

# **Privacy Training for Housing Registry Members**

## Purpose of Training

- This training has been developed for Housing Registry members, including their employees and volunteers.
- It ensures users with access to The Housing Registry understand their obligations to protect privacy.
- New employees/volunteers must review this training before accessing The Housing Registry.

## Note

- The training is a companion to the general Privacy Awareness Training.
- Please review the Privacy Awareness Training first. It will help you gain a better understanding of privacy.

**A link to the training is available on the Resources slide at the end of this presentation.**

# Learning Objectives

- You will learn about:
  - PIPA and FIPPA (general information only).
  - The Housing Registry Privacy Policy.
  - requirements regarding the collection of personal information.
  - limitations for the use, disclosure and retention of personal information.
  - examples of security measures you need to take in order to safeguard personal information.

- The *Personal Information Protection Act* (PIPA) sets out how private sector organizations must collect, use and disclose personal information.
- Non-profit organizations, housing cooperatives and for-profit property management firms in British Columbia are subject to PIPA.

- BC Housing is a public body subject to the *Freedom of Information and Protection of Privacy Act* (FIPPA).
- BC Housing has obligations under FIPPA that apply to The Housing Registry, and extend to registry members and their employees and volunteers.
- This is partly why BC Housing has put in place The Housing Registry Member Agreement and Privacy Policy.

# The Housing Registry Privacy Policy

- Housing providers are required to review and sign The Housing Registry Member Agreement before they can become Housing Registry members.
- Housing Registry members, including their employees and volunteers, are subject to The Housing Registry Privacy Policy.

**A link to the privacy policy is provided on the Resources slide at the end of this presentation.**

# Collection of Personal Information on the Application Form

- The Housing Registry's Application Form collects personal information from applicants for subsidized housing.
- The form outlines the authority under FIPPA to collect personal information.
- The personal information collected on the form is available to Housing Registry members on a need-to-know basis only.



## Collection of Personal Information by Housing Registry Members

- If a Housing Registry member collects other information (for screening or evaluation purposes), it must be made clear to the applicant that the additional information is collected for your organization only.
- Housing providers must develop an appropriate filing system to manage applicant and tenant information.

**See Section 3.1 of The Housing Registry Privacy Policy for more detailed information.**

# Records Retention and Disposition

- The privacy legislation states that if you use a person's personal information to make a decision about them, the information must be retained for a minimum of one year.
- Housing provider members should have a records retention and disposition schedule so that records are not retained longer than they are needed.
- Information must be disposed of in a secure manner.

# Use of Personal Information

- Users with access to The Housing Registry are permitted to use personal information in The Housing Registry only to assess an applicant for housing – and for no other purpose.
- This means you are not permitted to browse or search for someone you know in The Housing Registry out of curiosity or for other purposes that are not related to your work.
- Doing so would be a significant breach of your obligations and could result in the cancellation of membership in The Housing Registry.

**See Section 3.3 of The Housing Registry Privacy Policy for more detailed information.**

## Correction, Consent & Disclosure

- If an applicant feels there is incorrect information in the comment section of their file, a request for correction or annotation can be made to BC Housing's Privacy Office.
- When the applicant signs the housing application they are giving The Housing Registry consent to use their personal information to:
  - determine eligibility
  - assess housing needs
  - determine the housing developments that suit their needs.
- Only BC Housing's Privacy Office can provide a copy of an applicant file through FIPPA.

## Withdrawal of Consent

- Applicants who wish to withdraw consent from their housing registry application should put their request in writing.
- Withdrawal of consent means The Housing Registry cannot consider them for housing and their file will be cancelled.

- Protect personal information at all times – for example:
  - store paper records in locked cabinets.
  - make sure paper records are destroyed confidentially.
  - password-protect electronic files and keep your password secret.
  - notify The Housing Registry when an employee/volunteer no longer needs access so their password can be disabled.
  - don't discuss people's personal information where others can overhear.
  - access personal information on a need-to-know basis only.

# Privacy Breach

- A privacy breach occurs when there is unauthorized access to, collection, use, disclosure or disposal of personal information.
- Examples:
  - Your office is broken into and files containing personal information are stolen.
  - An employee writes their password on a post-it note attached to their computer and another individual uses it.
  - A client's application is left on a desk and another individual with no need to know the information is seen reading it.

## Privacy Breach

- If you suspect or know that there has been a privacy breach in relation to a Housing Registry file:
  - Take steps to contain the breach.
  - Contact BC Housing's Privacy Office immediately.



- Contact BC Housing's Privacy Office if:
  - you suspect there may have been a privacy breach; or
  - an applicant wishes to obtain a copy of their Housing Registry file.

## **Privacy Office**

BC Housing  
1701 - 4555 Kingsway  
Burnaby BC V5H 4V8  
604 433-1711

## Test your Knowledge

**Question:** An applicant wants a copy of his entire Housing Registry file. Can I provide it?

**Answer:** No. Under The Housing Registry Privacy Policy, all requests must be sent to BC Housing's Privacy Office.

**A copy of the FOI Request Form is available on the Resources slide and contact information for the Privacy Office is available on the Contact Us slide at the end of this presentation.**

## Test your Knowledge

**Question:** An applicant wants a copy of a letter that she provided to The Housing Registry last week. What do I do?

**Answer:** Ask the applicant to submit her request in writing to BC Housing.

**A copy of the FOI Request Form is available on the Resources slide and contact information for the Privacy Office is available on the Contact Us slide at the end of this presentation.**

## Test your Knowledge

**Question:** An applicant's mother calls wanting to add new buildings to the applicant's preferences. Can I do that?

**Answer:** First check to see if the mother has been designated as an "Authorized Contact" by the applicant. If yes, then she has the permission of the applicant to exchange information to maintain and update the file and therefore, she can update the preferences.

If she is not an "Authorized Contact" you are unable to share any information with her. The applicant must contact The Housing Registry to update the buildings selected on file, or to have their mother added as an "Authorized Contact."

## Test your Knowledge

**Question:** A person called asking for information about another person's file. Can I give the information?

**Answer:** No. You are permitted only to speak with Authorized Contacts as named on the applicant's file.

## **The Housing Registry Privacy Policy**

<http://www.bchousing.org/publications/Housing-Registry-Privacy-Policy.pdf>

## **The General Privacy Awareness Training**

<http://www.bchousing.org/partner-services/non-profit-training-resources/privacy-toolkit>

## **Link to FOI Request Form**

[http://www.oipc.bc.ca/media/11769/form\\_access-request-private-organization.pdf](http://www.oipc.bc.ca/media/11769/form_access-request-private-organization.pdf)

### Privacy Office

BC Housing  
1701 – 4555 Kingsway  
Burnaby, BC  
V5H 4V4  
(604) 433-1711  
[fippa@bchousing.org](mailto:fippa@bchousing.org)