



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

Table of Contents

PART 1: GENERAL INFORMATION..... 1

PART 2: COLLECTION, USE AND DISCLOSURE..... 4

PART 3: STORING PERSONAL INFORMATION..... 7

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA 7

PART 5: SECURITY OF PERSONAL INFORMATION 13

PART 6: ACCURACY, CORRECTION AND RETENTION..... 15

PART 7: AGREEMENTS AND INFORMATION BANKS 17

PART 8: ADDITIONAL RISKS..... 17

PART 9: SIGNATURES..... 18

Appendices 20

PART 1: GENERAL INFORMATION

PIA Drafter	Nicole McDowell
<i>Business unit:</i>	Human Resources
<i>Your name and title:</i>	Nicole McDowell, Talent Development & Engagement Specialist
<i>Your work phone:</i>	250-391-2600
<i>Your email:</i>	nicole.mcdowell@royalroads.ca
Initiative	Strategic People Plan - Employee Engagement Survey
<i>Initiative Lead name and title:</i>	Nicole McDowell, Talent Development & Engagement Specialist
<i>Initiative Lead phone:</i>	250-391-2600
<i>Initiative Lead email:</i>	nicole.mcdowell@royalroads.ca



Royal Roads University Privacy Impact Assessment *Employee Engagement Survey* PIA# 2022-14

GENERAL INFORMATION ABOUT THE PIA:

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.
This initiative is a data-linking program under FOIPPA No
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.
This initiative is a common or integrated program or activity No
Related PIAs, if any:
None

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 Employee Engagement Survey, HR Stakeholder Manager Survey, and the Internal HR Survey. McLean & Co, on behalf of the Human Resources Department will be administering online Employee Surveys. These surveys are being conducted to gather insights from RRU employees to inform the development of strategies for the *RRU Strategic HR People Plan (2023-2028)*.

These survey tools are provided to us under our McLean & Company HR Research and Advisory membership.



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

The core engagement survey will launch on November 1st at 11:00am PST and will close on November 15th at 11:45pm PST. All RRU employees that have been employed for longer than 3-months as of September 27th will be invited to participate in the survey via e-mail.

2. What is the scope of the PIA?

The Employee Engagement Survey is one element being used to inform and support the larger initiative of the RRU Strategic HR People Plan (2023-2028). The scope of this PIA is the surveying of RRU employees through multiple surveys (Employee Engagement Survey, Internal HR survey, Manager Stakeholder Survey) to collect data to inform the HR strategy.

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

The following information is being disclosed to McLean & Co in advance of the survey launch:

- Employee name (first and last name)
- Employee e-mail
- Employee ID number
- Age range:
 - Less than 25 years
 - 25-34 years old
 - 35-44 years old
 - 45-54 years old
 - 55+ years
- Manager
- Employment status
- Vice President Portfolio



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

- Unit (department, School etc.)

The following information may be voluntarily supplied by employees through the survey and will be collected by McLean & Co:

- Length of service (range)

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.



Royal Roads University Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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
<p>Step 1:</p> <p>Survey respondent list is provided to McLean & Co via SharePoint. The respondent list includes the following information:</p> <ul style="list-style-type: none"> • Employee name (first and last name) • Employee e-mail • Employee ID number • Age range: <ul style="list-style-type: none"> ○ Less than 25 years ○ 25-34 years old ○ 35-44 years old ○ 45-54 years old ○ 55+ years • Manager • Employment status • Vice President Portfolio • Unit (department, School etc.) 	Disclosure	s.33 (2)(d)	
<p>Step 2:</p> <p>McLean & Co emails the survey respondents a survey invitation for voluntary completion. There is one demographic question in the survey that</p>	Collection	s.26 (c)	



Royal Roads University Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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
may result in the collection of the following personal information: <ul style="list-style-type: none"> • Length of service (range) 			
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

RRU is committed to protecting your personal privacy and maintaining the confidentiality of your participation in this 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*. 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 final reports. Reports will be generated in an aggregate format to ensure your privacy is maintained. We encourage you to respond honestly to all questions, whether your feedback is positive or constructive. Your voice is very important. We want to hear from you to help shape our future human resources plans. 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.



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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).

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.

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)	Section 15(1)(l), Section 21	Client data is hosted on Amazon Web Service located in EU-Ireland, Daily back-ups are taken and stored securely in Canada.



Royal Roads University Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?
Section 21, Section 15(1)(l)		

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 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>.



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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

No reports will be generated for units that have fewer than four respondents. Where there are fewer than four respondents, the responses will be aggregated with the parent organizational unit. Royal Roads University will not be provided with raw data.

Section 15(1)(I), Section 21

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.



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

Aggregate survey reports will be saved securely on the private Human Resources folder on the O: drive. 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.



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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.
<i>Unauthorized access or disclosure of personal</i>		Low	High	<i>Contractual terms, privacy policies</i>	



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

<i>information by McLean & Company staff.</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>	
<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>	



Royal Roads University Privacy Impact Assessment *Employee Engagement Survey* PIA# 2022-14

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)(l)

Info-Tech



Royal Roads University
Privacy Impact Assessment
Employee Engagement Survey
PIA# 2022-14

Section 15(1)(l), 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.

Strategy	
We only allow employees in certain roles access to information	Yes



Royal Roads University Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

Strategy		
Employees that need standing or recurring access to personal information must be approved by executive lead		
We use audit logs to see who accesses a file and when		Yes
Describe any additional controls:		

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.

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

No.

Once feedback and responses are submitted, they cannot be edited by RRU staff.



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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?

No.

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. In addition, the [Information Management Act](#) requires that you dispose of government information only in accordance with an approved information schedule.

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.



Royal Roads University Privacy Impact Assessment *Employee Engagement Survey* PIA# 2022-14

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.

Possible risk	Response
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:	
Risk 3:	
Risk 4:	



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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. Once the survey is completed, the data set will contain an additional data element that may be considered 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.

Signing below constitutes a recommendation of this PIA to the RRU Vice-President, Finance & Operations.		
Signature:		Date:
Name:	Privacy Officer, Royal Roads University Don Devenney	<u>10/13/2022</u>

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



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #d9e1f2; width: 20%;">Signature:</td> <td style="text-align: center;"></td> </tr> <tr> <td style="background-color: #d9e1f2;">Name:</td> <td style="text-align: center;">Nicole McDowell</td> </tr> </table>	Signature:		Name:	Nicole McDowell	Date: <u>10/17/2022</u>
Signature:						
Name:	Nicole McDowell					
AVP, Operations & Resilience	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #d9e1f2; width: 20%;">Signature:</td> <td style="text-align: center;">CLEVESQUE</td> </tr> <tr> <td style="background-color: #d9e1f2;">Name:</td> <td style="text-align: center;">Carolyn Levesque</td> </tr> </table>	Signature:	CLEVESQUE	Name:	Carolyn Levesque	Date: <u>10/22/2017</u>
Signature:	CLEVESQUE					
Name:	Carolyn Levesque					
Head of public body, or designate Only required if personal information is involved	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #d9e1f2; width: 20%;">Signature:</td> <td></td> </tr> <tr> <td style="background-color: #d9e1f2;">Name:</td> <td style="text-align: center;"><ENTER FULL NAME></td> </tr> </table>	Signature:		Name:	<ENTER FULL NAME>	Date: <DATE>
Signature:						
Name:	<ENTER FULL NAME>					



Royal Roads University

Privacy Impact Assessment

Employee Engagement Survey

PIA# 2022-14

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

Appendix C

ISO 27001:2013 Information Security Management Certificate