

PERSONAL INFORMATION DIRECTORY (PID)

Authority

Freedom of Information and Protection of Privacy Act (FOIPP Act) is the authority for personal information and privacy protection responsibilities. Also, section 69 of the FOIPP Act relating to publishing a Directory of Records, including a directory of personal information banks.

Purpose

The purpose of the Personal Information Directory (PID) is to document the management of personal information holdings of government and to assist the public in identifying the location of personal information about them held by government.

Definitions

Schedule 1 of the Act defines

- **personal information bank** is a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol or other particular assigned to an individual.
- **personal information** is recorded information about an identifiable individual including
 - (a) the individual's name, address or telephone number;
 - (b) the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations;
 - (c) the individual's age, sex, sexual orientation, marital status or family status;
 - (d) an identifying number, symbol or other particular assigned to the individual;
 - (e) the individual's fingerprints, blood type or inheritable characteristics;
 - (f) information about the individual's health care history, including a physical or mental disability;
 - (g) information about the individual's educational, financial, criminal or employment history;
 - (h) anyone else's opinions about the individual; and,
 - (i) the individual's personal views or opinions, except if they are about someone else.

Interpretation

“Collection of personal information” means:

Paper or electronic file banks that contain personal information, as defined in the Act, that has been collected for the same purpose or to document the same function and relates to an identifiable individual.

A “collection” of personal information does not include random references to personal information contained in a file bank.

“Organized or retrievable by the name of an individual or by an identifying number, symbol or other particular assigned to an individual” means:

Personal information contained in either paper or electronic file banks that relates to an individual and is organized and retrieved using a personal identifier, i.e., individual's name, employee number, social insurance number, etc.

Paper files: Files (in the traditional paper sense) in a defined category that contain personal information relating to specific individuals retrievable by a personal identifier.

Example:

PIB - Physician/practitioner case files. These files are arranged by a practitioner billing number that is considered to be a personal identifier.

Not a PIB – Laboratory/hospital monitoring case files. These files are arranged and retrievable by name of the laboratory or hospital. The files cannot be retrieved by a personal identifier even though sensitive personal information may be contained within a file.

Electronic files: Files with a defined category that contain personal information that can be electronically searched and retrieved by an individual's name or other personal identifier.

Example:

PIB – Beneficiary (patient) claims information. These files can be searched and personal information retrieved by a Personal Health Number that is considered to be a personal identifier.

Not a PIB – Inspection and Deficiency Reports (Municipal Affairs). These files contain the names of contractors who inspect elevators. The files are not organized or retrieved by a personal identifier even though personal information is contained within the file.

It should be noted that not all collections of personal information are considered personal information banks. The key to determining whether a group of files, which contain personal information, is a PIB is the way it is arranged or retrieved. Collections of personal information that **relate to an individual** and are organized and retrievable by the person's last name or personal identifier are considered personal information banks. Collections of personal information that are organized and retrieved by an identifier that **relates to a corporate body or other search field** are *not* listed as personal information banks, even if the collections contain personal information.

[Personal Information Directory](#)

Personal Information Bank Component:

Section 69 of the Act **requires** that the following information be listed for personal information banks:

- (a) its title and location;
- (b) a description of the kind of personal information and the categories of individuals whose personal information is included;
- (c) the authority for collecting the personal information;
- (d) the purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed; and,
- (e) the categories of persons who use the personal information or to whom it is disclosed.

In addition, the Personal Information Directory will contain:

- (a) the name of an individual who may be contacted regarding the PIB
- (b) the Branch responsible for the PIB
- (c) Is there an Information Sharing Agreement relevant to the PIB?
- (d) Has a PIA been completed?

It is important to note that the Personal Information Directory will also incorporate the Registry of Information Sharing Agreements, and it is planned for the PID to include information on Privacy Impact Assessments and possibly other reference sources regarding personal information.

CHECKLIST

- Does the file bank contain personal information?
- Does the file bank contain like or similar personal information?
- Is the information linked to an identifiable individual?
- Is the information organized and capable of being retrieved by a personal identifier?