

Decision Note

Title:	Privacy Management Audit
Date Prepared:	February 2, 2026
Report To:	Audit Standing Committee
Councillor and Role:	Councillor Donnie Earle, Audit Standing Committee
Ward:	N/A

Decision/Direction Required:

To approve the Privacy Management audit report and the associated action plans put forth by management.

Discussion – Background and Current Status:

The Access to Information and Protection of Privacy Act, 2015 ("Act") is provincial legislation designed to foster a culture of openness and accountability in the public sector while protecting personal information and other sensitive types of information. It applies to all public bodies in Newfoundland and Labrador, including municipalities.

An Access to Information and Protection of Privacy ("ATIPP") function is in place at the City of St. John's ("City") to help implement the Act and City Policy 01-04-02, Privacy Management Policy. The policy, along with its related procedures, provides a framework for a variety of privacy-related activities throughout the organization.

The City's ATIPP function consists of two access and privacy analysts ("ATIPP Analysts"), who report to the City Solicitor. Furthermore, pursuant to the Act, the City Manager is designated as the head of the public body ("Head") for the City.

The Office of the City Internal Auditor recently completed an audit regarding privacy management at the City. The scope of the audit included a review of various City ATIPP processes to determine if they comply with the Act and/or internal City policy and procedure.

Audit testing and related procedures determined that the ATIPP function has a variety of effective and efficient processes in place to help the City fulfil its privacy-related obligations under the Act and meet its internal policy requirements. These include the implementation of a robust privacy

policy, which is supported by detailed procedures, guidance documents, and standardized templates and practices. The City also employs dedicated privacy professionals and ensures that privacy roles and responsibilities are clearly defined, documented, and fully formalized. Additionally, the City has implemented mandatory privacy training for all staff and undertakes awareness activities, such as postings on the City intranet, to further help ensure all employees are aware of their privacy obligations.

However, certain privacy processes at the City can be improved to ensure compliance with internal City policy and procedure. Foremost, the City has an opportunity to enhance the completeness of Preliminary Privacy Impact Assessments and Privacy Impact Assessments by effectively incorporating them into the forthcoming project review process. Steps can also be taken to collect all applicable Personal Information Banks and finalize a Personal Information Inventory for publication on the City's website. Similarly, ATIPP management should meet with management from the Archives and Records Management Division to determine which division should take ownership of the records safeguard plan requirement and ensure the process is completed.

These recommendations, and other observations outlined in the report, will assist the City in its continued efforts to protect personal information and meet its applicable privacy requirements under the Act.

The Office of the City Internal Auditor would like to thank the City Solicitor and ATIPP Analysts for their invaluable help and time during this audit.

Key Considerations/Implications:

1. Budget/Financial Implications:
 - There may be budget implications depending on how management decides to mitigate the risks highlighted in the report.
2. Partners or Interested Parties:
 - City Council.
 - All City employees.
 - The general public who provides personal information to the City.
3. Is this a New Plan or Strategy: No
 - If yes, are there recommendations or actions that require progress reporting?
 - If yes, how will progress be reported? (e.g.: through the strategic plan, through Cascade, annual update to Council, etc.)
4. Alignment with Strategic Directions:

A Sustainable City: Be financially responsible and accountable.

An Effective City: Work with our employees to improve organizational performance through effective processes and policies.

5. Alignment with Adopted Plans: N/A
6. Accessibility and Inclusion: N/A
7. Legal or Policy Implications:
 - Policies and/or procedures have been recommended throughout this report.
8. Privacy Implications:
 - There may be privacy implications depending on how management decides to mitigate the risks highlighted in the report.
9. Engagement and Communications Considerations:
 - There may be engagement and communications considerations depending on how management decides to mitigate the risks highlighted in the report.
10. Human Resource Implications:
 - There may be human resource implications depending on how management decides to mitigate the risks highlighted in the report.
11. Procurement Implications:
 - There may be procurement implications depending on how management decides to mitigate the risks highlighted in the report.
12. Information Technology Implications:
 - There may be information technology implications depending on how management decides to mitigate the risks highlighted in the report.
13. Information Management Implications:
 - There may be information management implications depending on how management decides to mitigate the risks highlighted in the report.
14. Other Implications:
 - There may be other implications depending on how management decides to mitigate the risks highlighted in the report.

Recommendation:

That Council approve the Privacy Management audit report and the associated action plans put forth by management.

Prepared by: Sean McGrath, Senior Internal Auditor

Approved by: Sean Janes, City Internal Auditor

Report Approval Details

Document Title:	Privacy Management Audit.docx
Attachments:	- Privacy Management Report.pdf
Final Approval Date:	Feb 4, 2026

This report and all of its attachments were approved and signed as outlined below:

Derek Coffey - Feb 4, 2026 - 12:04 PM