



Office of the Information and
Privacy Commissioner of Alberta



Goal 1: Enhancing internal processes to support our legislative mandate and improve timelines

In Business Plans 2023-2026 and 2024-2027, we identified two priorities associated with Goal 1 which will remain our priorities for 2025-28 as we continue our work to achieve this goal. Below is the progress made in 2024-25 regarding both priorities.

Priority 1: Tackling backlogs meaningfully

Mediation and inquiry files

In May 2023, the office restructured to create one case management stream by combining the intake function with case resolution and compliance support. The Assistant Commissioner, Case Management, is responsible for overseeing the management of case files from the time a complaint or request for review (RFR) is made to the Office of the Information and Privacy Commissioner (OIPC) to the time the file either closes or transitions to inquiry. As part of this work, we have established a gatekeeping procedure at intake and for case file transfer to inquiry.

The Case Resolution (CR)¹ team was established to focus on informal settlement of complaints and RFRs. In early 2023, we launched a project to review the processes used by this team and its predecessor and designed a strategy to reduce the time it would take to settle a matter by changing the settlement process.

On April 1, 2024, the CR team launched a new settlement process to focus on informal settlement of complaints and RFRs. CR moved away from written submissions and a findings-style process toward the use of verbal discussions between the parties, which is more in line with the mediation-style process that is anticipated by the legislation. As of November 2024, the new process has been operational for six months. Efforts to identify issues and speak to applicants and complainants at an early stage has resulted in an increase of closures at intake. Since the start of the process in April to the end of October 2024, 125 files were closed at this stage.

CR has also instituted a refer-back process for issues that concern only questions of whether the public body, custodian or organization conducted an adequate search for the records and for complaints regarding collection, use or disclosure of personal or health information. This allows the custodians, public bodies, or organizations to

respond directly to an applicant or complainant before our office is involved. To date, this has resulted in a modest increase of file closures at intake.

These increased gatekeeping mechanisms function to provide people with reasonable expectations about what the OIPC can or cannot do and they are told this information early in the process. It also allows the file to proceed into the settlement stage with the issues clearly defined, saving time for all parties. Also, the public body, custodian or organization has the issues clearly in front of them at the outset, which also provides them with greater opportunity to respond.

Additional gatekeeping has been added to the transition of a file to the inquiry phase, including ensuring that work on those files that proceed to inquiry is limited to the non-settled issues.

Despite our best efforts to resolve matters in a shorter time frame using our new expedited processes, we are seeing some delays due to parties failing to provide CR investigators with records or input related to the matter under review. In 2025-26, we will be monitoring these delays and strictly enforcing deadlines, including moving files to inquiry when parties are not cooperative in trying to settle a matter through this process. Additional strategies include transitioning to automated intake forms to reduce data entry, shortening parties' response times for producing records and input, requirements to produce schedules of records, and strict enforcement of our intake requirements and case resolution processes.

The transition of request for time extension (RFTE) files to another team was completed May 1, 2024. New RFTE forms and guidance were released in early 2024 to streamline the process. The CR team remains available for consultation to the other team, but the shift of this responsibility away from CR freed up resources within CR to focus on case resolution work.

¹ In the past, this team was called Mediation and Investigation or the Informal Case Resolution team.

As of November 2024, the time it takes to move a file through the settlement phase in CR is approximately one to one-and-a-half years. Our goal is to eliminate the backlog and reduce these timelines. However, this is proving to be challenging, given that new files continue to come in while we try to address backlog.

As noted in Goal 2, Priority 1 below, further procedural revisions and streamlining are being developed to respond to the anticipated impacts of the repeal of the *Freedom of Information and Protection of Privacy Act* (FOIP Act) and its replacement by the *Access to Information Act* (Bill 34) and the *Protection of Privacy Act* (Bill 33) that are anticipated to come into force in Spring 2025. We expect that these new laws will increase access request reviews and privacy complaints, which will impact the work of the CR team and the Adjudication team, as will the new timelines to complete an inquiry under these Acts (180 business days with a potential one-time 180 business day extension).

To align with our new procedures, we are establishing performance metrics and will assess our ability to meet them throughout 2025-26. Further, in November 2024 we retained two consultants to help us address the existing case resolution backlog, with minimum file closure targets. We plan to continue to utilize contracted resources or term positions to reduce our caseload as we implement our new procedures and position ourselves for increased review work and shorter timelines in which to complete this work. To address the number of files backlogged at the inquiry stage, a new staff member was added to the Adjudication team in August 2023.

