



Title:	Consent to Use or Disclose Personal Information
Effective Date:	2026 June 01
Responsible Business Unit:	Law, Legislative Services & Security – Information & Privacy Services

1. PURPOSE

- 1.1 This Administration standard will be followed by The City of Calgary (“The City”) when obtaining an individual’s consent to use or disclose their personal information.
- 1.2 The rules for how The City is authorized to use and disclose the personal information in its custody or under its control are set out in the *Protection of Privacy Act* (“POPA”), *Protection of Privacy Regulation*, the *Protection of Privacy (Ministerial) Regulation* and other applicable law (collectively, “applicable law”).
- 1.3 Where the use or disclosure of an individual’s personal information is not otherwise authorized by applicable law, that individual may provide consent for The City to use or disclose their personal information.
- 1.4 Consent of a minor, under age 18, is not valid unless The City has determined, on reasonable grounds, that the minor has the capacity to understand the information relevant to providing consent and appreciates the consequences of providing consent.
- 1.5 Consent obtained under this Administration standard may be provided orally, electronically or in writing.
- 1.6 Following this Administration standard will result in:
 - a) Consent practices that are compliant with applicable law; and
 - b) Increased public trust through consistent and transparent practices, ensuring individuals understand how consent may be provided for The City to use or disclose an individual’s personal information.

2. APPLICABILITY

- 2.1 This Administration standard applies to all City employees except:
 - a) Elected officials;
 - b) Calgary Housing Corporation employees; and,
 - c) Calgary Police Service employees.

3. STANDARD

- 3.1 Employees will:
 - a) Require consent when required by applicable law, policy or as informed by legal advice prior to using or disclosing personal information when not otherwise authorized by applicable law;

- b) Ensure that consent obtained in any form is informed and voluntary;
- c) Ensure that consent specifies:
 - i. The personal information to which the consent relates;
 - ii. To whom the personal information may be disclosed and how the personal information may be used; and
 - iii. The date on which the consent is effective, and, if applicable, the date on which the consent expires.
- d) Advise the individual that their consent, once given, may be withdrawn at any time, and provide contact information for withdrawing consent;
- e) If consent is withdrawn, ensure that the use or disclosure of the personal information ceases immediately upon receipt of the withdrawal;
- f) Ensure that the form of consent accepted by The City (oral, electronic or written) is explicitly communicated to the individual;
- g) Authenticate the identity of the individual in accordance with policies and procedures established by the business unit;
- h) Accept written consent as valid if it is physically signed by the individual;
- i) Accept oral, electronic or written consent only when the individual provides all information specified in subsections 3.1(b) and 3.1(c);
- j) Retain the electronic or written consent so that it is accessible by The City and useable for subsequent reference, in accordance with The City's Corporate Records and Classification Retention Schedule ("CRCRS").
- k) Retain a recording of the oral consent so that it is accessible by The City and useable for subsequent reference, in accordance with The City's CRCRS.

3.2 Business Unit Managers will:

- a) Identify all business unit activities that require consent to use or disclose an individual's personal information;
 - i. For each business unit activity, establish a process for:
 - a. obtaining consent, including whether consent is to be obtained orally, electronically or in writing, ensuring the process is appropriate and proportionate to the sensitivity and identified level of risk of the personal information involved;
 - b. authenticating the identity of the individual which may include, valid:
 - Government-issued photo identification;
 - City account or secure login credential; or
 - A previously established identity verification process, such as DocuSign.

- b) Document all established processes for obtaining consent to use or disclose an individual's personal information.

4. CONSEQUENCES OF NON-COMPLIANCE

- 4.1 Employees who fail to adhere to this Administration standard may be subject to corrective action, including dismissal from employment, in accordance with the *Labour Relations Administration standard*, the *Exempt Staff Administration policy*, or the specific terms outlined in their employment contract.
- 4.2 In addition to any consequences from The City associated with not adhering to this Administration standard, failure to comply with the duties imposed by the Acts or otherwise acting in contravention of the legislation may lead to penalties or offences under *POPA*.

5. DEFINITIONS

5.1 In this Administration standard:

- a) **Business unit** means the City business unit obtaining oral, electronic or written consent from the individual providing consent;
- b) **Electronic** includes created, recorded, transmitted or stored in digital form or in any other intangible form by electronic, magnetic or optical means or by any other means that have similar capabilities for creation, recording, transmission or storage;
- c) **Electronic consent** means a consent executed by the individual using an electronic signature that can be linked or attached to an electronic record;
- d) **Electronic signature** means electronic information that a person creates or adopts in order to sign a record and that is in, attached to or associated with the record, including a digital signature created through a platform such as DocuSign or typing a name in a box that indicates that they are signing;
- e) **Employee** means City staff and any person who performs a service for The City as an appointee, volunteer, or student, or under a contract or agency relationship with The City as per *POPA*;
- f) **Individual** means the individual providing oral, electronic or written consent for The City to use or disclose that individual's personal information;
- g) **Informed consent** means meaningful consent in which individuals understand the nature, purpose and consequences of what they are consenting to;
- h) **Personal information** means recorded information about an identifiable individual;
- i) **Record** means a record of information in any form and includes notes, images, audiovisual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded or stored in any manner but does not include software or any mechanism that produces records; and

- j) **Record of oral consent** means an audio recording of the consent created by or on behalf of The City.

ASSOCIATED GOVERNANCE

- 5.1 This Administration standard outlines requirements in support of the *Protection of Privacy policy*.
- 5.2 This Administration standard conforms to applicable law.
- 5.3 If any provision of this Administration standard conflicts with any provision of applicable law, the provision of the applicable law prevails.

6. HISTORY

Action	Date	Approval	Description
New	2026 Jun 01	Head of the Local Public Body	New Standard developed during the review of the Protection of Privacy policy.