



Freedom of Information and Protection of Privacy

Policy & Procedures Manual

District of Central Saanich

1903 Mount Newton Cross road

Saanichton, BC V8M 2A9

Tel: 250-652-4444

Email: municipalhall@csaanich.ca

Website: centralsaanich.ca

File No. 0580-10

June 2019

Table of Contents

| | |
|--|-----------|
| INTRODUCTION | 4 |
| CHAPTER 1: THE FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT..... | 5 |
| WHAT IS FREEDOM OF INFORMATION?..... | 6 |
| WHAT IS PROTECTION OF PRIVACY?..... | 6 |
| WHAT IS PERSONAL INFORMATION? | 7 |
| WHAT IS A RECORD? | 7 |
| WHAT IS CUSTODY OR CONTROL | 8 |
| CORPORATE RECORDS MANAGEMENT STANDARDS POLICY AND THE FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT..... | 8 |
| CHAPTER 2: HANDLING REQUESTS FOR INFORMATION | 10 |
| MAKING A REQUEST | 10 |
| POINTS TO REMEMBER | 11 |
| ROUTINE REDACTION GUIDELINES | 13 |
| REQUESTS FOR PERSONAL INFORMATION | 14 |
| REQUESTS FOR CORRECTION OF PERSONAL INFORMATION | 14 |
| TIMELINES..... | 15 |
| STANDARD REQUEST PROCESS | 15 |
| CHAPTER 3: ROUTINELY AVAILABLE RECORDS | 16 |
| CHAPTER 4: CORPORATE POLICIES AND PROCEDURES..... | 17 |
| ACCIDENT INCIDENT OR NEAR MISS REPORTS | 17 |
| AERIAL PHOTOGRAPHS | 17 |
| AGREEMENTS (see Contracts & Agreements) | 17 |
| APPRAISALS | 17 |
| ASSESSMENT AND TAX ROLLS | 18 |
| BUILDING PERMITS AND PLANS..... | 18 |
| BUSINESS LICENCES | 18 |
| CLOSED MEETINGS | 19 |
| CLOUD COMPUTING..... | 19 |
| COMMENTS ON PLANNING PROPOSALS..... | 20 |
| COMPLAINTS..... | 20 |
| CONTRACTS AND AGREEMENTS | 20 |
| COUNCIL RECORDS..... | 21 |
| DOG LICENCES..... | 21 |

| | |
|--|-----------|
| E-MAIL..... | 22 |
| EMPLOYEE FILES..... | 22 |
| FIRE INCIDENT REPORTS | 23 |
| FIRST AID RECRODS | 23 |
| INVOICES FROM LAWYERS | 24 |
| LICENCES AND PERMITS..... | 24 |
| LIST OF LICENCED BUSINESSES..... | 24 |
| MOTOR VEHICLE ACCIDENTS..... | 25 |
| PERMITS..... | 25 |
| PETITIONS | 25 |
| POLICE INVESTIGATIONS..... | 25 |
| PROPERTY INFORMATION | 26 |
| PROPERTY TAX OR UTILITY BILLING INFORMATION | 26 |
| RFP's REQUESTS FOR PROPOSALS..... | 27 |
| REQUESTS FROM OTHER PUBLIC BODIES OR GOVERNMENTS FOR ACCESS TO PERSONAL INFORMATION | 27 |
| SURVEYS - OF THE PUBLIC..... | 28 |
| SURVEYS- SITE SURVEY CERTIFICATES | 28 |
| TENDERS | 28 |
| UTILITY BILLING INFORMATION | 29 |
| VIDEO SURVEILLANCE | 29 |
| CHAPTER 5: CHARGING FEES | 30 |
| FEE ESTIMATES | 31 |
| CHAPTER 6: MANAGING PERSONAL INFORMATION AND FORMS..... | 33 |
| COLLECTION OF PERSONAL INFORMATION | 33 |
| FORMS AND SURVEYS DESIGN | 34 |
| USE AND DISCLOSURE OF PERSONAL INFORMATION | 34 |
| SECURITY AND RETENTION OF PERSONAL INFORMATION | 35 |
| EMPLOYEES AND PRIVACY..... | 36 |
| CHAPTER 7: PERSONAL INFORMATION DIRECTORY | 37 |
| PERSONAL INFORMATION BANKS..... | 38 |
| CHAPTER 8: ADDITIONAL RESOURCES | 40 |
| APPENDIX 1: ACCESS TO RECORDS REQUEST FORM | 41 |
| APPENDIX 2: INFORMATION REQUEST FORM | 42 |

Introduction

This policy manual is designed to provide both staff and the public with an overview of the *Freedom of Information and Protection of Privacy Act* and its application to District of Central Saanich records.

Any questions regarding the *Freedom of Information and Protection of Privacy Act* or District of Central Saanich policies with respect to the release of information may be directed to the Corporate Officer or Chief Administrative Officer who have both been designated 'Head' by the District of Central Saanich *Freedom of Information and Protection of Privacy Bylaw*. Both have also been appointed by that same bylaw as the Information and Privacy Coordinators for the purposes of the Act and are authorized to perform the duties and functions of the Head.

The FOI Head/Coordinator can be reached as follows:

Phone: 250-652-4444

Email: municipalhall@csaanich.ca

Chapter 1

The Freedom of Information and Protection of Privacy Act

British Columbia's *Freedom of Information and Protection of Privacy Act* (the 'Act') has applied to local government since 1994. The Act represents the provincial government's legislative commitment to make public bodies more accountable to the public and to protect personal privacy.

The Act gives individuals the right to access information held by local government and protects privacy by placing restrictions on the collection, use, storage and disclosure of personal information. The Act establishes a legislated set of rules governing what information can and cannot be disclosed. The underlying principle is that ALL recorded information in the custody or control of a public body is available to the public, except for information that is subject to the specific and limited exceptions to disclosure set out in the Act.

Information that is currently released by departments should continue to be made available unless the information is personal information. The Act does not replace other procedures for public access, or limit access to information other than personal information currently available to the public. Staff is expected to incorporate the concepts and procedures of the Act into their normal service delivery.

District of Central Saanich Bylaw No. 1853 - A bylaw for the administration of the *Freedom of Information and Protection of Privacy Act*, was adopted by Council on October 20, 2014. A copy of the bylaw is available at centralsaanich.ca.

What is Freedom of Information?

The Act establishes a process by which any person may request access to records in the custody or control of the District of Central Saanich. Individuals also have the right to request their own personal information held by the District. A formal request under the Act is generally referred to as a Freedom of Information or "FOI" request.

The general right of access to information is restricted by certain ***specified and limited exceptions***, necessary to protect a variety of needs of confidentiality and the right of individuals to privacy.

The Act also provides a review process whereby decisions relating to the disclosure or non-disclosure of information, or other related access or protection of privacy issues, may be reviewed by the Information and Privacy Commissioner of British Columbia.

