mission - To create desirable rural experiences



				results can be released.
Budget	Website	Finance	AD	Direct to website. Excludes working documents
Bylaws	Website	Corp. Ser.	AD	Direct to website. <i>Excludes working documents</i>
Census	Website	Corp. Ser.	AD	Direct to website.
Council Remuneration	Website	Payroll	RD	Direct to website.
Election Results	Website	Corp. Ser.	AD	Direct to website.
Job Descriptions	County Office	Corp. Ser.	RD	Direct to Payroll. <i>Excludes employee names.</i>
Legal or other information subject to solicitor-client privilege or otherwise protected by POPA	County Office	ATIA Coordinator	ATIA	Direct to ATIA Coordinator. <i>Subject to POPA exclusions redaction of information/non-disclosure.</i>
Media Relations - Advertisements - Notices - Publications	Website	All Depts.	AD	Direct to website or responsible department.
Permits - Development - Building - Gas/Plumbing/Electrical	County Office	Planning	RD ATIA	Information can be released to the property owner. Third party requests limited to name and nature of permit.
Planning Applications - Public Hearing	Website	Planning	AD RD	Applications and discussion during public meetings are public information. Included in Council minutes.
Planning Documents - Statutory Plans - Zoning Bylaws	Website/ County Office	Planning	AD	Direct to website.

COUNTY OF ST. PAUL NO. 19

Our Mission - To create desirable rural experiences



				<i>Excludes drafts and working documents.</i>
Plans and Studies - Strategic Plans - Area Structure Plans - Municipal Development Plan	Website	All Depts.	AD	<i>Excludes draft and working documents</i>
Policies & Procedures	Website	Corp. Ser.	AD	Direct to Website. <i>Excludes draft or working documents and internal policies and procedures.</i>
Property/Land Files - Compliance Certificates	County Office	Planning	RD ATIA	Owner or authorized agent may review redacted file. Refer to ATIA Coordinator if requested by third party.
Property Taxes - Roll Numbers - Landowner's Name - Legal Description - Tax Rates - Statement of Taxes Paid	Website RD Website County Office	Tax All Depts. Tax	AD RD	Direct to WebMap. Provided if requestor has legal description. Cannot be provided if requestor only has landowner's name. Direct to website. Only provided to property owner or authorized agent.
Receipts	County Office	Corp. Ser.	RD	Receipts are provided to payee or account holder only.
Utility Rates	Website	Utilities	AD	Direct to website.