



DECEMBER 2001

# Backgrounder

## FOR SENIOR MANAGERS AND INFORMATION AND PRIVACY CO-ORDINATORS RAISING THE PROFILE OF ACCESS AND PRIVACY IN YOUR INSTITUTION

*Produced by the Ministry of Natural Resources and the Information and Privacy Commissioner/Ontario*

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### Introduction

Freedom of Information and Privacy Co-ordinators play a critically important role in the administration of the *Freedom of Information and Protection of Privacy Act* and the *Municipal Freedom of Information and Protection of Privacy Act*. Co-ordinators assist institutions in meeting their statutory obligations under the *Acts*, promoting open government, and fostering an organizational culture that advances the fundamental principles of these *Acts*:

- Information (general records) should be available to the public;
- Individuals should have access to their own personal information;
- Exemptions to access should be limited and specific;
- Institutions should protect the privacy of individuals with respect to personal information held by institutions.

### Relationship between Co-ordinators and staff across the institution

To do the job of processing access requests, appeals and privacy complaints under the *Acts*, Co-ordinators rely on staff in all of the information-holding departments, or program areas, within the institution.

While access and privacy are an everyday and natural part of the work of the Co-ordinator's office, this is not necessarily the case for staff in the rest of the workplace. From senior management on down, their day-to-day activities focus on the operation of the institution's programs. Hopefully, in performing these day-to-day activities they integrate their understanding of the *Acts* into their performance. But what if they don't? And, even if they do, access and privacy are evolving matters, with new issues and questions continually being raised.



## Raising awareness

For Co-ordinators (and therefore institutions) to be successful in achieving the purposes of the *Acts*, raising awareness of access and privacy issues on a regular and proactive basis within the whole institution is an essential component of a Co-ordinator’s job.

Raising awareness includes not only a general awareness of the *Acts*, but also substantive matters such as updates on training sessions, or relevant orders and privacy complaint reports of the Information and Privacy Commissioner. Just as important, raising awareness includes creating a forum to provide answers to frequently asked questions, some of which are difficult or even unusual.

In order to be truly effective, access and privacy issues must be in the forefront of everyone’s consciousness. Everyone has to participate. Yet it is difficult, even at the best of times, to keep employees informed and focussed on access and privacy matters. So how do you achieve this?

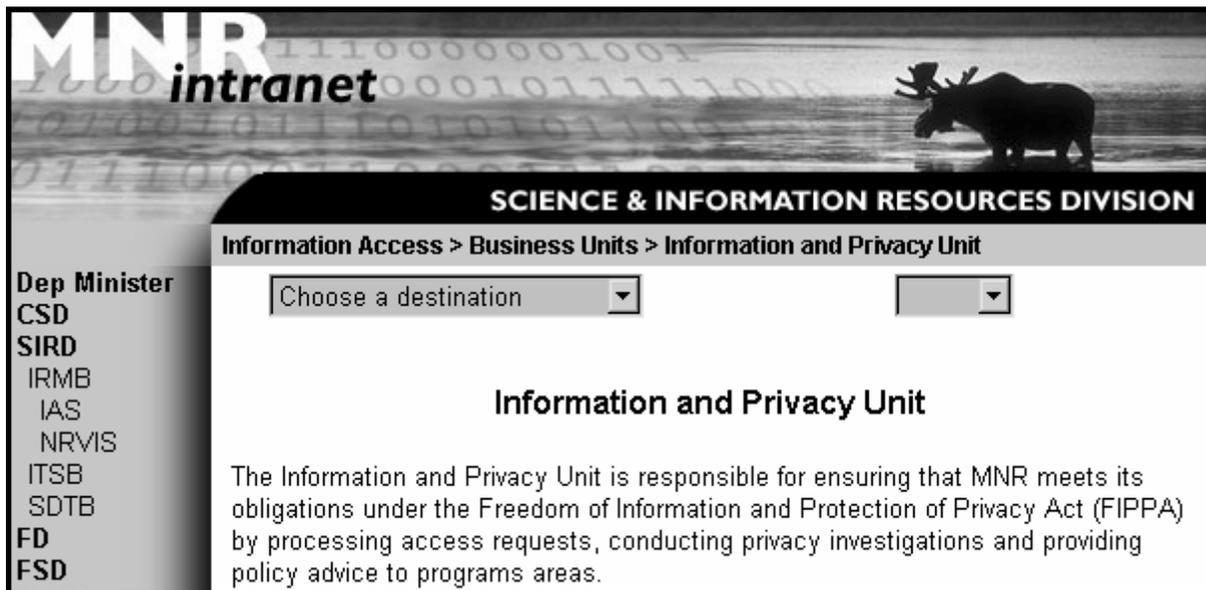
## How to raise awareness

The medium through which you choose to raise awareness will be dependent on an institution’s available resources, and certainly will vary from institution to institution.

