



Policy:	O-6.1
Approved By:	Board of Governors
Approval Date:	December 4, 2017
Amendment Date:	
Policy Holder:	VP Administration

Protection of Privacy Policy

Commitment

Camosun College is committed to meeting the spirit, intent, and requirements of the British Columbia *Freedom of Information and Protection of Privacy Act* (the “Act”). The Act clearly stipulates the requirements of a public body regarding disclosure obligations as well as the management of personal information within its custody and control. As a (local) public body, Camosun College facilitates the disclosure of information as well takes precautions to protect the privacy of personal information under its custody or control, as required by the Act.

Principles

- a. Privacy of student and employee information is paramount for Camosun College.
- b. The College is committed to compliance with the Act and other federal and provincial statutes governing and regulating the collection, use, disclosure, retention, disposition, and protection of personal information.
- c. The College will honour the right of access to information as required by the Act.
- d. The College is committed to putting into place measures and procedures in accordance with best practices, to ensure the effective management of information within its custody and control.
- e. The College requires third party service providers (e.g., contractors) and affiliates to comply with the Act, this policy, and related policies, principles, processes and requirements of the College.

Policy

It is the policy of Camosun College that the College will collect, use, disclose, retain, dispose, protect, and otherwise manage information within its custody and control in accordance and compliance with the Act and other federal and provincial statutes and regulations. The head of the public body shall oversee, and may delegate authority as deemed appropriate to manage information, privacy, and related functions of the College. Personal information shall only be used for the purpose for which it was collected or for related purposes subsequent to this policy and requirements of the Act.

Scope / Limits

- This policy applies to all records (paper and electronic) in the custody or control of the College.
- This policy is subject to the Act and other laws of general application.

Collection of Information

Personal information collected or acquired by College officials shall be used to fulfill program, activities and operational requirements of the College, or as required by law. Personal information not required in order to fulfill the College's program, activities, or operational requirements shall not be collected by the College. The College will not collect information unlawfully or unfairly. In most circumstances, personal information will be collected directly from the individual. Indirect collection may occur in exceptional circumstances and as authorized by explicit, written consent of the individual or as required by law.

Use of Information

College officials will use collected personal information to fulfill the purpose for which it was originally obtained; or for specific purposes if directed by the individual from whom the personal information was collected; or for a use consistent with the original purpose. The College shall strive to ensure the access to personal information by College officials is sufficient, but does not exceed the requirements necessary to fulfill their function(s). At no time may information be used for purposes or related purposes other than those for which it was initially collected and authorized, unless required by law.

Disclosure of Information

Camosun College will treat and manage personal information within its custody and control with the highest degree of confidentiality and privacy. Personal information will only be disclosed to the individual themselves, or in specific circumstances to a third party with the explicit authorization of the individual, or as required by law. Camosun College does not sell, share, or disclose personal information to others for any type of mailing list. Camosun College will not disclose personal information outside of Canada without explicit consent unless permitted to do so by law.

Disclosure of an individual's personal information is subject to the application of Part-2 of the Act.

Retention & Disposition of Information

Camosun College will retain, archive, and dispose of personal information under its custody and control in accordance with the Camosun Records Management Policy and subsequent procedures and requirements. Camosun College utilizes a records' retention policy, which is customized for each program area. This customization takes into account the length of time information held by that program needs to be maintained.

Once the personal information is no longer needed, it is confidentially destroyed on the authority of the program area. If an individual's personal information is used to make a decision, the personal information involved and a record of that decision will be kept for a minimum of one-year after the decision has been made.

Protection of Information

The security of personal information is paramount to Camosun College and measures will be taken to ensure personal information is secure at all times. Security measures include, but are not limited to: secure facilities, controlled areas, restricted user access, password protection, firewalls, encryption software, locked file cabinets, and best practices deployed by College officials which respect the confidentiality and security of

personal information.

Information & Technology

Camosun College may collect, retain, and store personal data electronically (e.g., servers, databases) for the purposes of fulfilling its program and operational requirements. Regardless of the mode of data collection and storage or retention, Camosun College will manage electronic personal information in accordance with provisions outlined in this policy, and as required by the province and by law. Storage of electronic data will be consistent with geographic and other boundaries and limitations outlined in the *Act*.

Using our Website

Camosun College captures identification data from visitors to its website for security, statistical and reporting purposes.

Consent to the use of cookies permits specific enquiries to be directed to, and managed by, appropriate information systems at the College.

In compliance with the *Act*, the College does not disclose information about any particular website visitor to external organizations or individuals.

The Camosun College website contains links to external third party websites. Clicking on these links means that you are leaving Camosun College's secure website and are no longer covered by our privacy policy.

Access to Information & Inquiries

Members of the public may request access to information by writing to or contacting the College privacy office, at:

Privacy Office
Camosun College
3100 Foul Bay Road
Victoria, B.C. V8P 5J2
OR
privacy@camosun.bc.ca

Definitions

- **Contact Information:** Information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.
- **College official:** Refers to employees or service providers of the College whose role is to fulfill a specific operational function requiring access to personal information – either regularly or from time-to-time.
- **Indirect Collection:** The collection of personal information from a source other than the individual.
- **Information:** Refers to personal information, unless otherwise specified.

- **Personal Information:** Recorded information about an identifiable individual other than contact information. Examples of personal information include, but are not limited to: name, home address, home telephone number, email address, mobile telephone number, ethnicity, gender, marital status, employment history, criminal history, grades, and health-related information.
- **Public body:** Includes a ministry of the government of British Columbia, an agency, board, commission, corporation, office or other body designated in, or added by regulation to, Schedule 2, or a local public body (i.e. an educational body). Under the *Act*, Camosun College is an educational body, and therefore, a public body.
- **Record:** 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.
- **Service Provider:** A person or organization contracted by the College to perform services.

Related Documents & Resources

- British Columbia *Freedom of Information & Protection of Privacy Act*
- Camosun Privacy Breach Protocol (in development)
- Camosun Records Management Policy (review pending)
- Office of the Information & Privacy Commissioner Guidelines
- Public Sector Surveillance Guidelines
- Privacy Impact Assessment Guidelines
- Web Security related policies and procedures
- Standards of Conduct Policy

Note: the above list is not exhaustive. Statutes, regulations, policies, procedures, directives, practices, guidelines and other documents related directly or indirectly to freedom of information and protection of privacy will be updated and change over time. Relevant additions and changes in statutory and non-statutory documentation and resources will be reflected in the list where possible.