



# Royal Roads University Privacy Impact Assessment

*McLean & Company: 360 Feedback, New Hire Survey, Exit Survey*  
PIA# 2023-04

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## PART 1: GENERAL INFORMATION

<b>PIA Drafter</b>	Nicole McDowell
<b>Business unit:</b>	Human Resources
<b>Your name and title:</b>	Nicole McDowell, Talent Development & Engagement Specialist
<b>Your work phone:</b>	250-391-2600
<b>Your email:</b>	nicole.mcdowell@royalroads.ca
<b>Initiative</b>	McLean 360 Feedback, New Hire Survey, and Employee Exit Survey Tools



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<b>Initiative Lead name and title:</b>	Nicole McDowell, Talent Development & Engagement Specialist
<b>Initiative Lead phone:</b>	250-391-2600
<b>Initiative Lead email:</b>	nicole.mcdowell@royalroads.ca

## GENERAL INFORMATION ABOUT THE PIA:

<p><b>Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.</b></p> <p>This initiative is a data-linking program under FOIPPA No</p>
<p><b>Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.</b></p> <p>This initiative is a common or integrated program or activity No</p>
<p><b>Related PIAs, if any:</b></p> <p>Employee Engagement Survey - PIA# 2022-14</p>

### 1. What is the initiative?

McLean & Company is a division of Info-Tech Research Group, a Canadian information technology research and advisory company. McLean & Company offer several survey tools including McLean & Company 360 Feedback (360 Feedback), New Hire Survey, and Employee Exit Survey.



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360 Feedback is a performance assessment tool that can be used to collect and assess feedback about an individual employee's strengths and areas of improvement. Feedback is collected from raters (managers, peers, and direct reports) and self-assessments.

The New Hire Survey asks new employees to provide feedback on the effectiveness of hiring and onboarding programs to identify effective and ineffective organizational practices. The

Employee Exit Survey asks departing employees to provide feedback on the factors that affect long-term employee engagement and performance to identify the top drivers of turnover within the organization. Both New Hire and Exit surveys can be tailored to meet our organizational needs.

## **2. What is the scope of the PIA?**

This PIA will cover the 360 Feedback, New Hire Survey, and Employee Exit Survey pilot projects and any subsequent implementations.

## **3. What are the data or information elements involved in your initiative?**

360 Feedback will collect the name of the employee being rated, their role, department, and opinions about their performance. Rater and ratee names and emails are collected by the tool to send out the assessment and track completion. The feedback for the 360 assessment is compiled anonymously ensuring the ratee does not see the rater's specific ratings; however, the comments will be provided verbatim.

The exit survey is a non-anonymous survey, therefore groups (e.g. department) with even one response will have data displayed. Individual responses will not be shared with managers; however, if serious issues are expressed, then we are obligated to release information to



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appropriate organizational stakeholders (e.g. discrimination). The following demographic information is shared with McLean and Company:

- First and last name
- Employee email
- Start date
- Age range
- Termination date
- Employee number

The new hire survey is an anonymous survey; McLean & Company only shares the aggregate results of the survey with Royal Roads University, and they do not share individual responses. No one at Royal Roads University has access to the raw data gathered by the survey or to any individual responses. Reports can be downloaded at any time, provided there are a minimum of four respondents within the reporting period. The following demographic information is shared with McLean and Company:

- First and last name
- Employee email
- Start date
- Age range
- Employee number



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**3.1 Did you list personal information in question 3?**

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Yes.

**4. How will you reduce the risk of unintentionally collecting personal information?**

*Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.*

## **PART 2: COLLECTION, USE AND DISCLOSURE**

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

**5. Collection, use and disclosure**

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: 360 Feedback/Exit Survey/New Hire Survey: RRU Administrators provide demographic data referenced above to McLean & Company via	Disclosure	s.33 (2)(d)	



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Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
SharePoint as well as through document upload to <a href="https://feedback.mcleanco.com/">https://feedback.mcleanco.com/</a>			
<p>Step 2: 360 Feedback: Feedback collected from ratees and self-assessments.</p> <p>Exit Survey/New Hire Survey: McLean &amp; Co emails the survey respondents a survey invitation for voluntary completion.</p>	Collection	s.26 (c)	
<p>Step 3:</p> <ul style="list-style-type: none"> <li>• 360 Feedback: Anonymized results are shared with the ratees;</li> <li>• Debrief meetings may be conducted;</li> <li>• Exit Survey/New Hire Survey: Aggregate data is used to produce reports. Individual responses are available for the exit survey and will only be shared with appropriate stakeholders if serious concerns are brought forward in responses.</li> </ul>	Use and disclosure	s.22 (3)(h)(i)(ii) s.32 (a)	
<p>Step 4: 360 Feedback/Exit Survey/New Hire Survey: Results are interpreted, and development plans will be created to modify processes (surveys) and develop raters.</p>	Use and disclosure	s.32 (a)	



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Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 3: Results from the survey will be shared with RRU in aggregate format and reports will be generated for units with at least four respondents.	Use and disclosure	s.32 (a)	
Step 4: Interpretation of these results will be used to guide the HR Strategic Plan.	Use	s.32 (a)	

## 6. Collection Notice

### 360 Feedback:

This information is collected by Royal Roads University for the purpose of employee performance management and is conducted under the authority of *the University Act and is subject to the Freedom of Information and Protection of Privacy Act*. For more information regarding the collection and use of your personal information please contact Royal Road’s University’s Privacy Officer via regular email [privacyofficer@royalroads.ca](mailto:privacyofficer@royalroads.ca).

