

<b>Approved by:</b>	<b>Procedure Number:</b> <b>A17.02</b>
<b>Approval Date:</b> <b>March 24, 2016</b>	<b>Title:</b> <b>Public Record Redaction of Personal Information</b>
<b>Revision Date:</b>	

### **Purpose:**

The Municipality'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, Planning matters)

Although the personal information is properly collected, used and disclosed under the provisions of Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), it is recognized that there may be situations where it may be appropriate to remove certain personal information from the website.

The Public Record Redaction of Personal Information Procedure is used to process requests from the public for a redaction of personal information from the Municipality's website.

This document offers guidelines on the process used by the Municipality to consider requests of this nature.

### **Guiding Principle**

The Municipality 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 Municipality will post material to the website, including personal information contained in documents and correspondence submitted for the consideration of Committee/Council and/or other Municipal departments, including information relating to delegations. Posted material includes audio/video recordings of public meetings.

### **Scope**

This procedure applies but is not limited to personal information submitted to the Municipality through the Clerk's Department and the Planning Department.

# Departmental Procedure

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**Public Record Redaction of  
Personal Information**

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

## Definitions

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

## Responsibilities

The Clerk's Department holds overall responsibility for the Procedure. The Clerk is the primary point of contact.

## Procedure:

### 1.1 Application Requirements

#### Application Requirements

1) Written request

The Municipality, on written request from an individual, 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

In the absence of detailed and compelling evidence to justify its removal, all other personal information will remain.

2) 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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### 3) Provide the anticipated harm

The written request must be accompanied by details of the reasons for your request highlighting the anticipated harm as a result of the information remaining on the Municipality's website. The request must articulate a particular or possible related harm(s) that reasonably relates to the appearance of the information.

## **Criteria**

The Municipality 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 Municipality 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 Municipality 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 Municipality will not consider redacting any personal information that is required to be submitted and made available to the public under a specific provincial statute.

## **Redacted information and internet search engines**

If the Municipality does amend its website content as a result of a request from an individual, the Municipality 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.

## **Application**

### **1.2 Application Requirements**

Download a copy of the [Public Record Redaction Procedure application form \(PDF\)](#)

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**Title:  
Public Record Redaction of  
Personal Information**

Please return the completed form along with any attachments to:

Clerk's Department  
Municipality of Clarington  
40 Temperance Street  
Bowmanville, ON L1C 3A6

Or by email to: [clerks@clarington.net](mailto:clerks@clarington.net)