The Adjudication team has also been focusing on ensuring that files are dealt with in the order they are received, and that older files that remained inactive because of difficulty in locating affected parties, or were otherwise complex, were moved to the appropriate place in the queue. The additional complexity and effects of the delays have required the team to expend additional time and resources to move these files forward. Significant progress has been made relative to these very old files. This focus will continue until this work is completed. Once the older files are dealt with, the processing of all remaining files, since more are current, should move more quickly.

The Adjudication team has also worked to review and assess the structure of the Adjudication Support unit (ASU), which was moved into the Adjudication team so that it operates more cohesively within that team. The goal of reviewing ASU is to develop an optimal structure for ASU to effectively communicate with and support adjudicators in processing inquiry files and effectively

liaise with CR team members and the new gatekeeping functions when transitioning files from CR to inquiry. Once implemented, these measures should also support the goal of eliminating the backlog.

As of November 2024, the number of active files at the inquiry stage was 186, with approximately 20 additional files expected to move through the gatekeeping process to inquiry in the near future. The number of active files at the same time last year was 234. The current number of 186 represents a 20.5% decrease in the total number of open/active files. Of the current total number of active files, 94 still require Notices of Inquiry to be issued (in contrast to 170 the previous year, a 44.7% decrease in pre-Notice files). There has also been a 43.8% increase in post-Notice files (from 64 last November to 92 in November 2024). These numbers represent a significant improvement to the ongoing problem of delays in issuing Notices of Inquiry. As of November 2024, the time it takes to move a file through the inquiry process is approximately two to three years.

Privacy impact assessment and breach files

The Compliance Support (CS) team supports public bodies, organizations, and custodians to comply with the FOIP Act, the *Health Information Act* (HIA), and the *Personal Information Protection Act* (PIPA), as applicable. Privacy impact assessments and breach files are managed by this team.

As part of our priority to tackle backlogs, we have prioritized reviewing privacy impact assessments (PIAs) and breach reports in a timelier manner.

In 2022-23, we established a project team to review how we are processing breach reports. A new PIPA breach process was implemented on April 1, 2024. This process streamlines the review of PIPA breaches reported to the OIPC. If the organization demonstrates it has notified affected individuals in accordance with the law for incidents involving a real risk of significant harm, the file is closed with a letter as opposed to a formal written decision under section 37.1 of PIPA. A similar process is being piloted for HIA. Work is also underway to implement online submission tools for notifying the Commissioner of privacy breaches under each of the three privacy laws as noted in Priority 2. Our goal is to have the breach notification tools integrate with the OIPC case management system to automate the processing of breach notices submitted to the OIPC. We expect this work to be done by March 31, 2025.

In October 2023, the CS team began reviewing our PIA process. A new approach to the PIA review process was implemented on October 1, 2024. The new approach better aligns with the Commissioner's mandate under section 64(2) of HIA to review and comment on PIAs as submitted

with the goal of improving response times by our office. My office also published in October 2024 a PIA Frequently Asked Questions (FAQ) document to better support compliance. Work will continue in 2024-25 on the OIPC PIA submission process with the goal of offering clarity and clear expectations on PIA submission requirements and to provide custodians, organizations and public bodies with a PIA online submission tool that integrates with the OIPC case management system. Such tools will assist in automating and optimizing existing OIPC processes for PIA submissions and processing. The CS team also devotes several days a year to review and close as many less complex PIAs as possible to reduce the backlog. We continue to explore the use of technology and innovation to assist us in tackling backlogs and our PIA caseload.

In 2025-26, we will establish performance measures for PIA and breach files which will position us to better assess our workload and resources, and ensure we are closing these files in a timelier manner.

Priority 2: Transforming our office to a digital environment

In 2024-25 we made progress on our continuing work to transition our records from paper to digital. We will continue to facilitate this transition and make digital records the default. Our goal is to have this work complete in 2025-26.

We also established the information technology foundation necessary to transform our office to a digital environment by setting up a Microsoft 365 and Azure tenant for the OIPC. We have now implemented Microsoft Teams for all staff and eliminated our office's landlines and use of mobile phones (except where operationally necessary). We are in the process of implementing a secure file transfer platform that will allow us to forgo the use of paper, mail, and couriers in most cases, except where an individual specifically requests to correspond with the OIPC by mail.

