

## Department of Seniors Privacy Policy

**Approval Date: November 9, 2009**

**Effective Date: April 1, 2009**

**Approved By: Deputy Minister, Rosalind Penfound**

### **I POLICY STATEMENT**

It is the policy of the Department of Seniors 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 Seniors 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.

<b><i>employee</i></b>	an individual in the employ of, seconded to, or under personal service contract to the Government entity and their volunteers, students, and interns who have access to records.
<b><i>FOIPOP</i></b>	<i>NS Freedom of Information and Protection of Privacy Act</i>
<b><i>personal information</i></b>	as defined in clause 3(1)(l) of the FOIPOP Act, "recorded information about an identifiable individual, including:  (l) the individual's name, address or telephone number; (ii) the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations; (iii) the individual's age, sex, sexual orientation, marital status or family status; (iv) an identifying number, symbol or other particular assigned to the individual; (v) the individual's fingerprints, blood type or inheritable characteristics; (vi) information about the individual's health-care history, including a physical or mental disability;

(vii) information about the individual's educational, financial, criminal or employment history;  
(viii) anyone else's opinions about the individual, and;  
(ix) the individual's personal views or opinions, except if they are about someone else”

***breach*** the event of unauthorized collection, access, use, disclosure, or alteration of personal information

***PIA*** a Privacy Impact Assessment 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 the Department of Seniors 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 and;  
all personal information in the custody and control of the Department of Seniors.

### **V POLICY DIRECTIVES**

- The Department of Seniors shall only collect, access, store, use, disclose and dispose of personal information where authorized by law.
- The CEO is responsible for making reasonable security arrangements for personal information in keeping with the provisions of applicable legislation.
- The Department of Seniors shall have a privacy breach protocol, per the template maintained by the Corporate Access and Privacy Office (Justice).
- The Department of Seniors 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 Corporate Access and Privacy Office (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 Department of

Seniors Internet Website.

- Requests for correction of personal information shall be directed to the Secretary II or the Administrative Assistant to the Chief Executive Officer of the Department of Seniors.
- Questions or concerns regarding compliance shall be directed to the Senior Policy Analyst who acts as the Information, Privacy and Access (IAP) Administrator for the Department of Seniors.

## **VI POLICY GUIDELINES**

The following actions and/or procedures will be taken by the Department of Seniors to ensure the Privacy Policy is implemented according to its requirements:

- filing cabinets will be locked and access will be limited to individuals who need access only for the purpose of carrying out a program or service;
- databases containing personal information will be password protected and passwords will only be issued to staff that require access to deliver the program or service;
- files containing personal information will not be removed from offices or left unattended;
- disposal of both transitory or master records containing personal information will only be carried out using secure methods, such as shredding;
- training and awareness will be provided to all staff on the privacy protection of personal information;
- all new employees will receive a copy of this policy in an orientation package, and/or the IAP Administrator will provide training on proper procedures regarding the privacy of personal information;
- a process for expressing concerns about compliance, with the Department of Seniors' privacy policy, shall be outlined.

## **VII ACCOUNTABILITY & SECURITY**

1. The Deputy Minister of the Department of Seniors shall be accountable for compliance with this policy.
2. Each employee is responsible for complying with the Department of Seniors privacy policy, and the Government of Nova Scotia's privacy policy.

## **VIII MONITORING**

The Department of Seniors' IAP Administrator will be responsible for monitoring compliance with this policy.

## **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

## **X ENQUIRIES**

Enquiries should be directed to:

Information, Access and Privacy (IAP) Administrator  
Department of Seniors  
1740 Granville Street, 4<sup>th</sup> Floor  
PO Box 2065  
Halifax Nova Scotia B3J 2Z1  
Phone: (902) 424-4735  
Toll free: 1-800-670-0065  
Fax: (902) 424-0065  
Email: [seniors@gov.ns.ca](mailto:seniors@gov.ns.ca)

Approved by:



Rosalind Penfound  
Deputy Minister

Date:

November 9, 2009

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