

Personal Information Protection

Purpose of the policy

To protect the dignity of members and the security of personal information the co-op may gather on individuals, in compliance with the *Personal Information Protection Act* (PIPA) and its principles.

Definition

“**Personal information**” under PIPA means information about an identifiable individual. It includes employee personal information but does not include work contact information or work product information.

Policy

1. The board will appoint **1** personal information protection officer (PIP officer).
2. The board will:
 - provide the PIP officer with a job description outlining duties in relation to PIPA and its principles
 - ensure the PIP officer receives appropriate training
 - ensure the PIP officer fulfills their duties, and
 - co-operate fully with the PIP officer in the performance of the officer’s duties and in implementation of the policy.
3. The co-op shall only collect the personal information that it requires to ensure sound management of the co-op and to fulfil its obligations to its members, its contractual obligations, and any legal requirements.
4. The co-op shall use and share personal information only with the agreement of the individuals concerned, or as provided for in PIPA.

5. The co-op will store documents that contain personal information securely to prevent unauthorized use. The co-op will destroy personal information when the co-op no longer needs it.
6. Individuals will, on written request, have access to any personal information that the co-op has about them. The co-op will provide the information within 30 days, except where to do so would be in violation of PIPA. The co-op will correct any errors in personal information that the individual brings to its attention.
7. All directors and management staff will sign a confidentiality agreement. Any designated members who have access to some personal information or co-op confidential information will also sign the agreement.
8. Discussion that will result in sensitive personal information appearing in the minutes will be held *in camera*. Minutes of the *in camera* portion of meetings will be kept separate from the regular minutes and stored securely to prevent unauthorized use.

Adapted from *Protecting Personal Information: A Housing Co-op's Guide to the PIPED Act*,
Co-op Housing Bookstore.

Policy approved by general meeting:

Replaces policy dated:

Procedures needed to carry out this policy

1. Determine how personal information and confidential co-op information will be collected, used, filed, shared and protected.
2. Determine who has the authority to access and release different types of personal information (and confidential co-op information).
3. Develop procedures for routinely destroying personal information that the co-op no longer needs.
4. Develop a personal information complaints procedure.
5. Review and revise, as necessary, forms that ask for personal information, e.g. application form.
6. Develop forms for the personal information protection statement (to be signed by applicants) and memo to current members about personal information.
7. Train management staff and members about their responsibilities for protecting personal information.
8. Establish procedures for keeping the *in camera* portion of minutes secure.

Resources

- Confidentiality agreement
- PIPA tools – where to find them