

IM@WORK
FOR MY TOWN: BEST
PRACTICES THROUGH THE
INFORMATION LIFECYCLE



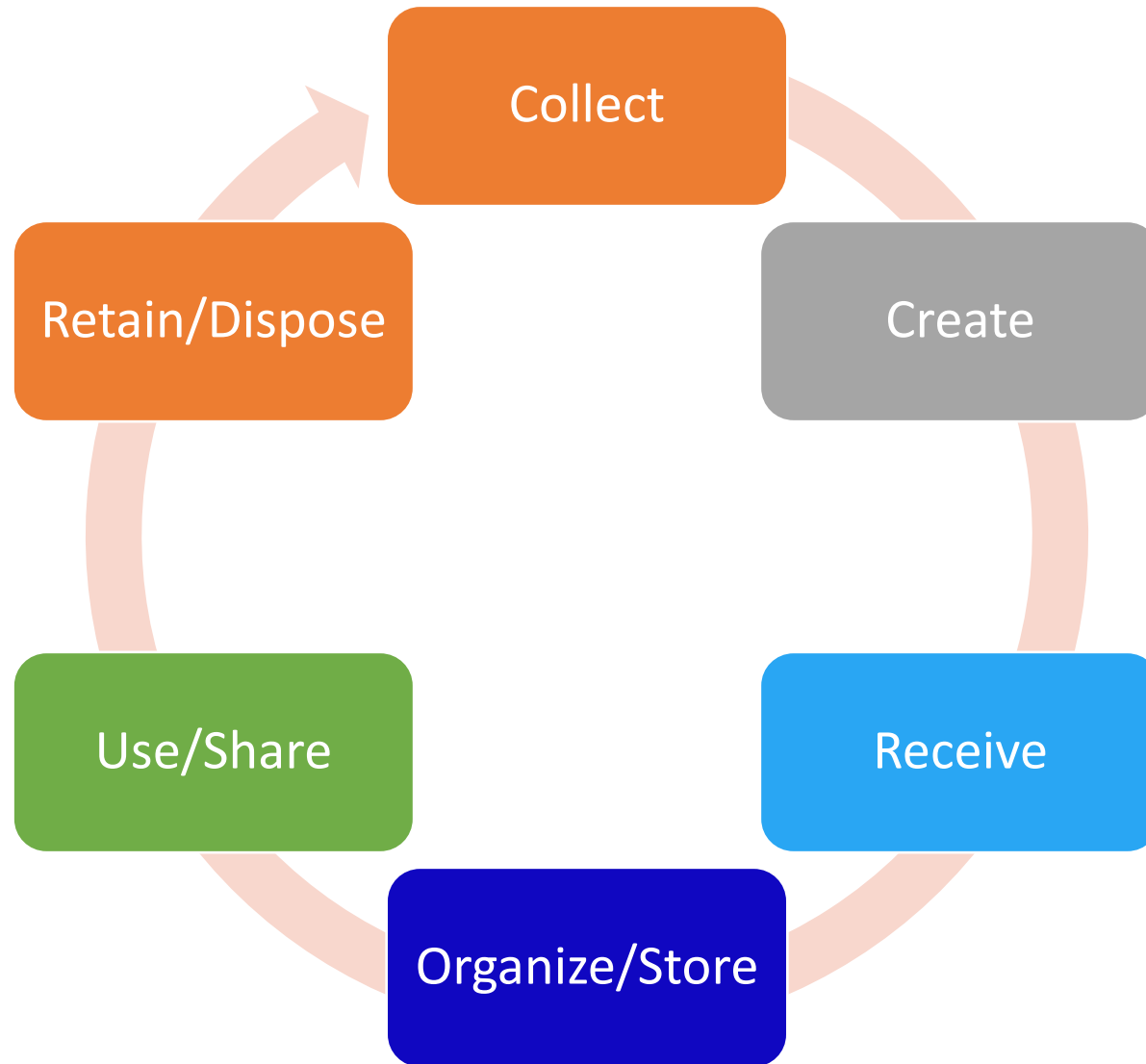
***Module 2.1 -
Collecting***

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Welcome to Module 2: IM Best Practices

- **In Module 2.1 you will learn to:**
 - Identify when collection of information occurs and potential sources/formats
 - Identify risks to information at the collection point
 - Define personal and confidential information

The Information Life Cycle



Collection



- Occurs whenever the town actively seeks, acquires, receives, obtains, gathers, or compiles information
- Often is driven or flows from an external source (e.g., taxpayer)
- Can happen via telephone, email, correspondence, form, interview, etc.
- Initiates a process or service and creation of new records (e.g., new permit)
- Some information the town collects is personal or confidential. This means that it needs to be protected at all stages
- The collection point is where there are many potential risks!

