

TOWN OF AJAX POLICIES AND PROCEDURES



SUBJECT: Redaction of Personal Information from Public Records

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1. POLICY OBJECTIVE

1.1. Purpose

The Town's website contains personal information collected and maintained for the purpose of creating records that are available to the general public (e.g. Committee/Council material and minutes of public meetings).

Although most personal information collected by the Town is used and disclosed in accordance with the provisions of the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), personal information that is collected as part of a public meeting of Council, Committees of Council, or other statutory public meeting is not subject to the privacy rules established in *MFIPPA* and remains part of the public record of that meeting.

It is recognized that there may be occasions where it is appropriate to redact personal information from public records that are posted on the Town's website. The *Redaction of Personal Information from Public Records* Policy defines the process used for addressing such requests.

1.2. Guiding Principles

The Town strives to strike a balance between both the need and obligation to provide transparent and accountable government vs. the necessary protections for the disclosure and protection of personal information and the privacy of individuals.

In the interest of proper municipal governance, the Town will post material to the website, including personal information contained in documents and correspondence submitted for the consideration of Committee/Council and/or other Town departments, including information relating to delegations. Posted material includes audio/video recordings of public meetings.

2. SCOPE

2.1. This procedure applies, but is not limited, to personal information submitted to the Town through:

- Legislative and Information Services (Town Clerk)
- Planning and Development Services

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2.2. This procedure does not apply to personal information contained in audio/video recordings of Council/Committee meetings which are open to the public.

2.3. Definitions and Abbreviations

Personal information is defined in s.2 of MFIPPA as recorded information about an identifiable individual, including but not limited to, address, phone number or email address.

2.4. Responsibilities

The Legislative and Information Services Department holds overall responsibility for the Procedure. The Manager of Legislative Services/Deputy Clerk is the primary point of contact.

3. PROCEDURE

3.1. Guidelines

3.1.1. Application Requirements

a) Written Request

The Town, on written request from an individual using the appropriate form, will consider redacting from any document that is posted to the website:

- a) house number or apartment number (save and except statutory requirements)
- b) email address
- c) telephone number
- d) signature

All other personal information will remain in the absence of detailed and compelling evidence to justify its removal.

b) Identify the Information

The individual must identify with particularity the appearance of their information by meeting date and/or by specifying the entry or entries (e.g. paragraph number 'x' on page number 'y', or screen shot with highlighted portion of text).

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c) Provide Detail

The written request must be accompanied by detail as to the anticipated harm as a result of the information remaining on the Town's website. The request must articulate a particular or possible related harm(s) that reasonably relate to the appearance of the information.

3.2. Criteria

The Town will consider all requests on an individual basis, however a blanket request to remove information or a suggestion of harm that is so general as to apply to anyone will not be considered.

The Town will consider any evidence provided by the individual that they have, prior to submitting their personal information, taken steps to limit access to this information through public means.

The Town will also consider the nature of the information posted, the presence or absence of statutory provisions requiring disclosure of the information, and the availability of solutions that promote both public transparency and necessary personal privacy protection.

In the absence of compelling evidence, the Town will not consider redacting any personal information that is required to be submitted and made available to the public under a specific provincial statute.

Should the Town determine that redaction of personal information is appropriate based on an application, the information will only be redacted from the Town's online version of the public record. Permanent physical records of public meetings shall remain un-redacted in accordance with the requirements of provincial legislation.

3.3. Redacted Information and Internet Search Engines

If the Town amends its website content as a result of a request from an individual, the Town will not take any further action regarding the redaction of the information from any other source. Any further action of this nature must be undertaken by the individual.