

Privacy Policy

Intergovernmental Affairs

Privacy Policy

Approval Date: April 22, 2009

Effective Date: May 1, 2009

Approved By: Judith Sullivan-Corney



Signature

I POLICY STATEMENT

It is the policy of the Department of Intergovernmental Affairs that it will ensure adherence to the privacy protection provisions of the *Freedom of Information and Protection of Privacy Act*, the *Personal Information International Disclosure Protection Act*, the Government Privacy Policy and other applicable legislation. The Department of Intergovernmental Affairs will uphold the principles of transparency, custodianship and shared responsibility established in the Government Privacy Policy, as it relates to the collection, use and disclosure of personal information.

II DEFINITIONS

For the purposes of this policy, the following definitions shall apply:

Employee - An individual in the employ of, seconded to, or under personal service contract to Intergovernmental Affairs and their volunteers, students, and interns who have access to records.

Personal information - As defined in clause 3(1)(l) of the *Freedom of Information and Protection of Privacy (FOIPOP) Act*, "recorded information about an identifiable individual, including:

1. the individual's name, address or telephone number
2. the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations,
3. the individual's age, sex, sexual orientation, marital status or family status,
4. an identifying number, symbol or other particular assigned to the individual,
5. the individual's fingerprints, blood type or inheritable characteristics,
6. information about the individual's health-care history, including a physical or mental disability,
7. information about the individual's educational, financial, criminal or employment history,
8. anyone else's opinions about the individual, and
9. the individual's personal views or opinions, except if they are about someone else"

Privacy Breach - Unauthorized collection, access, use, disclosure, or alteration of personal information.

Privacy Impact Assessment (PIA) - is a due diligence exercise which identifies and addresses potential privacy risks that may occur in the course of the operations of a public body.

Record - As defined in clause 3(1)(k) of the FOIPOP Act, includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records.

III POLICY OBJECTIVES

The policy is designed to ensure that government meets its legislated obligations in the management of personal information throughout its life cycle. This includes ensuring the protection of personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use disclosure or disposal.

IV APPLICATION

This policy applies to:

- All employees of Intergovernmental Affairs
- All personal information in the custody and control of Nova Scotia Intergovernmental Affairs.

V POLICY DIRECTIVES

- Intergovernmental Affairs shall only collect, access, store, use, disclose and dispose of personal information where authorized by law.
- The records analyst shall be responsible for making security arrangements for records containing personal information.
- Intergovernmental Affairs shall have a privacy breach/complaint protocol, per the template maintained by the NS Information Access and Privacy Office (located at Justice).
- Intergovernmental Affairs shall complete a privacy impact assessment for any new program or service or for a significant change to a program or service, as per the template maintained by the NS Information Access and Privacy Office (located at Justice).
- All employees shall be advised of the policy coming into force.

- This policy shall be made readily available and will be posted on the Intergovernmental Affairs Internet Website.
- Requests for correction of personal information or to express concern regarding compliance shall be directed to the Records Analyst at 902-424-7363.

VI POLICY GUIDELINES

- Intergovernmental Affairs shall approve new records management policies and procedures which will outline the proper handling, storage, access, retention and disposition of records containing personal information.
- Access to records and information systems containing personal information shall be restricted to those who require the information to deliver a program or service.
- Databases containing personal information shall be password protected.
- Training and awareness will be provided to all staff on the privacy protection of personal information. Intergovernmental Affairs shall ensure that all new employees receive a copy of this policy in an orientation package, or that the Information Access and Privacy Administrator will provide training on proper procedures regarding the privacy of personal information.
- Intergovernmental Affairs shall develop a process for expressing concerns about compliance with its own privacy policy. This process shall include who is responsible, how to contact the responsible individual, what detail is needed to provide an appropriate response and the time frame in which the individual can expect to receive a response.

VII ACCOUNTABILITY & SECURITY

The deputy head of Intergovernmental Affairs shall be accountable for compliance with this policy.

Each employee is responsible for complying with this policy and the privacy policies of Intergovernmental Affairs and the Government of Nova Scotia.

VIII MONITORING

The Director of Environmental and Social Affairs will monitor and report on this policy's implementation, performance, and effectiveness, including activity in compliance and noncompliance.

IX REFERENCES

- *Freedom of Information & Protection of Privacy Act* and Regulations
- *Personal Information International Disclosure Protection Act*
- *Government Records Act*
- Management Manual 300: Common Services, Chapter 4, Policy 4.7,
- Website Privacy Policy
- Management Manual 100: Management Guide, Chapter 1, Policy 1.2
- Management Manuals Policy
- Privacy Impact Assessment template for Intergovernmental Affairs
- Privacy Breach/Complaint Protocol For Intergovernmental Affairs
- Canadian Standards Association Model Code 10 Principles
- Intergovernmental Affairs Records Management Policy
- Intergovernmental Affairs Records Management Procedures

X ENQUIRIES

Records Analyst
Intergovernmental Affairs
1690 Hollis Street
7th Floor, Joseph Howe Building
Halifax, Nova Scotia B3J 2Y3
(902) 424-7363
iga@gov.ns.ca