

Fleming College

POSITION DESCRIPTION FORM (PDF)

Regular Part-time Support Staff

Position Title: Policy and Freedom of Information and Protection of Privacy (FIPPA) Coordinator

Position Number: PT0195

Pay Band: 11

Reports To: Manager of Governance, Policy and Freedom of Information and Protection of Privacy

Appointment Type: 12 Months "Other" Hours Details: [Click here to enter text.](#)

Scheduled Weekly Hours (maximum 24 hours per week): 24 hours per week

PDF Completed By (Manager Name): Sarah Beirness

Effective Date: November 18, 2019 Last Revision: N/A

SIGNATURES

Incumbent: _____ Date: _____

(indicates incumbent has read and understood the Position Description Form details)

Supervisor: _____ Date: _____

(indicates the supervisor has authorized and assigned the duties & responsibilities in the PDF)

NOTE: Please return the original PDF to HR Operations (Michelle Bozec) as soon as it has been signed. Thank you.

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PART ONE:

POSITION SUMMARY

Reporting to the Manager of Governance, Policy and Freedom of Information and Protection of Privacy the Policy and Freedom of Information and Protection of Privacy (FIPPA) Coordinator will support the development of College policies, operating procedures and best practices. The incumbent will act as the College's first point of contact for formal requests under the Freedom of Information and Protection of Privacy Act (FIPPA) and inquiries pertaining to information access and privacy concerns.

The Policy and Freedom of Information and Protection of Privacy (FIPPA) Coordinator is responsible for reviewing College policies and procedures ensuring adherence to published review timelines and legislative compliance (where applicable). Working collaboratively with College departments the Policy and Freedom of Information and Protection of Privacy Coordinator will provide comprehensive assistance with policy and procedure development and revisions.

The Policy and Freedom of Information and Protection of Privacy (FIPPA) Coordinator will ensure that formal access to information requests made under FIPPA are responded to within the prescribed timeframes and act as an information resource to the College on legislated requirements under FIPPA. The incumbent manages all records related to formal FIPPA requests and the compiling of data and information required for College analysis and annual report(s) as required by the Information and Privacy Commissioner.

KEY DUTIES & RESPONSIBILITIES

	Summary Details	Percentage %
1	<p>Supporting the development of College policies, operating procedures and establishment of best practices</p> <ul style="list-style-type: none"> • Researching policy and procedure best practices • Providing assistance to College departments with policy and procedure development and revisions as required • Writing initial drafts and editing College policies and operating procedures as needed • Updating the College's policy and procedure public website 	40%
2	<p>Monitoring and ensuring adherence to published College policy and procedure review timelines and legislative compliance (where appropriate)</p> <ul style="list-style-type: none"> • Maintaining a dynamic tracking system of College wide policies and procedures and a schedule of policy and procedure review • Ensuring policies and procedures comply with applicable legislation where required • Receiving notification of privacy breaches, ensuring they are reported to management and assisting with next steps to remediate, as required by management. • Identifying risks associated with privacy breaches and policy non-compliance and proposing strategies for mitigation 	15%

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	Summary Details	Percentage %
3	Receiving, responding to and coordinating formal access to information requests made under FIPPA <ul style="list-style-type: none"> • Receiving and responding to formal access for information requests. • Refers complex requests, and escalation of requests to the Supervisor • Assigning access to information requests to the appropriate department head(s) and assists with the determination of responsive records and/or narrowing of requests as required • Ensuring applicable fees (as prescribed under the FIPPA) are received and posted • Tracking, monitoring and electronic filing of FIPPA requests received by the College • Compiling of data and information required for College analysis and annual report(s) as required by the Information and Privacy Commissioner 	25%
4	Ensuring access to information and privacy requirements (under FIPPA and the College’s applicable policy) are published and privacy information and resources are accessible to the College community <ul style="list-style-type: none"> • Maintaining the College’s privacy and access to information website • Developing training resources and providing information sessions to College departments as requested • Assisting in the development of departmental and corporate policies and procedures associated with protection of privacy and access to information 	15%
5	Other Duties As Assigned <i>(do not amend this section)</i>	5%

To calculate the relative percentage of time allocated to each cluster of key duties & responsibilities, remember to consider the total amount of hours this part-time position will normally work in a year.

For example:

An RPT position which normally works 24 hours per week for 10 months of the year would have approximately 960 annual hours (24 hrs/wk x 4 wks/month x 10 months). If this position is estimated to spend 5 hours per week completing a cluster of work associated with organizing and maintaining business files, you would allocate 20% to this function calculated as (5 hrs/wk x 4 wks/month x 10 months) divided by 960.

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PART TWO:

TRAINING & TECHNICAL SKILLS

Overall: Bachelor's degree in related field. Equivalent work experience without a degree will be considered. Minimum of 2 years' policy related work experience, preferably in a post-secondary environment. Previous work experience with privacy and information security considered an asset.

