

# Access to Information & Privacy (MFIPPA) Policy

## Purpose

To ensure the BBIA meets its obligations as a local board under the **Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)**: access to records, privacy protection, security, retention, and transparency. [files.ontario.ca+1](https://files.ontario.ca+1)

## Scope

Applies to all BBIA records (paper, email, cloud files, messages, photos/video, meeting recordings) in the custody or under the control of the BBIA, including board, committees, staff, and contractors. [IPC Ontario](#)

## Roles

- **Head of Institution:** Board Chair (or designate).
- **FOI Coordinator:** Executive Director (manages requests, liaises with City/IPC).
- **All Staff/Directors:** Create, safeguard, and retain records; create a training module.

## Access to Records

- Any person may request records through the City of Ottawa MFIPPA office.
- **Timelines:** 30 calendar days to respond (extensions per MFIPPA allowed).
- **Fees:** Apply MFIPPA Reg. 823 fee schedule when applicable (copies, search/prep time).
- **Exemptions/Redactions:** Apply MFIPPA exemptions (e.g., personal privacy, third-party info, advice to board, solicitor-client). Provide a severed copy with reasons. [files.ontario.ca](https://files.ontario.ca)

## Privacy & Security

- Collect only what's necessary; use and disclose only for the stated purpose or as authorized by law.
- Store records in approved BBIA systems; prohibit use of personal email/cloud for BBIA business.
- **Breach Protocol:** Contain, assess risk, notify affected individuals where required, and document.
- **Third Parties:** Contracts should include MFIPPA privacy/security clauses.

## Records Management

- Follow City of Ottawa records retention/disposition by-law for local boards; do not destroy records subject to an active access request, appeal, investigation, or litigation hold. [City of Ottawa](#)

## Proactive Disclosure (recommended)

- Publish on website: agendas/minutes (open session), annual reports/budgets/audits. This reduces FOI volume and improves transparency. [files.ontario.ca](https://files.ontario.ca)

## Training & Review

- Annual MFIPPA/privacy refresher at operations planning meeting; policy reviewed after every legislative change.

# Public Communications & Online Conduct (Issues, Crises, and Attacks)

## Purpose

To standardize how BBIA responds to public criticism, misinformation, and harassment in traditional media and on social platforms—balancing transparency, safety, and reputation.

## Principles

- Safety first; do not engage with abusive content.
- Be factual, brief, and civil; correct clear misinformation.
- Escalate quickly when there's risk to people, property, or reputation.

## Team & Roles

- **Spokesperson(s):** Chair and Executive Director.
- **Monitoring Lead:** Staff member (Marketing Assistant) monitors channels and flags incidents.
- **Legal/Police Liaison:** ED coordinates when threats, hate, or defamation may be involved.

## Triage Categories & Actions

1. **Constructive criticism/complaints** → Acknowledge, route to service channel, respond within 1–2 business days with facts/resources.
2. **Misinformation** (incorrect facts about BBIA actions/spending/process) → Post a short correction with a neutral tone; link to source/policy/board minutes on our site.
3. **Personal attacks/harassment/hate** → **Do not debate.** Document (screenshots/URLs), apply platform rules (hide/remove if violating our page rules), and, if necessary, report to the platform and/or police.
4. **Media inquiries** → Centralize through ED/Chair; use approved key messages; keep a dated log of what was asked/said.
5. **Legal risk (defamation/privileged matters)** → No public comment beyond neutral holding line; seek counsel.

## Moderation Rules (publish on our channels)

- No hate, harassment, threats, doxxing, or profanity; no defamatory or false statements; no spam/ads.
- Posts that breach rules may be hidden/removed; repeat violators may be blocked per platform terms.
- For records: retain screenshots/exports of moderated content for our files (MFIPPA record).

[Ontario+1](#)

## Response Templates

- *Holding line (general)*: “We’ve seen the comments and are reviewing. We’ll share an update here once we’ve confirmed the facts.”
- *Correction*: “For clarity: the BBIA budget is approved by the Board and City; here’s the 2025 budget summary and audit [add the link].”
- *Boundary setting*: “We welcome respectful discussion. Posts with slurs or personal attacks will be removed under our community rules.”

