

City of St. John's Corporate and Operational Policy Manual

Procedure Title: Personal Information Bank and Inventory Procedures	
Authorizing Policy: Privacy Management Policy	
Procedure #: 01-04-02-04	
Last Revision Date: N/A	Procedure Sponsor: City Clerk

1. Procedure Statement

This document provides information to assist Employees in identifying and reporting Personal Information Banks (PIBs) and for the Access to Information and Protection of Privacy Coordinator ("ATIPP Coordinator") to develop and maintain the City's Personal Information Inventory.

2. Definitions

"Central Department Contact" means an Employee identified by the Department Head to be the liaison between the department's divisions and the ATIPP Coordinator.

"Department Head" means any Employee reporting directly to the City Manager and/or Council.

"Employee" means any person employed by the City of St. John's as a permanent, term, part-time, casual, contract, seasonal, temporary, or student worker.

"Office of the Information and Privacy Commissioner" (OIPC) means the Office of the Information and Privacy Commissioner of Newfoundland and Labrador.

"Personal Information" shall have the same meaning as defined by Section 2(u) of ATIPPA, that is, "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 status or history, including a physical or mental disability,
- vii. information about the individual's educational, financial, criminal or employment status or history,
- viii. the opinions of a person about the individual, and
- ix. the individual's personal views or opinions, except where they are about someone else."

"Personal Information Bank" means 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 Inventory" means an inventory of all of the City's Personal Information Banks.

3. Procedure Requirements

3.1 Preliminary Listing

Within each department, each division shall identify the collections of Personal Information it has in its custody. Once these are identified, each division shall develop a preliminary list with the name of each potential PIB to be reviewed to confirm whether each collection meets the three criteria for a PIB:

- a) It contains "Personal Information."
- b) It takes the form of a "collection."
- c) It is "organized or retrievable by the name or an identifying number, symbol or other particular assigned to an individual."

This list shall be provided to a Central Department Contact as designated by the Department Head. The ATIPP Coordinator shall work with the Central Department Contact to review the preliminary list.

Additional guidance on PIB development is available in the **Personal Information Bank and Inventory Guide** document.

3.2 Detailed Personal Information Bank Information

The Central Department Contact shall advise divisions which items on their preliminary lists meet PIB criteria. For each PIB, divisions shall provide:

- a) **Name of the PIB:** Description of the PIB that reflects the information contained.
- b) **Location:** A list of all the locations (department and/or division) where the information is maintained. This may also include other offices that have copies of the PIB in their custody.
- c) **Legal authority:** A list of the specific legal authority for the collection of the Personal Information. This may be a statute or a regulation. If more than one legal authority exists, all shall be listed.
- d) **Contents:** A description of the contents of the PIB and the types of Personal Information contained within.
- e) **How the information is used:** A description of the purpose for which the Personal Information was collected or compiled and how it is used or disclosed. All current uses of the information by the City or other authorized individuals/organizations shall also be listed. This includes authorized consistent uses, other permitted disclosures, and authorized information exchanges.
- f) **Who is authorized to use the information:** A list of the types of PIB users.
- g) **Retention and disposal:** Information on the applicable retention and disposal schedules for the records in the PIB.

The PIB information shall be provided in the format specified and within the timeframe specified by the ATIPP Coordinator.

3.3 Personal Information Inventory

Following receipt of all departmental PIB listings, the ATIPP Coordinator shall develop a single Personal Information Inventory (PII) for publication on the City's website.

The Inventory shall be reviewed and updated as directed by the ATIPP Coordinator.

4. Application

This procedure applies to all City departments and divisions with collections of Personal Information.

5. Responsibilities

5.1 ATIPP Coordinator is responsible for:

- a) Managing the PII and PIB process; and
- b) Providing direction and support to departments and individual divisions (as required) to facilitate the development of departmental PIB listings.

5.2 Department Heads are responsible for:

- a) Designating a Central Department Contact for the PIB process; and
- b) Ensuring departmental information is provided to the ATIPP Coordinator within the required timelines.

5.3 Central Department Contacts are responsible for:

- a) Working with Division Managers to develop preliminary lists of potential PIBs and then developing full detailed PIB listings for each division; and
- b) Ensuring departmental information is provided to the ATIPP Coordinator within the required timelines.

5.4 Division Managers are responsible for:

- a) Working with the Central Department Contact to develop the division's preliminary list of potential PIBs and the full detailed division PIB listing; and
- b) Ensuring divisional information is provided to the Central Department Contact within the required timelines.

6. References

- [Access to Information and Protection of Privacy Act, 2015](#)
- 01-04-02 Privacy Management Policy
- Personal Information Bank and Inventory Guide

7. Approval

- Procedure Sponsor: ATIPP Coordinator
- Procedure Writer: ATIPP Coordinator / Policy Analyst
- Date of Approval from:
 - Corporate Policy Committee: November 13, 2018
 - Senior Executive Committee: May 24, 2019

8. Monitoring and Contravention

The ATIPP Coordinator shall monitor the application of this procedure.

Any contravention of the procedure may be brought to the attention of the Department of Human Resources, the Office of the City Solicitor, the City Manager, and/or the OIPC for further investigation and potential follow up disciplinary or legal action, up to and including dismissal.

9. Review Date

Every 3 years