

# CITY OF HAMILTON MOTION

Governance Review Sub-Committee: January 19, 2026

**MOVED BY COUNCILLOR T. HWANG .....**

**SECONDED BY COUNCILLOR .....**

## **Data Minimization Principles and Policy**

WHEREAS, the City publishes a significant amount of information online to support transparency, public notice requirements, and public participation in municipal processes;

WHEREAS, certain Planning approval processes, including minor variance applications, primarily relate to the characteristics and use of property rather than the personal information of individual property owners or applicants;

WHEREAS the online publication, indexing, and long term retention of personal information can create privacy risks that may extend beyond the original purpose for which the information was collected or disclosed; and

WHEREAS, data minimization is a recognized privacy principle that supports limiting the collection, use, disclosure, and retention of personal information to what is reasonably necessary for an identified purpose.

THEREFORE, BE IT RESOLVED:

- (a) That staff in the City Clerk's Office, in consultation with Legal Services, Information Technology Services, Planning and Economic Development Department, and other relevant departments, report back to the Governance Review Sub-Committee with recommendations respecting data minimization principles and a data minimization policy for the City;
- (b) That, when developing their recommendations, staff specifically consider and address the following:
  - (i) Removing or limiting personal information published on the City's website, particularly in relation to minor variance applications and similar planning processes, where the information is not necessary to understand the property-based nature of the application;
  - (ii) Adopting data minimization practices for online publication, including but not limited to the use of de-indexing measures, avoidance of search engine indexing where appropriate, and other technical or administrative safeguards to reduce the discoverability of personal information;

- (iii) Conducting a jurisdictional scan of Ontario municipalities and other relevant public sector bodies with respect to the handling and online publication of personal information in minor variance applications and other planning or quasi-judicial processes; and
- (iv) Developing or confirming a public record redaction procedure, including consideration of:
  - (1) the types of personal information that should be redacted prior to online publication;
  - (2) the duration for which personal information is made available online; and
  - (3) processes for removing or limiting access to personal information after statutory or operational needs have been met; and
- (v) any implementation considerations and resource implications.