

Communications Nova Scotia
Privacy Policy

I. POLICY STATEMENT

Communications Nova Scotia will adhere to the privacy protection provisions of the Freedom of Information and Protection of Privacy Act (FOIPOP), the Personal Information International Disclosure Protection Act (PIIDPA), the Government Privacy Policy and other applicable legislation. Communications Nova Scotia will uphold the principles of transparency, custodianship and shared responsibility established in the Government Privacy Policy, as it relates to the collection, use and disclosure of personal information.

II. DEFINITIONS

For the purposes of this policy, the following definitions shall apply.

Employee: an individual in the employ of, seconded to, or under personal service contract to the Government entity and their volunteers, students, and interns who have access to records.

FOIPOP: Nova Scotia Freedom of Information and Protection of Privacy Act

Personal information: as defined in clause 3(1)(I) of the FOIPOP Act, recorded information about an identifiable individual, including:

- (I) the individual's name, address or telephone number
- (ii) the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations
- (iii) the individual's age, sex, sexual orientation, marital status or family status
- (iv) an identifying number, symbol or other particular assigned to the individual
- (v) the individual's fingerprints, blood type or inheritable characteristics
- (vi) information about the individual's health-care history, including a physical or mental disability
- (vii) information about the individual's educational, financial, criminal or employment history
- (viii) anyone else's opinions about the individual, and
- (ix) the individual's personal views or opinions, except if they are about someone else's privacy breach, the event of unauthorized collection, access, use, disclosure, or alteration of personal information

PIA: a Privacy Impact Assessment is a due diligence exercise which identifies and addresses potential privacy risks that may occur in the course of the operations of a public body record as defined in clause 3(1)(k) of the FOIPOP Act. It includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records

III. POLICY OBJECTIVES:

The policy is designed to ensure that government meets its legislated obligations in the management of personal information throughout its life cycle. This includes ensuring the protection of personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

IV. APPLICATION :

This policy applies to:

- all employees
- all personal information in the custody and control of Communications Nova Scotia

V. POLICY DIRECTIVES:

Communications Nova Scotia collects personal information about employees including contact information, performance reviews, competition records and salary details; private sector suppliers and those on the standing offer, (individuals and companies) including billing and tender information; charter members, potential charter members and sounding board members of Come to life.

The information is kept in a variety of ways, including the Communications Nova Scotia Corporate System (CNSCS), secure computer drives, the Apple server, GroupWise, and locked cabinets. The information must be stored in areas as outlined by CNS, see appendix.

The information is only accessible to staff who need it to perform their jobs and is password protected.

Communications Nova Scotia will only collect, access, store, use, disclose and dispose of personal information where authorized by law.

It is the responsibility of all CNS employees to ensure information is securely stored. This can be done through a variety of ways including the Corporate System (CNSCS), secure drives on computers. Any questions or concerns about security arrangements can be directed to CNS FOIPOP administrator or alternate.

Communications Nova Scotia will follow the privacy breach protocol, per the template maintained by the Corporate Access and Privacy Office (Justice). To see the protocol go to <http://iweb.just.gov.ns.ca/Divisions/IM/FOIPOP/documents/PrivacyBreachProtocolTemplate200708D1.7.pdf>

Communications Nova Scotia shall complete a privacy impact assessment for any new program or service or for a significant change to a program or service, as per the template maintained by the Corporate Access and Privacy Office (Justice). To see the protocol go to

<http://iweb.just.gov.ns.ca/Divisions/IM/FOIPOP/documents/PrivacyImpactAssessmentTemplate200708D1.6.pdf>

The policy will come into effect April 3, 2009.

VI. POLICY GUIDELINES

To ensure information is protected, filing cabinets will be locked, databases containing personal information will be password protected; and passwords will only be issued to staff that require access to deliver the program or service.

Files containing personal information will not be removed from offices or left unattended, and disposal of both transitory or master records containing personal information will only be carried out using secure methods, such as shredding.

All employees will receive a copy of this policy from the Assistant Deputy Minister and it will be posted on the Communications Nova Scotia Internet and Intranet sites.

An awareness session on the policy will be held at a staff meeting.

Copies will be included in orientation packages.

Any concerns or questions about the policy or compliance with the policy should be directed to the FOIPOP administrator or alternate. A response will be provided within two weeks. To see protocol go to this link,

<http://iweb.just.gov.ns.ca/Divisions/IM/FOIPOP/documents/PrivacyBreachProtocolTemplate200708D1.7.pdf>

VII. ACCOUNTABILITY & SECURITY

1. The deputy head of Communications Nova Scotia is accountable for compliance with this policy.
2. Each employee is responsible for complying with this policy and the privacy policies of Communications Nova Scotia and the Government of Nova Scotia.
3. Each employee is responsible for reporting a breach of the policy or concern to the FOIPOP administrator or alternate.

VIII. MONITORING :

The policy will be monitored to ensure compliance. The policy will be reviewed at least once a year and updated if necessary. This will be done by the CNS FOIPOP administrator or alternate.

IX. REFERENCES:

- Freedom of Information & Protection of Privacy Act and Regulations
- Personal Information International Disclosure Protection Act
- Government Records Act
- Management Manual 300: Common Services, Chapter 4, Policy 4.7, Website Privacy Policy
- Management Manual 100: Management Guide, Chapter 1, Policy 1.2 Management Manuals Policy
- Privacy Impact Assessment
- Privacy Breach Protocol
- Canadian Standards Association Model Code 10 Principles

X. ENQUIRIES:

Any enquiries about the policy can be directed to FOIPOP Administrator or alternate. Contact information is:

Carla Burns - 424-2876 or burnsca@gov.ns.ca

John Whidden - 424-2698 or whiddejl@gov.ns.ca

Approval Date: March 31, 2009

Effective Date: April 3, 2009

Approved by: Bob Fowler, Deputy Minister, Communications Nova Scotia and Laura Lee Langley, Assistant Deputy Minister, Communications Nova Scotia

Privacy Policy Appendix

Personal Information-Type	Stored	Person(s) Responsible	Access
Employee Contact Information - Home/Address/ Phone numbers, resumes	Secure drive-network Locked cabinet	Assistant to Managing Directors; Manager, Administration and Financial Recoveries	Senior Management Communications Support HR staff
Vendor information, including home phone numbers, project working files, purchase orders, tender information, billing information, correspondence between CNS and vendors	Corporate System Apple Server Secure drive-network Groupwise	Manager, Communications Technology Manager, Administration and Financial Recoveries	Senior Management Client Services
Standing Offer Information - Home Phone Numbers, Addresses	Corporate System	Advisor - Client Services/Corporate Projects	Client Services Section of CNS Team members have hard copy
Partners, clients, other levels of government, media (Emergency Broadcasters Contacts - Home phone numbers Come to life members- Home Phone numbers	Secure drive-network	Director, Communications Support Come to life team	Senior Management Communications Support Come to life team

Resumes, competition records, employee personal records	Filing cabinet	Manager, Administration and Financial Recoveries	Senior management and HR personnel
Business Continuity Plan (personal information includes home phone numbers)	Secure drive network and hard copy for team members	Director, Communications Support	Senior management

NOTE: Secure drive network, Communications Nova Scotia Corporate System, Apple Server are all password protected.