



College of Veterinarians of British Columbia

CVBC Privacy Management Program

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Preamble

Privacy management programs are vital to ensuring public bodies are accountable and transparent with respect to their management of personal information. They promote trust by assuring information sharing partners and the public that the public body is protecting the personal information in its custody or under its control. This document addresses the CVBC Privacy Management Program.

Privacy Designated Contact Person

Irina Sear

Chief Financial Officer and Information Management Officer

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The privacy contact supports the development, implementation, and maintenance of the public body's privacy policies and/or procedures and serves as the main point of contact for staff, registrants and members of the public with respect to privacy related questions. The privacy contact is also responsible for ensuring compliance with provincial FOIPPA requirements.

The privacy contact will maintain an inventory of personal information that is held at the CVBC which will include:

- the amount and categories of personal information
- the number and categories of individuals whose personal information is held
- location where personal information is held
- purposes for which information is held
- sensitivity of personal information held

Personal information is defined as “recorded information about an identifiable individual other than contact information¹”. Generally speaking, if information either identifies an individual (Including through a unique identifier) or the information could, when combined with other available information, reasonably identify an individual, it will be personal information.

Education and Awareness

Staff are asked to ensure completion of the FOIPPA Foundations course offered through the BC Government. This training is part of the CVBC staff and inspector onboarding process.

<https://mytrainingbc.ca/FOIPPA/>

¹ “contact information” is defined as contact information for an individual's place of business

Additional training can be requested from the government of BC through the following contact: privacy.helpline@gov.bc.ca

The Privacy Contact will work with the Registrar and in house counsel to develop training in areas where gaps are identified.

Ideally one session per year will be delivered to all staff and contractors regarding information and privacy management.

Information Management Practice Reviews

The privacy contact will ensure annual reviews of privacy management practices, as well as any reported privacy breaches to determine what corrective action may be required.

Updates and amendments will be made as needed to information management and privacy management practices.

Information Incident Management

Staff, contractors, committee and Council members must report information incidents or privacy breaches to the privacy contact immediately.

Incidents and breaches will be investigated in accordance with the CVBC Risk Assessment and Privacy Breach Investigation Policy. Low risk incidents and breaches will be reported to the CVBC Council at the next Council meeting following the breach or incident. High risk incidents or breaches will be reported to Council immediately after they have been identified.

Contract Service Providers, Council and Committee Members

All contract service providers, Council and Committee members will be asked:

- to complete the FOIPPA Foundations course
- to sign confidentiality agreements, as well as will have clauses regarding information management and privacy obligations in their contracts.
- to ensure that all CVBC related work is done within the CVBC Sharepoint or one drive system and not on the hard drive or desktop of personal computers.

Cybersecurity

The CVBC has established a robust cloud to cloud backup of OneDrive and Sharepoint and email to add system redundancy in the event of a breach or outage.

A virtual firewall has been set up to ensure additional protection regardless of where CVBC work is being undertaken.

The CVBC has transitioned to Azure AD and upgraded to Premium Microsoft 365 to improve security.

Security awareness training to test staff and provide remediation training in the event there is a data breach or outage.

The CVBC maintains Cybersecurity insurance as well as contract IT support to ensure a timely response in the event of a data security breach.

CVBC Policies

All CVBC privacy policies will be made available to employees, contractors, Council and Committee members, registrants and the public.