

SUBJECT: PRIVACY POLICY FOR ELECTIONS	
DATE OF ISSUE: May 16, 2022	ORIGIN: Legislative and Protective Services
REVISION DATE: July 31, 2026	REFERENCE: <i>Freedom of Information and Protection of Privacy Act (FIPPA)</i> <i>Election Act</i> Freedom of Information and Protection of Privacy Policy 1/FOI Privacy Management Policy 1/FOI Information Management Policy 1/IM Corporate Records Management Bylaw, No. 9404 Privacy Policy for 2026 General Local Election – Candidates, Political Parties and Elector Organizations

PURPOSE

The District of Saanich is having a General Local Election on October 17, 2026 to elect:

- One (1) Mayor,
- Eight (8) Councillors,
- Two (2) Greater Victoria School District No. 61 Trustees, and
- Two (2) Saanich School District No. 63 Trustees.

Municipalities can use the Provincial Voters List for the purpose of planning and administering local government elections. In accordance with Section 275 of the *Election Act*, all individuals and organizations who wish to access personal information available under the *Election Act* in records held by Elections BC must first file an acceptable privacy policy with British Columbia's Chief Electoral Officer (BCCEO). The policy will remain in effect until six months after the 2026 General Local and School Board Elections.

The purpose of the Privacy Policy for Elections ("the policy") is to ensure Personal Information collected from Elections BC by the District of Saanich ("the District") is only obtained in accordance with the Section 275 of the *Election Act*:

- as necessary for planning and administering the 2026 District of Saanich General Local and School Board Elections;
- as requested for viewing by individuals;
- as requested by a registered candidate; and
- is destroyed in accordance with *Election Act*.

The policy has been developed in accordance with British Columbia's *Freedom of Information and Protection of Privacy Act* ("FIPPA"), which sets out rules for how public bodies can collect, use and disclose Personal Information.

Personal Information: means recorded information about an identifiable individual other than contact information as set out in FIPPA and refers only to Personal Information disclosed or to be disclosed by Elections BC to the District pursuant to section 275 of the *Election Act*.

SCOPE

The Policy applies to District of Saanich employees and all individuals or entities representing or working for the District of Saanich on a paid or unpaid basis for the 2026 General Local and School Board Elections and who may have access to Personal Information.

As defined in FIPPA, employees include volunteers and/or service providers.

The policy applies to Personal Information contained in the Provincial Voters List disclosed by Elections BC to the District of Saanich under the *Election Act*.

PERSONAL INFORMATION COLLECTED

The Provincial Voters List (PVL) contains the following Voter Records Information (VRI):

- Surname
- Given Name
- Initials
- Date of Birth
- Residential Street Name Key
- Building Number – Numeric
- Building Number - Alpha
- Apartment Number

USE OF PERSONAL INFORMATION

The Personal Information on the Voters List will be used:

- a) By election officials for the purposes of managing and administering the elections:
 - ensuring the list of eligible voters is up-to-date for General Voting Day (GVD),
 - producing a voters card for the purposes of communicating with voters about the election, providing a reminder to voters to vote, indicating the location of the voting places and as a piece of identification for voters already on the list of voters, scanning the bar code on voting day to facilitate voting process.
 - producing the voters book,
 - confirming individual's eligibility to vote.
- b) By nominees/candidates for the purposes of campaigning
 - The list will be made available on a USB stick.
- c) By residents, via VoterView, Online Voter Services, that allows electors to determine if they are on the Voters List, by name and address. If an elector is not the Voters List, they can provide their name and address via VoterView to register to be added to the Voters List.
- d) By registered voters, via VoterView to view if their registration information is correct. (An

authorized employee only can make corrections to the Voters List).

- e) By direction of the Chief Election Officer (CEO), to amend the Voters List that is available for public inspection or given to candidates by omitting or obscuring the address or other personal information about the voter, when requested to do so by that voter for privacy reasons.

RESTRICTIONS ON USE

An employee's use of the Voters List and the Personal Information contained within must comply with this Privacy Policy, the *Electoral Purpose for Access to and Use of Personal Information Regulation* and the requirements under section 275 of the *Election Act* to:

- Only use the Personal Information for the purposes of the *Election Act* and the administration by the District of Saanich of the 2026 General Local and School Board Elections; and
- Not use the Personal Information for commercial purposes.