We have also begun the work to convert our intake forms to online forms, which will facilitate the receipt of information required to manage cases and reduce our workload. By March 31, 2025, we expect to complete the work on two forms and to have implemented the infrastructure necessary for the operation of our website workflow forms.

In 2023, we undertook a security assessment of our infrastructure and acquired additional security software to continue to ensure we have adequate security to

protect against breaches. We anticipate that the costs of this technology will be offset, to some degree, by the reduction of our current manual operating costs.

To build on the progress achieved during 2023-24, we identified the following four projects for 2024-25:

- 1) Finalize the implementation of our secure file transfer platform. (completed)
- 2) Add additional website forms for requests for review and complaints.
- 3) Utilize our new Azure environment to manage virtual machines and increase storage capacity and platform services.
- 4) Create an engagement platform, develop an App providing support for private sector organizations, and explore the use of AI technology for some business processes.

Projects 2 to 4 were not advanced in 2024-25 for several reasons, some of which included budget constraints, pending investigations that may impact our use of AI technology, or prioritization of other work that was time sensitive, such as legislative reviews. However, these remain important goals for the OIPC, and we will continue to work towards achieving them in 2025-26.

The engagement platform and App noted above is part of our engagement strategy and will help us interact more effectively with external stakeholders. The platform would host training-related materials on specific subject matters and would include (but not be limited to) tools such as PowerPoints, advisories, podcasts, animated videos, and video clips. Such a tool can go a long way to support our educational mandate and help us to engage and communicate with stakeholders more broadly.

The App would help small and medium-sized enterprises (SMEs) establish privacy management programs. We can also use this platform to support public bodies to develop their privacy management programs as is now required in Bill 33. It would also enable us to develop a communication channel with these bodies and with custodians to provide guidance on the use of innovative technology, as well as other guidance to better support privacy protection, as the use of digital technology advances in the province. This is part of our goal to establish a trusted network for the use of innovative technology in the province.

Our exploration of AI technology would enhance internal processes within the office. Specific tools could be Robotic Process Automation (RPA), Chatbots and Virtual Assistants, as well as Workflow Automation Platforms.

Goal 2: Providing information and support to improve the protection of personal and health information

In Business Plans 2023-2026 and 2024-2027, we identified two priorities associated with this goal, which will remain our priorities for 2025-28. Below is the progress made in 2024-25 regarding both priorities.

Priority 1: Support stakeholders in implementing proactive measures to protect personal information and facilitate access to information

As indicated in our two previous business plans, engaging with stakeholders to help them improve access to information and the protection of personal and health information for Albertans is essential to our mandate and is a necessary component of protecting the public, particularly in the age of technology innovation. Our approach is to proactively support stakeholders in meeting their obligations under the Acts, which is emphasized by our commitment to support stakeholders in protecting personal and health information and facilitating access to information.

In 2023-24 we were given budget for one FTE to support this work. In May 2023, the Engagement team was established as a new function within the office. The work of this team is supported by the Commissioner, Assistant Commissioner Strategic Initiatives and Information Management, one full-time Senior Information and Privacy Manager, and one contracted resource. The latter was retained in 2024 to support the significant workload of the team during 2024.

The engagement function of the OIPC focuses on three main objectives.

Objective One: Support innovation in the public, health and private sectors through the use of technology.

Objective Two: Help shift the office from working primarily in a reactive manner to adopting a service delivery model that more proactively supports compliance.

Objective Three (NEW): Guiding the implementation of new access and privacy laws.

In October 2023, the team developed an engagement strategy to deliver on Objective One. This strategy was

based on a number of factors that were included in our prior business plans.

The following two deliverables are designed to achieve Priority 1 of Goal 2.

DELIVERABLE 1: Create alliances for technology engagement.

We have identified a five-phased approach to achieving this deliverable.

- 1) Identify the key players in the tech sector. (completed)
- 2) Meet with key/core/leading organizations to build and transfer knowledge. (ongoing, partially completed)
- 3) Work with organizations to target high risk systems.
- 4) Assess privacy risks associated with these systems.
- 5) Help embed controls in the design of innovative technology to facilitate compliance through the development and use of risk mitigation tools.

In January 2024, the Engagement team launched its first stakeholder engagement plan targeting the innovative technology development sector². In the months that followed, the team engaged with several organizations and researchers to help them navigate Alberta's privacy legislation when adopting innovative technologies and met with various stakeholders to hear their interests and concerns. The lessons learned from these engagements helped formulate our PIPA recommendations report to the Standing Committee on Resource Stewardship and in considering amendments needed to the FOIP Act and HIA to support the responsible development of innovative technology in the province³.

