

Privacy Management Program Components

Ensuring consistent application of legislation, including through policies, procedures, standards, and reporting.

- Personal information inventories, directories or databases
- Privacy management policies
- Risk assessment tools (privacy impact assessment, security assessment)
 - Employee, Elected Official and Volunteer orientation and training
 - Breach response protocols
 - Compliance reporting
 - Service provider management
- Communicating with individuals and demonstrating accountability

Definitions according to FIPPA

Personal information:
Recorded information about an identifiable person other than “contact information”

Contact information:

To enable an individual at a place of business to be contacted and includes the name, position or title, business telephone number, business address, business email or business fax number of the individual

Legislation

Freedom of Information & Protection of Privacy Act

Local Government Act

Community Charter

Freedom of Information & Protection of Privacy Regulations

Other Relevant Federal Legislation & RDOS Bylaws

Protecting Personal Information

Privacy Management Framework



Personal information is collected, used and disclosed in the context of RDOS business.

The Regional District of Okanagan-Similkameen (RDOS) is a public body whose business is done on behalf of and in the best interests of its citizens. The business of the RDOS encompasses all departments and personal information is considered in the context of the records management program.

The RDOS has a legal and moral obligation to responsibly manage personal information.

The RDOS protects the personal information it collects, uses and discloses in accordance with the Freedom of Information and Privacy Act (FIPPA) by:

- Promoting a culture of privacy awareness
- The application of sound information access and privacy principles and appropriate and reasonable security measures.

Objectives

- Building a corporate culture of privacy awareness
- Collaborating on privacy management across all departments led by a committed Corporation
- Implementing a comprehensive Privacy Management Program in compliance with privacy legislation and regulations

Measures

- Privacy considerations are ‘built by design’ into all RDOS initiatives, programs and services
- Personal information is responsibly collected, used and disclosed
- People understand why their information is being collected, used and disclosed
- Employees have a sound understanding of responsible privacy practices with respect to personal information

Privacy Principles

Accountability

Responsibility for personal information protection is practiced at all levels. A designated FOI Head provides advice and support related to personal information management.

- The RDOS provides training and skill development opportunities related to privacy management for all staff
- If the RDOS uses personal information to make a decision directly affecting an individual the information is retained for at least one year after use

Openness and Transparency

The Regional District of Okanagan-Similkameen (RDOS) aims to instill trust and confidence in its information access and privacy practices.

- The RDOS makes information available to the public about policies, practices and compliance measures relating to personal information management
- The RDOS informs the public, employees and service providers why their personal information is being collected, what it will be used for, and to whom it will be disclosed
- The RDOS tells people how they can access and amend their personal information

Consent

The knowledge and consent of an individual is required for the collection, use or disclosure of their personal information, except in certain limited circumstances.

- The RDOS collects personal information directly from, or as authorized by, the person concerned
- The RDOS only uses personal information for the purpose it was collected for, unless the person consents to it being used for a different purpose.

Accuracy

Personal information shall be reasonably accurate, complete and up to date.

- The RDOS will ensure that personal information is relevant and accurate before use
- The RDOS allows people to update, correct or amend their personal information where necessary

Limiting Collection

The collection of personal information relates directly to and is necessary for a program or activity.

- The RDOS collects personal information for a lawful purpose that is directly related to RDOS functions and activities
- The RDOS maintains a Personal Information Inventory to record the nature of personal information collected, stored and shared
- The RDOS regularly reviews the nature (amount, sensitivity, elements) of personal information collected

Limiting Use, Disclosure, and Retention

Personal information is used or disclosed for the purposes for which it was collected, except with the consent of the individual or as required by law.

- The RDOS uses the BC LGMA Records Management Manual to apply a consistent and comprehensive approach to managing the personal information used
- The RDOS implements Information Sharing Agreements to document the purposes and conditions of information access and use with other organizations
- In accordance with FIPPA, the FOI Head must refuse to disclose information that would be harmful to the rights of Indigenous people with respect to their cultural practices or traditional knowledge

Security

Personal information is protected by security safeguards appropriate to the sensitivity of the information.

- The RDOS has policies in place to govern the use of technology resources
- The RDOS stores and protects records responsibly based on the sensitivity of the information, does not keep personal information longer than necessary, and destroys information appropriately
- The RDOS reviews service provider contracts and includes privacy protection clauses that address the contractor's responsibilities concerning personal information

Individual Access

Upon request, an individual shall be informed of the existence, use and disclosure of personal information and shall be given access to that information.

- The RDOS tells people how they can access and amend their personal information
- The RDOS tells people whom they can contact for access to their information
- The RDOS maintains and makes available a directory that lists personal information banks