Individuals requesting answers to questions (rather than requesting copies of records) will generally not be required to submit formal requests for information. Staff is expected to assist such individuals through routine departmental procedures.

What is Protection of Privacy?

The Act protects the personal privacy of individuals by restricting the collection, use, storage and disclosure of personal information. Disclosure of personal information, even to other public bodies, is strictly limited under Part 3 of the Act.

The District of Central Saanich may only collect personal information:

- That it has clear authority to collect (i.e. expressly authorized under an Act, or information that is collected for the purposes of law enforcement), or
- Where collection is directly related to and is necessary for operating a program or activity of the District.
- That is necessary for the purposes of evaluating a program or activity of the District.

Personal information can be used only for the purpose for which it was originally obtained; a purpose that is consistent with the purpose for which it was originally obtained, or where an individual has provided written consent for use of their personal information. Multiple and inconsistent uses of information are restricted by the Act.

An individual from whom personal information is collected is entitled to know what the information will be used for and under what authority we are collecting it. ***If personal information is not needed, do not collect it.***

The security of personal information is one of the most important privacy-related issues that the District must deal with. Reasonable security arrangements must be established and maintained to protect personal information against unauthorized access, collection, use, disclosure or disposal.

It is recommended that all staff practice good privacy protection by:

- Using passwords on their computer;
- Locking computers when away from workstation or desk;
- Using locks on cabinets;
- Turning monitors away from public view;

- Not leaving completed application forms and other records containing personal information in high traffic and/or public areas; and
- Destroying all personal and/or confidential information by shredding in accordance with the District records management standards policy.
- Not discussing confidential personal information with others.

What is Personal Information?

Personal information is simply defined as "recorded information about an identifiable individual." Examples of personal information include but are not limited to the following:

- An individual's name, home address, personal e-mail or telephone number;
- An individual's race, national or ethnic origin, colour or religious or political beliefs or associations;
- An individual's age, sex, sexual orientation, marital status or family status;
- An identifying number, symbol or other particular assigned to an individual (i.e. Social Insurance Number, driver's licence number, customer ID, etc.); Information about the individual's health care history, including a physical or mental disability;
- Information about the individual's education, financial, criminal or employment history;
- Anyone else's opinion about the individual (but not the identity of the opinion holder); in most cases you can know what is said about you, but not who said it.
- The individual's personal view or opinion, except if it is about someone else, belongs to the individual and is considered personal information; and
- Images of identifiable individuals captured by cameras, including surveillance systems.

What is a Record?

The definition of a "record" included under the Act is as follows:

"includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by any means whether graphic, electronic, mechanical or otherwise, but does not include a computer program or any other mechanism that produces records."

Records, then, include memos, letters, reports, e-mails, maps, calendars, post-it notes, annotations, etc.

Remember, if it is recorded, it is a record which may be subject to disclosure under the Act. If it includes personal information, it must be appropriately protected.

The information contained in records could be produced by a public body or received from other sources, such as third parties, service providers or other public bodies.

All records created or received by employees during the course of their work duties or during the conduct of District business, belong to the District, not the individual employee. This is true whether employees are using district technology (workstations, corporate email accounts, etc.) or personal devices.

All District records must be treated in accordance with the District's Corporate Records Management Standards policy

What is Custody or Control?

The Act applies to records that are in the custody or control of a public body. Custody normally means physical possession of records. For example, paper copies of records held in office file cabinets would normally be considered to be in the custody of the District. Similarly, electronic records stored on computers located in District offices would normally be considered to be in the custody of the District. Control normally refers to a public body's power to determine what happens to records. For example, District records are subject to the Corporate Records Management Standards policy. This is a measure of control. However, the District may also have control of records that are not in our custody. For example, under the Act, records on personal devices which relate to District business would be considered to be under District control and subject to FOI requests. Records produced by contractors or stored in the cloud may also be under District control. If you have questions about custody or control, please contact the FOI Head.

Corporate Records Management and the *Freedom of Information and Protection of Privacy Act*

The records classification system and retention/disposition schedule as defined within the District's Records Classification and Retention Schedule (RCRS) provides staff with specific information on the classification, retention and disposition of District records.

All departments, branches and sections throughout the District are expected to participate in the corporate records management program. Adherence to the standardized RCRS ensures consistent records classification and enables staff to quickly and easily search for and retrieve records for operational purposes. Standardization facilitates consistent management practices and reduces training requirements. It also decreases the search and retrieval time required to respond to FOI requests; particularly for the individual(s) in the affected department tasked with the search process.

Disposition of records in accordance with the RCRS ensures that the District retains records only for the time required to meet legal and operational needs, thus minimizing records storage costs. The annual destruction of records, in accordance with the RCRS ensures that District staff can effectively manage records throughout their lifecycle. The RCRS is designed to both facilitate access to records as required under the *Freedom of Information and Protection of Privacy Act* and to provide verification that a record has been dealt with appropriately at final disposition.

When the District receives a formal request for records, those records become subject to a 'legal hold', meaning that the disposition is suspended until such time that the matter has been completely dealt with. In addition to FOI requests, this also applies in cases where courts may order production of records. If the District receives a court order or a formal request for records that have been prepared for destruction, but have not yet been destroyed, the records are subject to and must be included in the response to the court order or FOI request. This also applies to records which would normally be considered "transitory."

Chapter 2

Handling Requests for Information

Making a Request

Before a formal written request for a record is made it should be established that the record being searched for is not "routinely available".

Routine requests - Requests for records that are easily accessible and do not include information subject to the Act do not normally require the involvement of the FOI Head. A fee may be charged for this information, as set out in the *Fees and Charges Bylaw*. Please consult the District's list of routinely available records (see Appendix 3). If you have any questions or concerns, consult the FOI Head. Routine requests can be verbal rather than written.

Information requests - Requests for information that are generally routinely available but requires an information review of the records, usually by a departmental supervisor or the administrative assistant. This can also be a request for records that are not readily to hand, such as records stored in semi-active or archived permanent files. Requests can be made in writing using the 'Information Request form', available on the website. As with routine requests, applicable fees may be charged, as set out in the *Fees and Charges Bylaw*. These requests should be responded to within 3 business days.

Formal requests - Requests for records that are neither routinely available, nor available through more informal procedures. Formal requests under the Act must be made in writing. The 'Access to Records Request Form' (Appendix 1) is used for this purpose and is available on the District's website, but a letter, or e-mail is also acceptable. Formal requests are to be directed to the FOI Head as soon as received, as the Act stipulates a deadline for response.

Staff may direct an applicant to the FOI Head for assistance with making a request. Wherever possible, staff should assist an applicant in preparing a written request. Assistance may include helping an applicant to define the request as specifically as possible.

Note: Just because an applicant provides a request in writing or makes a request for records "pursuant to the Freedom of Information and Protection of Privacy Act," does not make it a formal request. If the information is routinely available staff should provide it to the applicant routinely.

Points to Remember...