In 2024 the team also began engaging key players in the tech sector including Alberta Innovates and various small businesses and researchers that are working on developing technology, including AI, to discuss ways that our office could support the building of privacy into the development and use of technology.

² <https://oipc.ab.ca/stakeholder-engagement-plan-for-innovative-technology-development-sector-announced-by-office-of-the-information-and-privacy-commissioner/>

³ <https://oipc.ab.ca/pipa-review-oipc-submission/>

We will continue to work on these deliverables in the coming year.

DELIVERABLE 2: Facilitate the broad adoption of privacy management programs by private sector organizations to establish a foundation for a trusted network to facilitate development and use of innovative technologies in this sector.

Deliverable 2 has been put on hold until the PIPA Review is complete.

Priority 2: Identify, facilitate and support opportunities to enhance access and privacy education and protections for children and youth

In our 2023-26 Business Plan, we identified the following as necessary to achieve Priority 2 of Goal 2.

- 1) Increase efforts to help students in Alberta learn about access to information and privacy rights.
- 2) Liaise with Alberta educators to help them develop a coordinated vetting process to acquire education Apps and e-learning platforms that will maximize privacy for students.
- 3) Engage with the Digital Education Working Group of the Global Privacy Assembly to support the development of privacy-enhancing educational tools.

In our engagement strategy, we identified the following deliverable to achieve Priority 2 of Goal 2.

DELIVERABLE 3: Work with education partners in the province who are using or intend to use digital technology in the education of children, to prevent harm that may occur from the use of this technology.

Innovative technologies, such as AI, have created a shift toward increased use of technology in education, which has led to children spending an increased amount of time on online platforms or interacting with connected devices. As a result, children are now more exposed to the influence of technology, which can have harmful effects. These harms are recognized both in Canada⁴ and globally and have drawn the attention of governments and regulators with calls to take action to protect children from this harm.⁵ Many of these harms stem from violation of children's privacy.

As a result of these risks, we are committed to engaging with educational institutions in the province on their use of educational technology to increase the protection of children including their privacy.

In the past year, we provided relevant guidance, and delivered presentations and training, about how to better protect the privacy of children. We established various channels for reaching educators and started developing and planning outreach initiatives in addition to already established channels such as our participation in the School at the Legislature (SATL)⁶ program.

We have identified six phases to achieving this deliverable:

- 1) Establish communication channels to educate about how to mitigate the risks of harm from the use of educational technology (EdTech). (ongoing)
- 2) Identify the EdTech being used and work with educators to develop guidance on its responsible use. (ongoing)
- 3) Provide continuous support through these channels.
- 4) Work with EdTech providers to help them build in safeguards to protect children from harm and to promote privacy compliance.
- 5) Work with our colleagues and the education technology industry to establish codes of conduct related to the development and use of EdTech.
- 6) Recommend amendments required in law to better protect children concerning the use of EdTech. (completed⁷)

In 2024, the Engagement team initiated contact with school boards and non-profit organizations to collaborate on children's privacy. School boards provided the team with input regarding applications used in Alberta schools, which the OIPC assessed as part of the GPEN privacy sweep⁸. The team plans to further use these contacts in the development of privacy and technology guidance for both teachers and students.

It is the OIPC's priority to ensure that Alberta's children are protected from harm that may occur as a result of the use of technology in the course of their public education, and to provide resources more generally regarding their digital citizenship in relation to privacy and access.

⁴ In October of 2023, Canada's privacy commissioners issued a joint resolution, [Putting best interests of young people at the forefront of privacy and access to personal information](https://www.oipc.gc.ca/en/putting-best-interests-of-young-people-at-the-forefront-of-privacy-and-access-to-personal-information).