Formal Education Requirements:

Completion of a three (3) year college diploma or, three (3) university degree.

Field(s) of Study:

Policy and Public Administration

Business Administration

EXPERIENCE

Practical Work Experience:

More than 3 and up to 5 years' experience.

Additional Skills & Abilities:

- Coordination and organizational skills to plan and manage with proven ability to prioritize work on a number of projects simultaneously and maintain compliance within legislated timelines
- Experience researching, writing, and interpreting policies and procedures
- Well-developed written and verbal communications skills, including presentation skills, and a demonstrated ability to provide information and instruction effectively
- Proficiency with computer technology to conduct research, track and process requests, prepare reports, and maintain websites
- Ability to work independently and collaboratively as part of a team in a confidential work setting
- Demonstrated ability to maintain detailed records
- Knowledge of and experience interpreting the FIPPA and other access and privacy-related legislation and policies and responding to formal access for information requests
- Knowledge of privacy risks and mitigation strategies to identify contentious privacy issues, and propose strategies for mitigation.
- Strong and responsive customer service focus, interpersonal skills and can develop and maintain effective working relationships with individuals at all levels of the organization
- Ability to maintain tact and discretion when dealing with sensitive issues
- Deep appreciation and commitment to diversity and inclusion

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PART THREE:

COMPLEXITY

Describe the amount and **nature of analysis, problem-solving and reasoning** required to perform the core duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position. Answer the questions listed below in the Key Considerations section.

Example #1

Policy development → The College requires development, implementation and maintenance of an overarching policy on protection of privacy and access to information policy

The incumbent will:

- determine a project scope and timeline for completion
- research best practices and compile a list of recommendations
- consult with management and other department heads, as required
- assist with drafting of the initial policy ensuring adherences to FIPPA
- prepare briefing notes and supplementary materials as required for policy approval
- once approved, develop policy training resources, information materials (i.e. FAQs), supplementary materials (i.e. forms, process schematics)
- publish both the policy and supporting documentation on the College website
- provide training and support to College departments as requested / required
- track issues with policy interpretation and implementation and make recommendations to management for improvements

Example #2

FIPPA request → The College receives a complex formal request for information (under FIPPA) involving numerous records and potential third party notifications

The incumbent will:

- process the request and initial application fee and provide the requestor with an initial response regarding receipt of request
- open a case file and an electronic document repository folder on the shared drive
- work with the department head(s) to determine: scope; number of responsive records; third party notifications requirements; timeframe for completion (in accordance with FIPPA); responsive records and exemptions under FIPPA
- based on scope, determine applicable fees and prepare a fee estimate (in accordance with FIPPA), send estimate letter to the information requestor and indicate timeframe for payment
- refer complex questions pertaining to, and or the escalation of the request to the Supervisor
- receive additional fee payment and work with department head to complete request
- send all third party notifications, as required, and receive and act upon any objections to release of information
- compile all responsive records and ensure required redactions
- prepare the final records and completion letter, indicating responsive records and any information exempt under FIPPA, for the requestor

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Key Considerations:

With respect to the examples above and the regular duties associated with this position's core functions, please answer the following questions:

Is the work considered to be routine/non-routine?

Non-routine.

How would you describe the complexity of the work?

Some duties are varied and complex.

Describe the business processes used by the position.

Processes are specialized.

JUDGMENT

Describe the degree of independent judgment and problem-solving required to perform the duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position. Answer the questions listed below in the Key Considerations section.

Example #1

FIPPA complaint → a breach of privacy is reported

The incumbent will:

- report the breach to their immediate supervisor
- where required, work with the affected party to determine type of breach and type(s) of information accessed and advise their immediate supervisor of the findings
- advise manager on inherent risks and scope of the breach
- work with direct Manager and affiliated department head to determine next steps
- work with the Manager to determine if the breach requires reporting to the Information and Privacy Commissioner (IPC); if reporting to the IPC is required the incumbent will draft the initial report for management review and edits
- analyze internal policies, procedures and identify institutional gaps that may have contributed to the breach
- recommend strategies to mitigate future risk

Example #2

New Legislation

The incumbent will:

- Review the newly passed legislation and identify any College policies impacted
- Identify the discrepancies between the new legislation and the affected College policy and determine next steps (i.e. policy revision or new policy required)
- Notify the department head and assist with next steps of revision / creation
- Conduct research as necessary to inform policy revision / creation
- Assist with revision of existing policy and/or writing of new policy as needed

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Key Considerations:

With respect to the examples above and the regular duties associated with this position's core functions, please answer the following questions:

The work duties typically require:

Breakdown facts or components of the problem situation to find a solution.

In determining a solution for problems, the incumbent has discretion to:

Modify/refine existing methods and options.