#### **Documentation & Retention**

- Keep a crisis log: date/time, platform, screenshots/links, our response, escalations, and outcome. Treat as a BBIA record (subject to MFIPPA). [files.ontario.ca](https://files.ontario.ca)
- Align with our existing Social Media policy section and Code of Conduct expectations.

# Barrhaven BIA Policy on Third-Party Goods and Services Opportunities

## 1. Purpose

This policy establishes clear guidelines for evaluating, sharing, and communicating third-party goods and services opportunities with BBIA members. It ensures that:

- Members are made aware of relevant cost-savings or group purchasing opportunities.
- The BBIA avoids liability for third-party offers.
- The BBIA maintains fairness and avoids conflicts with services already provided by its members.

## 2. Scope

This policy applies to all third-party requests received by the BBIA to share goods or services (e.g., insurance, HR tools, shipping, office supplies, advertising, professional services, etc.) with BBIA members.

## 3. Evaluation Criteria

The BBIA will consider opportunities based on the following factors:

- **Relevance:** The offer must provide demonstrable value to a wide range of BBIA members.
- **Credibility:** The provider must be a recognized, reputable organization with a clear track record.
- **Neutrality:** The offer must not unfairly compete with or disadvantage existing BBIA member businesses.
- **Alignment:** The opportunity must align with BBIA's mission to support local businesses and community growth.
- **Administrative Impact:** The opportunity should require minimal BBIA staff resources to share and promote.

The BBIA reserves the right to accept, decline, or defer opportunities at its sole discretion.

## 4. Sharing Mechanism

- **Designated Platform:** Approved opportunities will be posted on the BBIA website under the **Business Events & Opportunities** page (to include both group discount programs and business events).
- **Frequency:** Posts will be updated on a rolling basis as approved opportunities are received.
- **Format:** Each posting will clearly state:
  - Provider name and contact information.
  - Summary of the offer.
  - Expiry or eligibility details.
  - A **disclaimer statement** (see Section 5).

The BBIA will not distribute opportunities via individual e-blasts unless explicitly approved by the Board.

## 5. Disclaimer & Liability Waiver

All shared opportunities will include the following disclaimer language:

*“The Barrhaven BIA is providing this information solely as a courtesy to its members. The BBIA does not endorse, guarantee, or assume responsibility for any products, services, or offers provided by third parties. Participation in any program is at the discretion of the member, and all inquiries, transactions, and liabilities remain strictly between the member and the provider. By accessing or using these offers, members release the BBIA from any and all claims, damages, or losses that may arise.”*

This disclaimer must appear on all postings, newsletters, and related communications.

## 6. Conflict Avoidance

- Before accepting an opportunity, staff will review whether similar goods or services are already offered by BBIA members.
- If a conflict exists:
  - The BBIA may **decline** the opportunity outright, or
  - The BBIA may **seek member input** (via survey or consultation) to determine interest.
- Final approval rests with the Executive Director in consultation with the Board Executive.

## 7. Review & Oversight

- This policy will be reviewed and approved by the BBIA Board of Managers.
- Adjustments may be made to reflect member feedback, legal requirements, or evolving business practices.

### **Suggested Memo to BBIA members: Sharing Discounted Goods & Services Opportunities**

*How the Barrhaven BIA supports members with third-party offers*

The Barrhaven BIA often receives requests from outside organizations to share discounted goods or services with our members (e.g., insurance, shipping, office supplies, training programs, etc.). We know that cost savings can be valuable, but we also want to ensure fairness, transparency, and protection for our members.

### **Our Approach**

- **Selective Sharing**  
We review each opportunity to make sure it's credible, relevant, and beneficial to a broad range of our members. Not all requests will be shared.
- **Dedicated Platform**  
Approved opportunities will be posted on our website under the **Business Events & Opportunities** page, alongside other useful programs and group discounts.
- **Fairness to Members**  
We take care to avoid conflicts with products or services already offered by our own members.

### **Important Disclaimer**

The BBIA shares third-party offers **as an information service only**.

*We do not endorse, guarantee, or take responsibility for the quality or terms of any third-party product, service, or discount. Participation is entirely voluntary, and any questions or issues must be handled directly with the provider.*

**What This Means for You**

- You'll have access to a curated set of cost-saving opportunities.
- You can choose to participate or not — at your discretion.
- Your business is protected because we won't share offers that compete directly with member-provided services without consultation.

**Tip:** Check the BBIA website regularly for updated group discounts and business opportunities!