



CORPORATE POLICY

Sub Topic: Protection of Personal
Information

Policy No. CORP. 1-08

Topic: Corporate Records

Applies to: All Employees

Section: Legislative Services

Council Adoption Date: May 5, 2014

Effective Date: May 5, 2014

Revision No:

Date:

Policy Statement & Strategic Plan Linkages

The collection and use of personal information about Newmarket residents and other members of the public is a necessary part of the Town's regular business processes. Part II of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) requires institutions to use appropriate methods for the collection, use, retention and disposition of personal information.

This Policy relates to the key area of focus: "Well-Equipped and Managed" of the Strategic Plan. The collection, use and management of personal information in a responsible and transparent manner links directly to the Core Values of Accountability and Accessibility.

Purpose

In order to provide greater accountability and to protect the privacy of staff and the public, this policy outlines the standards and procedures for the collection, use and management of personal information by all Town employees. This policy applies to all personal information, personal health information and personal information banks which are collected and maintained by the Town of Newmarket.

Definitions

Personal information

Personal Information Bank (PIB)

Personal Health Information

Privacy Audit

Privacy Breach

Privacy Impact Assessment (PIA)

Records

Procedures

1. Personal information will be collected, used and retained in accordance with MFIPPA and other privacy legislation and all related procedures attached as Appendix B.
2. A privacy audit will be conducted for the Corporation every two to three years by the Legislative Services Department to evaluate employee knowledge and execution of the Town's privacy related policies and procedures. Interim audits will be conducted on an as needed basis for individual departments or business units. The Audit will be conducted according to the procedures attached as Appendix C.
3. All privacy complaints and either suspected or evident privacy breaches will be reported immediately according to the procedures in Appendix D.
4. All personal information about Town employees will be collected used and retained in accordance with Appendix B and Appendix F.

Responsibilities of Employees

All Town of Newmarket employees shall take all reasonable measures to protect against theft, loss, unauthorized use, and unauthorized disclosure of any personal information.

All employees shall ensure that all records containing personal information are disposed of in a safe and secure manner and in accordance with the Records Retention Policy CORP.1-06.

Employees who do not comply with this policy may be subject to progressive discipline up to and including termination of employment.

Responsibilities of Management

All supervisors, managers, directors, and commissioners must maintain all personal information of staff and the public in accordance with the established procedures in this policy.

Cross-References

Alternative Work Arrangement Policy HR.2-07

Employee Code of Conduct Policy CAO.3-01

Municipal Freedom of Information and Protection of Privacy Act, R.S.O., 1990, C. M.56

Personal Information Protection and Electronic Documents Act S.C. 2000, c.5

Records Retention Policy Corp.1-06

Routine Disclosure and Active Dissemination Policy (TBD)

Risk Management Policy (TBD)

Video Surveillance System Policy (TBD)

Use of External and Mobile Devices Policy (TBD)

Appendices (which may be amended from time to time)

Appendix A - Definitions

Appendix B - Procedures for the Collection, Retention and Disclosure of Personal Information

Appendix B.i - Privacy Impact Assessment Form

Appendix B.ii - Privacy Impact Assessment Guidelines

Appendix B.iii - Notice of Collection Template

Appendix B.iv - Personal Information Bank Listing - Town of Newmarket (TBD)

Appendix C - Privacy Audit Procedures

Appendix D - Privacy Breach/Complaint Procedures

Appendix E - Website Privacy Policy

Appendix F – Procedures for Staff Access to Human Resources Personal Information