



SFSS Privacy and
Information
Management
Policies

Simon Fraser Student Society

simon fraser

student society

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PURPOSE OF THESE POLICIES

The goal of this document is to establish the Simon Fraser Student Society's commitment to collect, use, disclose, ensure accuracy of, protect, and retain any and all personal information under control of the Society in the manner established by the *Personal Information Protection Act*.

POLICY REVIEW AND APPROVAL PROCESS

Each policy will be reviewed annually by any staff involved in achieving the stated policy outcome. The Campaigns, Research, and Policy Coordinator or designate will provide staff with an annual review schedule.

Where no change is required, the Board President and Executive Director (ED) or designate shall sign the policy indicating it has been reviewed.

Where a need or an opportunity for improvement arises, policy shall be created, changed, or repealed in the following way:

1. The office responsible for the policy outcome shall propose amendments and communicate those to the ED or designate.
2. The ED or designate shall review the proposed changes with the Privacy Officer and Manager - Administrative Services or designate involved.
3. Any new, amended, or repealed policy shall be signed by the ED and the Board President or designate and shared with staff and membership.



P-1: PERSONAL INFORMATION AND PRIVACY POLICY

<p><i>POLICY TYPE: PRIVACY AND INFORMATION MANAGEMENT POLICY</i></p> <p><i>POLICY TITLE: PERSONAL INFORMATION AND PRIVACY POLICY</i></p> <p><i>POLICY REFERENCE NUMBER: P-1</i></p> <p style="text-align: right;"> Adopted: June 1, 2020 Previous Revisions: April 3, 2017 </p>		
Position	Signature	Date
Executive Director		

Policy

This policy aims to establish the standards according to which all SFSS processes will collect, use, disclose, ensure accuracy of, protect, and retain personal information, ensuring thereby that all obligations under British Columbia’s *Personal Information Protection Act* (PIPA), and Canada’s *Personal Information Protection and Electronic Documents Act* (PIPEDA) only if personal information crosses provincial or national borders, are respected.

The Campaigns, Research, and Policy Coordinator serves as the Privacy Officer of the Simon Fraser Student Society (SFSS).

Definitions

1. ‘Personal information’ means information about an identifiable individual which includes, but is not limited to names, home addresses and telephone numbers, age, sex, gender identity, marital or family status, SIN, identifying number, race, national or ethnic origin, colour, religious or political beliefs or associations, educational history, medical history, disabilities, blood type, employment history, financial history, criminal history, anyone else's opinions about an individual, an individual's personal views or opinions, and name, address and phone number of parent, guardian, spouse or next of kin. Personal information includes employee personal information but does not include workplace contact information or *work product information*.
2. ‘Work production information’ means information prepared or collected by an individual or group of individuals as a part of the individual's or group's responsibilities or activities related to the individual's or group's employment or business but does not include personal information about an individual who did

- not prepare or collect the personal information. Work product information may be written or verbal information.
3. 'Privacy Officer' means the individual designated responsibility for ensuring that the SFSS complies with this policy and with the obligations of PIPA.

Standards

4. The Society will ensure that:
 - a. the purpose for the collection, use, and disclosure of any personal information is clear or evident,
 - b. the process for obtaining consent for the collection, use, and disclosure of personal information is clear or evident,
 - c. the collection, use, and disclosure is limited to what is necessary for the conduct of its operations and to establish and manage employee relationships,
 - d. clients reserve the right to maintain access to and request the correction of their personal information,
 - e. the personal information it collects is accurate,
 - f. the personal information it collects is protected,
 - g. the personal information it collects is retained in a manner consistent with applicable regulations,
 - h. there are clear schedules for the retention and destruction of the personal information it possesses,
 - i. Directors, staff, and volunteers are trained so as to ensure they comply with the requirements of this policy,
 - j. annual privacy audits of Society will be conducted,
 - k. there are procedures for the prevention, reporting, containment, remediation and notification of an information incident, and
 - l. complaints, inquiries, or requests for the access to, correction of and/or removal of personal information

Purpose of collection

5. Personal information will only be collected, used, or disclosed where required by the provision of Society services or programming, or the Society's adherence to its legal obligations.

Process for obtaining consent

6. The Society will obtain consent to collect, use, or disclose personal information at the time of collection, except for the purposes of, for instance:
 - a. acquiring the SFSS member registry, and
 - b. improving Society programs and services.
7. Subject to certain exceptions (e.g. the personal information is necessary to providing a service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients can withhold or withdraw their consent.

Limitations on collection, use, and disclosure

8. The Society will only collect, use, or disclose personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as the conduct of surveys intended to enhance the provision of our programs and services.

