



Team Name: Health Information Services Team Lead: Regional Privacy & Access Officer Approved by: VP Corporate Services	Reference Number: ORG.1411.PL.007 Program Area: Health Information Services Policy Section: Privacy & Access
Issue Date: December 14, 2015 Review Date: Revision Date:	Subject: Privacy of Personal Information Under The Freedom of Information And Protection of Privacy Act (FIPPA)

POLICY SUBJECT:

Privacy of Personal Information under The Freedom of Information And Protection of Privacy Act (FIPPA)

PURPOSE:

To ensure that a procedure is established to protect an Individuals' rights to Privacy of Personal Information against unauthorized access, collection, Use, Disclosure and destruction as set out in *The Freedom of Information and Protection of Privacy Act (FIPPA)*.

BOARD POLICY REFERENCE:

Executive Limitation (EL-7) – Corporate Risk

POLICY:

The Public Body shall protect Individuals' rights to Privacy of Personal Information against unauthorized access, collection, Use, Disclosure and destruction as set out in The Freedom of Information and Protection of Privacy Act. (FIPPA)

DEFINITIONS:

ORG.1411.PL.001.SD.01 FIPPA Definitions

PROCEDURE:

1. The Public Body shall ensure that Personal Information collected by or for the Public Body:
 - 1.1 Is authorized by or under an enactment of Manitoba or Canada; or
 - 1.2 The information relates directly to and is necessary for an existing service, program or activity of the Public Body, or;
 - 1.3 The information is collected for law enforcement purposes or crime prevention.
2. The Public Body must ensure that only as much Personal Information as is necessary to accomplish the authorized purpose is collected.
3. Personal Information must be collected directly from the Individual it is about, unless the Individual consents to collection from another source; or collection is authorized by another statute or regulation of Manitoba or Canada, or is authorized under FIPPA.
4. Individuals must be notified about the purpose of, and legal authority for, collecting Personal Information and be provided with information about a contact person within the Public Body to answer their questions.
5. Reasonable steps must be taken to ensure the accuracy and completeness of the Personal Information if it will be used to make a decision that directly affects the Individual the information is about.

6. The Public Body shall ensure that appropriate Security measures are in place to prevent unauthorized access, Use, Disclosure or destruction of Personal Information.
7. Every use of Personal Information must be in accordance with FIPPA and access to the information must be limited to those who require the information to perform their duties.
8. Disclosure of Personal Information must be authorized under FIPPA, and limited to the amount necessary to accomplish the purpose for which it is disclosed.
9. The Public Body shall enter into a written agreement with Information Managers to ensure that Personal Information is protected against unauthorized access, Use, Disclosure or destruction.
10. Retention and destruction of Personal Information will be in accordance with the existing policies of the Public Body.
11. The Regional Privacy & Access Officer may be consulted to determine whether requests to collect, Use, or Disclose Personal Information are in compliance with the legislation, on a case by case basis.

SUPPORTING DOCUMENTS:

[ORG.1411.PL.001.SD.01](#) FIPPA Definitions

REFERENCES:

Government of Manitoba, [The Freedom of Information and Protection of Privacy Act](#)

The Provincial Government Freedom of Information and Protection of Privacy Act Resource Manual, WHRA Policy Privacy of Personal Information Under The Freedom of Information and Protection of Privacy Act, Policy number 10.40.170