## Personal Information Protection

# Purpose of the policy

To protect the dignity of members and the security of personal information the co-op may gather on individuals, in compliance with the Personal Information Protection Act (PIPA) and its principles.

# Definition

Personal information under PIPA means information about an identifiable individual. It includes employee personal information but does not include work contact information or work product information.

# Policy

1. The Board will appoint a Personal Information Protection Officer (PIP Officer)
2. The Board will:
   * provide the PIP Officer with a job description outlining duties as per PIPA and its principles
   * ensure the PIP Officer receives appropriate training
   * ensure the PIP Officer fulfills their duties
   * co-operate fully with the PIP Officer in the performance of the Officer's duties and in implementation of the policy.
3. The co-op shall only collect the personal information that it requires to ensure sound management of the co-op and to fulfill its obligations to its members and the government.
4. The co-op shall use and share personal information only with the agreement of the individuals concerned.
5. The co-op will store documents which contain personal information securely to prevent unauthorized use. The co-op will destroy personal information when the co-op no longer needs it.
6. Individuals will, on written request, have access to any personal information about themselves that the co-op has. The co op will provide the information within 30 days, except where to do so would be in violation of PIPA. The co-op will correct any errors in personal information that the individual brings to its attention.
7. All directors and management staff will sign a confidentiality agreement. Any designated members who have access to some personal information or co-op confidential information will also sign the agreement.
8. Any minutes or records of discussion on members', residents.' or applicants' personal information will conceal their identity, except for *in camera* minutes. Minutes of the *in camera* portion of meetings will be kept separate from the regular minutes, and stored securely, to prevent unauthorized use. (2007-9-18)

# Procedures needed to carry out this policy

1. If you have a request for information or complaint, please contact the Privacy Officer directly (posted on View Court Co-op noticeboard), if your complaint is not dealt with in a satisfactory manner, you may contact the Provincial Information and Privacy Commissioner:

*David Loukidelis*

*Office of the Information and Privacy Commissioner for British Columbia*

*PO Box 9038, Stn. Prov. Govt.*

*Victoria, BC V8W 9A4,*

*604 660 2421*

## Job Description

The View Court Privacy Officer:

* monitors adherence with privacy law and policies, and reports periodically to the Board;
* handles requests and complaints about issues concerning personal information;
* reports information requests and any action taken to the Board; and
* is appointed by the Board of Directors at the beginning of each new year.

## Information life-cycles

View Court collects personal information in different circumstances requiring different lifecycles:

1. Application form:
2. Membership files:
3. Income declarations:
4. Information emerging from specific issues and disutes:

Board and committee [personal information inventories](http://viewcourt.vcn.bc.ca/privacy/pipa-inventories) were collected in 2008 as an initial step on the PIPA checklist.

## Towards PIPA compliance

So far (Sept. 2008), we have been following the suggested sequence for PIPA compliance described in the CHF BC "PIPA checklist." The below are from the CHF BC Policy Manual template and can also be used to guide PIPA compliance.

1. Determine how personal information and confidential co-op information will be collected, used, filed, shared and protected.
2. Determine who has the authority to access and release different types of personal information (and confidential co-op information) ie filing cabinets.
3. Develop procedures for routinely destroying personal information that the co-op no longer needs.
4. Review and revise, as necessary, forms which ask for personal information, e.g. application form. ([CHF resources](http://www.chf.bc.ca/pages/resources-pipa.asp))
5. Develop forms: personal information protection statement (to be signed by applicants), memo to current members about personal information.
6. Train management staff and members about their responsibilities for protecting personal information.
7. Establish procedures for keeping secure the *in camera* portion of minutes.