- Any staff member, of any department, can accept a written request for information.
- Formal requests can be submitted in the form of a letter, e-mail, or by using the 'Access to Records Request Form' in Appendix 1.
- Information requests can also be submitted in the form of a letter, email or by using the 'Information Request Form' in Appendix 2.
- It is not necessary for applicants to quote the Act to obtain access to records.
- It is not necessary for applicants to provide their contact information when making an FOI request. However, it enables the FOI Head to better assist the applicant with their request.
- The Act does not apply to requests for answers to questions or records of answers to questions.
- Requestors should be encouraged to be as specific as possible in wording their request to enable the District to effectively respond to the request.
- Written requests for records that are not normally routinely available must be forwarded immediately to the FOI Head for response. They will be in contact with staff to receive copies of responsive records once an acknowledgement letter has been sent to the requestor.
- The Act includes a "duty to assist" clause. This states that:
 - "The Head of a public body must make every reasonable effort to assist applicants and to respond without delay to each applicant openly, accurately and completely."
 - "Moreover, the Head of a public body must create a record for an applicant if:
 - the record can be created from a machine-readable record in the custody or under the control of the public body using its normal computer hardware and software and technical expertise, and
 - creating the record would not unreasonably interfere with the operations of the public body."
- The Act also specifies that if the applicant has asked for a copy of a record in electronic form and it is reasonable to provide the record in that form, a copy of the record or part of the record must be provided in that form with the response

Routine Redaction – If the records require severing (redaction) prior to disclosure, the request must be processed as a formal request for information. Please refer to the 'Guideline for Release of Information – Routine Redaction' on the following page.

| GUIDELINE FOR RELEASE OF INFORMATION - Routine Redaction | | | |
|--|------------------------------------|--|---|
| Information Requested | Releasable | Not Releasable | Legislation |
| Agreements & Leases | NO | Consult with FOI Head | s. 21 FOIPPA |
| Building Inspection Reports | YES | NOT - owner's name, address and phone# and if related to a bylaw complaint | s. 15, 21, 22 FOIPPA |
| Building, Plumbing and Development Applications and Permits | YES (including owners name) | NOT - owner's address (if different from subject property) email address and phone#, contractor's home address and phone# and how long the person has owned the property or other supporting information on the permit | s. 22 FOIPPA |
| Building Plans | YES | NOT - information on security systems or interior of building without written consent of owner, plans that are copyright designs | s. 15, 19 FOIPPA |
| Business Licences | YES | NOT - owner's home address, telephone#; unless it is a home based business | s. 22 FOIPPA |
| Bylaws, Policies and Procedures | YES | | s. 97 Charter |
| Bylaw Complaints | NO | ALWAYS treat as FOI Requests | s. 15, 19, 22, 23 FOIPPA |
| Dog Licences | YES (including owner's name) | NOT - owner's address, telephone#, email address; owner's information can be released to CRD Animal Control Services | s. 22, 33 FOIPPA |
| Engineers Certificate | YES | | |
| Fire Inspections (Date of last inspection and whether there are outstanding fire department violations) | YES | NOT - property manager name, telephone #, personal address or email | s. 22 FOIPPA |
| Legal Lot Surveys/Site Surveys/ Site Survey Certificates | YES (bound by copyright law) | To be stamped with "this document is a copy for information only" and "not acceptable for legal purposes" | s. 15, 19 FOIPPA |
| Minutes of Open Council Meetings | YES | | s. 90 & 97 Charter s. 12 FOIPPA |
| Petitions | YES | NOT - email addresses and phone #'s | s. 82 Charter s. 33 FOIPPA |
| Property Owner Information (Requests for registered owner's name, address, telephone#) | NO (YES - if commercial owner) | - | s. 22 FOIPPA |
| Property Tax Information (including Home Owner Grant) | YES (amount of unpaid taxes) | NOT - owner's name, address, telephone#, how and who paid the taxes | s. 203, 249 Charter s. 22, 23 FOIPPA |
| Proposed Development or Subdivision Plans (if no official application received) | YES (drawings for viewing only) | NOT - if submitted in confidence and if before Council In-Camera | s. 21, 22, 23 FOIPPA |
| Tenant Information (tenant's name, address, telephone#) | NO (YES - if commercial tenant) | - | s. 22 FOIPPA |
| Utility Billing | YES (amount unpaid) | NOT - owner's name, address, telephone#, consumption information, overdue and disconnected notices | s. 22 FOIPPA |

Requests for Personal Information

The Act provides that an individual has the right to request access to his/her personal information in the custody or control of the District. However, the Act generally restricts individuals from having access to the personal information of others.

Please note that a property file, for example, may contain personal information, but the file itself is not the homeowner's personal information.

Requests for Correction of Personal Information

Inaccurate personal information can have serious consequences for an individual. For example, inaccurate personal information could result in the denial of benefits associated with a disability claim or the refusal of employment opportunities.

Public bodies must make every reasonable effort to ensure that personal information in their custody or control is accurate and complete. If someone's personal information changes, that person may make a request to the public body to correct the information. Requests for correction of personal information in the custody or control of the District may be treated *informally or formally*:

Informal corrections of personal information can be handled immediately by the appropriate District staff. For example, a member of the public may be in contact with the District to register a change of address or to update contact information. These types of corrections do not require any involvement from the FOI Head.

Formal requests for correction of personal information must be routed through the FOI Head. These might include requests for correction of more sensitive information, such as medical status, bylaw compliance or disciplinary measures.

In response to a request for correction of personal information, the District FOI Head will decide to either correct or annotate the personal information. If the information cannot be corrected (an opinion for example), then the public body must annotate the information. The District must provide the corrected or annotated information to any individual, company, organization or public body to whom the recorded information was disclosed within the preceding year. This means that a careful record must be kept of individuals to whom recorded personal information is disclosed. This another reason why it is important that District staff only collect personal information relating directly to and necessary for an operating program or activity of the

District or for the evaluation of such a program or activity.

