

CLBC Service Provider Privacy and Information Management Course

Q1. Why is the CLBC Service Provider Privacy and Information Management Course mandatory for most agency staff and subcontractors?

A1. The course is required to comply with BC legislation. BC's Freedom of Information and Privacy Protection Act (FOIPPA) applies to all public bodies, including CLBC, and also applies to all organizations that provide services under a contractual relationship with public bodies. Agency staff or subcontractors are required to take the course if they collect, create, use, or have (or may have) exposure to personal information of individuals who receive CLBC-contracted services. To ensure that everyone providing CLBC services knows how to be compliant with FOIPPA, it is important to take this course.

Q2. Does the requirement to take the course apply to all CLBC service providers?

A2. Yes, under the new contracting agreements, CLBC contracts contain *Schedule E - Privacy Protection Schedule* which specifies each person must complete CLBC's privacy course prior to providing services as of April 1, 2019. This applies to all service providers, including: Standard Individualized Funding agreements, Microboards, accredited and non-accredited agencies. Currently, IF Simplified (under \$6000/year) providers are not required to take the course, but taking the course is a best practice.

Q3. If my staff and I have taken the MCFD Privacy Course, do we also need to take the CLBC course?

A3. Yes, you need to take the CLBC-offered course. CLBC is a separate public body and, therefore, CLBC requires a different method be used to report information incidents and privacy breaches than MCFD uses:

- Information incidents and privacy breaches are reported to your local CLBC office that, in turn, passes the information to CLBC's Privacy Officer and CLBC's Information Security Officer.
- Under MCFD, service providers call the Shared Service BC Service Desk to report.

Q4. Is there a cost?

A4. No, the course is free.

Q5. What do I do with my certificate showing I completed the course?

A5. Keep the copy for your records and, if you work for an agency, give them a photocopy of the certificate. CLBC does not collect certificates but may ask to see the agency's, or your, copy.

Q6. Who needs to take this course? Do my casual workers or respite workers need to take the course?

A6. All employees, staff, managers, consultants, contractors, subcontractors, volunteers and casual workers who provide a CLBC service (such as home share, community inclusion, employment support, outreach, respite, home-maker, behavioral, and skill development) are required to take the course. For existing staff and employees, they should complete the course by March 31, 2019. New employees and staff can take the course during their orientation training.

The course is available to everyone on CLBC's website – individuals, families, CLBC staff and the general public may want to review the material for their own interest.

Q7. Do volunteers need to take the course? What about directors?

A7. Yes, volunteers and directors need to take the course if they collect, create, use, or have (or may have) exposure to personal information when carrying out their duties.

Q8. Does everyone living at HS location need to take the course?

A8. Only those who are providing a service (either paid or voluntary) where they collect, create, use, or have (or may have) exposure to personal information are required to take the course. However, it would be a best practice for everyone to take the course, within reason.

Q9. How often do I need to retake the course?

A9. You only need to take the course once; the certificate of completion does not expire. You and your staff can retake the course or parts of the course at any time if you want.

Q10. Can I take the course in sections or do I need to complete it all at one time?

A10. The course can be stopped at any time. Just remember where you were so when you restart the course you don't repeat sections or miss sections. The course should take about 45 minutes.

Q11. Can groups take the course together or is it individual-based?

A11. The course can be taken either as a group or individually, as it suits your agency. However, at the end of the course, please remember to print off a certificate of completion for each participant. Both the agency and the participant should keep a copy.

Q12. Who do I contact if I need clarification about a privacy or security issue?

A12. Contact your CLBC analyst. Your analyst may forward your question to CLBC's Privacy Officer if the issue is about privacy and/or CLBC's Information Security Officer if the issue is about equipment and information technology. If the issue is urgent, please call the Privacy Practice Analyst, Janine Twist, at 604-817-0376 or email PrivacyOfficerCLBC@gov.bc.ca.

Q13. I have an information incident or privacy breach to report. Who do I contact?

A13. You notify your local CLBC office and your agency's CLBC analyst as soon as possible. If you do not know which office or analyst to notify, contact your manager or the staff person who knows who to call within CLBC. It is a best practice to also let your manager or your organization's privacy staff know about the incident as soon as possible. Both CLBC and your organization will be working together to remediate any harms from the incident and to prevent future incidents.

Q14. My staff do not have access to the internet, how can they do the course?

A14. Call your local CLBC office and ask them to provide you with a paper copy of the course.

Q15. Who do I contact if I have questions or concerns or compliments about the course?

A15. Your comments are valuable and may lead to changes. Your CLBC analyst should be able to answer your concerns or pass them onto CLBC's Privacy Officer. You can also call the Privacy Practice Analyst, Janine Twist, at 604-817-0376 or email PrivacyOfficerCLBC@gov.bc.ca.