MOTOR SKILLS

Describe the aspects of the position that require fine motor movements (delicate, intricate or precise) related to the core duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position Answer the questions listed below in the Key Considerations section.

Example #1

Task / Activity Typing and computer-based work
Description Typing and word processing while creating and editing policies/procedures and conducting on-line research.

Example #2

Task / Activity
Description

Key Considerations:

With respect to the examples above and the regular duties associated with this position's core functions, please answer the following questions:

When considering 'speed' of fine motor movements for this position:

Speed is a secondary consideration.

Indicate the percentage of time that is required in performing each of the tasks discussed above.

Task	% of Time
Typing and word processing	40%

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PHYSICAL DEMAND

Describe the degree of **physical demand** required to perform the duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position that illustrate the type and duration of physical effort, the frequency, the strain from rapid and repetitive fine muscle movements or the use of larger muscle groups, lack of flexibility of movement, etc.

Example #1

Regular office duties
<ul style="list-style-type: none"> • Sitting and working at a computer • Occasional standing, if required, when delivering presentations

Indicate the percentage of time that is required in performing each of the tasks discussed above.

Task	% of Time
Regular office duties - Typing / Computer Based Work	95%
Standing, if required, when delivering presentations	5 %

SENSORY DEMAND

Describe the degree of **sensory demand** required to perform the duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position that illustrate the level/degree of concentration (visual, auditory, tactile, etc.). Answer the questions listed below in the Key Considerations section.

Example #1

Task / Activity Researching and writing policies
Description Incumbent is required to conduct research regarding new policies and to carefully analyze legislation vis-a-vis existing policies and practices to determine gaps and required improvements. Careful attention to detail and considerable concentration is required. Policy creation and revision requires significant focus to ensure requirements are captured accurately.

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Example #2

Task / Activity Responding to a potential privacy breach and access to information requests under FIPPA
Description Incumbent is required to carefully review the details of the alleged privacy breach and/or access to information requests and determine appropriate action to be taken, which may including consulting privacy legislation. This requires the incumbent to collect and carefully analyze facts so that appropriate recommendations can be made and accurate responses can be provided.

Key Considerations:

With respect to the examples above and the regular duties associated with this position’s core functions, please answer the following questions:

How would you describe the requirement for attention to detail in this position?

Frequent/Regular

Indicate the percentage of time that is required in performing each of the tasks discussed above.

Task	% of Time
Researching and writing policies	40%
Investigating privacy breaches	30%

STRAIN FROM WORK PRESSURES / DEMANDS / DEADLINES

Describe the degree of **work pressures** involved in performing the duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position that illustrate the deadlines, interruptions, distractions, multiple or conflicting demands/workloads and dealing with people in difficult situations. Answer the questions listed below in the Key Considerations section.

Example #1

Job involves recurring conflicting work pressures or demands. <ul style="list-style-type: none"> Effective project management skills and careful attention to detail and accuracy are essential Multiple demands occur regularly and are usually unpredictable The time required to solve an unanticipated interruption depends on the nature of the issue and would conflict with already established priorities The incumbent is often under pressure to meet critical, legislative FIPPA deadlines. College deadlines change as college priorities/processes change. The incumbent must use initiative and professionalism when dealing with occasionally changing deadlines, distractions and/or demands. A typical workday would include the incumbent's normal workload with multiple and varying demands from external sources (i.e. FIPPA requests).

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Key Considerations:

With respect to the examples above and the regular duties associated with this position’s core functions, please answer the following questions:

How would you describe the workflow demands this position typically faces?
 Deadlines regularly are tight AND periodically change.

How would you describe the existence of critical deadlines in this role?
 Occasional critical deadlines.

How would you describe the level of interruptions this position faces?
 Interruptions are frequent and may be unpredictable.

Indicate the predictability of the strain and percentage of time required in each task discussed above.

Task	% of Time	Predictability*
Interruptions	30%	NP (Not Predictable)
Deadlines	50%	UP (Usually Predictable)

INDEPENDENT ACTION

Describe the degree of **independent action** and **autonomy** required to perform the core duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position. Answer the questions listed below in the Key Considerations section.

Example #1

There is considerable freedom to act independently and the incumbent is expected to work with a high level of autonomy
<ul style="list-style-type: none"> • The incumbent is aware of the day-to-day responsibilities of the position. • The incumbent initiates and follows through on various processes and FIPPA requests • The Manager outlines special projects as required • The incumbent determines appropriate process for completion of tasks • Some assignments, such as research projects and drafting initial recommendation documents, are completed with no supervision and independent judgment and thinking is required throughout the span of an assignment

Key Considerations:

With respect to the examples above and the regular duties associated with this position’s core functions, please answer the following questions:

What type of instruction is typically given to the incumbent?

