

The purpose of this document is to clarify the meaning of personal information under the Freedom of Information and Protection of Privacy Act (FIPPA). However, it is not intended to be a substitute for legal advice.

Personal Information Overview

FIPPA establishes rules around personal information that all public bodies, including school districts in B.C., must follow.

Learn more about FIPPA and how it applies to personal information in the FIPPA Overview document. (<https://bcerac.ca/wp-content/uploads/2019/04/FIPPA-Overview-2019-04-25.pdf>)

WHAT IS PERSONAL INFORMATION?

BC's Freedom of Information and Protection of Privacy Act defines personal information (PI), as "recorded information about an identifiable individual other than contact information."

To be an identifiable individual means that the person can be identified using their name or some other unique characteristic that applies specifically to them. Examples include student ID numbers, email addresses, phone numbers, mailing addresses, fingerprints or photographs.

WHAT IS CONTACT INFORMATION?

FIPPA Schedule 1 defines contact information as "information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual." Contact information is not considered personal information.

Personal Information examples:

- Student #8579 has been absent for two weeks.
- Joe Jones lives at 1822 Willow Street.
- Jane Smith turns 16 on December 19th.

Contact Information examples:

- Joe Jones works in School District 93.
- Jane Smith's work address is 1580 West Broadway.
- Jane Smith, the school's Facilities Manager, can be contacted at Jane.Smith@SchoolDistrict.ca

WHY IS IT IMPORTANT TO PROTECT PERSONAL INFORMATION?

Individuals have a right, under FIPPA, to have their personal information that is collected by school districts be protected. Under FIPPA Section 30:

“A public body must protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.”

Personal Information should be treated as confidential unless it is public information or unless there is consent for disclosure from the individual.

HANDLING PERSONAL INFORMATION (PI) RESPONSIBLY

Due to its sensitive nature, personal information should be protected by following best practices and procedures, which include:

- **Secure Storage** – PI should be stored in secure locations, such as on encrypted servers. It should not be stored or transmitted on unencrypted devices (e.g. USB flash drives). If a device is being discarded or recycled, districts should ensure that it does not contain any PI.
- **Data minimization** – School Districts should avoid collecting personal information beyond what is needed for the stated purpose. For example, if the stated purpose of collecting PI is to create user accounts in a new software program, and this can be done using only a person’s name and email address, then unnecessary information, like their home address and birthdate, should not be collected.
- **Notification** – Individuals need to be notified what PI is being collected from them and how it will be used and protected. For example, tools that collect PI, such as an online survey, or a printed form, must include a privacy notification advising people what information is being collected and how it will be used and protected.

QUESTIONS?

If you have specific questions, contact the privacy officer in your district or the provincial privacy helpline.

Email: privacy.helpline@gov.bc.ca

Phone: 250-356-1851, or 1-800-663-7867 (and ask for the Privacy and Access Helpline).