

COMMUNITY REVIEW NOTE

September 29, 2026

PREPARED FOR: Policy Review Team, BCIT Employees and Students

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ISSUE: Proposed Revision of Policy 6700 Freedom of Information & Protection of Privacy and Associated Procedures:

- 6700-PR1 Information Access Procedure
- 6700-PR2 Privacy Incident Handling Procedure
- 6700-PR3 Privacy Risk Assessments Procedure [New]

OBJECTIVE

This review modernizes and strengthens BCIT's access to information and privacy governance framework through an extensive revision of Policy 6700, the refinement of Associated Procedures, and development of a new Procedure. The proposed revisions reflect the requirements of the *Freedom of Information and Protection of Privacy Act* (FIPPA), align with current operational practices, clarify roles and responsibilities, and establish a comprehensive Privacy Management Program. Accordingly, the revised Policy is renamed "Access to Information and Privacy Management Program".

The amendments include both substantive and administrative changes. Key enhancements include the addition of guiding principles, strengthened accountability requirements, formalized privacy risk assessment processes, updated privacy incident management requirements, and clear procedures supporting access to information requests and privacy compliance activities. The revisions also address emerging considerations associated with digital services, artificial intelligence, information sharing arrangements, and third-party service providers.

BACKGROUND

Policy 6700 was last revised in 2021 and has now undergone a thorough review to ensure continued alignment with legislation, best practices, and BCIT's operational environment. The review was initiated to strengthen BCIT's privacy governance framework and support compliance with access and privacy obligations.

The revised Policy establishes BCIT's Access and Privacy Management Program and provides an Institute-wide framework for managing access to information and privacy responsibilities. The review recognizes BCIT's obligations as a public post-secondary institution to provide access to records under its custody or control, protect personal information throughout its lifecycle, and demonstrate accountability for information stewardship.

The review also responds to increased reliance on digital technologies, cloud-based services, information sharing initiatives, and emerging technologies, including artificial intelligence, all of which require enhanced privacy oversight and risk management. The Associated Procedures have been revised or developed to provide direction in three critical operational areas:

- Information access and disclosure requirements;
- Privacy incident reporting, assessment, and response; and
- Privacy risk assessments for new and changed initiatives involving personal information.

DEVELOPMENT & CONSULTATION PROCESS

The review was sponsored by the Vice President, People, Culture & Inclusion and led by the Information Access and Privacy Office (IAPO). Draft revisions were developed through a review of legislative requirements, existing BCIT policies and procedures, Office of the Information and Privacy Commissioner (OIPC) guidance, privacy management program best practices, and Institute operations.

Consultations included engagement with subject matter experts and administrators whose responsibilities involve privacy, information management, information security, records management, technology services, procurement, and legal compliance. Feedback received throughout is incorporated in the draft revisions to improve clarity, accountability, and implementation.

The proposed framework consists of:

- Policy 6700 Access to Information and Privacy Management Program, establishing institutional governance, principles, responsibilities, and accountabilities;
- Procedure 6700-PR1 Information Access, providing guidance regarding access to information requests;
- Procedure 6700-PR2 Privacy Incident Handling, establishing requirements for reporting, assessing, containing, investigating, and responding to privacy incidents and privacy breaches;
- Procedure 6700-PR3 Privacy Risk Assessments, establishing requirements for privacy assessments of initiatives involving personal information, including technology implementations, artificial intelligence, cloud services, and information-sharing arrangements.

NEXT STEPS

The purpose of this community review is to obtain feedback from the BCIT community prior to final consideration and approval. Feedback will be collected and reviewed by the Information Access and Privacy Office and the Policy Review Team. After the sponsor's consideration of feedback and making any additional revisions, the proposed Policy and Procedures will proceed to BCIT's Board of Governors for review and approval.

Subject to approval, the revised Policy 6700 and Associated Procedures are anticipated to come into effect in Q4 2026. Supporting implementation activities may include updated guidance materials, training initiatives, privacy assessment resources, and communication facilitating awareness and compliance across the Institute.

Community members are encouraged to review the proposed documents and provide comments regarding clarity, operational impacts, implementation considerations, and any other matters relevant to the successful implementation of BCIT's Access and Privacy Management Program.