

District of West Vancouver  
**PROCEDURE**

Title: Privacy  
Division: Legislative Services  
Procedure Number: 0209  
File Number: 0282-20-0209

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## **1. Governing Policy**

- 1.1. This procedure is associated with Privacy Policy 0208.

## **2. Scope/Application**

- 2.1. This policy document applies to Council, employees, volunteers, and service providers; and affects any personal information, in the custody or control of the District or its service providers, belonging to the District or its residents, service users, service providers, employees, and volunteers.

## **3. Procedure for Security Measures and Control Mechanisms**

- 3.1. The District meets its privacy obligations under FIPPA through its Privacy Management Program.
- 3.2. The District executes a Privacy Protection Schedule or ensures contractual terms that address privacy as part of all service agreements with service providers in accordance with FIPPA.
- 3.3. The District has appropriate physical and technical security procedures aligned with the level of sensitivity of personal information. These security measures and mechanisms are to protect the District's personal information which may or may not be within the District's custody, including but not limited to personal information that is shared with its service providers.
- 3.4. All employees shall meet their obligations in accordance with FIPPA, FIPPA regulations, and other applicable regulations, in regard to accessing any District information outside of Canada, including:
  - 3.4.1. a completed Privacy Impact Assessment; and
  - 3.4.2. a signed Confidentiality Agreement.
- 3.5. All employees using District technology resources (including but not limited to computers of all kinds, phones, software, and peripherals) shall abide by the Privacy Policy and Acceptable Use of Technology Policy. Employees who use a mobile device to access District resources must also abide by the Mobile Device Policy.
- 3.6. Personal information being exchanged over emails is subject to the Electronic Mail Policy and the Privacy Policy.

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- 3.7. Personal information shall not be disclosed by employees on any publicly available applications. Employees shall use any publicly available applications for work related purposes only in accordance with the privacy obligations set out in the Privacy Policy, Acceptable Use of Technology Policy, and Generative Artificial Intelligence Policy.
- 3.8. The District, being a public body, complies with FIPPA, and establishes categories of records available to the public without a request for access under FIPPA, through its Routine Release Program. The Routine Release Program ensures that no categories of records containing personal information are disclosed by the District to the public, except if the records containing such information have first been redacted pursuant to FIPPA.
- 3.9. The District educates its employees, service providers, and volunteers regularly through its privacy training programs and mandates an online FIPPA training course for all employees and service providers and updates its privacy training modules on a regular basis.
- 3.10. The District conducts regular reviews of the privacy management program in accordance with FIPPA to ensure that privacy requirements are met by all employees and service providers.
- 3.11. The District maintains an established process for conducting Privacy Impact Assessments on new initiatives for which no Privacy Impact Assessment has previously been conducted and for any significant changes to existing programs or activities.

## 4. Procedure for Privacy Complaints and Privacy Breaches

- 4.1. All privacy complaints shall be directed to the Senior Manager, Legislative Services (or designate).
- 4.2. Privacy complaints may be received by:
  - 4.2.1. a member of the public in person, via email, phone or mail; or
  - 4.2.2. an employee in person, via email, phone or mail; or
  - 4.2.3. the OIPC notifies the District that they have received a complaint about the District and are opening a file.
- 4.3. Upon receiving a privacy complaint, the Senior Manager, Legislative Services (or designate) must:
  - 4.3.1. review the privacy complaint, and depending upon the nature of the complaint, must investigate the complaint further;
  - 4.3.2. investigate the privacy complaint to determine whether the District has breached the complainant's privacy or does comply with its legal obligations;
  - 4.3.3. comply with any OIPC directives where legally required and consider any OIPC suggestions where appropriate; and
  - 4.3.4. respond to the complainant, after conducting investigations by preparing a response letter that outlines relevant facts and findings of the investigation and provides a resolution to the complainant accordingly.

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- 4.4. Any privacy breaches shall be immediately reported to the Senior Manager, Legislative Services (or designate).
- 4.5. Upon receiving a report that a privacy breach has occurred, the Senior Manager, Legislative Services (or designate) must:
- 4.5.1. investigate the report of unauthorized access, collection, use, disclosure, or disposal of personal information;
  - 4.5.2. determine whether it is necessary to inform the OIPC of the matter;
  - 4.5.3. determine whether it is necessary to inform the individual(s) whose personal information is affected by the matter;
  - 4.5.4. take appropriate action to mitigate any harm caused; and
  - 4.5.5. make recommendations to prevent similar occurrences.

## 5. Approval

<b>Approved by</b>	<input type="checkbox"/> Municipal Manager	<input checked="" type="checkbox"/> Mayor and Council
<b>Approval date</b>	2025/11/17	
<b>Council minutes Document ID</b> (Council Procedures only)	LGDM-711734498-24782	
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<b>Signature</b>	<u>[Original signed by Mayor]</u> MAYOR	

## 6. Additional Information

<b>Category</b>	<input checked="" type="checkbox"/> Council	<input type="checkbox"/> Administrative
<b>Date of last review</b>	2025	