CITY OF NANAIMO

BUSINESS CASE – Legislative Services Department: Assistant Manager, Records Information & Privacy

CURRENT OVERVIEW

The Legislative Services Department provides legislative, policy and administrative expertise and services to Council, committees, task forces and City departments to ensure the City conducts its business in a manner that is consistent with provincial legislation and City bylaws. The department is also responsible for implementation and oversight of the Privacy Management and Records Management programs, managing all requests received under the *Freedom of Information and Protection of Privacy Act (FOIPPA)*, corporate records management services, coordinating with the City's municipal insurer on liability claims received by the City and coordinating municipal elections.

There are two distinct sections in the Legislative Services Department: Legislative Support and Records, Information & Privacy. Liability claims management is handled by the Records, Information & Privacy section.

The Legislative Services Department currently consists of:

- Director of Legislative Services & Communications/Corporate Officer (1)
- Deputy Corporate Officer (1)
- Steno Coordinator (1)
- Stenos (3)
- Records/Information & Privacy Coordinator (1)
- Records and Information Specialist (1)
- FOI Claims & Records Clerks (2)
- Records Management Clerk (1)

BUSINESS ISSUE

Legislative Services is experiencing increasing demands associated with expanded privacy obligations, growing FOI and records volumes, digital transformation, liability claims management and increased public expectations for transparency and accountability. These pressures have increased workload, complexity and organizational risk within the Records, Information & Privacy section.

Key contributors to these pressures include:

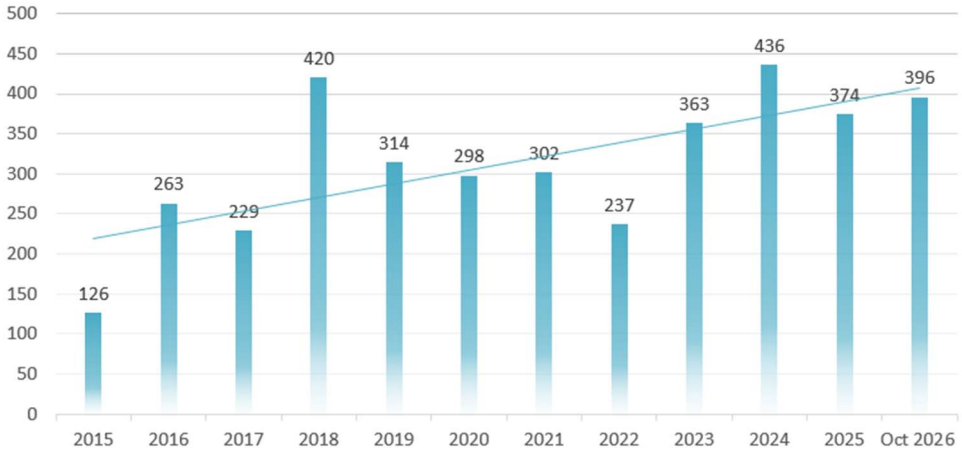
Increasing Privacy Compliance Requirements

FOIPPA requires the City to maintain a Privacy Management Program ensuring personal information is collected, used, disclosed, stored and retained appropriately.

Growing Number and Complexity of Freedom of Information (FOI) Requests

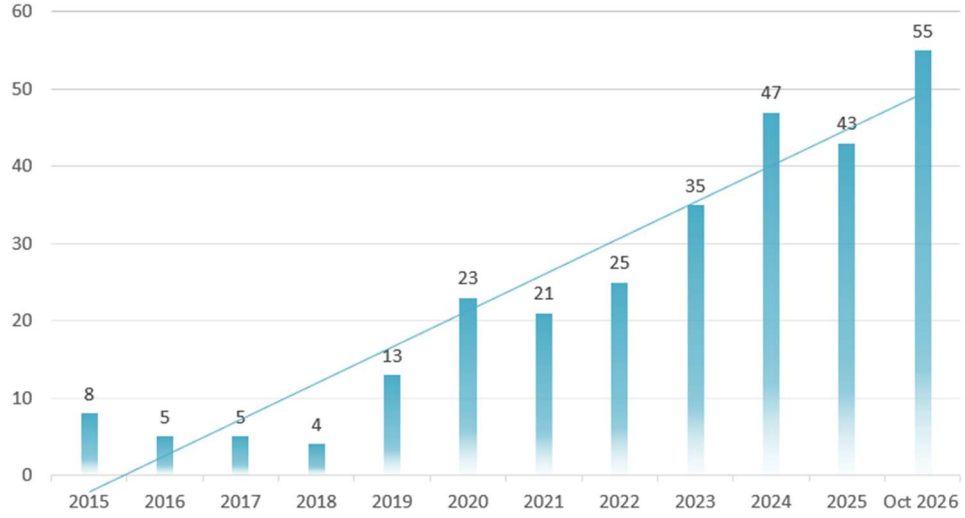
FOI requests have been increasing in both volume and complexity due to technology changes and inconsistent records and data management practices.