⁵ See for example recent legislation and new oversight authorities as summarized by the OECD <https://www.oecd.org/education/protecting-children-online-9e0e49a9-en.htm>

⁶ <https://www.assembly.ab.ca/learn/programs-and-resources/school-at-the-legislature>

⁷ See e.g. chapter 7.5 of our PIPA review <https://oipc.ab.ca/wp-content/uploads/2024/06/OIPC-Submission-to-PIPA-Review-May-2024.pdf>

⁸ <https://oipc.ab.ca/gpen-sweep-finds-majority-of-websites-and-mobile-apps-use-deceptive-design-to-influence-privacy-choices/>

Goal 3: Modernizing regulatory mechanisms

In our 2024-27 Business Plan, we identified that modernizing Alberta’s access and privacy laws remains a leading issue. The same is true now, as many jurisdictions in Canada and globally are enhancing regulatory frameworks to facilitate innovation and ensure that privacy rights and other human rights are protected. This is a pressing issue as the rise of innovative technology, such as artificial intelligence, is having an impact on privacy locally, nationally, and internationally.

The opportunity to modernize in Alberta exists through the PIPA Review, spearheaded by the Standing Committee on Resource Stewardship⁹. We stated in our previous business plan that we are also seeking modernization of the FOIP Act and HIA to address the requirement that all three laws must work together to facilitate innovation across sectors and adequately protect the access and privacy rights of Albertans. At the time of writing this business plan, Bills 33 and 34 are before the legislature. These Bills will repeal the FOIP Act. We have been informed that HIA is also currently under review.

In our prior business plans, we stated that organizations in all sectors continue to amplify the use of technology to improve processes and create innovative products. Options considered to enhance these efforts include greater cross-sectoral information-sharing and use of artificial intelligence and machine learning to deliver public and health services. Overall, we must ensure that our laws balance the privacy rights of Albertans with the need to use personal and health information to develop innovative technologies to deliver services to Albertans, including public and health services.

This goal will remain for 2025-28, as will the following priorities.

Priority 1: Update Alberta’s access to information and privacy laws

Regarding Priority 1, we have called for the modernization of Alberta’s laws with respect to freedom of information and the protection of personal and health information. Modernization includes recognizing and addressing the risks to Albertans from the use of artificial intelligence and digital healthcare; creating algorithmic transparency; regulating automated decision-making; and de-identification or anonymization of personal and health information. It also involves securing public trust in the system through such measures as ensuring effective oversight and demonstrable accountability and improving the freedom of information system to facilitate democracy. It also includes developing ethical frameworks to guide responsible technological innovation.

For this priority, in 2024 we:

- 1) Submitted our comments on the review of PIPA to the Standing Committee on Resource Stewardship in May 2024 and participated in Committee meetings on two occasions about potential amendments.

- 2) Met with representatives of the Ministry of Technology and Innovation to discuss proposed changes to the FOIP Act. On March 4 and September 23, 2024, we made submissions on these changes. Following the tabling of Bills 33 and 34, we submitted additional comments and recommendations regarding these Bills.¹⁰
- 3) Met with representatives of Alberta Health to discuss possible amendments to HIA.

All our discussions, comments and recommendations made so far in relation to these laws have included the goal of modernizing these laws as indicated herein and harmonizing the legislative framework in Alberta to the degree possible.

As the FOIP Act, PIPA and HIA are currently in the process of being amended or reviewed, we will continue to work with government and other stakeholders, as applicable, on achieving this priority.

⁹ Prior to the election in May 2023, the PIPA Review was assigned to the Standing Committee on Alberta’s Economic Future. On November 1, 2023, a motion was made for the PIPA Review be referred to the Standing Committee on Resource Stewardship.

¹⁰ <https://oipc.ab.ca/alberta-information-and-privacy-commissioner-calls-for-changes-to-new-proposed-public-sector-access-and-privacy-legislation-for-alberta/>

Priority 2: Work with stakeholders to evaluate how to modernize the legal framework in Alberta to facilitate innovation that will best serve Albertans

Regarding Priority 2, we identified that we would:

- 1) Work with stakeholders to understand their opportunities and challenges with respect to the Acts and make recommendations for amendments to Alberta's laws that will facilitate innovation and uphold the access to information and privacy rights of Albertans.
- 2) Work with government to inform amendments required to access to information and privacy laws to create an ecosystem that will facilitate digital innovation in the delivery of services across the sectors in Alberta while preserving and enhancing the access and privacy rights of Albertans.

In 2023 and 2024 we engaged with Albertans, health care providers, regulated professionals, large custodians, research ethics boards, and researchers to learn about their interactions, and understand concerns and experiences with HIA. The purpose of this engagement was to facilitate making recommendations regarding changes needed to HIA to adjust for health care system change and technology innovation in the health sector.