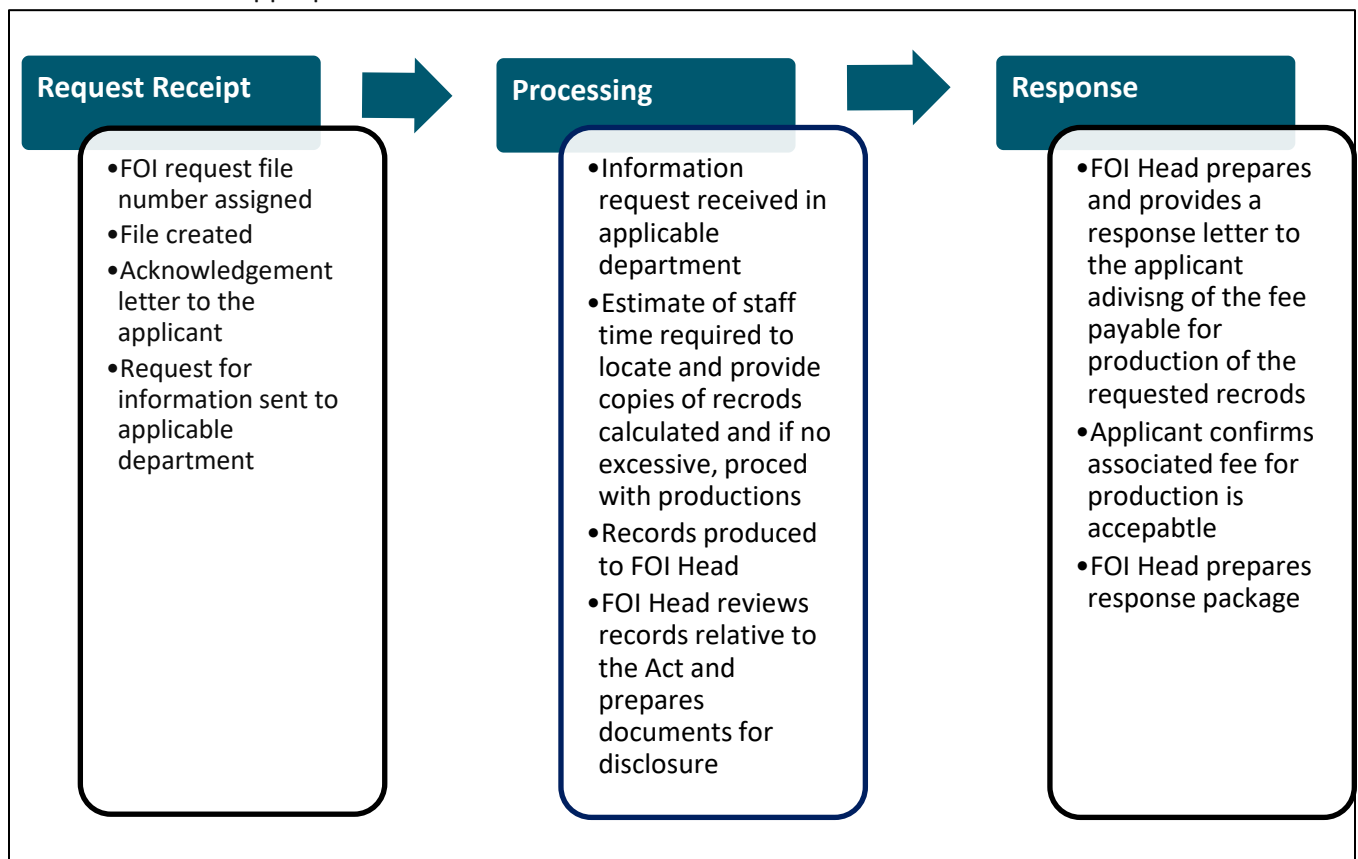
Individuals may request the correction of their personal information, either verbally or in writing. Remember, if you have any questions about the request for correction, please refer them to the FOI Head.

Timelines

The Act generally requires that a response be provided to the applicant within 30 business days of receipt of the request. Occasionally it might be necessary to extend the timeline by an additional 30 business days. Should this situation arise, the FOI Head will advise the applicant of the time extension in advance.

Standard Request Process:

This is the standard process for a simple *Freedom of Information and Protection of Privacy Act* requests (FOI requests) where no 'Third Party Notice' is required and the number of records requested is not large. Where 'Third Party Notice' is required or the number of records requested is very large, the process and timeline will be extended as appropriate.



Chapter 3

Routinely Available Records

The following list identifies some of the most common record types that are routinely available to the public at the District of Central Saanich. The list should be used to help determine whether or not a particular record can be released routinely, released with routine redaction, or whether a more formal review is required. It is by no means an exhaustive listing; it is meant only as a guide.

See Chapter 3 for examples of routinely releasable records.

Formal reviews and FOI requests are handled by the FOI Head. Any requests for records not available routinely should be made in writing and directed to the FOI Head.

Copies of routinely available records may be provided at a cost in accordance with the *Fees and Charges Bylaw*.

Chapter 4

Corporate Policies and Procedures

Standardized policies and procedures apply to records requested under the *Freedom of Information and Protection of Privacy Act* as outlined in this chapter by record type. These policies reflect provisions of the Act as well as the corporate/administrative policies of the District of Central Saanich. Please direct any questions regarding this information to the Corporate Officer.

Accident Incident or Near Miss Reports

Accident Incident Near Miss Reports are considered confidential and must not be released routinely. Requests for copies of Accident Incident Near Miss Reports must be directed to the FOI Head.

Accident Incident Near Miss Reports will contain personal information, including medical information, about the individual subject to the Report, and the name and contact information of witnesses. The relationship between the requestor and those identified on the form will be taken into account when making any considerations to release, and third party written consent may be required depending upon the circumstances of a request.

Aerial Photographs

Some aerial photographs held by the District are routinely available upon request.

Older aerial photographs, due to their fragile nature and historical significance are not available routinely. Requests for staff to review aerial photographs may be subject to the *Fees and Charges Bylaw*.

The Province maintains an extensive aerial photograph database that may be accessed via GeoBC: [http:// geobc.gov.bc.ca/](http://geobc.gov.bc.ca/).

Agreements

See 'Contracts and Agreements'.

Appraisals

Land appraisals commissioned or received by the District are not routinely available to the public. Requests for appraisals are to be forwarded to the FOI Head.

Assessment and Tax Rolls

The Assessment Roll is not available at the District Municipal Hall for public viewing, as it is not a District record. The Assessment Roll can be viewed at the BC Assessment Office at 3350 Douglas St. Victoria BC V8Z 7X9.

Individuals wishing to obtain property owner information should visit the BC Assessment Office, use the BC Online service or contact the Land Title and Survey Authority Office in Victoria for assistance.

Building Permits and Plans

Issued building permits are routinely available to any interested party. The permit should be reviewed, and all personal information redacted (personal phone numbers, personal email addresses, and residential address if different from the subject property). The application and supporting materials for the building permit are not routinely available and should ordinarily be subject to a formal FOI request. However, it is not uncommon for neighbours to be interested in developments within their neighbourhood and, within the limits of common sense, we will make every effort to provide them with information other than personal information.

Where a request is made to view proposed or existing building plans, access should be provided to plans showing site layout and any exterior elevations. These plans may be viewed, but not copied as they are protected by copyright law. Copies of such plans will only be provided upon receipt of a written release from the owner and the professional that created the plans or as part of an FOI request. The federal Copyright Act provides for the copying of copyright materials as part of an access request. However, copyright restrictions still apply to the use of the copied plan by the applicant or by any other person. Any released plan must be stamped with the appropriate "Copyright Act Information" stamp.

The District will not normally provide access to or make available those plans showing security systems.

Business Licences

A business is not considered an individual and therefore does not have privacy rights under the *Act*. Most issued business licence information is routinely available to the public. However, staff should be cautious when dealing with sole proprietorships when the business address and home address are the same. Consult with the FOI Head if you have any questions. The District does not keep hardcopies of business licences.