As of October 2026, the City was on track to surpass its highest annual volume of FOI requests.



Increased Privacy Impact Assessments (PIA)

PIAs are mandatory under FOIPPA and requests have been increasing in volume and complexity.



Data Breach Prevention and Response Requirements

Ongoing staff training is required to maintain compliance and reduce privacy risk. Without dedicated management support, privacy risks may increase and affect organizational reputation and public trust.

Growing Records Management Demands

The City's Records Management Program faces growing complexity as it handles both physical and electronic data. With data volumes increasing, the City must maintain strict oversight of records classifications, lawful disposition, information governance and digital transformation. This oversight requires dedicated leadership for additional project management support and coordination with IT and other departments for continued records governance.

Liability Claims and Risk Management
The Records Information and Privacy section coordinate liability claims adding complexity to FOI, privacy, and records management responsibilities.

Leadership Capacity Constraints
Records, Information and Privacy functions rely on limited management resources for operational, strategic and legislative oversight. This creates limited capacity for program improvement, staff support, business continuity and strategic initiatives. An Assistant Manager would provide dedicated operational leadership and staff support for ongoing development opportunities. This addition would allow the Deputy Corporate Officer and Director to focus on broader strategic and corporate priorities.

Risks and Impact
Non-compliance with *FOIPPA* can result in financial, legal, reputational and service-delivery impacts. Strengthening management capacity would reduce risk and support consistent, proactive information governance.

EXPECTED OUTCOME
Create an Assistant Manager, Records Information & Privacy position within the Legislative Services Department to provide operational leadership and oversight of the Records Management and Privacy Management programs and directly supervise five full-time employees within the Records, Information & Privacy section.

Establishing the position would increase leadership capacity within the Department, strengthen organizational resilience, support regulatory compliance and improve service delivery. The position would also strengthen business continuity and succession planning and reduce operational risk associated with employee turnover or extended absences.

OPTIONS

Option #1 – Add an Assistant Manager, Records Information & Privacy
Create a permanent full-time Assistant Manager, Records Information & Privacy position reporting to the Deputy Corporate Officer.

Benefits:

- Increase leadership capacity, organizational resilience and knowledge sharing within Legislative Services.
- Provides dedicated management operational oversight for Records Management, Privacy Management, FOI administration and liability claims.
- Improves compliance with legislative requirements under *FOIPPA* and related legislation.
- Enhance staff supervision, coaching and performance management.
- Allow the Deputy Corporate Officer and Director to focus on strategic priorities and corporate initiatives.

- Supports ongoing staff and Council education, policy development, auditing and program improvements.
- Improves service delivery, responsiveness and management of increasing workloads.
- Better positions the City to manage privacy risks, records governance and digital transformation initiatives.
- Enhances public trust through stronger privacy and information management practices.

Weaknesses:

- Permanent increase to operating budget.

Financial Analysis:

- Position is anticipated to be at a management level 5, with an annual salary of approximately $129,900 plus benefits. 2027 budget impact including benefits is estimated at $123,000 based on an April 1st start, 2028 budget impact is estimated at $173,700.
- Additional annual costs are anticipated at $3,600 for professional development and computer charges.
- One-time costs upon the creation of the position are projected at $8,100. This includes the purchase of a computer, monitors, desk phone and office furniture.
- The estimated 2027 property tax impact is 0.08%.

Option #2 – Status Quo

Continue with the current organizational structure.

Benefits:

- No impact to the operating budget.

Weaknesses:

- Current workload and capacity challenges remain.
- Limited ability to undertake high-level strategic work and program development.
- Increased risk of employee burnout, turnover and absenteeism.
- Reduced organizational resilience and business continuity due to continued reliance on a single subject matter expert for multiple critical functions.
- Legislative requirements may not be completed as efficiently or proactively as required.
- Increased privacy, compliance and reputational risks.
- Delays to technology initiatives, records management improvements and privacy projects.
- Reduced ability to provide staff education, policy development, auditing and continuous improvement activities.
- Not a sustainable long-term solution given growing legislative and operational demands.

RECOMMENDATION

Option #1 is recommended.

Appendix 1

Proposed reporting structure with the Assistant Manager, Records Information and Privacy.