Access to personal information and requests for correction and removal of personal information

9. Clients have the right to access and request to correct and remove their personal information.
10. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
11. A request to correct or remove personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
12. A minimal fee of no more than one dollar may be charged for providing access to personal information.
13. The Society will respond to requests from clients no later than 30 days after the client's request, unless:
 - a. the request is not detailed enough to identify the personal information requested,
 - b. a large amount of personal information is requested or must be searched and meeting the time limit would unreasonably interfere with the operations of the Society, or
 - c. more time is needed for the Society to consult with another organisation or public body to decide whether or not to provide the client access to the requested document or information.
14. If a request is refused in full or in part, we will provide the reasons for refusal and the recourse available to the client. Requests may be denied if they reveal personal information about another individual, threaten the safety and/or health of another individual, or reveal third party information without their consent, among other things.

Assurances of accuracy

15. The Society will make every reasonable effort to ensure that the personal information it uses is accurate and complete. Upon request by an individual to whom information relates, the Society will correct or annotate the information with a correction when documentary evidence, satisfactory to the Society, is provided to substantiate the correction.

Assurances of protection

16. The Society will protect personal information by making reasonable security arrangements to prevent the risk of unauthorized collection, access, use, disclosure or disposal of personal information.

Assurances of retention

17. The Society will retain personal information for a period of at least one year.

Schedule for retention and destruction of personal information

18. The schedule for retention and destruction of any and all personal information in the control of the Society will be outlined in SFSS Personnel Policies.

Training for Directors, staff and volunteers

19. The Society will provide training to Directors, staff and volunteers upon hire on the SFSS Privacy and Information Management Policies. New Directors, staff and volunteers are required to provide their signature indicating they have completed the aforementioned training during orientation. Current Directors, staff and volunteers are required to provide their signature upon completion of the aforementioned training.

Privacy audits

20. Annual privacy audits of Society operations will be conducted by the Privacy Officer to ensure that staff are compliant with Society policies and procedures, and that there is continuous improvement in privacy and information management practices.

Information incident

21. The Society will establish an information incident procedure, which will include steps on preventing (including risk identification), reporting, containing, remediating, and notifying those affected of an information incident.

Complaints, inquiries or requests

22. Complaints, inquiries, or requests for the access to, correction of and/or removal of personal information should be directed, in writing, to the Campaigns, Research and Policy Coordinator, who is the Privacy Officer of the Society. If the Privacy Officer is unable to resolve the concern, the Information and Privacy Commissioner of British Columbia may be contacted. The Privacy Officer may be contacted by email at policyresearch@sfss.ca.



P-2: REQUESTS FOR SOCIETY RECORDS

<i>POLICY TYPE: PRIVACY AND INFORMATION MANAGEMENT POLICY</i>		
<i>POLICY TITLE: REQUESTS FOR SOCIETY RECORDS</i>		
<i>POLICY REFERENCE NUMBER: P-2</i>		
		<i>Adopted: June 1, 2020</i> <i>Previous Revisions</i>
Position	Signature	Date
Executive Director		

Policy

The Privacy Officer is responsible for administering all requests for Society records from members.

The ED is responsible for administering all requests for information from the public.

Clients

1. Members
2. Public

Definitions

1. 'Society records' refers to a record the Society is required to keep as per section 20 of the *Societies Act*.

Process

2. Where a client wishes to request Society records not available on the Society website, that client must submit a Society Record Request Form.
3. Where the client is a member, the Privacy Officer will:
 - a. consult with the client for additional details where required,
 - b. collect the documents requested, ensuring no sensitive information or personal information is included in the package,
 - c. coordinate the time and place where the client may access and review the requested documents in accordance with Society by-laws or, where

- appropriate, provide the client with the documents in electronic format,
and
 - d. retrieve the documents after the client is finished their review where those documents are made available on location.
4. Where the client is external to the Society, the ED will:
- e. consult with the Board where appropriate,
 - f. refer the request to the Privacy Officer with direction on how to proceed.



P-3: REQUESTS FOR MEMBER INFORMATION

<i>POLICY TYPE: PRIVACY AND INFORMATION MANAGEMENT POLICY</i>		
<i>POLICY TITLE: REQUESTS FOR MEMBER INFORMATION</i>		
<i>POLICY REFERENCE NUMBER: P-3</i>		
<i>Adopted: June 1, 2020</i> <i>Previous Revisions: April 3, 2017</i>		
Position	Signature	Date
Executive Director		

Policy

The Privacy Officer is responsible for administering all requests for member information from Directors, staff, and members.

