

The government Security Policy specifies that personal information be given enhanced protection. It is designated **PROTECTED - PERSONAL INFORMATION**, and the government-wide security standards set out appropriate protection. This includes lockable storage containers, controlled access to the areas in which personal information is located, and security measures related to transmitting it.

Additional protection is provided for particularly sensitive personal information in EAP and medical files. For example, information that can be linked to a client in an EAP file is accessible only to the client and the EAP Coordinator. Particularly sensitive personal information is designated **PROTECTED**, followed by words that describe the category of information (e.g. **PROTECTED - EMPLOYEE ASSISTANCE PROGRAM**), and particular storage and transmittal standards support the additional protection.

- *Employees shall be able to find out how their personal information will be finally disposed of.*

Personal information must be retained and disposed of in accordance with approved and published records retention and disposal schedules. Except as otherwise provided in law, or when the employee consents to earlier disposal, personal information must be kept for a minimum of two years after the last time it was used for an administrative purpose, so that employees have an opportunity to request access to the information and ask for a correction if necessary.

## **Management of the Code**

### **Organization**

The head of the personnel function should be responsible for the management of employee privacy matters, because employee personal information and employee records are usually under his or her jurisdiction.

Treasury Board policy provides for the designation of an Access to Information and Privacy (ATIP) Coordinator in each department or agency. This official has detailed knowledge of the *Privacy Act* and its Regulations; Part III of the *Interim Policy Guide*, which governs the application and interpretation of the *Act* and Regulations; and other guidance from the Treasury Board Secretariat. The ATIP Coordinator should play an active role in advising the head of the personnel function when institutional practices to protect personal information are being established.

### **Published Personal Information Banks**

The *Privacy Act* requires the government to produce the *Personal Information Index*. As a matter of policy, each government institution must include, in its descriptions of its Personal Information Banks, details of all the consistent uses for which information in any bank can be used or disclosed.