INFORMATION MANAGEMENT AND SECURITY STANDARD
Access and Sharing

Approved By: **Information Management and Security Governance Committee**
Effective Date: **2018/01/30**
Next Revision Due: **2021/01/30**
Department / BU: **Corporate Analytics and Innovation**

GENERAL

This standard is an extension of the Information Management and Security Policy. Consequences of non-compliance with this Standard are outlined in the Policy.

PURPOSE

The Information Management and Security Policy states, "City of Calgary information that meets requirements outlined in the associated Information Management and Security Standards will be made available to authorized users, including the public, either proactively or upon request."

This Standard outlines the requirements for access and sharing of City of Calgary information assets with authorized users.

INFORMATION ACCESS CATEGORIES

There are two different groups of authorized users that may be given access to City of Calgary information and therefore two categories that describe the type of access given:

1. Internal

   "Internal" describes access to City-owned information assets or systems within The City of Calgary. Internal parties include all City of Calgary staff.

2. External

   "External" describes access to City-owned information assets or systems by authorized users who are not part of The City of Calgary's Administration including, but not limited to: the public; citizens; contractors, consultants or service providers working on behalf of The City of Calgary; members of Council and Council staff; the Mayor and staff of the Office of the Mayor; boards, commissions and committees appointed by Council; Calgary Police Service; Civic Partners; other governmental organizations and researchers.

INTERNAL ACCESS AND SHARING

Information should be shared internally wherever possible and appropriate to further business activity and facilitate knowledge reuse.

To prevent inadvertent disclosure, authorized users must follow procedures and safe-guards identified in the *Information Security Classification Standard.*

Requesting Access

All internal requests for access to information will be directed to the appropriate information steward and should include a detailed business reason for requiring that information. The information steward shall grant access to or share the information, except in cases where there is no business need demonstrated.

An authorized user who believes that they have been unreasonably denied access to information may petition the *Information Management and Security Governance Committee* for resolution.

Personal Information

Authorized users with access to personal information must ensure that this information is properly safeguarded. A *Privacy Impact Assessment (PIA)* or *Access Impact Assessment (AIA)* or both must be completed before access to personal information is granted or personal information is shared. All security and privacy recommendations made as part of those assessments must be implemented and adhered to.

Personal information can only be used for the purposes for which it was originally collected. Access to personal information requires a documented business requirement creating the need for access. All personal information (electronic or paper) must be clearly identified as such.

Transmission Mechanisms

Information handling procedures as outlined in the *Information Security Classification Standard* must be followed. Wherever possible, to prevent duplication of information or insecure transmission, access should be granted by the information steward to the original source file with proper security and access controls in place, rather than providing copies.

The information steward can define the type of access (e.g. read-only or write access) to electronically stored information. If copies are provided (either electronically or in physical form), the authorized user is expected to secure those copies to the same level as the original information asset, as defined in the *Information Security Classification Standard.*

Cost Recovery

There will be no fees or 'chargeback' imposed on internal authorized users for providing access to information other than to recoup significant costs directly related to preparing that information for sharing.

EXTERNAL ACCESS AND SHARING

Information created and maintained by The City is often shared externally. Sharing of information for the benefit of citizens and the whole of The City of Calgary is encouraged but authorized users must follow proper procedures to manage risk.

External Access Management

With the exception of information classified as "Unrestricted" and provided through approved routine disclosure methods (e.g. Calgary.ca, City Archives, etc), all external access to, or sharing of, information is managed by Intellectual Property, Access and Marketing (IPAM) in Corporate Analytics and Innovation.

All legal agreements and related procedures are managed by IPAM. Authorized users, information stewards and City business units may not enter into external information sharing arrangements without the involvement of IPAM.

Records of legal agreements for external use are maintained by IPAM in accordance with corporate records management practices.

Requests for Access or Sharing of Information

Routine Disclosure of "Unrestricted" information is highly encouraged.

External requests for access to information will be directed to both IPAM and the appropriate information steward. If the external request does not fall under a pre-existing legal agreement, the information steward and IPAM will work together to provide the requested information. External requests for information may also be submitted in the form of a FOIP request.

Legal Agreements

A legal agreement is required for ALL external party access to information, except for information classified as "Unrestricted" and provided for non-commercial use. Agreements may take the form of a license agreement, an information sharing agreement or other such document defining the terms of use, duration, warranty, disclaimers, destruction notice and royalties/fees.