### Exit survey:

This survey is conducted under the authority of *the University Act and is subject to the Freedom of Information and Protection of Privacy Act*. The purpose of this survey is to evaluate the supports Royal Roads University offers its employees. This survey is not anonymous; however, your individual responses will not be shared with your manager. For more information



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regarding the collection and use of your personal information please contact Royal Road's University's Privacy Officer via regular email [privacyofficer@royalroads.ca](mailto:privacyofficer@royalroads.ca).

#### **New hire:**

RRU is committed to protecting your personal privacy and maintaining the confidentiality of your participation in this survey. The purpose of this survey is to evaluate the supports Royal Roads University offers its employees throughout their candidacy and onboarding. This survey is conducted under the authority of *the University Act and is subject to the Freedom of Information and Protection of Privacy Act*. As the vendor administering this survey, McLean & Company, a HR firm we regularly work with, will ensure your data and responses are kept confidential. All data will be housed with McLean & Company and RRU will only have access to the aggregate data. For more information regarding the collection and use of your personal information please contact Royal Road's University's Privacy Officer via regular email [privacyofficer@royalroads.ca](mailto:privacyofficer@royalroads.ca).

### **PART 3: STORING PERSONAL INFORMATION**

**7. Is any personal information stored outside of Canada?**

Yes.

**8. Does your initiative involve sensitive personal information?**

Yes.

**9. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(1)?**

Yes (potentially).



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**10. Where are you storing the personal information involved in your initiative?**

Client data is hosted on Amazon Web Service located in EU-Ireland, Daily back-ups are taken and stored securely in Canada.

360 Feedback: McLean & Company has a Canadian instance that can be supplied upon request.

**PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA**

**11. Is the sensitive personal information stored by a service provider?**

Yes.

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?
Info-Tech (McLean & Co)	Info-Tech uses Amazon Virtual Private Cloud (VPC), which is a logically isolated section of the AWS cloud. All media content stored in the cloud is encrypted at rest using AWS’s server-side encryption. Each object stored within AWS is encrypted with an AES 256-bit encryption key.	Client data is hosted on Amazon Web Service located in EU-Ireland, Daily back-ups are taken and stored securely in Canada.



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- 12. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.**

Initial survey data from members, typically containing names and email addresses, is manually uploaded to Info-Tech's survey engine by Info-Tech operational teams using a secure connection.

The post-completion survey data, which contains sensitive personal information, is restricted within Info-Tech to those who require access to the information and is carefully segmented between companies and surveys.

The output of the new hire survey is a formatted report, usually a PDF or an Excel document, that is an aggregate of all responses for the company and the resulting analysis. Only internally vetted Info-Tech employees have access to the raw survey data.

- 13. Does the contract you rely on include privacy-related terms?**

*Yes (indirectly)– it references a terms link (<https://hr.mcleanco.com/terms>). This further references privacy terms: <https://hr.mcleanco.com/terms/privacy>.*

- 15. What controls are in place to prevent unauthorized access to sensitive personal information?**

### Internal controls

Only Human Resources staff who require access to RRU's McClean & Company account to perform their job functions will be issued access credentials.

360 Feedback: The feedback for the 360 assessment is compiled anonymously ensuring the ratee does not see the rater's specific ratings. RRU staff will only be given access to their own 360 Feedback Report.



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New hire survey: No reports will be generated with less than four respondents. Royal Roads University will not be provided with raw data.

Exit survey: Survey data is not anonymous; however, individual responses will not be shared with outside of internally vetted employees that are required to evaluate and act upon feedback. Data will be summarized and anonymized prior to sharing any reports with stakeholders.

## External controls

# Section 15(1)(l), Section 21



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**16. Provide details about how you will track access to sensitive personal information.**

The survey data is restricted within Info-Tech to those who require access to the information and is carefully segmented between companies and surveys. The output of the survey is a formatted report, usually a PDF or an Excel document, of all responses for the company and the resulting analysis. Only internally vetted employees have access to the raw survey data.

RRU's human resources team will store the downloaded reports in a restricted-access storage area. Only staff who need access to the reports to perform job functions will have access to the storage area. No identifying, sensitive personal information will be made available in the aggregate reports provided to RRU. Server audit logs will record any unauthorised attempts to access data stored in these locations.



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17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.



