

Privacy Policy

Date approved by Council: March 2, 2022	Policy Number: GOV-76
Lead Role: Chief Administrative Officer	Replaces: 08/2016
Last Review Date: January 6, 2016	Next Review Date: March 2025
Administrative Responsibility:	
Director of Development and Legislative Services	Resolution: 50/2022

Policy Statement

The Town of Bruderheim is committed to protecting the personal information of its residents, taxpayers and customers. The Town of Bruderheim will ensure that privacy protection is a core consideration in the design, implementation and evolution of all Town programs and services.

The collection and disclosure of personal information may only be undertaken within the parameters of the Freedom of Information and Protection of Privacy Act (“FOIP Act”). The Town of Bruderheim will ensure that appropriate measures are in place to govern the collection and disclosure of personal information.

Definitions

“Collection” means the gather, acquisition, receiving or obtaining of personal information; whether that information is collection through such interviews, questionnaires, surveys, polling, or by completing forms. Collection may be in writing, audio or video taping, electronic data entry or other such means.

“Disclosure” means to release, transmit, reveal, expose, show, provide copies of, tell the contents of, or give personal information by any means to someone. It includes oral transmission of information by telephone, or in person; provision of personal information on paper, by facsimile or in another format; and electronic transmission through electronic mail, data transfer or the internet.

“Freedom of Information and Protection of Privacy Act (“FOIP Act”)” means the Freedom of Information and Protection of Privacy Act, RSA 2000, c. F-25.

“Personal Information” means recorded information including name, home or business address, or home or business telephone number, race, national or ethnic origin, color or religious or political beliefs or associations, age, sex, marital status or family status, an identifying number, fingerprints, other biometric information, blood type, genetic information or inheritable characteristics, health and health care history, including information about a physical or mental disability, educational, financial, employment or criminal history, anyone else’s opinions about the individual, and person views or opinions, except if they are about someone else.

Privacy Impact Assessment (“PIA”) means an assessment conducted to determine privacy risks inherent to any service delivery channel, including in-person, mail, telephone and electronic services.

Guidelines

Forms Management

The FOIP Act recognizes that forms are a major way of collecting personal information. Collection can also occur through questionnaires, surveys and interviews. It is important to bring forms into compliance with the privacy protection provides of the FOIP Act, therefore, a thorough review of all forms is undertaken to ensure that those used to collect information from individuals meet privacy requirements and that any unnecessary data elements are eliminated.

Privacy Impact Assessments

Where appropriate, the Town of Bruderheim departments must develop and maintain Privacy Impact Assessments to evaluate whether new initiatives involving the collection, use or disclosure of personal information comply with privacy requirements.

Roles and Responsibilities

1. The Chief Administrative Officer is responsible for ensuring that accountability for privacy issues is clearly incorporated into the duties of all Town employees, volunteers, contractors, and any other participants, including those from other institutions, jurisdictions and sectors.
2. Department Directors are responsible for demonstrating that their collection, use and disclosure of personal information respects the FOIP Act throughout the initiation, analysis, design, development, implementation and post- implementation review phases of their program activities.
3. The Director of Development and Legislative Services is responsible for providing advice to Department Directors, Town employees and Council; and to develop and implement procedures to assist departments in respect of the Forms Management Programs and is responsible for liaising with the Office of the Information and Privacy Commissioner on privacy breaches, privacy complaints and access appeals.

Dated this 02 day of March, 2022

THE TOWN OF BRUDERHEIM

PER: *Sherry Cote*
for PATTY PODOBORZNY,
Chief Administrative Officer