

# PRIVACY MANAGEMENT FRAMEWORK

Elections BC's privacy management framework enables Elections BC to manage the privacy of personal information that it collects, uses, discloses and holds in the course of performing its statutory functions. The framework is reviewed every two years.

## Executive Support

The Chief Electoral Officer and Elections BC Senior Management Team have endorsed this plan and are committed to its implementation.

## Privacy Officer

The designated privacy officer has overall authority for monitoring privacy management and compliance.

## Training

All headquarters staff (permanent and temporary) receive privacy training as part of the new employee orientation package. Additionally, all permanent staff are required to complete a privacy training course through the B.C. Public Service Agency. Temporary staff working in district electoral offices are required to complete an online, self-directed privacy training module. Training for enumerators and temporary election officials working in voting places includes instructions for the appropriate use and management of personal information.

## Privacy Management Policies

Elections BC privacy management policies are designed and implemented to support Elections BC's privacy compliance and management. Policies and associated processes and documentation are periodically reviewed and updated as necessary to ensure they remain current and comprehensive. Elections BC also complies with external privacy policies established in the [Core Policy and Procedures Manual](#) and

the Office of the Chief Information Officer's [Information security policy](#) where the policies do not contravene the *Election Act* or compromise the independence of the Chief Electoral Officer as an independent Officer of the Legislature.

## **Collection Notices**

In accordance with the *Freedom of Information and Protection of Privacy Act*, Elections BC informs individuals from whom we collect personal information, at the time of collection, either verbally or in writing, of the purpose for collecting it, the legal authority for collecting it, and how to contact Elections BC's privacy officer.

*Example of an Elections BC collection notice used for the 2017 Enumeration:*

This information is collected under the authority of the *Election Act* and the *Freedom of Information and Protection of Privacy Act*. The information will be used to administer provisions under the *Election Act*. Questions can be directed to: Privacy Officer, Elections BC 1-800-661-8683, [privacy@elections.bc.ca](mailto:privacy@elections.bc.ca) or PO Box 9275 Stn Prov Govt, Victoria BC V8W 9J6.

## **Privacy Risk Assessments**

Elections BC considers privacy risks and uses the designated preliminary privacy risk assessment and privacy impact assessment tools when a new event, project, activity or system that collects, uses, or discloses personal information is being planned.

## **Personal Information Inventory**

Elections BC maintains a personal information inventory to document the specific authorities for the collection, use and disclosure of the kinds of personal information it holds and uses.

## **Service Provider Management**

Service providers are required to abide by the Privacy Protection Schedule to the B.C. government General Service Agreement when the agreement involves personal information.

## Privacy Breach Protocol

Given the varied nature of information incidents or privacy breaches, no “one-size-fits-all” response is possible, and actions are proportional and appropriate to each incident.

1.	Staff report the actual or suspected incident to their program area director/manager and to the privacy officer.	Service providers report the actual or suspected incident to their Elections BC contract administrator, who in turn report to their program area director/manager and to the privacy officer.
2.	The Chief Electoral Officer, in consultation with the privacy officer and Elections BC’s Senior Management Team will determine next steps including whether to involve the government’s Office of the Chief Information Officer (OCIO), the Office of the Information and Privacy Commissioner (OIPC), the police or other relevant authorities.	

## Records Management

Elections BC manages records, including records containing personal information, using its administrative and operational records classification systems (ARCS/ORCS). ARCS and ORCS classify records by common subjects, explain how long records of different classifications must be kept (retention schedules), and describe what must be done with records at the end of the retention period.

## Transparency

Elections BC strives to be open and accountable about our privacy policies and practices and maintains this page on our website for this purpose. It can be reached by following the Privacy link available on every page of our website or by visiting [elections.bc.ca/privacy](http://elections.bc.ca/privacy).

## Contact

For privacy questions or concerns, contact Elections BC’s privacy officer:

[privacy@elections.bc.ca](mailto:privacy@elections.bc.ca)