



Privacy Policy

Last modified: August 20, 2012

1. Reason for Policy

This policy has been developed as a companion to the Housing Registry Member Agreement to ensure compliance with British Columbia's *Freedom of Information and Protection of Privacy Act* (FIPPA) and the *Personal Information Protection Act* (PIPA).

This policy outlines how personal information relating to the Housing Registry is to be collected, used, protected and disclosed by The Housing Registry Members and their staff.

2. Background

PIPA sets out how private organizations (including non-profit organizations, businesses, associations and labour organizations) may collect, use and disclose personal information.

FIPPA allows access to information held by public bodies (such as ministries, universities, hospitals and crown agencies such as BC Housing) and determines how public bodies may collect, use and disclose personal information.

3. Policy Statement

The Housing Registry Member Agreement requires Housing Registry Members to adhere to the provisions in PIPA and to some of the provisions in FIPPA, as they apply to the collection, use and disclosure of personal information held in The Housing Registry database.

3.1 Collection of Personal Information

The Housing Registry requires the collection of selected personal information as outlined on the Housing Registry's Application for Accommodation form, which also outlines the authority under FIPPA to collect the information.

Any additional personal information collected by The Housing Registry Members (for screening purposes) must not be represented as being required by The

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Housing Registry, because that additional information would put BC Housing in violation of FIPPA.

Section ten of PIPA requires that an individual be told the purposes for the collection of the personal information. The Housing Registry Members must ensure that any additional personal information requested is necessary for the administration of their housing programs in order to be in compliance with PIPA.

In the collection of data, care must be taken to ensure that only factual information – free of opinion, judgement and speculation – is recorded on applicant records and in The Housing Registry.

Reasonable steps must be taken to ensure that any additional applicant information or updates received are from the applicant or that consent to work with a designate has been received before information is accepted or disclosed. For example, if meeting with an applicant in person, please view picture identification. If speaking to an applicant over the telephone, ask them to verify details on file, such as, date of birth, phone number, a former address, etc.

3.2 Correction of Personal Information

Both privacy legislations allow applicant's to request a correction to their file if they believe an error or omission has occurred. An applicant's request for an update or correction should be forwarded to The Housing Registry for action.

3.3 Use of Information

Application for Accommodation forms received by The Housing Registry Members will be entered into The Housing Registry database and forwarded to The Housing Registry. The information will be used strictly to assess an applicant for housing and for no other purpose.

Occasionally, an applicant will request, through FIPPA or PIPA, to view his/her applicant file. Please pass all requests on to The Housing Registry. Section 3 of PIPA outlines that "... PIPA does not apply to personal information if FIPPA applies to the personal information." Therefore, all requests for applicant records must go through The Housing Registry and BC Housing's Privacy Department.

3.4 Consent

The Housing Registry Members must not collect, use or disclose personal information about an individual without his or her consent. Verbal or implied

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consent is recognized by the privacy legislations as acceptable forms of consent in some cases. If you are unsure, please contact The Housing Registry.

Please ensure every application is signed, which gives both The Housing Registry Members and BC Housing the consent to use the personal information to administer the housing program.

3.5 Disclosure

At no time is any information from the Application for Accommodation form or The Housing Registry database to be disclosed to a third party or anyone other than the applicant without specific written or verbal consent noted on the applicant file in the database.

As noted above, precautions must be taken to verify the identity of anyone requesting his or her own personal information.

3.6 Withdrawal

At any time, an individual may give notice to an organization withdrawing consent to collect, use or disclose personal information about themselves.

Applicants who wish to withdraw their housing registry application should put their request in writing to The Housing Registry.

3.7 Protection

All personal information collected must be protected with reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.

Examples of protecting personal information could include storage of paper files in locked cabinets, electronic files are password-protected, and secure servers that protect data.

As required in The Housing Registry Members Agreement, you must notify The Housing Registry once an employee no longer needs access to the database so that his or her password can be disabled.

3.8 Retention and Disposition

If your organization uses an individual's personal information to make a decision that directly affects the individual, you must keep that information for at least

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one year after using it, so that the individual has a reasonable opportunity to obtain access to it.

3.9 Access to personal information

As noted above, applicants who wish to obtain a copy of their Housing Registry Application for Accommodation file should put their request in writing to:

Privacy Department
BC Housing
1701 – 4555 Kingsway
Burnaby BC V5H 4V8

Please ensure that the request is forwarded within five working days of receipt so that deadlines for response imposed under FIPPA will be met. If The Housing Registry Member has a separate file containing any of the applicant's personal information relating to The Housing Registry Application for Accommodation, that file must also be forwarded to BC Housing for release to the applicant. The file will be returned after processing of the request for information.

4. Privacy Breach

A privacy breach occurs when there is an unauthorized access to, or collection, use, disclosure, or disposal of, personal information. Such activity is "unauthorized" if it occurs in contravention of FIPPA or PIPA. The most common privacy breach happens when personal information of applicants, tenants, or employees is stolen, lost, or mistakenly disclosed.

A privacy breach involving the information related to The Housing Registry must be brought to the attention of the:

Privacy Department
BC Housing
1701, 4555 Kingsway,
Burnaby, BC V5H 4V8

The Housing Registry is maintained and administered by BC Housing.

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5. Definitions

Applicant	"Applicant" means an individual or family who completes a Housing Registry Application for Accommodation for a unit managed by Housing Registry Members.
Disclosure	Disclosure includes the showing, sending or giving of personal information to some other organization, government or person.
Employee	Employee means an individual employed by an organization and includes a volunteer working within an unpaid volunteer work relationship.
Explicit Consent	Explicit consent signifies that an individual, knowing what personal information is being collected and for what purposes, willingly agrees to the information being collected, used and disclosed as notified. Explicit consent can be given in writing or verbally. If you rely on verbal consent, remember that you may have to prove later that the consent was actually given by the individual.
Housing Registry	"Housing Registry" means the service and access to the Housing Registry Database provided by BC Housing to Members designed to provide comprehensive and conveniently located housing information services to Housing Providers and Applicants seeking affordable housing.
Housing Registry Database	"Housing Registry Database" means the data kept in electronic form in connection with the Housing Registry and the software application that interfaces with this data.
Housing Registry Member	"Member" means a Housing Provider, Community Agency, municipality, or government agency that has been approved as a Member of the Housing Registry.
Implied Consent	Means one of two things: <ol style="list-style-type: none">1. One voluntarily provides personal information for an organization to collect, use, or disclose for purposes that would be considered obvious at the time.2. One provides personal information to an organization and it is used in a way that clearly benefits the individual and the organization's expectations are reasonable. Implied consent is usually inferred from an individual's actions and the current circumstance of the individual.

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Personal Information	Information about an identifiable individual, such as, but not limited to, an individual's name, birth date, home address, social insurance number, gender, home phone number, gross income and assets, medical information and disabilities.
Privacy	The claim of individuals to determine for themselves when, how, and to what extent information about themselves is communicated to others. Privacy includes such concepts as confidentiality of an individual's personal beliefs and control over information about the individual and others' knowledge of the individual's affairs.
Record	"Record" 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.

6. HISTORY

Version #	Policy Name	Reason	Date
2.0	The Housing Registry Privacy Policy	Full Review	August 20, 2012
1.0	The Housing Registry Privacy Policy	Original Policy	October 21, 2003

7. APPROVAL

Authorized:

Date Approved:

September 11, 2012