

Enterprise Data Policy

Policy Statement

The City of Hamilton (the City) is committed to the principles of openness, accountability and transparency in its decision making and service delivery. This Enterprise Data Policy provides a framework for the management and use of Enterprise Data while ensuring alignment with ethical principles, legal standards, and best practices in Data governance.

City staff are empowered to collect, manage, analyze and visualize Data using modern technology, while utilizing safeguards that protect stakeholders and ensure Data usage remains safe, appropriate, and responsible. This policy aims to build confidence of staff, trust with residents, deliver the highest quality of service, and uphold all applicable legal and regulatory requirements.

Purpose

This policy acts as the overarching document in support of the implementation of the [Enterprise Data Management Guidelines](#). The purpose of this Data policy is to:

- Provide an overview of acceptable use and handling of Enterprise Data, its tools and systems;
- Protect the privacy and rights of individuals in accordance with applicable laws and regulations;
- Encourage staff to:
 - Responsibly harness the tremendous potential of Data to increase the effectiveness and efficiency of service delivery;
 - Educate themselves and take training related to Data management;
 - Contribute positively to the City's [Strategic Plan \(hamilton.ca\)](#) and [Council Priorities \(hamilton.ca\)](#).

Scope

This Policy applies to all staff, contract workers and consultants working in, with, or on behalf of the City.

Definitions

The following terms referenced in this Policy are defined as:

Data: Facts, figures, or statistics which when processed or analyzed form information.

Enterprise Data: Structured and Unstructured Data encountered by the City employees, contractors, vendors, and consultants.

- **Structured Data:** Organized data stored in databases, spreadsheets, and structured formats.
- **Unstructured Data:** Includes emails, documents, images, videos, and free-text fields that require specialized governance.

For a comprehensive glossary, refer to the [Enterprise Data Management Guidelines](#).

Principles

The following principles are synthesized and adapted from the standards, principles, and recommendations of over 80 sources of federal, provincial, municipal, academic, data industry and professional organizations. These sources can be reviewed in Appendix C of the [Enterprise Data Management Guidelines](#). These principles apply to this Policy, and all Data-related policies in use at the City:

1. **Accountable:** Data Management is everyone's responsibility.
2. **Equitable:** The use and handling of Data must be ethical, purposeful, and legitimate. Data will be collected and used with aim to improve residents' welfare and efficiency of services and will be managed with respect to any applicable equity, cultural, or community lenses.
3. **Compliant and Secure:** Data throughout its lifecycle must be compliant to all laws, by-laws, and industry standards, to assure integrity of the Data, and privacy of any Data subjects.
4. **Explainable and Interpretable:** Integrated Data is more useful than siloed Data, and Data is only useful when accurate, creating a need for ownership, lineage, and curation to ensure the integrity, security, and applicability of Data.
5. **Digital Sobriety:** Data must only be collected as needed, and only retained for as long as is required by law, agreement, or functional need in order to maintain system health and sustainability while minimizing the City's digital footprint and climate change impact.
6. **Transparent:** Data transparency and Open Data practices build trust, which is required for any sharing or collection partnerships to support the authenticity, accuracy, and integrity of available Data.

For detailed explanation on the above principles, refer to the Enterprise Data Standards and Guidelines housed within the [Enterprise Data Management Guidelines](#).

Terms & Conditions

All employees are responsible and accountable for carrying out their professional duties and responsibilities in accordance with this Policy and the related [Enterprise Data Management Guidelines](#).

Roles And Responsibilities

Employees

All Data viewers, users, analysts, collectors, custodians, stewards, and owners must:

- Stay current with City Data Policies and comply with all related principles, processes, and protocols.
- Complete applicable Data Management Training as outlined as mandatory in the City's Learning Management System.
- In consultation with Information Technology, Data Services, identify areas of concern as it relates to the application of the Policy and related [Enterprise Data Management Guidelines](#).

Leaders

All people leaders must:

- Ensure employees have received a copy of the Policy and related [Enterprise Data Management Guidelines](#) and are provided with any updates.
- Incorporate discussions about the Policy and related [Enterprise Data Management Guidelines](#) into staff meetings, highlighting areas of relevance to the employees' work.

Compliance

Where an employee does not comply with their role and responsibilities as outlined in the Data Policy, related policies, and applicable Guidelines and procedures, such non-compliance issues will be brought to the Chief Information Officer for review.

The Chief Information Officer, in consultation with City Manager, SLT, and relevant organizational subject matter experts will review and action accordingly.

Violations of this Policy may result in appropriate disciplinary measures, up to and including termination of employment. Employees who identify risks, policy violations, or security breaches must report them to their manager or Manager of Data Services immediately.

Attached Schedule

The following related documents are critical to the understanding and operation of this Policy:

- [Enterprise Data Management Guidelines](#)

Related Documents

- The City of Hamilton's Open Data Policy
- The City of Hamilton's Generative AI Policy
- The City of Hamilton's Protection of Privacy Policy

Corporate Policy

Information Technology, Data Services

Policy No: CM-23-001

Page 4 of 4



Content Updated: **2025-04-01**

Supersedes Policy No: N/A

Approval: 2025-04-01

- The City of Hamilton's IT Security Policy

History

The following stakeholders were consulted in the creation or revisions made to this Policy:

- City Clerk and Privacy Specialist;
- Digital & Innovation;
- Information Technology;
- Legal Services;
- Enterprise Data Management Steering Committee, including representation from all City departments.

This Policy was developed by Data Services as a new policy: 2025-04-01

This Policy was approved by the Chief Information Officer: 2025-04-01