The ED is responsible for administering all requests for information from the public.

Standards

1. Requests for member information may only be made in accordance with the standards contained in P-1: Personal Information and Privacy Policy.
2. Requests for member information regarding an individual other than one’s self will be denied unless the requestor has express written permission from the individual of who the personal information pertains to.

Clients

1. Directors
2. Staff
3. Members
4. Public

Process

3. Where a client wishes to request personal information about a staff, Director or member of the Society, including but not limited to information regarding the membership or student status of a person, they must complete a Member Information Work Order.
4. Where the client is a Director or staff person, the Privacy Officer will:
 - a. consult with the client for additional details where required,

- b. collect the documents requested, ensuring no sensitive information is included in the package,
 - c. coordinate the time and place where the client may access and review the requested documents or, where appropriate, provide the client with the documents in electronic format, and
 - d. retrieve the documents after the client is finished their review where those documents are made available on location.
5. Where the client is external to the Society, the ED will:
- a. consult with the Board where appropriate,
 - b. refer the request to the Privacy Officer with direction on how to proceed.



P-4: REQUESTS FOR GENERAL INFORMATION

<i>POLICY TYPE: PRIVACY AND INFORMATION MANAGEMENT POLICY</i>		
<i>POLICY TITLE: REQUESTS FOR GENERAL INFORMATION</i>		
<i>POLICY REFERENCE NUMBER: P-4</i>		
<i>Adopted: June 1, 2020</i> <i>Previous Revisions: April 3, 2017</i>		
Position	Signature	Date
Executive Director		

Policy

The Communications Coordinator is responsible for administering all requests for general information from Directors, staff and members.

The Manager Administrative Services is responsible for administering all requests for information from the public.

Standards

1. Requests for general information will be received and handled by the Communications Coordinator and forwarded to the appropriate staff person if necessary.
2. The Privacy Officer will handle any requests for information that concern member, staff or Director privacy and personal information in accordance with the standards contained in P-1: Personal Information and Privacy Policy.

Clients

1. Members
2. Public

Process

3. Where a client wishes to request general information about the Society that is not otherwise regarding a Society record or the personal information of a staff, Director, or member of the Society, they must complete a Feedback Form.
4. Where the client is a member, the Communications Coordinator will:
 - a) consult with the client for additional details where required,
 - b) forward the request to the most appropriate staff member,

- c) provide the information requested, ensuring no sensitive information is included,
 - i. if a document is requested, collect the document requested, ensuring no sensitive information is included in the package,
 - ii. coordinate the time and place where the client may access and review the requested documents or, where appropriate, provide the client with the documents in electronic format, and
 - iii. retrieve the documents after the client is finished their review where those documents are made available on location.
- 5. Where the client is external to the Society, the ED will:
 - a. consult with the Board where appropriate,
 - b. refer the request to the Privacy Officer with direction on how to proceed.



P-5: INFORMATION INCIDENT MANAGEMENT

<p><i>POLICY TYPE: PRIVACY AND INFORMATION MANAGEMENT POLICY</i></p> <p><i>POLICY TITLE: INFORMATION INCIDENT MANAGEMENT</i></p> <p><i>POLICY REFERENCE NUMBER: P-5</i></p> <p style="text-align: right;"><i>Adopted: June 1, 2020</i> <i>Previous Revisions</i></p>		
Position	Signature	Date
Executive Director		

Policy

This policy will establish a process for managing information incidents. The Privacy Officer is responsible for the administration of this policy.

Definitions

Information incidents are when unwanted or unexpected events threaten privacy or information security. They can be accidental or deliberate and include the theft, loss, alteration, or destruction of information. An information incident may also be referred to as a privacy breach.

Standards

1. The Society will ensure that:
 - a. privacy breaches are prevented through risk management procedures,
 - b. privacy breach reporting procedures are established and followed,
 - c. privacy breaches are contained as soon as reasonably possibly and efforts are made to recover any confidential or person information, and
 - d. the cause of the breach is determined, the incident is resolved, and affected parties are notified.

Prevent

2. Information incidents will be prevented through established of risk management procedures for any and all personal information in the custody of the Society.

Report

3. Staff will adhere to privacy breach reporting procedures for when and how to report privacy breaches to the Office of the Information and Privacy Commissioner (OIPC).
4. Members who have personal information in the custody of the Society may report concerns to the OIPC if they suspect a breach has occurred.

Contain

5. Privacy breaches will be contained as soon as reasonably possible and efforts will be made to recover any confidential or person information.

Remediate

6. The Society will work with relevant parties to determine the specific causes of the incident, resolve the incident, and if necessary, notify affected individuals.