

**TOWN OF CARLYLE
POLICY MANUAL**

POLICY DESCRIPTION:

Protection of Privacy

POLICY NUMBER:

PRI00010

DATE APPROVED: December 19, 2007

DATE REVISED:

RESOLUTION #12

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Purpose of Policy: To comply with the Local Authority Freedom of Information and Protection of Privacy Act and Regulations.

The main purpose of the Local Authority Freedom of Information and Protection of Privacy Act is to provide every person a right of access to records in the possession or under the control of a local authority, subject to certain exemptions.

The second main purpose of the Local Authority Freedom of Information and Protection of Privacy Act is to establish rules for the protection of personal information. Personal information is any information about an identifiable individual (e.g., race, religion, sexual orientation, family status, criminal or employment history, or opinions of another person about that individual), but does not include classification, salary, benefits or responsibilities.

The Office of the Information and Privacy Commissioner has concluded that public bodies in Saskatchewan have a duty to assist all applicants when they apply for access to records.

- Collection of personal information must be for a purpose that relates to an existing or proposed program or activity (for example, collecting employees' social insurance numbers for the purposes of payroll administration).
- Collection of personal information must be limited to information reasonably necessary for the activity.
- There is a duty to inform the individual when collecting directly from the individual.

Accountability and Scope

This policy applies to all personal information in the custody or control of the Town of Carlyle for the purposes of its operations.

This policy applies to all employees of the Town of Carlyle, and to any other person requiring access to the information to satisfy the purpose for which the information is collected.

Collection and Purpose

- a) The Town Administrator collects personal information about individuals in order to:
- assess properties and levy taxes on properties owned by individuals or corporations,
 - provide utilities and levy utility charges to individuals or corporations,
 - permit rental of trailer lots and levy rental charges to individuals,
 - provide other services as may be authorized by Council.

Only the information necessary to satisfy this purpose will be collected and it will only be shared with others as needed for that purpose, with consent or as otherwise provided for in law.

The personal information collected is limited to:

- Name of property owner or renter
- Mailing Address of property owner or renter
- Telephone number of property owner or renter
- Legal Description of property
- Civic Address of property
- Assessed value of land and improvements
- Taxes levied, taxes paid
- Utilities levied, utilities paid

- b) The Town Administrator collects personal information about individuals in order to:
- Pay wages and benefits to employees,
 - Remit payroll deductions to appropriate agencies,
 - Enroll employees in approved benefit and pension plans.

The personal information collected is limited to:

- Name of employee
- Employee's social insurance number
- Employee's beneficiary
- Employee's mailing address
- Employee's home telephone number

- c) When personal information is collected, the staff member collecting the information shall:
- Provide the individual with an explanation of how the information will be used and disclosed.
 - Provide the individual with a written brochure, information sheet, or any other information available that explains the purposes for the collection of information.
 - Respond to any questions the individual may have about the purposes for the collection, or refer the individual to a person who can respond to the questions.

Use and Disclosure

- a) No manager or employee, other than those who need to access the personal information to perform an accepted function, shall access, use, disclose, or otherwise view the personal information collected for the purposes intended.
- b) Before allowing a use or disclosure of personal information that is not the original purpose for collection, the following must be applied:
- The purpose must be approved by the Town Administrator, who will consult with the Privacy Officer as required.
 - The use or disclosure must be permitted in The Freedom of Information and Protection of Privacy Act.
 - Where practicable, the consent of the subject individual must be received and documented prior to the use or disclosure being made.
- c) De-identified personal information is used or disclosed if it will serve the purpose and if it is practical to do so.
- d) Aggregate and statistical information which is derived in whole or in part from personal information may be used or disclosed without reference to this policy provided all identifying information has been removed and it is not reasonably possible to re-identify the individuals.

Retention and Disposal

Personal information collected for this application will be retained in accordance with the Town of Carlyle's Bylaw No. 2707, a Bylaw for the Destruction or Records. Once the retention period is reached, records containing personal information are disposed of in a safe and secure manner, by being shredded, to ensure no unintentional disclosures of personal information contained within.

Access, Accuracy and Amending Personal Information **Individuals can request access to their own personal information**

An individual will be given access to his or her own personal information upon request by contacting the Town Administrator.

Accuracy

Personal information is collected directly from the subject individual, whenever possible, to ensure it is accurate.

Amendment

Upon request, an individual may review the personal information collected and, if inaccurate, request that the information be corrected.

Upon receiving a request to amend personal information, the Town Administrator will review the request and will:

- Amend the personal information as requested; or add a note to the record indicating that a request for an amendment was made and noting why the amendment was not made.
- Where practical, inform others to when the personal information has been previously disclosed, if it is thought that the personal information is or will still be used by the other body.

Safeguards

Personal information collected will be stored in an area accessible only by authorized staff. The records will be protected in accordance with the following specific steps:

- Use of passwords and limiting the number of persons accessing the software applications;
- Safe transmission and storage of all records;
- Physical safeguards – records are to be kept in file cabinets that are locked whenever the information is not being used; file cabinets are kept in a restricted area which is locked whenever it is not occupied.

Openness and Compliance

This policy will be made available to the public upon request.

Summary information about the policy may be included in public notices, including for example, posting on the Town of Carlyle's Internet web site.

Individuals with questions or concerns about the application of this policy should contact the Town Administrator at 453-2363, or at towncarlyle@sasktel.net, or at Box 10, Carlyle, Sask. S0C 0R0.