

Policy Number: IT5.210	Policy Section: Information Technology	Effective: March 2, 2011 Amended: July 9, 2025
Title: Access to Personal Information for Research and Statistical Purposes Policy		Executive Sponsor: Vice President, Information Technology and Project Services

SUMMARY

This policy explains how CLBC can use people’s personal information for research.

Anyone who wants to use information for research must apply to CLBC and sign an agreement to keep the information safe.

The information must not be able to identify anyone.

1. PURPOSE

This policy explains under what conditions Community Living British Columbia (CLBC) may access personal information for research and statistical purposes. It ensures CLBC’s compliance with the *Freedom of Information and Protection of Privacy Act (FOIPPA)* and that individuals’ privacy rights are upheld while allowing for research that contributes to public interest and improved services and service delivery.

This policy forms part of CLBC’s Privacy Management Program.

2. DEFINITIONS

See *Appendix – Definitions* for relevant definitions.

3. POLICY

3.1 This policy applies to personal information held by CLBC. It does not apply to CLBC records used for research purposes that do not contain personal information.

3.2 CLBC supports research and statistical activities that enhance public knowledge and improve services. These activities may be internal or may be conducted by third parties, under a research agreement with CLBC. Personal information about individuals served by CLBC is permitted by law to be used for research or statistical purposes only if the following conditions are met:

- Privacy Officer has approved conditions relating to the following:
 - security and confidentiality;
 - the removal or destruction of individual identifiers at the earliest reasonable time; and

- the prohibition of subsequent use or disclosure of the information in individually identifiable form without the express authorization of CLBC.
- The research purpose cannot be accomplished unless the information is disclosed in individually identifiable form, or the research purpose has been approved by the Office of the Information and Privacy Commissioner.
- The information is disclosed on condition that it not be used for the purpose of contacting a person to participate in the research.
- The researcher has signed an agreement to comply with the approved conditions, FOIPPA and the CLBC's policies and procedures relating to the confidentiality of personal information.
- **Anti-Racism Data Act Compliance:** CLBC ensures that the research adheres to the principles and requirements of the *Anti-Racism Data Act*, including collection, use and disclosure of personal information.
- **Cultural Safety:** All research and statistical activities must be carried out in a culturally safe manner and in alignment with the principles of CLBC's *Cultural Safety Policy*.
- **Clear Public Benefit:** Any data-linking must not harm individuals and must offer clear public interest benefits.
- **Identification Minimization:** Identifiers must be removed or destroyed as early as reasonably possible.
- **Restricted Use:** Personal information cannot be used or disclosed for any purpose other than the approved research without explicit authorization from CLBC.
- **Jurisdiction:** Use of personal information for research and information sharing are authorized only within Canada.

Compliance and Accountability

- 3.3** CLBC is committed to safeguarding the privacy of individuals while promoting responsible research. Any breach of confidentiality will be investigated by CLBC's Privacy Officer and may result in termination of the researcher's agreement, as well as potential legal action.

4. PROCEDURES

Referring Research Requests

- 4.1** All research proposals involving personal information are referred to the CLBC Privacy Officer. Relevant manager or project lead is also required to complete a PIA, see the *Privacy Impact Assessment Policy* for more information.

Cultural Safety

- 4.2** When research involves an Indigenous person or community, or with an Indigenous Governing Entity, staff contact the Privacy team. The Privacy team, Indigenous

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Relations team, and Policy and Government Relations team will work collaboratively with the region to ensure cultural safety issues are considered and addressed.

Role of the CLBC Privacy Officer

4.3 The CLBC Privacy Officer is responsible for:

- Prescribing legal requirements, security, and confidentiality conditions for the use of personal information.
- Reviewing and approving research proposals to ensure they comply with this policy, FOIPPA, and other applicable laws.
- Supporting the completion of Privacy Impact Assessments, according to the *PIA Policy*.
- Completing or reviewing Information Sharing Agreements as necessary.
- Maintaining a record of all approved research proposals, including an original copy of the research agreement signed by the researcher or statistician, is kept on file.

5. REFERENCES

[Anti-Racism Data Act](#)

[Cultural Safety Policy](#)

[Freedom of Information and Protection of Privacy Act](#)

[Organizational Privacy Policy](#)

Privacy Impact Assessment Policy

Privacy Management and Accountability Policy

Appendix - Definitions

Common Key: Information about an identifiable individual that is common to two or more data sets.

Confidentiality: The obligation to keep others' personal information private, secret and safe from access, use or disclosure by people who are not authorized to have that personal information, and it is not made available or disclosed to unauthorized individuals, entities or processes.

Cultural safety: An outcome of respectful engagement based on recognition of the power imbalances inherent to service systems, and the work to address these imbalances. A culturally safe environment for Indigenous peoples is one that is physically, socially, emotionally, and spiritually safe without challenge, ignorance, or denial of an individual's identity. Practicing cultural safety requires having knowledge of the colonial, sociopolitical, and historical events that trigger disparities Indigenous Peoples encounter and perpetuate and maintain ongoing racism and unequal treatment.

Data-linking: The linking, temporarily or permanently, of two or more data sets using one or more common keys.

Data-linking program: A program of a public body that involves data-linking if at least one data set in the custody or under the control of a public body is linked with a data set in the custody or under the control of one or more other public bodies or agencies without the consent of the individuals whose personal information is contained in the data set.

Data Set: An aggregation of information that contains personal information.

Freedom of Information and Protection of Privacy Act (FOIPPA): Provincial legislation that provides the legal context for the accountability of public bodies, including CLBC, as regards to information sharing and protecting personal privacy.

Information Sharing Agreement: an agreement that sets conditions on the collection, use or disclosure of personal information by the parties to the agreement. These conditions support compliance with the provisions of FOIPPA, other applicable legislation and relevant policy requirements.

Personal Information: Information recorded about an identifiable individual, other than contact information. Personal information may include but is not limited to:

- Name, address, telephone number, email;
- Race, national/ethnic origin, colour, religious or political beliefs or associations;
- Age, sex, sexual orientation, marital status;
- Identifying number or symbol such as social insurance number or driver's license number;

- Fingerprints, blood type, DNA prints;
- Health care history;
- Educational, financial, criminal, employment history; and
- Anyone else's views or opinions about an individual and the individual's personal views or opinions unless they are about someone else.

Personal information also includes separate pieces of information that may seem unrelated, but when put together would allow someone to accurately infer information about an individual.

Privacy Management Program: The framework of policies, documents, terms and conditions, processes, organizational accountability activities and role responsibilities that ensure CLBC meets its privacy requirements under FOIPPA.

Third Party: A person or organization other than the person or organization requesting the information.