Any person who wishes to inspect or obtain a copy of the Voters List must:

- a) Satisfy the election official that the information will be used for election purposes.
- b) Provide a signed statement that the individual, and any individual or organization on whose behalf the first individual is inspecting or obtaining a copy of the record, will not use the Personal Information included in the record except for purposes of the election.

Recipients of Personal Information must not disclose Personal Information to any individual or entity to whom this policy does not apply.

RESPONSIBILITIES

Chief Election Officer: manages the policy.

All Recipients of Personal Information: are responsible for the security and integrity of Personal Information and shall safeguard such Personal Information against accidental or unauthorized access, disclosure, use, modification and disposal.

SECURITY

All individuals or entities with access to, or a copy of, Personal Information must take reasonable precautions to protect the security and confidentiality of the Personal Information.

In accordance with FIPPA, the District will protect Personal Information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized collection, use, disclosure or disposal. Current security arrangements employed by the District include but limited to the following:

- a) All physical documentation containing Personal Information for active files is retained in a secure (locked) filing cabinet and accessible to authorized employees only;

- b) Personal Information collected for billing or payment purposes is retained within the Finance Department and is destroyed in accordance with the District's Corporate Records Management Bylaw and Records Classification and Retention Schedule (RCRS);
- c) Restricted access to Personal Information stored on computer systems and electronic storage devices and media by unique passwords and permissions that are linked to identifiable authorized employees;
- d) Personal Information collected pursuant to the policy is not be stored, disclosed or accessible outside Canada;
- e) District systems are protected with up-to-date anti-virus software, security patching, and supported operating systems and internet browsers;
- f) An employee, Officer or Director of the District, who knows there has been an unauthorized disclosure of Personal Information that is in the custody or under the control of the District, must immediately notify the Privacy Officer for the District.

DISPOSITION OF PERSONAL INFORMATION

All recipients provided Personal Information for the purposes of the General Local Election will return all digital and/or physical records and/or copies to the District of Saanich, Legislative Services Division no later than November 17, 2026. The records will be securely destroyed in accordance with the District of Saanich's Records Classification and Retention Schedule and the *Local Government Act*.

TRACKING OF DISTRIBUTION

If the District of Saanich provides any other individual or entity representing or working for the District, on a paid or unpaid basis, with access to, or a copy of, Personal Information, the following information will be tracked and retained:

- The date of provision of access or distribution.
- Who the Personal Information was provided to.
- What Personal Information was provided (e.g. Voters List).
- How the Personal Information was provided (e.g. provision of electronic copy).
- Confirmation that the individual or entity has read this policy and agrees to be bound by it.
- Confirmation of the date the Personal Information is returned or destroyed.

LOSS OR THEFT OF INFORMATION OR AUTHORIZED ACCESS

PRIVACY BREACH MANAGEMENT

The District of Saanich Privacy Officer, in consultation with the District's FIPPA Head, is responsible for the coordination, investigation, and risk management of privacy breaches.

There are four key steps in responding to a privacy breach. The steps may occur concurrently, in quick succession, or in a different order. The first three steps must be undertaken as soon as

possible following the breach. The fourth step involves investigation into the cause of the breach and may require a security audit of both physical and technical security.

- Step 1 **Containment** of the breach, **recovery** of confidential or personal data and **reporting** the incident;
- Step 2 **Investigation** and **evaluation** of the risks of the unauthorized disclosure of personal information;
- Step 3 **Notification** of individual(s) affected as determined necessary; the loss, theft or unauthorized access must be reported to the Chief Election Officer and the Information and Privacy Commissioner;
- Step 4 **Prevention** strategies to safeguard against future breach incidents.

COMPLIANCE AUDITS

Elections BC may conduct a compliance audit of any individual or entity to whom this policy applies, whereby it may inspect and review the policies, procedures and practices that relate to the Personal Information. This includes documents that must be retained under this policy.

EDUCATION AND AWARENESS

Training for employees, individuals or entities, as appropriate to their work functions, on the Freedom of Information and Protection of Privacy Act (FIPPA), with a focus on the protection of Personal Information, must be taken prior to obtaining access to Personal Information.

DURATION AND TERMINATION

This Privacy Policy comes into effect when it is accepted by Elections BC and shall remain in effect until six months after the 2026 General Local Election, or this policy is superseded by a subsequent Privacy Policy.