Subject to the cautions noted above, the following business licence information contained within the Tempest System (database containing business licence related information) may be released in the form of a Business Licence Summary Report to the public upon request:

- Business Licence number
- Business Licence type code
- Location
- Business Name
- Mailing Address
- Business Phone number
- Description of Business

Additional information regarding licence details, including personal telephone numbers and home address of the applicant (if different from the business contact information), must not be disclosed without the permission of the business owner or in response to a formal FOI request

For information relating to other types of licences, see *Licences* below.

Closed Meetings

The meetings of Council and Council Committees may be, in specific circumstances, held "in camera" or "closed" according to the *Community Charter*. Typically, matters relating to land, legal issues and human resources are held in closed meetings. Records relating to a closed meeting may not be released unless the matter has been discussed at length in an open meeting, or if the report or minutes have been in existence for more than 15 years and no other exceptions under the *Freedom of Information and Protection of Privacy Act* apply.

Cloud Computing

Cloud computing involves the provision of data storage services by third parties. One of the provisions of the Act requires that public bodies, in most cases, not store personal information outside Canada. Before using any cloud computing services, be sure that data is stored and accessible only in Canada. If you have any questions or concerns, contact the FOI Head.

Comments on Planning Proposals

Notices for a planning or development proposal should be made available to the public prior to the application appearing before Council through such means as public hearings. Members of the public that object to proposals may submit their objection to the Corporate Officer before the applicable deadline.

If the planning process in question is governed by a section of the *Local Government Act* that authorizes or requires public disclosure in relation to planning matters and liquor licensing, staff may disclose personal information as required by the *Local Government Act*. Section 33.1 of the *Freedom of Information & Protection of Privacy Act* permits a public body to disclose personal information for the purpose of complying with an enactment of BC.

Complaints

The District receives several different types of complaints from members of the public. Many of the District's bylaw enforcement issues are a direct result of complaints lodged by individuals. Complainants are advised that their names and addresses will be kept confidential unless disclosure is required by law. This confidentiality is protected by Sections 15, 19 and 22 of the *Freedom of Information and Protection of Privacy Act*.

The person the complaint is about has the right to know the substance of the complaint, but not the identity of the individual who made the complaint. The requestor should be made aware that the complainant's identity will not be revealed. In the event of a bylaw complaint, the substance of a complaint may not be released until the investigation has been concluded. Requests for copies of complaints must be directed to the FOI Head.

Contracts and Agreements

Generally speaking, most contracts or agreements signed by the Mayor and Corporate Officer with any other party are available to the public.

Care must be taken to examine the wording and clauses of a contract to ensure that it does not reveal trade secrets, proprietary information or information which could possibly harm the business interests of a third party. Therefore, before releasing any contractual information staff must consult with the FOI Head.

Wherever possible, contracts awarded by the District must include a confidentiality clause stating the contract or agreement is subject to FOI and will be released upon request.

In addition, contracts and agreements must address whether the District or the consultant/contractor has ownership of the records created while under contract.

Contact the FOI Head for examples of appropriate wording.

Council Records

All "non-confidential" Council records, such as agendas for regular Council meetings, are available to the public only **after** they have been approved by the Corporate Officer and Chief Administrative Officer.

Council Meeting Agendas (Open Meeting): Open meeting agendas and accompanying reports are released a minimum of one day prior to the regularly scheduled meeting date.

Council Meeting Minutes (Open Meeting/Public Hearing): Open meeting minutes are posted to the District website following the adoption of the minutes.

Public Hearing Agendas: Public Hearing meeting agendas are released a minimum of one business day prior to the public hearing.

Development Variance Permit Items: Development Variance Permit items are posted on the District website a minimum of one business day prior to the public hearing.

Agendas, minutes, notices and other Council documents can be found on the [CivicWebsite](#).

See "Closed Meetings" for more information.

Dog Licences

The District of Central Saanich issues dog licences and has an agreement with the Capital Regional District (CRD) to share information regarding dog licensing in order to enforce the animal control bylaw. Information on whether a dog is licensed is routinely available to the public.

Requests for personal information supplied must be forwarded to the FOI Head.

**Requests for information relating to animal control should be made to the Capital Regional District.*

Email

Email is subject to the Act. Current District of Central Saanich policy is:

All District email must be managed in accordance with District of Central Saanich records management procedures, and must be saved either in the appropriate departmental electronic document file ("the electronic file") or printed and filed in hardcopy.

The same retention principles that apply to regular mail apply to the disposal of email. Transitory email, for example, is disposed of on a regular basis.

Email is not a secure or confidential means of communication. One of the privacy protection provisions included in the Act requires public bodies to store or disclose personal information only in Canada. Many email services used by individuals are based in the United States. The emails sent and received by those individuals is often stored on servers based in the United States. Do not send email to individuals outside the District if you do not know the attributes of their email services. However, the Act permits public bodies to respond to individuals if those individuals have initiated the communication using whatever email service they choose.

Please note that when you are requested by the FOI Head to produce records in response to a request, it is expected that you will also include any and all relevant email records and attachments in your possession.

Employee Files

Employees are entitled to view their employee file. A request in advance must be made to the Human Resources Department to arrange a time to review the file. Direct supervisors may access employee files in order to review work history, education/training, discipline, etc.

Please note that as an employee, you are entitled to request access to any comments made about you - that is your personal information - however, the identity of the person making the comments may be withheld.

Information regarding a person's employment history is considered personal information and will not be disclosed to third parties unless express permission of the employee is obtained first. This includes information regarding benefits paid to the employee. If a request for salary information is received, the requestor will be told of the salary range for that particular position without identifying any individual's specific salary unless express permission from the employee has been

obtained first.

Verbal requests from outside agencies wanting to confirm whether a particular individual is currently employed at the District of Central Saanich should not be confirmed without the employee's consent or without consultation with the FOI Head.

Fire Incident Reports

The Fire Department releases information as routinely available or as required under the *Freedom of Information and Protection of Privacy Act*.

Routinely Available Records: Although some information is available on the District website, a fee may be charged under the *Fees and Charges Bylaw* depending on the format requested and the complexity of the request for the following:

- Maps
- Hydrant location
- Annual reports
- Budgets
- Policies/ Guidelines
- Bylaws
- Brochures
- Strategic Plans

Any requests for information that may have corporate impact beyond the fire department shall be forwarded to the FOI Head for co-ordination.

First Aid Records

First Aid Reports are considered confidential and must not be released routinely. Requests for copies of First Aid Reports must be directed to the FOI Head.

First Aid Reports will contain personal information, including medical information, about the individual subject to the report, and the name and contact information of witnesses. The relationship between the requestor and those identified on the form will be taken into account when making any considerations to release, and third party written consent may be required depending upon the circumstances of a request.

