

Collection, Use and Disclosure of Personal Information

The purpose of this resource is to provide practical guidance to support employees, contractors, volunteers and others in understanding and applying the College’s Privacy Management Policy when collecting, using, and disclosing personal information.

The guide is intended to promote consistent and respectful handling of personal information in accordance with the Protection of Privacy Act (POPA). If you have questions, please email the Privacy Office at privacy@portagecollege.ca.

What is personal information?

The short answer – it’s recorded information about an identifiable individual.

It includes a student, employee, contractor, or other individual’s:

- Name, home or business address, except where the individual provided the information on behalf of their employer in their capacity as an employee
- Race, national or ethnic origin, colour or religious or political beliefs or associations
- Age, gender identity, sex, sexual orientation, marital or family status
- Identifying number (for example, student or employee ID number)
- Personal views or opinions, except if they are about someone else
- Fingerprints, or other biometric information

What is the meaning of identifiable individual – can you provide examples?

Individuals can be identified using their name, unique number and by certain characteristics. Examples include photographs and videos, employee or student ID numbers, and in some situations, job titles.

For example:

- Jane Smith is 35 years old.
- The Director of HR called in sick today.
- Student ID 123456 filed a complaint.

Even if a name is not used, an individual can still be “identifiable” if someone could reasonably figure out who

the person is by combining the information with other details.

Ask yourself – could someone reasonably figure out who this is? And if the answer is ‘yes’, the individual is identifiable.

| Collection of Personal Information

<p>When can personal information be collected?</p>	<p>Personal information may only be collected when:</p> <ul style="list-style-type: none"> • the collection is authorized under POPA, and • the information is reasonably required to carry out a program, service, or activity at the College. <p>Employees should not collect personal information ‘just in case’ or for convenience.</p>
<p>When is a collection notice required?</p>	<p>Unless an exception under POPA applies, employees must provide a collection notice when collecting personal information directly from an individual.</p> <p>A collection notice helps individuals understand why their information is being collected, and how it will be used.</p>
<p>What must a collection notice include?</p>	<p>A collection notice must include:</p> <ul style="list-style-type: none"> • the purpose for collecting the personal information • the legal authority for the collection, and • the title and contact information of an employee who can answer questions about the collection <p>Collection notices may be in:</p> <ul style="list-style-type: none"> • written form – this is the most common where we include the collection notice on forms (paper or electronic forms) • provided verbally – only where written notice is impracticable <p>For the most part, employees should use a standard collection notice. Check out the Collection Notice Guide.</p>
<p>What are some key questions you should ask yourself before collecting</p>	<p>You should ask:</p> <ul style="list-style-type: none"> • Do I need this information to do my job?

personal information from an individual?

- Am I collecting the minimum amount of personal information required?
- Have I told the individual why I'm collecting it?
- Is there a way to achieve the purpose without collecting personal information?

| Use of Personal Information

<p>What does 'use of personal information' mean?</p>	<p>Use refers to accessing, viewing, analyzing, or otherwise handling personal information within the control of the College.</p>
<p>How can we use the information collected?</p>	<p>Personal information may only be used:</p> <ul style="list-style-type: none"> • for the purpose it was originally collected • for use a use consistent with that original purpose, or • where otherwise authorized under POPA. <p>Using information out of curiosity, convenience, or personal interest is not permitted.</p>
<p>What are some examples of inappropriate use?</p>	<p>Examples include:</p> <ul style="list-style-type: none"> • accessing a colleague's or student's records without work-related reasons • using personal information for a new purpose without property authority • sharing personal information internally with individuals who do not need it to perform their duties
<p>When to pause and ask for guidance?</p>	<p>If a new or different use of personal information is proposed, employees should pause and consider whether:</p> <ul style="list-style-type: none"> • the use is authorized, • additional notice or consent may be required, or • a Privacy Impact Assessment (PIA) should be completed

| Disclosure of Personal Information

<p>What is disclosure?</p>	<p>Disclosure occurs when personal information is shared outside the immediate work unit or with another department, organization, or external individual or third-party.</p> <p>This includes disclosures by email, phone, conversation, or electronic systems.</p>
<p>When is disclosure permitted?</p>	<p>Personal information may only be disclosed:</p> <ul style="list-style-type: none"> • With the consent of the individual, or • Where the disclosure is authorized or required under POPA <p>Disclosures must always be limited to the minimum amount of information necessary to achieve the intended purpose.</p>
<p>What are some disclosure risks to watch for?</p>	<p>Disclosure risks you should watch for include:</p> <ul style="list-style-type: none"> • Emailing personal information to the wrong recipient • Copying unnecessary recipients on emails • Discussing personal information in public places • Sharing more information than required to answer a question or request <p>Any suspected or actual unauthorized disclosures, including accidental ones, must be reported immediately to your supervisor and the College's Privacy Office by sending an email to privacy@portagecollege.ca. Please review the College's procedures for Reporting and Responding to a Privacy Incident (<i>currently under development</i>).</p>