

JOB DESCRIPTION
MANAGEMENT EXCLUSION

1. Position No. 32005, 81486	2. Descriptive Working Title Privacy & Access Program Manager		3. Present Classification Excluded Mgmt
4. Branch Corporate Services	5. Department Information Management & Technology	6. Work Location Telework Eligible	Date Nov 2018 Revised Nov 2020; Nov 2021
7. Position No. of Supervisor 81086	8. Descriptive Work Title of Supervisor Chief Privacy Officer		9. Classification of Supervisor Excluded Mgmt

POSITION SUMMARY

Reporting to the Chief Privacy Officer, the Privacy & Access Program Manager is responsible for administering BC Housing's obligations under the *Freedom of Information and Protection of Privacy Act* (FIPPA). The incumbent interacts with BC Housing's executive and senior management to provide advice on complex and sensitive freedom of information and privacy matters, and develops effective trust-based working relationships with the Office of the Information and Privacy Commissioner. He/she/they provides support in the management of effective freedom of information and protection of privacy programs at BC Housing and participates in the planning and formulation of departmental objectives, plans, policies and procedures to ensure accomplishment of business objectives. He/she/they manages complaints about BC Housing's programs and inquiries from the Ombudsperson's Office in the Complaints Resolution Program Manager's absence.

MAJOR RESPONSIBILITIES

1. Freedom of Information:

- Manages and completes FOI requests, some of which are highly complex and involve a large number of records, including identifying and collecting records from program areas; processing, reviewing and redacting records in compliance with FIPPA; preparing fee estimates, notifications to third parties and time extensions, where appropriate; reviewing requests completed by team members to provide quality assurance; mediating with the Office of the Information and Privacy Commissioner (OIPC) in request for reviews; preparing and organizing review materials for the OIPC; and managing the process and progress of all FOI requests to ensure compliance with FIPPA

2. Privacy:

- Provides support to the Chief Privacy Officer in the management of effective freedom of information and protection of privacy programs at BC Housing
- Prepares and reviews Privacy Impact Assessments (PIAs), including for significant IT implementations
- Develops, recommends and implements the privacy audit program, and conducts privacy audits
- Investigates reported privacy breaches, in collaboration with IT Security where appropriate. Completes privacy breach reports in accordance with BC Housing and OIPC procedures; prepares breach notification letters; makes recommendations regarding preventative measures; prepares reports for the OIPC, where appropriate; and considers guidance from OIPC in decision-making
- Provides advice and guidance regarding the application of the *Personal Information Protection Act*, to which non-profit housing providers are subject
- Reviews contracts, information sharing agreements and other BC Housing agreements to ensure terms and conditions are consistent with the requirements of FIPPA, participates in the drafting of information sharing agreements; and provides expert advice to BC Housing program areas in matters of collection, use, retention

and disclosure of information

3. **General Responsibilities:**

- Provides support in the management of effective freedom of information and protection of privacy programs at BC Housing
- Interacts with executive and senior management, exercising considerable discretion and providing advice on sensitive and complex FOI, privacy and complaints matters
- Develops and maintains effective trust-based working relationships with the OIPC and other government entities and with BC Housing staff in order to facilitate the resolution of issues
- Maintains current working knowledge and accurately applies relevant federal and provincial statutes and regulations and departmental policies and procedures, and ensures managers are kept informed of developments and their implications
- Supports the development of a training strategy and develops and provides privacy and FOI training
- Provides input and recommendations in the planning and formulation of departmental objectives, plans, policies and procedures to ensure accomplishment of business objectives and to mitigate risks
- Develops, facilitates and maintains an effective corporate approach to the management of FOI requests and privacy matters
- Maintains a tracking system of FOI and privacy-related matters.
- Prepares quarterly summaries of statistics for the Vice-President Corporate Services and CFO for presentation to the Board of Commissioners.
- Continually seeks, establishes and implements 'best practice' techniques, and develops opportunities for reducing risk and achieving efficiencies
- Manages complaints about BC Housing's programs and inquiries from the Ombudsperson's Office in the Complaints Resolution Manager's absence.
- Performs other related duties that do not affect the nature of the job, including conducting special studies, making presentations and participating in task force, project teams and committee work.

ORGANIZATION

The Privacy & Access Program Manager reports to the Chief Privacy Officer.

No positions report to the Privacy & Access Program Manager.

QUALIFICATIONS

Education, Experience and Occupational Certification

Bachelor degree in a related discipline supplemented by industry recognized professional courses, such as International Association of Privacy Professionals (IAPP) certification.

Considerable experience processing FOI requests of varied complexity, communicating with senior level staff and organizations including the OIPC, completing Privacy Impact Assessments, including for complex Information Technology (IT) systems and environments and completing Information Sharing Agreements.

Or an equivalent combination of education, training and experience acceptable to the Employer.

Knowledge, Skills and Abilities

Core Competencies

- Personal Effectiveness
- Communication
- Results Oriented
- Teamwork
- Service Oriented

Extensive knowledge of freedom of information and privacy legislation

Some knowledge of IT Security

Ability to analyze the requirements of FIPPA and the impact of OIPC decisions

Ability to communicate clearly, in both spoken and written communications, and provide complex and sensitive information where there may be significant barriers to acceptance

Ability to learn and understand BC Housing's business operations

Ability to build strong and trusting relationships with BC Housing executive, managers and staff, the OIPC and other government agencies

Ability to maintain confidentiality, and utilize diplomacy and tact in dealing with confidential matters

Ability to be flexible and have excellent interpersonal skills

Ability to analyze and solve issues and make effective decisions in a results-oriented environment

Proven communication, facilitation, problem solving and negotiation skills

Effective organizational, planning and project management skills

Effective leadership, communication, presentation and interpersonal skills