

CHF BC Sample – Memo to Members (blank)

(remove header when adapting for use)

[Full name of housing co-op or letterhead]

Memo to members (example)

[Give to all new members as they are accepted]

To: Members of *Model Housing Co-operative*

From: Board of directors

Date:

Subject: Personal information

In October 2003, the provincial government passed a law to protect the privacy of personal information – the *Personal Information Protection Act* (PIPA or the Act). This law applies to housing co-ops since January 1, 2004.

The Act allows the co-op to use the personal information it has already collected about you before 2004 for the purposes that “a reasonable person would consider appropriate in the circumstances.” From 2004 onward the co-op will continue to collect the following information from you for the purposes listed below.

Here is a list of the personal information we have about you and how we use it.

Information	How we use it
1. financial information on household income when you applied to the co-op	<ul style="list-style-type: none">• set initial housing charges based on household income. If you did not qualify for subsidy, the co-op has destroyed this information one year later.• [determine your eligibility to live in the co-op—our co-op has minimum and/or maximum income requirements because of our operating agreement and the program rules with CMHC (Canada Mortgage and Housing Corporation) and/or BC Housing and/or co-op policy.]
2. [financial information on household income when you moved into the co-op and your initial market housing charges]	<ul style="list-style-type: none">• [decide if you qualify when you apply for help from our Security of tenure fund after move-in] Only for FCHP (ILM) co-ops.

3. financial information yearly
 - to set housing charges based on household income ***[for households receiving subsidy or for the six ILM (FCHP) co-ops in BC that have income ceilings and surcharges.]***
4. eligibility information
 - to apply for the supplementary Home Owner Grant
5. co-op census information including a record of all residents in each unit and any relevant information on medical conditions that people are willing to provide
 - ensure safe evacuation of all household members in case of an emergency
 - ***[to monitor whether households are over or under housed]***
 - ***[for security purposes especially in areas of high crime rates]***
6. emergency contact
 - for emergency purposes if you cannot be contacted
7. *[relationship of co-applicant to applicant and date of birth of other occupants]*
 - ***[to establish the size of unit for your household, based on co-op occupancy standards, or to set housing charges based on income.] Only if this is required by the co-op's operating agreement or program rules or co-op policies.***
8. member's date of birth
 - for purposes of conducting a credit check before you were accepted as a member
 - for purposes of reporting unpaid debts to a collection agency or credit bureau.
 - ***[to verify eligibility for the supplementary Home Owner Grant]***
9. date of birth of all occupants
 - ***[to determine the age of residents for the purpose of calculating subsidized housing charges]***
 - ***[for BC Housing rent supplement applications]***
10. whether applicants for membership meet the age requirements
 - to determine if applicants have the minimum age required for membership ***[16, 17, 18 or 19]*** as set out in the co-op's Rules.
 - ***[to determine if the applicant is eligible for a unit for seniors (55 years or older) – for Homes BC co-ops only.]***
11. for co-op signing officers only: ID for credit union or bank
 - to change the signing officers at the bank

- | | |
|--|--|
| 12. arrears information and payment history ¹ | <ul style="list-style-type: none">• for the purposes of monitoring the co-op's arrears management for the purposes of documenting payment history for decisions about payment requirements and possible termination proceedings due to non-payment of housing charges or a breach of the Occupancy Agreement and/or co-op financial policies. |
| 13. household insurance policy <i>[and vehicle insurance policy]</i> | <ul style="list-style-type: none">• to document compliance with co-op Occupancy Agreement and/or policies. This will be shredded once proof of compliance is received. |
| 14. grievances and complaints | <ul style="list-style-type: none">• to document any ongoing history of conduct which may require board action and possible termination proceedings. The co-op may not be able to release information about grievances and complaints in order to protect the identity of the person supplying the information. In future, a grievance or complaint must include written consent to information sharing with the respondent and those involved in resolving it. |

* List all additional personal information that you will keep about the member and how you use it.

In addition, we use the information generally to:

- comply with the co-op's operating agreement or program rules with **[CMHC (Canada Mortgage and Housing Corporation) and/or BC Housing]**
- decide if households qualify for an internal move when they request it.

* **[add any other way you will use the information if it relates to the co-op's role as a provider of housing]**

Who we will share your personal information with, if required in the performance of their duties:

1. co-op auditor
2. employees of **[CMHC and/or the Agency for Co-operative Housing and/or BC Housing]**
3. municipal employees dealing with the Home Owner Grant (for grant application)
4. co-op lawyer

¹ "An organization may use personal information about an individual without the consent of the individual, if the personal information is needed to facilitate
(i) the collection of a debt owed to the organization, or
(ii) payment of debt owed by the organization" "Part 5 of the Act/ Use of Personal Information Section 15[1][j]"

5. security committee (for co-op census information)
6. co-op staff or management
7. designated management staff **[or committee member(s) – give the position of the committee member(s), or committees, or directors or officers]** who have designated official duties for:
 - applications for membership: _____
 - income review and setting housing charges, **[including applications for security of tenure fund]**: _____
 - applications for the Home Owner Grant: _____
 - collecting signatures for the Home Owner Grant: _____
 - collecting co-op census information: _____
 - credit checks: _____
 - landlord and other reference checks: _____
 - maintaining secure filing and storage of personal information (both hard copy and computer): _____
8. board of directors only if it is in connection with the Board’s official duties
9. credit check agency (for credit check only when you first applied for membership)
10. general meeting only if it is relevant to an appeal I make of a board decision.
11. **[Add any other positions as needed.]**

PIPA requires us to designate a person responsible for handling questions or complaints about how we use and protect personal information. The co-op's personal information protection officer (PIP officer or *privacy officer*) *[officers]* carries out this duty.

If you have any questions or objections, please contact the *PIP officer*, **[insert the name of the person [persons] and how to contact them]**. You can contact the co-op office in case this is not the current PIP officer