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Work is carried out in accordance with general instructions and policies.

What degree of supervision is typically provided to the incumbent?

Periodic supervision; occasional supervisory input.

How is the work typically checked and verified?

Output is reviewed by report/discussion.

How frequently is the work checked?

Most processes are reviewed monthly.

Describe duties which are the incumbent's responsibility where independent action requires initiative and/or creativity and indicate how often the duties occur. Identify the typical situations or problems that are normally referred to the Manager for solution.

- All duties as described on page 3 and 4 are the distinct responsibility of the incumbent and all require initiative and some creative skills (approximately 50%).
- Manager would be required for:
 - Assigning tasks (outside of day-day duties) and project work
 - Assistance with complex requests under FIPPA; appeals under FIPPA and reported breaches of privacy
 - Assistance with College-wide overarching policies and procedure and review of final policies and procedures prior to approval and implementation

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COMMUNICATIONS / CONTACTS

Describe the nature of contact and purpose involved in communicating information (i.e. to provide advice, explanation, to negotiate, or influence others to reach agreement, etc.), and the confidentiality of the information provided. Answer the questions listed below in the Key Considerations section.

Nature of Contact (Who)	Purpose of Contact (What)	Frequency
External persons	Requests for access to information Provide information Advise on timelines and procedures **amount of contact is unpredictable (can be several times a week or once a month), requests can be sensitive and all are considered confidential and must be handled in accordance with FIPPA and established College policies	Monthly
Internal persons (Senior Management Team, College leaders)	One or more of the following tasks with Internal persons is expected on a daily basis <ul style="list-style-type: none"> • Provide advice and instruction on handling requests for information and protection of privacy • Provide information forms and refer to resources • Provide advice on policy and procedure location on web, development process, review timelines, compliance etc. • Provide support in developing College policies and procedures • Assist with researching other policies, procedures, and best practices • Contributing to cross-departmental project 	Daily
Department heads	Collaboration and providing of advice and instruction	Weekly
Manager	Receiving instructions Status updates Seeking clarity Exchange of information	Weekly
Legal Counsel and / or other Post-Secondary institutions	Seek clarity and best practices from legal counsel on occasion and where instructed to by the Manager	Monthly

Key Considerations:

With respect to the examples above and the regular duties associated with this position’s core functions, please answer the following questions:

Communications in this position are typically engaged for the purpose of:

Providing guidance/technical advice of a specialized nature; seeks to secure cooperation of others.

What type of involvement does this position have with confidential information?

Regular involvement; disclosure implications could include adverse publicity or litigation.

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RESPONSIBILITY FOR DECISIONS AND ACTIONS

Describe the type of **responsibility** that exists for the **decisions** and **actions** related to the core duties of the position. Provide up to two (2) examples in the space provided below of regular duties for this position. Answer the questions listed below in the Key Considerations section.

Example #1

The incumbent has responsibility for coordination and oversight of policy and access to privacy and information.

- Independently researching policy and procedure best practices
- Writing initial drafts and editing College and departmental policies and operating procedures as needed, including the College policies and procedures associated with protection of privacy and access to information.
- Updating the College's policy and procedure public website and the College's privacy and access to information website
- Receiving and responding to formal access for information requests.
- Assigning access to information requests to the appropriate department head(s) and assists with the determination of responsive records and/or narrowing of requests as required
- Ensuring applicable fees (as prescribed under the FIPPA) are received and posted
- Developing training resources and providing information sessions to College departments as requested
- Assisting in the development of departmental and corporate policies and procedures associated with protection of privacy and access to information

Key Considerations:

With respect to the examples above and the regular duties associated with this position's core functions, please answer the following questions:

How errors are typically detected for work completed by this position?

Errors usually detected through verification and review processes.

What is the typical scope of impact to the organization for errors in this position?

****FIPPA and legislative compliance should be considered significant organizational risks.**

Results in some workflow disruption, duplication and/or wasted resources.

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WORK ENVIRONMENT

Describe the physical environment that the incumbent works in. Consideration should be given to:

- The probability or likelihood of exposure to disagreeable/hazardous elements.
- The nature of the disagreeable/hazardous element
- Length of exposure while on the job
- Travel

Complete the chart below. Answer the questions in the Key Considerations section.

Environment	% of Time
Professional office environment Yes	100%
Choose an item.	
Other (please specify)	
Other (please specify)	

Key Considerations:

With respect to the nature of disagreeable/hazardous elements this position is in contact with, would you describe them as:

Choose an item.

With regard to the disagreeable/hazardous elements referenced above, how often does the position encounter them?

Choose an item.

If this position is required to engage in business related travel, what is the frequency of the travel?

Choose an item.

SUPPLEMENTAL DATA

Provide any additional information which will serve to further enhance understanding of the position.

[Click here to enter text.](#)