

Section	Administrative Procedure Number
Governance Procedures	RCJTC AP.08.08
Administrative Procedure Title	
Confidentiality of Information Procedure	
Date	Revised
March 3, 2014	

1. The following principles shall guide the management of personal information:
 - a) The RCJTC is responsible for personal information in its custody or under its control and may delegate its authority and responsibilities as required.
 - b) Personal information shall only be collected for specified purposes, duly noting the legislative authority for the collection.
 - c) Informed consent shall be required for the collection, use or disclosure of personal information, except where otherwise permitted by law.
 - d) The collection of personal information shall be limited to that which is necessary for the purposes identified.
 - e) Personal information shall only be used, retained or disclosed for the purposes for which it was collected.
 - f) Personal information collected, used or disclosed shall be accurate, complete and up to date as is necessary.
 - g) Personal information in the custody or control of the RCJTC shall be protected.
 - h) All policies and procedures relating to the management of personal information shall be made readily available to the public.
 - i) An individual has the right to access his or her information, to challenge its accuracy and completeness, and be notified of all requests for access to personal information from individuals other than the individual, whom the information relates to, with such requests to be administered in accordance with applicable laws.

2. Personal information means recorded information about an identifiable individual, including but not limited to:
 - a) Information relating to the number, race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual;

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- b) Information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
 - c) Any identifying number, symbol or other particular assigned to the individual;
 - d) The address, telephone number, fingerprints or blood type of the individual
 - e) The personal opinions or views of the individual except if they relate to another individual;
 - f) Correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence;
 - g) The views or opinions of another individual about the individual; and
 - h) The individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.
3. Consent for the collection, use, or disclosure of personal information may be expressed in writing. It may also be given verbally, electronically, or through authorized representatives. In certain circumstances, consent may be implicit, explicit or implied.
 4. The General Manager of RCJTC shall issue such procedures as may be necessary to support this policy.
 5. The RCJTC, in consultation with Member Boards, shall review and reflect on freedom of information and privacy legislation requirements on an annual basis or as deemed necessary.
 6. All requests for access to information must be submitted in writing to the RCJTC General Manager.
 7. The General Manager of RCJTC is responsible for:
 - a) Administering and ensuring compliance with respect to the collection, use, disclosure and retention of personal information in accordance with applicable legislation;
 - b) Administering all requests for access or correction to personal information;
 - c) Ensuring that procedures are in place regarding third party service providers who have custody of personal information;
 - d) Overseeing and managing any privacy breaches that may occur;
 - e) Communicating and providing training opportunities to staff, as required.
 - f) Any other requirements and responsibilities that may arise with respect to the district's obligations.

8. The RCJTC General Manager or designate will ensure an individual's informed consent is obtained for the collection, use, or disclosure of personal information, except where otherwise permitted by law. Such exceptions are set out in the law and include where legal, medical or security reasons make it impossible or impractical to seek consent.
9. The RCJTC staff will ensure that personal information is protected by security safeguards that are appropriate to the sensitivity of the information, in order to protect personal information from unwarranted intrusion, release or misuse. The methods of protection of personal information will include, but are not limited to:
 - a) Physical measures such as locked filing cabinets, restricted access to offices, sign-in logs, securely disposing of confidential information, and limited distribution of reports containing personal information as required;
 - b) Organizational measures such as security clearances, and limiting access to and ability to change personal information in hard copy and electronic form;
 - c) Technological measures such as passwords, firewalls, levels of encryption;
 - d) Measures applicable to the use of personal information off-site.
10. The RCJTC General Manager or designate will ensure that an individual has the right to:
 - a) access his/her personal information and will be given access to that information in accordance with privacy legislation, subject to any mandatory or discretionary exceptions;
 - b) challenge the accuracy and completeness of the information and to request that it be amended as appropriate or to have a letter/statement of disagreement retained on file.
11. The RCJTC will advise an individual of any third party service provider requests for his/her personal information in accordance with privacy legislation.
12. All requests for access to personal information from individuals other than the individual whom the information relates to, will be administered in accordance with the RCJTC privacy policy, procedures, FIPPA, MFIPPA and associated legislation.

Related RCJTC Policy

P.05 *Human Resources Policy*

P.08 *Governance Policy*

Related RCJTC Administrative Procedures

Related RCJTC Forms