



# Personal Information Classification Guidance



# 1 Purpose

This document is intended to assist information owners' classification of personal information. Classifying personal information can assist in ensuring:

- Heads of public bodies are protecting the personal information held by their public body by securely managing it in accordance with the *ATIPP Act* and *ATIPP Act Regulations*;
- Appropriate safeguards and controls are in place to a level commensurate with the sensitivity of the information to which employees have access;
- Employees are informed and understand how to manage the type of personal information in their work unit appropriately;
- Ministerial public body Information Owners must follow training, policies and procedures provided through ICT's Corporate Information Management and the Chief Information Security Office
- Statutory and Non-Statutory (entities) public bodies Information Owners can design training, policies and procedures to a level commensurate with the sensitivity of the personal information, and may consult with an information security specialist before applying specific classifications.

**NOTE:** The classification scheme below is intended for guidance purposes only and applies to personal information. The *ATIPP Act* definition of personal information is a **non-exhaustive** list.

## 2 Definitions

“head”, of a public body, means

(a) in the case of a public body that is a ministerial body, the minister responsible for the public body,

(b) in the case of a public body that is a statutory body, the individual who holds the office or position prescribed as the office or position of the head of the public body, or

(c) in the case of a public body that is an entity, the individual who holds the office or position prescribed as the office or position of the head of the public body;

“hold”, in respect of information, means to have custody or control of the information;

“information” means information contained in a record;

“manage”, in respect of personal information, includes retaining, storing, transferring, transmitting or disposing of the personal information but does not include collecting, using or disclosing the personal information;

“personal information” means, subject to section 3, recorded information about an identifiable individual, including

- (a) their name,
- (b) their home, mailing or email address or phone number,
- (c) their age, sex, gender identity or expression, or sexual orientation,
- (d) their skin colour, fingerprints, blood type or any other genetic characteristic or biometric information,
- (e) their race, ethnicity or nationality,
- (f) information about their current and past physical or mental health, including their personal health information,
- (g) information about their marital, family, education or employment status or history,
- (h) information about their current or past
  - (i) political or religious beliefs, associations or activities,
  - (ii) amounts or sources of income, or
  - (ii) income tax returns,
- (i) information about
  - (i) an asset that they wholly or partially own or owned,
  - (ii) a liability for which they are or were wholly or partially liable,
  - (iii) a transaction or banking activity in which they are or were involved,
  - (iv) an assessment of credit-worthiness of which they are or were the subject,
  - (v) a discretionary benefit in the nature of income assistance, legal aid or another similar type of benefit that they are receiving or have received, or
  - (vi) a law enforcement matter of which they are or were the subject,
- (j) a personal unique identifier that has been assigned to them, (k) another individual’s opinion or view about them, or

(l) their opinion or view about something other than their opinion or view about another individual;

“personal unique identifier”, of an individual, means an identifier that

(a) is assigned to the individual, and

(b) uniquely identifies the individual in relation to a public body;

“record” means a storage medium (including a written, graphic, electronic, digital, photographic or audio medium) in which information is contained and stored but does not include any software or mechanism used to store or produce the information;

## 3 PERSONAL INFORMATION CLASSIFICATION

### 3.1 CONFIDENTIAL

DEFINITION	<p><b>CONFIDENTIAL PERSONAL INFORMATION</b> is the highest level of classification. Unauthorized access, use, disclosure, alteration, or destruction of this information would result in severe damage and penalties to the department, its clients, participants or employees. It is intended solely for use within the program area and for the purposes it was originally collected. Access is limited to those with an explicit, predetermined and stringent "business need-to-know" and is further limited to the lowest level of access necessary to fulfill the business requirements.</p> <p>If this information can be legally used or disclosed outside of your program (refer to <b>section 35 or 36 of the ATIPP Act</b>), a written agreement must be in place.</p>
SENSITIVITY	<b>HIGH</b>
Examples:	<p>Information used to authenticate an individual's identity, such as passwords, PINS, and records and/or databases containing authenticating information</p> <ul style="list-style-type: none"><li>• Payroll and compensation data</li><li>• Employee medical information</li><li>• Disability accommodations, workers compensation details, etc.</li><li>• Information that relates to a medical, psychiatric or psychological history, diagnosis, condition, treatment, or evaluation</li></ul>

	<ul style="list-style-type: none"> <li>• Information that relates to eligibility for income assistance or social service benefits or to the determination of benefit levels</li> <li>• Information that indicates the racial or ethnic origin, sexual orientation or religious or political beliefs or associations</li> <li>• Information that consists of personal recommendations or evaluations, character references or personnel evaluations of poor performance</li> <li>• Information that describes finances, income, assets, liabilities, net worth, bank balances, financial history or activities, or credit worthiness</li> <li>• Credit/debit card numbers, and bank routing codes</li> <li>• SIN, Driver's License, other national or provincial/territorial ID numbers</li> <li>• Information under non-disclosure orders from a regulatory or court authority</li> </ul>
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### 3.2 PROTECTED

DEFINITION	<p><b>PROTECTED PERSONAL INFORMATION</b> is of medium sensitivity. Unauthorized access, use, disclosure, alteration, or destruction of this information would, <i>directly or indirectly</i>, result in significant adverse impact on the department, its clients, participants, or employees. Personal information of employees, or of client's participants, will typically be categorized as Protected. Adverse impacts may include financial loss, damage to reputation, and potential legal action. Protected information is for use within the program area and for the purposes it was originally collected. Access is limited to those with "business need-to-know".</p>
SENSITIVITY	<b>MODERATE TO HIGH</b>
Examples:	<ul style="list-style-type: none"> <li>• Personnel records</li> <li>• Client records (unless such contains data classified as "Confidential")</li> <li>• Customer Correspondence (unless such contains data classified as "Confidential")</li> <li>• Educational history</li> <li>• Employee information and records</li> <li>• Information that consists of personal recommendations or evaluations, character references or personnel evaluations</li> <li>• Applicant data</li> <li>• Employee travel details</li> <li>• Employee attendance data</li> </ul>

### 3.3 INTERNAL

DEFINITION	<b>INTERNAL PERSONAL INFORMATION</b> is of low sensitivity. Unauthorized disclosure, compromise, or destruction may result in some adverse impact to the department, its customers, or employees.
SENSITIVITY	<b>LOW</b>
Examples:	<ul style="list-style-type: none"><li>• Contact Information (names, addresses, phone numbers, email addresses)</li><li>• Organization Charts</li><li>• Employee status and work history</li><li>• Business Contact information (information that could be contained on a business card, for example)</li></ul>