Collection Risks

Risks to information collection may include:

- Town users are unaware which types of information includes personal or confidential content
- Failure to obtain consent for the collection of personal information
- Collecting information beyond what is needed to provide the program or service
- Information is not collected in a secure manner – e.g., at the counter where others may overhear

Personal and Confidential Information

- **Personal Identifiable Information (PII)** means recorded information about an identifiable individual
- **Confidential information** is information that is prohibited from disclosure because of legislation or court order or any other information that pertains to the business of the Town generally considered to be of a confidential nature,
 - All municipalities must comply with the ATIPPA 2015 so using the definitions in that Act is an easy way to identify what information needs to have extra protection
- All employees need to understand whether the information they are working with is personal or confidential and apply safeguards

What is Personal Information?

Contact Information (e.g., name)

Race/Religion/
Political (e.g.,
Indigenous status)

Physical Descriptors
(e.g., age)

Health Information
(e.g., sick leave
note)

Anatomical (e.g.,
biometrics)

Unique Identifier
(e.g., account
number)

Social, Educational
or Financial
(e.g., bankruptcy)

Opinions (e.g.,
reflects personal
relationship or
assessments)

What is Confidential Information?



s. 27 - Cabinet confidences

s. 28 - Local public body confidences

s. 29 - Policy advice or recommendations

s. 30 - Legal advice (legal opinions from town solicitor)

s. 31 - Disclosure harmful to law enforcement

s. 32 - Confidential evaluations

What is Confidential Information?



s. 33 – Information from a workplace investigation

s. 34 - Disclosure harmful to intergovernmental relations or negotiations

s. 35 Disclosure harmful to the financial or economic interests of a public body

s. 36 -
Disclosure harmful to conservation

s. 37 - Disclosure harmful to individual or public safety

s. 38 – Disclosure harmful to labour relations interests of the public body as an employer

What is Confidential Information?



s. 39 Disclosure harmful to business interests of a third party – proprietary info and trade secrets

s. 40 Disclosure harmful to personal privacy see the examples included as PII

S. 41 Disclosure of House of Assembly service and statutory office records

- Determining whether information is confidential can be challenging:
- May be dependent on timing! (e.g., confidential until a report is released, negotiations are complete, etc.)
 - The information may appear to fall into more than one exemption (e.g., policy vs. legal)
 - Reach out to the ATIPP office if you need to clarify

Collection

- Limited only to that which is necessary to provide a program or service
- Town users must collect only information that the Town is authorized to collect
- Requires a privacy notice, as set out in s. 62(2) of the *ATIPP Act, 2015*, to be given either verbally or in writing prior to collection
- Be mindful of your surroundings during collection and ask yourself the following question: what would the impact or risk be if this information was accidentally seen or heard by clients, colleagues, or bystanders?

Collection

- Do not leave confidential or sensitive information on a desk or displayed on a screen while you deal with another client, colleague, etc.
- Use the most up to date form or template
- Verify that information/records are complete and accurate
- Organize and label information as soon as it is collected

Collection Summary

- Collection occurs whenever information is obtained
- Information can be collected from many sources in varying formats
- The collection point of information can pose many risks. This includes unidentified personal information, failure to obtain appropriate consents, over/unnecessary collection and unsecure collection.
- Personal and confidential information acquired by the town requires additional protection in order to comply with ATIPP legislative standards

References

- *Access to Information and Protection of Privacy Act 2015*, Government of Newfoundland and Labrador:
<https://assembly.nl.ca/legislation/sr/statutes/a01-2.htm>
- Collection of Personal Information, Information and Privacy Commissioner of Ontario: <https://www.ipc.on.ca/part-x-cyfsa/collection-use-and-disclosure-of-personal-information/collection-of-personal-information/>
- Policy and Procedures Manual, ATIPP Office, Government of Newfoundland and Labrador: <https://www.gov.nl.ca/atipp/info/>

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