

# FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY

[Organization Name] is committed to protecting the privacy of its employees and will do so in accordance with Saskatchewan's Freedom of Information and Protection of Privacy Act (FOIPP).

## **POLICY**

All requests for information will be evaluated objectively in light of [Organization Name]' obligations to the public and under FOIPP. To the greatest extent possible, the rights and interests of any third party who may be directly impacted by an information request will be considered.

Personal information about [Organization Name]' employees and stakeholders may be collected, created, and maintained, but only in accordance with FOIPP. Accordingly, [Organization Name] will take reasonable and prudent steps to safeguard and maintain the privacy of any such personal information in its possession or control in accordance with this policy and FOIPP.

Unless expressly permitted by law, [Organization Name]' policies and procedures are subject to and must comply with FOIPP's provisions.

This policy is applicable to all [Organization Name] employees and stakeholders who have access to personal information maintained by [Organization Name], in any form or type of data.

#### **Privacy of Information**

Collection of Personal Information

Only in the following circumstances will personal information be collected:

- when it is necessary for the proper administration of [Organization Name]' programs, services, or general operations;
- when it is expressly authorized or required by a Government of Canada or Province of Saskatchewan enactment; or
- when it is necessary for law enforcement purposes.

Members of [Organization Name] responsible for collecting personal information must be able to articulate the reason(s) for the collection.

If the person collecting personal information is unable to answer questions about the purpose(s) for collection, the individual seeking clarification will be referred to another person who is more qualified to address the question(s).

Individuals' personal information will be collected directly from them unless circumstances necessitate obtaining it from another source. Any other collection will only be done in accordance with FOIPP.



[Organization Name] and its employees will take reasonable and prudent steps to protect personal information from all unauthorized collection, access, use, disclosure, or destruction.

Personal information will be accessible to authorized employees only for the purposes specified in this policy.

Personal data will be stored in a secure environment that is only accessible to authorized employees. This includes:

- storing personal information in locations that are not generally accessible to all employees and/or the general public;
- securing rooms and/or filing cabinets that contain personal information when an authorized employee or staff member is not present; and
- restricting authorized employees' access to personal information stored in an electronic format by requiring them to sign a confidentiality agreement.

#### Use of Personal Information

Personal information may be used only for the following purposes:

- for the purpose(s) for which it was obtained or compiled, or for a purpose consistent with that purpose;
- for any other purpose permitted, authorized, or required by FOIPP; or
- with the explicit consent of the individual to whom the personal information pertains, or by someone duly authorized to provide such consent on that individual's behalf.

# Disclosure of Personal Information

[Organization Name] will only disclose or allow for the public disclosure of personal information in the following circumstances:

- for the purpose(s) for which it was gathered or compiled, or for a purpose that is compatible with that purpose;
- under a FOIP-permitted, -authorized, or -required purpose;
- for a purpose expressly authorized or required by the Government of Canada or the Province of Saskatchewan through legislation; or
- for any other purpose, provided that the individual to whom the personal information pertains consents.

## Access and Correction of Personal Information

[Organization Name] will use all reasonable efforts to ensure that all information in its possession or control is complete and accurate for the purposes for which it was collected.

Individuals have the right to access personal information about themselves held by [Organization Name] pursuant to FOIPP and any other enactment of the Government of Canada or the Province of Saskatchewan. Individuals may not need to submit a formal Freedom of Information request.



Individuals have the right to request that [Organization Name] amend or correct personal information in its possession or control. If necessary, [Organization Name] will review and confirm corrections.

Retention and Disposal of Personal Information

[Organization Name] will retain personal information in accordance with the retention schedule established for the type of data.

When personal information no longer needs to be retained for administrative, regulatory, legal, or historical purposes, it will be destroyed in the following manner:

- paper records shall be shredded, incinerated, or pulped; and
- electronic records shall be deleted in such a way that their contents cannot be recovered using current technology.

#### Outsourcing

[Organization Name] may enter into agreements with external individuals or organizations to grant them access to personal information held by [Organization Name]. This policy and FOIPP will be incorporated into any agreements requiring external individuals or organizations to safeguard such personal information.

#### Responsibility

The (Insert Title) is ultimately responsible for all decisions made on behalf of [Organization Name] in accordance with this policy and FOIPP.

The (Insert Title) will be appointed to advise and coordinate on issues concerning information freedom and privacy protection. This person is responsible for responding to all requests for information on behalf of [Organization Name], in consultation with any other parties as necessary.

## Non-Compliance

[Organization Name] reserves the right to take any of the following actions against anyone who violates FOIPP, other applicable privacy laws, or this policy:

- Legal action that may result in criminal or civil proceedings; or
- Disciplinary action against employees.

#### **Procedures**

The (Insert Title) will establish appropriate guidelines and procedures for implementing this policy.

[Organization Name] stakeholders will contact the (Insert Title) for assistance in complying with FOIPP and implementing this policy and any related procedures.

# **Schedules for Retention and Disposition**



Records retention and disposition schedules are approved and distributed following the applicable legislation for the documents retained.