City of St. John's Corporate and Operational Policy Manual

Procedure Title: Privacy Assessment Procedures (PPIA and PIA)	
Authorizing Policy: Privacy Management Policy	
Procedure #: 01-04-02-03	
Last Revision Date: November 3, 2026	**Procedure Owner:** City Manager

1. Procedure Statement

This document provides information to assist Employees of the City of St. John's (**"City"**) in developing a Preliminary Privacy Impact Assessment (**"PPIA"**), and if required, a Privacy Impact Assessment (**"PIA"**).

2. Definitions

"Program Manager" means anyone responsible for leading the development and/or implementation of any new or substantially modified City project.

3. Procedure Requirements

3.1 Preliminary Privacy Impact Assessments

a) All PPIAs shall use the **PPIA Template**, available via the City Intranet.
b) For any new or substantially modified project, the responsible Program Manager shall complete a PPIA and forward it to the Access to Information and Protection of Privacy Coordinator (**"ATIPP Coordinator"**) prior to advancing any direction or decision notes for approval. If no direction or decision note is required, the PPIA shall be completed and forwarded to the ATIPP Coordinator prior to implementation of the program or project. Further information on completing a PPIA is detailed in the **Privacy Assessment Guidelines**.

c) If requested, the ATIPP Coordinator shall work with the Program Manager to assist in completing the PPIA.
d) The ATIPP Coordinator shall review the project for compliance with the Access to Information and Protection of Privacy Act, 2015, and advise in a report whether the project is approved, conditionally approved with minimal recommendations, or requires a PIA.
e) The ATIPP Coordinator shall follow up with the Program Manager on the implementation of any recommendations within the timeframe specified in the report.
f) If the ATIPP Coordinator advises that a PIA is required, a PIA shall be completed, in collaboration with the ATIPP Coordinator, **prior to the start** of the proposed program or project. The PIA recommendations shall be noted in the "Privacy Considerations" section of the direction/decision note, if one is required.
g) The completion of a PIA shall comply with the procedures in Section 3.2.

3.2 Privacy Impact Assessments

a) All PIAs shall use the City's PIA Template, available via the City intranet.
b) When the ATIPP Coordinator advises that a PIA is required, the Program Manager and the ATIPP Coordinator shall establish a timeline for the development of the PIA. Further information on completing a PIA is detailed in the **Privacy Assessment Guidelines**.
c) The PIA development team may include, but is not limited to the following members:
    i. Program Manager;
    ii. ATIPP Coordinator;
    iii. IT representative for projects with IT elements (e.g., website, database, etc.); and
    iv. Solicitor.
d) The Program Manager for the project shall lead the completion of the PIA with support and input from the other team members.
e) The ATIPP Coordinator shall review the document and complete the risk analysis and recommendations sections of the PIA.
f) Once the PIA is completed, it shall be submitted to the City Manager for final approval.

g) Following approval, the ATIPP Coordinator shall monitor the project at prescribed times to ensure any recommendations in the PIA have been implemented.

4. Application

These Procedures apply to any new or substantially modified project that is under the custody and/or under the control of the City, including (i) those developed by external contractors and/or consultants and (ii) offsite electronic systems (e.g., cloud solutions).

5. Responsibilities

5.1 The ATIPP Coordinator shall be responsible for:

a) Reviewing PPIAs and providing feedback in a timely manner;
b) Assisting in the development of PPIAs when requested;
c) Working with Program Managers and the PIA team to complete any required PIAs;
d) Providing analysis and recommendations of PIAs for the City Manager's review;
e) Monitoring projects with PPIAs and PIAs to ensure any recommendations have been appropriately implemented; and
f) Advising the City Manager if there are issues with the implementation of PPIA and/or PIA recommendations.

5.2 The Program Manager shall be responsible for:

a) Completing PPIAs when required and forwarding them to the ATIPP Coordinator prior to advancing any related direction/decision notes for approval, or otherwise, prior to implementation of the project;
b) Working with the ATIPP Coordinator and the PIA team to complete any required PIAs prior to implementation of the project; and
c) Implementing any recommendations resulting from PPIAs and/or PIAs.

5.3 Department Heads shall be responsible for:

a) Ensuring that Program Managers in their department (including any external consultants/contractors) complete required PPIAs and PIAs and include the appropriate information in direction/decision notes; and
b) Ensuring that PPIA and PIA recommendations are incorporated into the applicable project.

5.4 The City Manager shall be responsible for reviewing and approving/rejecting completed PIAs.

6. References

- Access to Information and Protection of Privacy Act, 2015
- 01-04-02 Privacy Management Policy
- Privacy Assessment Guidelines

7. Approval

- Procedure Owner: ATIPP Coordinator
- Procedure Writer: ATIPP Coordinator / Policy Analyst
- Date of Approval from:
  - Corporate Policy Committee: November 13, 2018
  - Senior Leadership Team : May 24, 2019

8. Monitoring and Contravention

a) The ATIPP Coordinator shall monitor the application of these Procedures.
b) Any contravention of these Procedures may be brought to the attention of the Department of Human Resources, the Office of the City Solicitor, the City Manager, and/or the Office of the Information and Privacy Commissioner for further investigation and potential follow up disciplinary or legal action, including dismissal.

9. Review Date

Concurrent with Policy.