Due to the significant restructuring of Alberta's healthcare system that began in 2024, HIA is being considered for amendment. To inform any comments and recommendations that we may make to modernize HIA in accordance with this priority, the Engagement team undertook surveys of stakeholders and met with representatives from Alberta Health about the proposed changes to the health care system and to HIA.

Our work in relation to meeting this priority in 2024 is as follows:

- 1) Met with representatives of the College of Physicians & Surgeons of Alberta, presented at the Alberta Medical Association (AMA) annual meeting, met several times with the AMA informatics team, met with AHS Board members, met routinely with senior officials of AHS and Alberta Health, attended a meeting with all chairs of Research Ethics Boards in the province and met with technology innovation bodies, such as Alberta Innovates.

- 2) Engaged with Albertans through a survey to understand their experiences with HIA, any concerns regarding changes to the healthcare system, and use of innovative technology. (completed)
- 3) Engaged with researchers through a survey regarding their needs, current challenges, and concerns related to the facilitation of research regulated under HIA. (completed)
- 4) Engaged with regulated health professionals via a survey regarding the adequacy of their access to health information, their privacy concerns regarding changes to the healthcare system, and use of innovative technology. (completed)
- 5) Engaged with larger health care institutions (e.g. AHS) via a survey regarding their experience with HIA and concerns and insights regarding changes to the healthcare system. (completed)
- 6) Report on the findings of the engagements that will be used to formulate recommended amendments to HIA. (in progress)

We will continue to engage these key stakeholders and work with them to determine how HIA should best be amended to facilitate health care and health system management while ensuring the health information of Albertans is adequately protected within the new structure.

As part of our engagement strategy, we identified a fourth deliverable to achieve the priorities for this goal.

DELIVERABLE 4: Work with government and relevant stakeholders to assist in the design of privacy and access to information legislation that will facilitate innovation while adequately protecting privacy and access rights.

Currently, there is a patchwork of privacy laws that restrict the sharing of personal or health information within and across sectors. This patchwork is unfavourable when organizations need to collaborate, for example when trying to use personal or health information in research and development of innovative technology. Government has indicated that there is a need to break down the silos to facilitate innovation between all three sectors.

To create a clear path of responsible innovation in the province involving the use of personal and health information, there must be a harmonized approach to establishing privacy rights in all three laws. To do so, the

various Acts and regulations need to be both modernized and work well enough together to enable the development and use of this innovative technology by public bodies, custodians and organizations. These changes are necessary to foster responsible innovation, prevent harm to individuals or the public, and foster public trust. There is also a need to establish guardrails and transparency requirements in our privacy laws around the use of data and data sharing within and across sectors to improve public and health services. The Alberta government has announced that it will be rolling out a unified data strategy in 2024-25.

We have identified five phases to achieving this fourth deliverable:

- 1) Identify the impact of innovative technologies. (ongoing)
- 2) Identify and engage with key stakeholders. (ongoing)
- 3) Engage with ministries responsible for the laws. (ongoing)
- 4) Work with stakeholders to develop a framework to promote responsible innovation and adequate privacy protection. (ongoing)
- 5) Recommend amendments to harmonize the laws so innovation opportunities in Alberta are optimized while ensuring an enhanced level of privacy protection for Albertans. (ongoing)

Goal 4: Guiding the implementation of new access and privacy laws

For 2025-2028, we have added the new goal of guiding the implementation of any new legislation coming into force. We expect that 2025 will be a crucial year in that respect, with potentially all three pieces of Alberta's privacy legislation undergoing major changes. This will require us to adjust our processes to any changes included in the Acts, as well as guide public bodies, custodians, and organizations to become compliant with new requirements.

We will prioritize the following activities to meet this goal.

- 1) Identify legislative changes that impact OIPC processes, standards and requirements; and ensure change management and project planning are in place to guide organizational changes to ensure that we will meet our legislated mandate and requirements.
- 2) Promote compliance, educate, and help custodians, public bodies and organizations understand their obligations under the new or amended access and privacy laws by engaging with them through presentations, informal meetings and training sessions, and by creating guidance, advisories, training materials, tools and templates to support their processes of becoming compliant.
- 3) Enforce compliance according to the Commissioner's powers under the revised or new legislation.
- 4) Educate the public about the legislative changes, their rights, and how to exercise them. This includes educating the public, including children and other vulnerable groups, about the impact of technological changes, such as the use of AI, on their privacy.

For activities 2 to 4, the Engagement team will be tasked with adding this new goal to our engagement strategy.