For some ideas, let’s look at what the Ministry of Natural Resources (MNR) Freedom of Information and Protection of Privacy (FIPPA) Unit is doing on its intranet site.

### Intranet

Co-ordinators in institutions with technical capabilities may find that using their institution’s intranet is an efficient and effective way to reach all staff. The FIPPA section of the MNR’s intranet may be accessed at [mnrweb.mnr.gov.on.ca](http://mnrweb.mnr.gov.on.ca). Once there, click on SIRD, Information Resources Management Branch (IRMB), Information Access Services, and Information and Privacy Unit — and you are there!





## Newsletter

Co-ordinators at institutions without an intranet may choose to produce their own hardcopy newsletter. Or, they may suggest that a regular column on access and privacy matters be included in the institution’s existing newsletter. It is important, however, to update the intranet site or produce the newsletter on a regular basis in order to sustain interest and awareness. For example, if you choose to issue your newsletter on the same day every second month, staff may actually look for it. And it will certainly help to make access and privacy issues a regular and natural part of the workplace for all.

Whichever format you choose as being appropriate for your institution, it cannot but help to raise the profile of both the Co-ordinator’s office in general, and access and privacy matters in particular.

## Content

The sky’s the limit. Based on the MNR’s experience, here are some topics you may wish to consider:

- **FIPPA Office**            Who we are and what we do

<p>IRMB IAS NRVIS ITSB SDTB FD FSD NRMD</p> <p><b>Org Charts</b> <b>Who's Who</b> <b>Library</b> <b>Applications</b> <b>E.P.I.K.</b> <b>Links</b> <b>Acronyms</b></p>	<p><b>Information and Privacy Unit</b></p> <p>The Information and Privacy Unit is responsible for ensuring that MNR meets its obligations under the Freedom of Information and Protection of Privacy Act (FIPPA) by processing access requests, conducting privacy investigations and providing policy advice to programs areas.</p> <p><u><a href="#">Information and Privacy Unit Staff Contact Information</a></u></p> <p>Every district, region and branch has a local contact person who can assist you with questions about access and privacy concerns. These contacts also help us by retrieving records for requests and by providing advice on program issues.</p> <p><u><a href="#">Branch/District/Regional Contact Information</a></u></p>
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• **Notices**

Dates for upcoming in-house training sessions provided by Unit staff, and pre-course reading package.

	<p><b>Upcoming Training Courses and Information Sessions</b></p> <p>Kemptville – May 29, 2001</p> <p><a href="#">Course Reading Package</a> <a href="#">Course Slides</a></p>
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For a recent training session, MNR posted a comprehensive package for participants in advance of the session. Here is a snapshot of the Table of Contents:

<b>Table of Contents</b>	
Information and Privacy Unit .....	3
Roles and Responsibilities .....	4
Purposes of the Act .....	5
Definitions .....	5
List of exemptions .....	9
Case studies .....	10
Retrieval message and forms .....	20
Tips for retrieving and packaging records .....	23
Evaluation Form .....	24

- **FAQs**

While individual Co-ordinators are in the best position to know the kinds of questions frequently asked in their institutions, here is an example from the MNR intranet site:

**FAQs - Frequently Asked Questions**

[Why should I be concerned about FIPPA?](#)

[What is a FIPPA request?](#)

[What if I receive a request but the \\$5.00 filing fee is missing?](#)

[What is a record?](#)

[Does FIPPA only apply to records? What about answering questions over the telephone? How do I know the difference between a FIPPA request and other requests for information?](#)

[What if I'm not sure if the request should be processed as a FIPPA request or not?](#)

[Should I be concerned about FIPPA impacts in relation to research and other agreements?](#)

[What is a third party?](#)

[What kinds of information are considered to be personal information?](#)

[I have been asked to share a mailing list. Is this okay?](#)

[I'm designing a new form. What should I do to make sure it complies with FIPPA?](#)

[What does "authority to collect" mean?](#)

[Another government institution wants me to give out personal information. What are the rules?](#)

[I need to make some changes to a computer system that contains personal information. Are there any special procedures I should follow?](#)

Here's how the first FAQ was handled:

- Q: *Why should I be concerned about FIPPA? I don't think it has anything to do with my job. I don't deal with the public.*
- A: Everyone encounters personal information, third party information and confidential government information when dealing with records in their daily work. It is the responsibility of every employee to be aware of how the *Act* applies to that kind of information.



- **Advisor's Corner** Mainly for FIPPA Advisors, this area provides information on current access and privacy issues; recent IPC orders; and practical tips. Topics from the MNR site include:

### Advisor's Corner

A special section of practical tips for *FIPPA* advisors.

