



DISTRICT OF NORTH SAANICH

COUNCIL POLICY

TITLE: INFORMATION HANDLING AND PRIVACY POLICY	NO. COU-037
<p>1. INFORMATION HANDLING AND PRIVACY POLICY</p> <p>a) The District of North Saanich (the District) is committed to protecting the privacy of its user community. The British Columbia Freedom of Information and Protection of Privacy Act (FIPPA) gives direction with respect to the collection, use and disclosure of information in the custody and in the control of the District.</p> <p>b) This policy is intended to set out guidelines on the collection, use, disclosure, security, retention and disposal and correction of personal information.</p> <p>2. PERSONAL INFORMATION</p> <p>a) In this Policy “personal information” is as defined in FIPPA, as amended from time to time.</p> <p>3. COLLECTION OF PERSONAL INFORMATION</p> <p>a) The District will only collect the minimum amount of personal information as necessary for delivery of District services and operations.</p> <p>b) Personal information will only be collected as authorized by FIPPA.</p> <p>4. USE OF PERSONAL INFORMATION</p> <p>a) Personal information that is collected by the District must only be used for the purpose for which the information was collected, or a use consistent with that purpose.</p> <p>b) Personal information is only to be shared with other District staff on a need-to-know basis in order to complete the task for which it was collected.</p> <p>5. DISCLOSURE OF PERSONAL INFORMATION</p> <p>a) The District will only disclose personal information in accordance with FIPPA.</p> <p>b) Individuals have a right to access their own personal information that is held by the District. Requests can be submitted by contacting the Corporate Services Department.</p> <p>c) Staff may disclose personal information to other staff members for the purpose for which the information was collected, or a use consistent with that purpose.</p>	

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- d) Requests for records which contain personal information are processed in accordance with FIPPA and the North Saanich Freedom of Information and Protection of Privacy Bylaw No. 1154 (2007), as amended from time to time.
- e) Personal information will not be disclosed to third parties, except where authorized by FIPPA.

6. SECURITY

- a) Staff must take reasonable measures to secure personal information from unauthorized access, including but not limited to:
 - i. Physical barriers such as locked doors, locked filing cabinets and building alarm systems;
 - ii. Technological barriers such as passwords, encryption and firewalls; and,
 - iii. Personal information must not be stored, disclosed or accessible outside Canada.
- b) Protection of personal information must be respected when using cloud solutions, and the service provider must protect the information in a manner that is consistent with this policy.

7. PRIVACY AWARENESS & EDUCATION ACTIVITIES

- a) The Information and Privacy Coordinator will facilitate privacy training annually for all employees to ensure awareness of privacy obligations under FIPPA.

8. PRIVACY IMPACT ASSESSMENTS

- a) Department Heads shall work with the Information and Privacy Coordinator to ensure privacy impact assessments are completed in accordance with the requirements set out in FIPPA prior to the implementation of any project, program, system, software, activity etc. that personal information will be collected to facilitate.

9. INFORMATION SHARING AGREEMENTS

- a) The Information and Privacy Coordinator, in collaboration with the Department Heads, will ensure completion of, and conduct reviews of, all information sharing agreements and ensure they are updated when changes have been made to the initiative.

10. RETENTION AND DISPOSAL

- a) Personal information is kept for as long as it is needed to fulfill the purpose for which it was collected and is retained in accordance with FIPPA.
- b) Records are maintained as per the District’s Classification Scheme and Retention Schedule.
- c) Records must be securely destroyed through confidential shredding.

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11. CORRECTION OF PERSONAL INFORMATION

- a) Corrections to personal information can be made by contacting the Corporate Services Department.

12. PRIVACY COMPLAINTS AND PRIVACY BREACH MANAGEMENT

- a) All possible events that threaten privacy security must immediately be reported to the Chief Administrative Officer (CAO) and handled by the CAO and Information and Privacy Coordinator in accordance with Sections 36.3 of FIPPA.
- b) Complaints regarding compliance with this policy, or inquiries about this policy should be directed to the Information and Privacy Coordinator.

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