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<i>Unauthorized access or disclosure of personal information by McLean &amp; Company staff.</i>		Low	High	<i>Contractual terms, privacy policies</i>	
<i>Employee's personal information is compromised when transferred to the service provider</i>		Low	High	<i>Transmission is encrypted and over a secure line</i>	
<i>Service provider could be compromised by an external attacker resulting in a breach.</i>		Low	High	<i>Contractual terms, high security standards and policies.</i>	



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<i>Service provider's database could become corrupted by a software malfunction</i>		Low	Medium	<i>Contractual terms, high security standards and policies.</i>	
<i>A service provider's system upgrade could introduce a security vulnerability</i>		Low	Medium	<i>Contractual terms, high security standards and policies.</i>	



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## Outcome of Part 4

The outcome of Part 4 will be a **risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

## PART 5: SECURITY OF PERSONAL INFORMATION

18. Does your initiative involve digital tools, databases or information systems?

Yes.

18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Yes.

19. What technical and physical security do you have in place to protect personal information?

RRU

# Section 15(1)(I)



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Info-Tech

## Section 15(1)(I), Section 21

### 20. Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.



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<b>Strategy</b>	
We only allow employees in certain roles access to information	Yes
Employees that need standing or recurring access to personal information must be approved by executive lead	Yes
We use audit logs to see who accesses a file and when	Yes
<b>Describe any additional controls:</b>	

## PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

### 21. How will you make sure that the personal information is accurate and complete?

The initial disclosure of user data to McLean & Co will be a data export from existing RRU systems and can be assumed to be correct. Survey responses will be collected through web-based forms that use controls that don't allow for users to enter non-standard responses.

### 22. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.



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**22.1 Do you have a process in place to correct personal information?**

Once feedback and responses are submitted, they cannot be edited by RRU Staff. With assistance from McLean & Company, 360 Feedback received can be reopened for edits to be applied. Staff would receive an email inviting them to update or correct their feedback.

**22.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?**

Yes.

**22.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?**

Yes.

**23. Does your initiative use personal information to make decisions that directly affect an individual?**

Yes, 360 Feedback reports will be used to formulate employee development plans.

**24. Do you have an information schedule in place related to personal information used to make a decision?**

*FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.*



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Yes.

*Royal Roads has a detailed records and retention schedule that may be viewed [HERE](#). A review of the appropriate section in this schedule confirms that personal information used to make a decision directly affecting an individual is retained for a minimum of one year.*

### **PART 7: AGREEMENTS AND INFORMATION BANKS**

25. Does your initiative involve an information sharing agreement?

No.

26. Will your initiative result in a personal information bank?

No.

### **PART 8: ADDITIONAL RISKS**

27. Risk response

*Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.*

<b>Possible risk</b>	<b>Response</b>
Risk 1: Personal information may be entered into comment fields and be used to identify otherwise anonymous respondent	Respondents will be advised not to include personal information in their comments.
Risk 2: 360 Feedback: Where there are few peers/direct reports it may be possible to link	A minimum of 3 raters per category is required to include the data in a report. The



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Possible risk	Response
feedback to rater – providing the recipient with unauthorized access to the rater’s identity information.	exceptions are the self and manager categories where only 1 rater is required. Can combine direct reports and peers into one category to achieve minimum of 3 raters in a category, if needed.
Risk 3:	
Risk 4:	

## PART 9: SIGNATURES

### Privacy Office Comments

The information provided by Royal Roads University to the vendor to create this survey is not much more than business contact information. However, once the survey is completed, the data set will contain a range of data elements that may be considered sensitive personal information and thus will require that appropriate privacy and security safeguards be in place.

Evidence supplied by the vendor, in the form of independent auditor reports, demonstrate that the required privacy and security safeguards are in place. Further, the survey results being provided to RRU do not contain data in a form that would represent a privacy or security risk.

### Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.



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<b>Signing below constitutes a recommendation of this PIA to the RRU Vice-President, Finance &amp; Operations.</b>		
Signature:		Date: <u>5/19/2023</u>
Name:	Don Devenney	

### Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

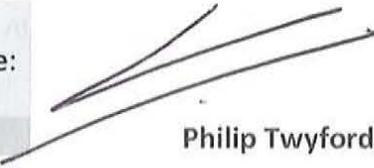
### Program Area Comments:

Role	Name / Signature <small>(Right-click on signature line and select "Sign")</small>	Date signed
Initiative lead	Signature:  Name: <b>Nicole McDowell</b>	Date: <u>3/24/2023</u>



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Role	Name / Signature <small>(Right-click on signature line and select "Sign")</small>	Date signed
<b>Head of public body, or designate</b>  Only required if personal information is involved	<div style="display: flex; align-items: center;"> <div style="background-color: #e0e0e0; padding: 2px; margin-right: 10px;">Signature:</div>  </div> <div style="display: flex; align-items: center; margin-top: 5px;"> <div style="background-color: #e0e0e0; padding: 2px; margin-right: 10px;">Name:</div> <span>Philip Twyford</span> </div>	Date: <u>7/27/2023</u>



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## **Appendices**

The following is a list of appendices associated with this PIA. For security purposes, these documents are securely stored and not included with the PIA

### **Appendix A**

McLean & Company Service Agreement & Terms of Use

### **Appendix B**

Info-Tech – SOC2 Type 2 – Report  
Report Password: **Section 15(1)(l)**

### **Appendix C**

ISO 27001:2013 Information Security Management Certificate