For a "plain language" overview of *FIPPA* processes, take a look at the [online manual](#) at the Management Board Secretariat Corporate *FIPPA* site.

[FIPPA Roles and Responsibilities](#)  
[Tips for retrieving and packaging records](#)  
[Checklist for submitting FIPPA requests](#)

- **Manager's Corner** A great way to get Senior Management involved. Here, the MNR describes the role of Program Advisors and the core competencies required to perform the responsibilities of the position.

### Helpful Tips for Managers

We ask each director and district manager to designate two contacts for *FIPPA* purposes. Because of the tight, legislated deadlines we face, we need to ensure that there is always at least one advisor available to coordinate records retrieval and provide advice on program information and issues.

[How to Choose an Advisor](#)

The *Freedom of Information and Protection of Privacy Act* requires that ministries respond to requests within 30 calendar days. Processing requests is a shared responsibility between the program areas, who have the records, the subject knowledge and the expertise, and staff in the Information and Privacy Unit, who process the requests. In order to meet these deadlines, we have programmed our file management system to reflect the following deadlines for various actions required by the program areas: Records Retrieval (5 business days), Advice from Program Area (2 business days), and Approval (1 business day). We want to thank you for the cooperation we have received to date, and ask for your continued support.

In addition, Freedom of Information and Privacy Coordinators play a critically important [role](#) in the administration of the *Freedom of Information and Protection of Privacy Act*. It is essential that a Coordinator has the support and commitment of the institution, starting at the top, and extending throughout the senior management and program-delivery structure. [Management Board Secretariat's FIPPA Policy Directive](#) outlines additional key roles and responsibilities.



- **Forms** An easy way to access frequently used forms.

	<h3>Forms</h3> <ul style="list-style-type: none"><li><a href="#">Access to Information Request form</a></li><li><a href="#">Disclosure of Personal Information - Law Enforcement</a></li><li><a href="#">Disclosure of Personal Information - Other Government</a></li><li><a href="#">Records Retrieval form Part 1</a></li><li><a href="#">Records Retrieval form Part 2</a></li><li><a href="#">Research Agreement</a></li></ul> <p><a href="#">Information and Privacy Newsletter</a></p>
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- **Links to other web sites**

<p>ITSB SDTB FD FSD NRMD</p> <p>Org Charts Who's Who Library Applications E.P.I.K. Links Acronyms PSC Feedback</p> 	<h3>Recommended Web sites</h3> <h4>Legislation</h4> <ul style="list-style-type: none"><li>• Freedom of Information and Protection of Privacy Act <a href="http://www.ipc.on.ca/english/acts/acts.htm">http://www.ipc.on.ca/english/acts/acts.htm</a></li><li>• Annotated Act with Reference to Information and Privacy Commission Order <a href="http://www.gov.on.ca/MBS/english/fip/ann/ann.html">http://www.gov.on.ca/MBS/english/fip/ann/ann.html</a></li></ul> <h4>Policies and Best Practices</h4> <ul style="list-style-type: none"><li>• Management Board Secretariat Corporate FIPPA Office <a href="http://www.gov.on.ca/MBS/english/fip/">http://www.gov.on.ca/MBS/english/fip/</a></li><li>• Information and Privacy Commission <a href="http://www.ipc.on.ca/">http://www.ipc.on.ca/</a></li><li>• Archives of Ontario Recorded Information Management <a href="http://intra.gov.on.ca/MBSPASB/archives/rims/index.html">http://intra.gov.on.ca/MBSPASB/archives/rims/index.html</a></li></ul>
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• **Contacts**

Names, telephone numbers and e-mail addresses of Co-ordinator and staff members, plus any field and program area contacts who have been specially trained in access and privacy matters.

<b>Information and Privacy Staff Contact Information</b>			
<b>INFORMATION AND PRIVACY UNIT- PETERBOROUGH</b>			
Stephanie Saitz	705-755-1624	A/Coordinator	
Sandra Hamilton	705-755-1653	Administrative Assistant	
Paul McReavy	705-755-3309	Assistant Coordinator	
Marg McIntyre	705-755-1443	A/Assistant Coordinator	
Jo-Anne Sweeting	705-755-1622	A/Assistant Coordinator	
Marylou Rutherford	705-755-1625	A/Assistant Coordinator	
FAX #	705-755-1621		

IRMB  
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NRMD

Org Charts  
Who's Who  
Library  
Applications  
E.P.I.K.  
Links  
Acronyms  
PSC  
Feedback

**MNR Online**

Whether the intranet, a newsletter, or some other creative method is used, raising awareness of access and privacy issues within an institution can only help Co-ordinators successfully carry out their role.

*The Information and Privacy Commissioner/Ontario wishes to acknowledge the contribution of the FIPPA office of the Ministry of Natural Resources in developing this Backgrounder.*

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