Invoices from Lawyers

Requests for details of legal invoices must be forwarded to the FOI Head. The details may divulge the strategy or grounds on which a legal case is being based or disclose personal information, therefore must be treated as a formal FOI request. Individual or case specific invoices are considered privileged communication between the solicitor and the District and are usually withheld.

Licences and Permits

Copies of approved building, electrical, mechanical, plumbing, occupancy and any other permits (Environmental and/or Form & Character Development Permits) or licences providing a discretionary benefit are routinely available to the public, including the following information:

- Name of the person or company to whom the licence or permit was issued
- Name and address of businesses connected with the licence or permit, such as the name of a contractor or subcontractor
- Location that the work is being performed at
- Value of construction
- Size of building and use of property
- The permits should not disclose any additional personal information supplied in support of the permit application, such as:
 - the home or cellular phone number and email address of the applicant
 - the permit applicant's home address if it is different from the property to which the permit applies
 - how long the owner has owned the property
- Lists of permits issued (weekly or monthly) may be made routinely available to the public but must not contain personal information that is supplied in support of the permit or licence application.

List of Licenced Businesses

The list of licenced businesses within the District of Central Saanich is considered public information. The list may contain the following:

- name and location of the company
- names of principals or officers of the company
- type of business and product(s) produced

Note: In most cases, businesses do not have privacy rights under the Act; only individuals do.

Motor Vehicle Accidents

The District of Central Saanich Fire Department responds to many motor vehicle accidents and often performs rescue and provides medical assistance. Requests for information about motor vehicle accidents must be forwarded to the FOI Head.

Permits

See "Licences and Permits"

Petitions

Citizens may provide input or feedback in the form of petitions and letters listing their names, addresses and signatures to express support or opposition to an issue and to establish their legitimate interest in the matter. Since the intent of such petitions is to demonstrate the degree of public support or opposition to the subject matter of the petition, individuals who complete them normally expect that they will be used for discussion purposes and that it will be part of the District's public record.

If the petition is discussed in an open meeting, then staff can provide copies of requested petitions under the Act which permits disclosure for a consistent purpose. Otherwise, the request must be in writing and forwarded to the FOI Head for response.

Note: Alternative Approval Process (AAP) petitions are not normally available for public inspection.

Police Investigations

The Act allows public bodies such as the District to disclose information to law enforcement bodies to assist in a specific investigation of a law enforcement matter. Staff can provide the requested information directly to District Police, provided that sufficient identification is supplied by the officer and confirmation is received that the information requested relates to a specific investigation (including police file number). The District currently engages in regular exchanges of information with The Central Saanich Police Department on bylaw enforcement matters.

The Central Saanich Police Department is a separate public body from the Municipality and manages its own *Freedom of Information and Protection of Privacy Program*.

Property Information

Routine access to property files is granted upon request only to the registered owner(s) or individuals who have obtained written permission from the registered owner(s) to access property files (see the '[Information Request Form](#)' in Appendix 2). However, staff may disclose information from building or other related approved property permits. See "building permits and plans" for additional information.

Disclosure of Property Information regarding Grow Ops

The Office of the Information & Privacy Commissioner for British Columbia has suggested that information about the physical condition of a particular property or about a bylaw infraction, notices or actions respecting a property is information about a piece of real estate, not about an identifiable individual. Personal information found in or associated with this type of information must not be disclosed.

Property Tax or Utility Billing Information

Under Section 249 of the Community Charter we must provide the following information to anyone who requests it:

- the amount of unpaid taxes and/or utilities,
- whether the property has been sold for taxes, and
- if the property has been sold for taxes, the time, if any remaining, for redemption and the amount required to redeem it.

The charter specifies a "certificate showing" the above information, but in essence it can be in any form.

As the section reads "unpaid" taxes, we can give out balances owing to anyone.

If more detailed information is requested, such as information about payments or releasing of access codes a reasonable affirmation that the person you are speaking to is the owner is required. A reasonable affirmation can be obtained by asking the customer various questions that allow you to determine that they are the owner of the property, such as:

- Knowing the access code
- Previous payment information such as: what they paid in the past, how they paid it and who paid it
- Phone numbers submitted on previous HOG claims

- How a previous HOG was claimed (i.e. online or by paper form)
- If on the instalment plan and if so what they pay each month
- If the mortgage company pays, the name of the mortgage company and/or bank
- Adjustments to account done in the past
- Name of people on title (including middle names)
- Names of previous owners of the property

If reasonable affirmation is achieved then staff may give out the information the customer requested.

Information may be given to customers in various forms, including verbal, re-printing of bills or tax certificates. Tax certificates may be given to any customer, but our usual fee applies. When giving out verbal information, **where the customer did not have the access code**, please add a comment to the tax account as to who you gave the information to and preferably add a contact number or email address.

RFP's - Requests for Proposals

Request for proposals can be viewed at [BC Bid](#) and/or [Civicinfo](#) BC

All 'Requests for Proposals' should contain a statement advising that "All proposals received may be made publicly available, except where confidentiality is required or permitted by law." Proposals containing unit pricing, confidential third-party business information and/or the employment history of employees would normally only be disclosed through the FOI process and where required, through consultation with third party businesses.

Requests from other Public Bodies or Governments for Access to Personal Information

From time to time, other public bodies or governments may contact District staff requesting copies of personal information held by the District. The Act permits disclosure if the other public body or government has the legislative authority to demand or request such information. For example, WorkSafeBC administers the Workers Compensation Act, which provides WorkSafeBC investigators with the authority to request and obtain the records necessary to complete an investigation. Similarly, the Canada Revenue Agency has the authority to demand copies of payments and other information relating to individuals and companies. In most cases, staff can directly release information, but in all cases, must ask the requesting agency to provide written proof of its authority to collect such information. All such disclosures

should be carefully documented. If you have questions about such disclosure, contact the FOI Head.

Surveys - of the Public

Results of surveys conducted by the District of Central Saanich or our agents are considered public information and should be routinely disclosed. Please note that the survey forms themselves will likely contain personal information that should not be disclosed. Therefore, it is District practice not to release the completed forms. An FOI request must be made if an applicant wishes to see the actual completed forms.

A survey form must include a statement informing the public why the information is being collected, under what authority and for what purposes the personal information will be used. This allows the individual discretion whether or not to participate and informs them what will happen with the information collected. Contact the FOI Head for examples of appropriate wording to be used for public surveys.

When conducting internet-based surveys, the personal information collected must reside on a server within Canada in accordance with the Act. Contact the FOI Head for assistance.

Surveys - Site Survey Certificates

Site surveys are submitted to the District as part of various application processes. Site survey Certificates are protected by copyright but may be copied as part of an FOI request. Like building plans, copyright applies to the use of the released survey by the applicant or by any other third party. Any released copy of a survey must be stamped with the appropriate "Copyright Act Information" stamp.

Tenders

Tenders submitted to the District in response to a call for bids or request for proposals are available to the public, except for information regarding unit pricing, employment histories and other confidential third-party business information. The Act recognizes that the release of such information could potentially harm the company's business interests and provide access to personal information of their employees. Unit pricing information is considered proprietary information belonging to the third party. This information may be severed (redacted) prior to disclosure.

