

Policy Number: IT5.170	Policy Section: Information Technology	Effective: September 22, 2010 Amended: July 9, 2025
Title: Confidentiality and Information Sharing Policy		Executive Sponsor: Vice President, Information Technology and Project Services

SUMMARY

This policy explains how CLBC staff make sure the personal information they have collected from people is only used and shared in a way that keeps the information private and safe.

It describes when and how CLBC staff are allowed to share people's personal information with other staff, and with people outside of CLBC.

It explains that:

- People's personal information can only be shared when staff need the information to do their job. This is called need-to-know.
- People's personal information can only be used in a way that is in line with why it was collected. This is called consistent purpose.
- People whose information is being shared must understand why it is being shared and must agree to it. This is called informed consent.

1. PURPOSE

This policy establishes Community Living BC's (CLBC) requirements for maintaining the confidentiality of personal information throughout the processes of collection, use, and disclosure. It also identifies requirements for sharing personal information both within and outside of CLBC while safeguarding the privacy and dignity of individuals served by CLBC.

This policy ensures organizational compliance with the Freedom of Information and Protection of Privacy Act (FOIPPA). It forms part of CLBC's Privacy Management Program and should be reviewed with the [Organizational Privacy Policy](#) and the *Information Sharing Procedures*.

2. DEFINITIONS

See *Appendix – Definitions* for relevant definitions.

3. POLICY

- 3.1** CLBC ensures that the personal information of individuals applying for and receiving services is treated as confidential, is securely stored, and is accessible to and shared amongst CLBC staff and/or a service provider as permitted under law and only on a need-to-know basis.

Use of Personal Information

- 3.2** CLBC staff use personal information only for consistent purposes, or as otherwise permitted by FOIPPA (see section 3.5). If the intended use is not clearly consistent with the original purpose for which it was collected, staff must seek the individual's consent before proceeding. This prevents personal information from being used or shared in a way that has not been authorized by the individual.
- 3.3** Personal information is securely stored in CLBC's electronic information systems (PRISM and My Workspace) and paper files where it is accessible only to CLBC staff and MCFD Provincial Centralized Screening (after hours) staff who require it to perform their duties.
- 3.4** Individuals have a right to know how their information has been used, and whether and to whom their information has been disclosed. See the *Access to Records and Correction of Personal Information Policy* for more information.

Disclosure of Personal Information

- 3.5** CLBC requires an individual or their legal representative's consent to disclose personal information under its control or custody to a third party, **except**:
- For purposes consistent with the purpose for which it was collected (for example, sharing information that was collected to support an individual's service request, with the service provider that will support them);
 - Where required under another CLBC policy or for legislative compliance (such as under the Adult Guardianship Act);
 - In compelling circumstances involving risk to an individual's health or safety;
 - To assist police investigations where public or individual safety is at risk; **or**
 - As otherwise permitted by Section 33 of FOIPPA.

See the *Information Sharing Procedures* and the *Legal Requirements Policy* for more information.

- 3.6** Individuals may choose to involve their support network including family members, friends, or informal representatives to assist with decision making. CLBC may not disclose personal information about an individual to their support network without informed consent. See the *Role of Formal and Informal Representatives Policy* for further information about the roles and responsibilities of informal representatives and related CLBC requirements.
- 3.7** Staff must not share personal information or records obtained in confidence from a third party. The third party remains responsible for the release of their records.
- 3.8** Staff must ensure compliance with the confidentiality requirements of the *Youth Criminal Justice Act*, which limits the sharing or publishing of information obtained under the Act. See the *Documentation and Recording Policy: Individual Records* for more information.

Compliance and Accountability

- 3.9** All staff are responsible for upholding this policy and ensuring compliance with FOIPPA. Any breach of confidentiality or misuse of personal information will be investigated according to the *Information Incidents including Privacy Breaches Policy*.

Documentation of Information Sharing

- 3.10** Staff must document in PRISM all instances where personal information is released, whether with or without the individual's consent. This ensures accountability and transparency in the handling of personal information. See the *Documentation and Recording Policy: Individual Records* for more information.

Cultural Safety

- 3.11** When working with an Indigenous person in a way that involves the disclosure of their personal information, staff contact the Privacy team. The Privacy team, Indigenous Relations team, and Policy and Government Relations team will work collaboratively with the regional staff to ensure cultural safety considerations are addressed.

Evaluation

- 3.12** This policy will be reviewed periodically to ensure continued relevance and compliance with legislation. Amendments will be made as necessary to reflect changes in law or organizational practices.

4. REFERENCES

Access to Records and Correction of Personal Information Policy
Adult Guardianship Policy
Documentation and Recording Policy: Individual Records
Freedom of Information and Protection of Privacy Act
Information Incidents including Privacy Breaches Policy
Information Sharing Procedures
Legal Requirements Policy
Organizational Privacy Policy
Role of Formal and Informal Representatives Policy
Youth Criminal Justice Act

Appendix - Definitions

Confidentiality: The obligation to keep others' personal information private, secret and safe from access, use or disclosure by people, entities, or processes that are not authorized to have that personal information.

Consistent Purpose: Use and disclosure of personal information is considered consistent if the use and disclosure has a reasonable and direct connection to the purpose for which it was originally collected and is necessary to carry out the mandate and responsibilities of CLBC.

Information System: A system (including people, machines, methods of organization, and procedures) which provides input, storage, processing, communications, output, and control functions in relation to information and data. Normally used to describe computerized systems, including data processing facilities, database administration, hardware and software which contain machine-readable records, but also includes electronic or physical system that holds information about individuals, staff, CLBC or third parties, (for example, PRISM, MWS, Supplier Registry). A collection of manual and automated components that manage a specific data set or information resource.

Informed Consent: A person is made aware of the decision or choice to be made; understands the possible consequences of giving or not giving consent, including for instance the purpose for which released information may be used; and then consents voluntarily.

Need-to-Know: The legitimate requirement to know, access or possess personal information that is critical to the performance of an authorized, assigned mission.

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.

Records: All materials regardless of type or format including but not limited to books, documents, reports, photographs, letters, papers, assessments, plans, notes, electronic methods of communication such as Email or fax, audio or video tapes, film and information stored in CLBC information systems whether in writing, electronically, mechanically or by other means.

Service Provider: A person or an independent organization under contract with CLBC to deliver supports and services to individuals, their families and/or support networks. This term is also utilized in situations where a contract has not yet been issued, such as during an approval or procurement process.

Third Party: A person or organization other than CLBC or the individual (or their legal representative).