The following chart provides examples of when a legal agreement may or may not be required:

Agreement Required	Agreement Not Required
For a student or researcher for a thesis, research, teaching or instructional purposes, including analysis conducted at the request of a City department or affiliate	Any data required by statute (Statistics Act, Excise Tax Act) or legislation (Municipal Government Act, Local Authorities Election Act) in the course of an official request such as law enforcement, audit or election purposes
Provided for submission in a contest or for public display or publication	Personal data as it pertains to an individual's own business relationship with The City of Calgary, such as Property Tax, billing or account information
For information exchanges with other government agencies or organizations	Personal information related to the requestor
The disclosure of intellectual property either verbally, in the form of samples, as a proof-of-concept, at seminars and trade shows, or for testing and validation purposes	Physical maps, reports, data, photos or manuals classified as "Unrestricted". Copyright law still applies
Open Data	Freedom of Information and Protection of Privacy requests
Data for use on a non-City web site, electronic device (handheld, GPS, etc.)	Provided for legal proceeding
Sample Data	Electronic documents (maps, reports, and manuals) classified as "Unrestricted". Copyright law still applies
Data updates, refreshes or changes that are not specified in the data license agreement	
Access to databases or other City systems	

Note: The above examples are not intended to be exhaustive. Contact IPAM when in doubt.

Commercial Use

Information may only be provided to commercial parties under terms of a license. Commercial use is considered to be any use of information by any commercial entity or an individual's use of City information for the purpose of income generation (realized or potential). External parties interested in obtaining access to information for commercial use must be referred to IPAM for commercial licensing opportunities.

Security

Sharing of information externally carries unique security risks. If IPAM identifies that a *PIA* or *AIA* is required, access will be provided only after all concerns related to the assessment(s) have been satisfied.

Personal Information

Personal information must never be exchanged externally, including with municipal partners, without prior authorization of the FOIP Office and completion of a PIA. Personal information can only be used for the purposes for which it was originally collected.

External Access Mechanisms

IPAM, in consultation with the information steward, determines the appropriate access mechanism for external access to information. Information may be licensed but not sold. Information handling as outlined in the Information Security Classification Standard must be followed. New access mechanisms or methods not outlined below may require approval by Corporate Security.

External Access to "Unrestricted" Information

Proposed Use	Access Mechanism
Information Purposes Only	• Routine Disclosure • Calgary.ca • 3-1-1 • Electronic and hard copy disclosure
Any Use including Commercial	• Open Data • CITYonline • Executed Licence Agreement • Corporate Records Archives

External Access to "Confidential" Information

Proposed Use	Access Mechanism
Any Use including Commercial	• CITYonline • Executed Licence Agreement
Contractors/Consultants	Approved vendors, contractors and consultants that do not have an active *Master Consulting Terms and Conditions* (MCTC) or *Professional Services Terms and Conditions* (PSTC) agreement must enter into a Vendor Data license agreement or non-disclosure agreement for each project to receive City of Calgary information.
Student, Researchers and Education Instructions	Executed license agreement
Information (tradeshows, seminars, samples, testing etc)	Legal Agreement or waiver reviewed by IPAM

External Access to "Restricted" Information

Proposed Use	Access Mechanism
Any Use	External access is NOT provided to information classified as Restricted.

Online (Calgary.ca, Open Data, CITYonline and CalgaryTransit.com)

City divisions providing public access to information via the Internet or other electronic methods must ensure that the information provided is:

- On a platform that is secure to industry standards in order to prevent unauthorized data mining;
- Covered by a terms of use in order to limit The City's liability regarding the accuracy of the Information provided, quality, delivery, or other issues;
- Permissible for disclosure under the Freedom of Information and Protection of Privacy Act or other legislation and that an approved Impact Assessment exists if required; and
- Referencing "The City of Calgary, Innovation, Data & External Access" as the contact for licensing.

Information may be provided through calgary.ca, data.calgary.ca, cityonline.calgary.ca or CalgaryTransit.com. The respective license agreements apply to the use of information supplied through each platform.

Fees

Fees, including royalty payments, may be applied to external access requests; however whenever possible, information will be provided at no cost.

Fees may be applied to requests for information assets classified as "Confidential". The information steward, along with IPAM, will calculate these fees based on market value. If the market value of the information is less than the potential societal benefits of providing the information, The City will provide the information to requestors at no charge.

Fees may be applied to requests for information classified as "Unrestricted". These fees will not exceed the distribution cost and whenever possible the information will be provided at no charge, typically through routine disclosure mechanisms such as the Open Data Catalogue.

Where appropriate, distribution of information may require royalty or payment schedules to The City. Distribution of revenues from information licensing is the responsibility of the City Treasurer.

In any instance where information is available for a fee, IPAM has the authority to grant a fee waiver if it is deemed to be in The City's best interests to supply the information at no cost. A legal agreement will still be required.

FOIP Requests

All requests for information made through a *Freedom of Information and Privacy Act* request ("FOIP request") are done so under the provisions granted therein and may supersede those outlined in the *Information Management and Security Policy* and its associated Standards.

RESOURCES

Refer to the **Administration Policy Library** for the following:

Information Management and Security Policy

Corporate Records Management Policies and Program

REVISION HISTORY

Review Date	Description
2018 / 01 / 30	New Access and Sharing Standard reviewed and approved by Information Management and Security Governance Committee.