Requests for copies of tenders submitted to the District should be directed to the

FOI Head.

Utility Billing Information

See "Property Tax or Utility Billing Information" for more details.

Video Surveillance

The District of Central Saanich utilizes video surveillance to protect District assets, staff and the public. The images captured by surveillance cameras, which are stored on various media including but not limited to CD-ROM and/or hard drives, contain personal information and therefore shall not be subject to public viewing. Only authorized staff may view the recorded images.

In accordance with the Act, the District will disclose video surveillance records to a law enforcement agency in response to a written request in relation to an active police investigation.

Chapter 5

Charging Fees

The Act permits public bodies to charge applicants fees for costs associated with processing requests to access records under the Act. The maximum fees are set out in the *Freedom of Information and Protection of Privacy Regulation* (B.C. Reg. 323/93) to the Act.

The Act prohibits public bodies from charging applicants for access to their own personal information. Please note that a property file, for example, may contain personal information, but the file itself is not the homeowner's personal information.

The Act stipulates that an applicant may be required to pay a public body for the following services:

- locating, retrieving and producing the record
- preparing the record for disclosure
- shipping and handling the record
- providing a copy of the record

The Act further states that an applicant must not be required to pay a fee for the following:

- the first three hours spent locating and retrieving a record, or
- time spent severing information from a record

If an applicant is required to pay fees the public body must give the applicant an estimate of the total fee before providing the service.

Records provided routinely to applicants by departments may charge the applicant for copies in accordance with the *Fees and Charges Bylaw*.

Fee Estimates

In order to prepare and provide fee estimates to applicants in a timely fashion, departments may be asked to provide the FOI Head with an estimate of the number of records that respond to the request, as well as the amount of staff time that would be involved with the following:

- Locating records that respond to the request (includes time spent searching for both physical and electronic records including records on the computer network and email etc.)
- Preparing the records for photocopying (removing staples, etc.)
- Photocopying the records
- Time spent reassembling the original files

The Act provides that the Head of a public body may excuse (upon written request) "an applicant from paying all or part of a fee if, in the Head's opinion,

- the applicant cannot afford the payment, or for any other reason it is fair to excuse payment, or
- the record relates to a matter of public interest, including the environment or public health or safety."

Note: "Public interest" is a specifically defined term and should not be confused with records that may be of interest to some members of the public or that the public may find interesting.

The District *Freedom of Information and Protection of Privacy Bylaw* adopts the Schedule of Maximum Fees provided by British Columbia Regulation 323/93, as amended from time to time, to be the maximum fees charged by the District as permitted under the Act. The schedule is reproduced on the following page for convenient reference.

| | Column 1 | | Column 2 |
|----|---|--|---|
| | Description of Services | | Management Fees |
| 1. | For applicants other than commercial applicants: | | |
| a) | for locating and retrieving a record | | \$7.50 per ¼ hour after the first 3 hours |
| b) | for producing a record manually | | \$7.50 per ¼ hour |
| c) | for producing a record from a machine-readable record from a server or computer | | \$7.50 per ¼ hour for developing a computer program to produce the record |
| d) | for preparing a record for disclosure and handling a record | | \$7.50 per ¼ hour |
| e) | for shipping copies | | actual costs of shipping method chosen by applicant |
| f) | for copying records | | |
| | i) | floppy disks | \$2 per disk |
| | (ii) | CDs and DVDs, recordable or rewritable | \$4 per disk |
| | (iii) | computer tapes | \$40 per tape up to 2400 feet |
| | (iv) | microfiche | \$3 per fiche |
| | (v) | microfilm duplication | \$25 per roll for 16 mm microfilm \$40 per roll for 35 mm microfilm |
| | (vi) | Microfiche or microfilm to paper duplication | \$0.50 per page (8.5" X 11") |

Chapter 6

Managing Personal Information and Forms

The *Freedom of Information and Protection of Privacy Act* governs how public bodies are to collect, use and retain personal information. The District of Central Saanich has a duty to ensure that information is legitimately collected, stored securely, kept current and used only for the purposes for which it is collected.

The Act requires that individuals from whom information is being collected be advised on the purpose for collecting it (i.e. what will it be used for); the legal authority for collecting it and the contact information for a staff member who can answer questions regarding the information collected. Wherever possible, staff should only collect personal information directly from the person who the information is about.

Collection of Personal Information

The Act imposes limitations on the collection of personal information. Section 26 of the Act stipulates that public bodies may only collect personal information under the following circumstances:

- Where the collection is expressly authorized by law (e.g. Elections purposes as per the *Local Government Act*)
- Law enforcement purposes (includes bylaw enforcement)
- Where the information relates directly to, and is necessary for, an operating program or activity of the public body
- That is necessary for the purposes of evaluating a program or activity of the District.

Please note that if one or more of the circumstances listed above does not apply, the District cannot purposefully collect personal information from an individual even if that individual “consents” to such collection.

When Personal Information is not collected

While the Act establishes requirements on what personal information can be collected by public bodies, it cannot impose controls over the personal information individuals may choose to submit to public bodies. If individuals submit personal information that does not relate to a District program or activity and staff take no action with regard to that information other than to read all or part of it, delete, destroy or return it; or forward it to another public body, then that personal information is not considered to have been collected by the District. For example, the District may be copied on unsolicited letters

containing personal information that relates to programs offered by other municipalities, the Capital Regional District, Province or Federal Government.

If you receive personal information that does not relate to a District program or activity, please delete or securely destroy that information in accordance with the Information and Privacy policy.

Public bodies need to collect personal information when it is essential for program delivery or operational requirements. Methods of collection include forms, questionnaires, personal interviews, surveys, etc.

Forms and Surveys Design

Prior to designing forms or surveys, it is important to examine their purpose, use and format. Whether on-line or in traditional paper format, forms and surveys that collect personal information must be designed to provide the public with the information required under Section 27 of the Act.

The name, position and telephone number of a senior staff member responsible for the program or service for which the information is being collected and used must be provided on the surveyform.

Here is an example from the Homeowner Authorization form:

Personal information requested by the District of Central Saanich in this authorization letter is collected for the purpose of authorizing applicants other than the owner to apply for development and building permits and to view and obtain copies of all related records, and will only be used for related purposes. Disclosure of personal information by the District of Central Saanich is subject to the requirements of the Freedom of Information and Protection of Privacy Act. Any questions about the collection of your personal information may be referred to the District of Central Saanich Corporate Officer, by phone to (250) 652-4444, or by email to Municipal.Hall@csaanich.ca

Use and Disclosure of Personal Information

The Act embodies the principle that individuals own their personal information and have the right to exercise control over its use and disclosure.

Public bodies are only permitted to use personal information for the following purposes:

- The purpose for which it was collected or a use consistent with that purpose;
- A purpose for which the person concerned has consented in writing; or
- A purpose for which the information may be disclosed to the public body under other sections of the Act.

