

CO-OPERATIVE HOUSING FEDERATION OF BC POLICY MANUAL

Date Approved/Amended: December 1, 2003

Subject: Personal Information Protection

Approved by: Board of Directors

1. Introduction

Effective January 1, 2004, the provincial *Personal Information Protection Act (PIPA)* regulates the collection, storage, use and disclosure of personal information by any organization in British Columbia not subject to other privacy legislation. Personal information is defined by the Act as “information about an identifiable individual”. It includes employee personal information but excludes contact information and work product information.

Although all of our members are organizations, from time to time CHF BC may collect, use and share personal information in conducting its business. In order to comply with *PIPA*, and out of respect for the privacy of the individuals who have shared their personal information with us, CHF BC has adopted this policy.

2. Limited Collection of Personal Information

CHF BC and its representatives will request and collect only the limited personal information needed to deliver high-quality member services, manage the organization effectively and fulfill our obligations to members, employees, business partners and government. Once personal information has been collected, CHF BC will use it only for the purpose for which it was collected, unless an individual gives specific permission for its use for another purpose.

3. Agreement of Individuals

Subject to Article 11 (Exemptions), CHF BC will collect, use and share personal information only when three conditions have been met:

- The information is needed for an identified purpose;
- That purpose has been explained to the person we are seeking information from, or the purpose would be considered obvious to a reasonable person;
- The person has consented to the collection of information for that purpose and understands that he or she may withdraw his or her consent at any time.

4. Storage of Information

CHF BC will store personal information securely so as to prevent its unauthorized use. Access will be restricted to the individual who provided the information, the Personal Information Protection (PIP) Officer, if necessary, and the persons who need the information for the purpose for which it was gathered.

5. Access to Information

Individuals will, on written request, have access to any personal information about themselves that CHF BC has. We will provide the information within 30 days, except where to do so would be in violation of *PIPA*.

Should an individual point out any errors in the personal information we have about him or her, CHF BC will correct the information, if possible. If the incorrect information was shared with any third parties during the year before the date the correction was made, CHF BC will send them, where appropriate, the corrected personal information.

6. Retention of Information

CHF BC will keep personal information only for as long as we need it to achieve the purpose for which it was collected. Our operational procedures will identify the general classes of personal information we gather and will set out standard retention periods for each one. These periods will vary, based on our best estimate of how long we need to retain the information in order to meet the purpose for which it was collected. Where personal information contributes to the making of a decision that directly affects an individual, we will keep the information for at least one year after the decision was made to provide the individual with a reasonable opportunity to obtain access to it.

Once every two years, CHF BC will review the purposes for which it collects personal information, the general classes of information collected, and the retention period for each class, and will modify operational procedures, as required.

7. Destruction of Information

CHF BC will review its files on an annual basis and, in accordance with the retention schedules established for separate classes of information, will destroy or erase any personal information no longer needed for the purpose it was collected. While the absolute destruction of electronic data is difficult to achieve, CHF BC will make every reasonable effort to eliminate all redundant personal information from our files.

8. Complaints Process

CHF BC will develop a complaints procedure, so that if an individual is dissatisfied with CHF BC's handling of his or her personal information, he or she may make a formal complaint. The complaints procedure will be published on the web site.

9. Personal Information Protection (PIP) Officer

The Executive Assistant will serve as PIP Officer for CHF BC. The PIP Officer will be responsible for CHF BC's compliance with the *Personal Information Protection Act*, or any legislation that takes its place, and this policy.

The PIP Officer will be responsible for advising any of CHF BC's volunteers, staff and consultants who ask for guidance in complying with the Personal Information Protection Policy. The PIP Officer will also respond to and investigate any inquiries or complaints about the way CHF BC collects, uses or discloses personal information. CHF BC will publish the PIP Officer's name and contact information on the web site.

The PIP Officer will document any misuse of personal information and will report it to the Executive Director, who will report the problem to the Board of Directors at the next regular meeting. The PIP Officer will recommend changes in CHF BC's system of managing personal information, as appropriate.

10. Staff and Volunteer Education

CHF BC will ensure that once a year its staff, the Board of Directors, committees and, as necessary, consultants are reminded of this policy, its underlying principles and aims, and the procedures that accompany it.

11. Exemptions

CHF BC may make personal information available without permission if the information is used to take action during an emergency that threatens the life, health or security of an individual.

CHF BC may make personal information available to the appropriate authorities if it has reasonable grounds for believing that, by doing so, it is helping in the investigation or prevention of a breach of the laws or security of Canada or a province.

CHF BC may also make personal information available without consent in other circumstances permitted by *PIPA*.

The PIP Officer will report any collection, use or disclosure of personal information without consent to the Executive Director, who will report it to the Board of Directors.

12. Application of this Policy

This policy must be followed by individual directors, employees, independent contractors acting in CHF BC's name, committee members and any other volunteers acting on CHF BC's behalf. If any of these individuals is unsure about the requirements of CHF BC's system for managing personal information, he or she may consult the PIP Officer, under Article 9 (Personal Information Protection Officer) of this policy.

13. Conflict Between This Policy and Applicable Privacy Legislation

Should a legal expert or competent authority advise CHF BC that this policy conflicts with the *Personal Information Protection Act* or any successor legislation, CHF BC will amend the policy, while retaining all the acceptable provisions.

14. Definitions

Where a word or phrase used in this policy is defined in *PIPA*, the definition given in the *Act* will apply to this policy.