

## 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

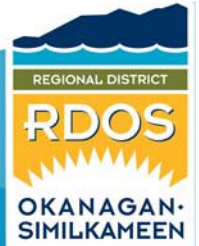
Freedom of Information & Protection of Privacy Act

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 our 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 our 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
- 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 the 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 the information is being collected, used and disclosed
- Employees have a sound understanding of responsible privacy practices for their own and the personal information of others

## Privacy Principles

### Accountability

Responsibility for personal information protection is practiced at all levels.

A designated Privacy Coordinator provides advice and support related to personal information management to Directors, Staff and members of the public.

- We provide training and skill development opportunities related to privacy management for all staff
- If we use personal information to make a decision directly affecting an individual, the information is retained for at least one year after use in accordance with FIPPA and the Local Government Management Association of BC (LGMA) Records Management Manual

### Openness and Transparency

The Regional District of Okanagan-Similkameen aims to instill trust and confidence by its information access and privacy practices.

- We make information available to the public about policies, practices and compliance measures relating to personal information management
- We inform 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
- We tell people how they can access and amend their personal information

### Consent

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

- We collect personal information directly from or as authorized by the person concerned
- We only use personal information for the purpose we collect it 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.

- We will ensure that personal information is relevant and accurate before using it
- We allow 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.

- We collect personal information for a lawful purpose that is directly related to our functions and activities
- We maintain a Personal Information Inventory to record the nature of personal information we collect, store and share
- We regularly review the nature (amount, sensitivity, elements) of personal information collected

### Limiting Use, Disclosure and Retention

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

- We use the BC LGMA Records Management Manual to apply a consistent and comprehensive approach to managing the personal information we use
- We implement Information Sharing Agreements to document the purposes and conditions of information access and use with other organizations

### Security

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

- We have policies in place to govern the use of technology resources
- We store and protect records responsibly based on sensitivity of the information and keep personal information no longer than necessary and destroy it appropriately
- We review service provider contracts and include the privacy protection clauses that address the prohibition of the disclosure of personal information outside Canada except in limited circumstances

### 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.

- We tell people how they can access and amend their personal information
- We tell people who they can contact for access to their information
- We maintain and make available a directory that lists personal information banks