Public bodies are only permitted to disclose personal information in certain circumstances; the most common of which are as follows:

- If the individual the information is about has consented in writing
- For the purpose of complying with a law of British Columbia or Canada
- For the purpose of complying with a subpoena, warrant or court order
- To a public body or a law enforcement agency in Canada to assist in a law enforcement matter
- To an officer or employee of the public body if the information is necessary for the performance of his or her duties or safety ("need-to-know" principle)
- For research, statistical, archival or historical purposes

Should you have questions regarding the use or disclosure of personal information, contact the FOI Head.

Security and Retention of Personal Information

The security of personal information is one of the most important privacy-related issues that public bodies such as the District of Central Saanich have to deal with. Reasonable security arrangements must be established and maintained to protect personal information against unauthorized access, collection, use, disclosure or disposal.

All staff should practice good privacy protection by:

- Using passwords on their desktop computer
- Locking computers when away from work-station or desk
- Using locks on cabinets
- Turning monitors away from public view
- Not leaving completed application forms and other records containing personal information in high traffic and/or public areas
- Destroying all personal and/or confidential information by shredding in accordance with the District records management standards policy.

The District is required to retain personal information for one year if that information was used as a basis for a decision directly affecting the individual to allow the affected individual a reasonable opportunity to obtain access to that personal information. After one year, the information must be disposed of in accordance with the RCRS.

Employees and Privacy

Employees of public bodies have fewer privacy rights than private sector employees. This is because the Act states that it is not an unreasonable invasion of privacy for public bodies to disclose information: “about the third party's position, functions or remuneration as an officer, employee or member of a public body,” and/or “the information is about expenses incurred by the third party while travelling at the expense of a public body.” This means that the public has a right to know the names, positions, salary information, travel expenses, job titles and duties of public bodies. Additional employee information such as the details of licences, permits, degrees, certificates or diplomas issued to employees may also be disclosed.

However, the courts have determined that employees do not lose their privacy rights when they start work. The District of Central Saanich respects the privacy rights of employees and takes all reasonable measures to protect those privacy rights. Records created or received by employees during the normal course of business are considered to be in the custody or control of the District. This is true whether those records are created or received through the use of district technology or on personal devices. However, the district recognizes that employees will occasionally engage in personal matters while at work (lunch breaks, coffee, for example). The district discourages employees from including personal information in business records, but if this occurs, the personal information will usually be withheld from disclosure. If you have questions about the privacy rights of employees, please contact the FOI Head.

Chapter 7

Personal Information Directory

The District of Central Saanich is required under Section 69(6) of the *Freedom of Information and Protection of Privacy Act* to make available for inspection and copying by the public a Personal Information Directory. The Directory must list each personal information bank held by the District and the following information for each:

1. Title and location;
2. A description of the kind of personal information and the categories of bylaw enforcement complaints and individuals whose personal information is included;
3. The authority for collecting the personal information;
4. The purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed;
5. The categories of persons who use the personal information or to whom it is disclosed; and
6. Other Information as required by the Provincial Minister responsible for the Act under specific circumstances.

The Act defines a "personal information bank" as follows:

"Personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol or other particular assigned to an individual."

Personal information banks are created and maintained on an ongoing basis. This publication is updated periodically as new information becomes available in an effort meet the legislated requirements.

Personal Information Banks:

Development Application Inquiry System

1. **Title & Location:** The Development Application Inquiry Database is an electronic database that resides on the Municipality of Central Saanich computer network located at Municipal Hall.
2. **Description:** The database contains the name, address and phone number of bylaw enforcement complaints and individuals applying for various planning and development applications, such as rezoning, subdivision, development permit and development variance permit applications. The database includes contact information of the registered property owner and where applicable, their agent.
3. **Authority:** Section 26(b) of the Freedom of Information and Protection of Privacy Act (regulatory bylaw enforcement) and Section 26(c) of the Freedom of Information and Protection of Privacy Act (community planning and land use regulation program).
4. **Purposes:** The personal information is compiled and used to process planning and development applications.
5. **Use:** Planning and Building Services

Central Saanich Computer Network

1. **Title & Location:** The Central Saanich Computer Network contains corporate records, located on the District's Local Area Network (LAN) on the N drive.
2. **Description:** The N drive contains information about corporate files created and maintained according to the corporate Records & Information Management Program. Files, file titles or notes may contain individual's names and personal contact information.
3. **Authority:** Section 26(c) of the Freedom of Information and Protection of Privacy Act (operating program or activity of the public body).
4. **Purposes:** The personal information is compiled and used for locating corporate records/files throughout the District of Central Saanich operations.
5. **Use:** All District of Central Saanich staff.

Human Resources Employee Files

1. **Title & Location:** Human Resources employee files are located at municipal hall, public works administrative offices, fire hall no. 1 and at the off-site corporate records storage site.
2. **Description:** These files contain employment information of current and former employees of the District of Central Saanich.
3. **Authority:** Section 26(c) of the Freedom of Information and Protection of Privacy Act (Employment Program).
4. **Purposes:** The personal information is compiled and used for employment related purposes.
5. **Use:** Supervisors and employees. Security measures are in place to ensure access is on a "need to know" basis only.

Calls for Service System

1. **Title & Location:** The Calls for Service System is an electronic database that resides on the District of Central Saanich computer network located at Municipal Hall.
2. **Description:** This database contains personal contact information from individuals requesting District services and reporting issues, such as the repair of potholes.
3. **Authority:** Section 26(c) of the Freedom of Information and Protection of Privacy Act. (Public Works and Engineering Programs)
4. **Purposes:** The personal information is compiled and used to process requests for service and respond to reports of issues made to the District.
5. **Use:** All District of Central Saanich staff.

Email Archive System

1. **Title & Location:** The Email Archive System is an electronic database that resides on the District of Central Saanich computer network located at municipal hall. An offsite backup of the Email Archive database is copied to tape weekly and securely stored offsite in a vault at a facility located in Central Saanich.
2. **Description:** The database contains personal information including names, email addresses, phone numbers
3. **Authority:** Section 26(c) of the Freedom of Information and Protection of Privacy Act.
4. **Purposes:** The personal information is compiled and backed up to prevent data loss in the event of a hardware or software failure.
5. **Use:** The Information Technology Department and the Administration Department staff.

Chapter 8

Additional Resources

[Official Website of the Information and Privacy Commissioner of British Columbia](#)

[Freedom of Information and Protection of Privacy Act and Regulations](#)

[Office of the Chief Information Officer](#)

Ministry of Citizens' Services and Open Government - [Freedom of Information and Protection of Privacy: Policy and Procedures Manual](#)

[District of Central Saanich - Freedom of Information](#)

Appendix 1

Access to Records Request Form

[See separate document posted on the webpage.](#)

Appendix 2

Information Request Form

[See separate document posted on the webpage.](#)