

Royal Roads
UNIVERSITY

**Royal Roads University
Privacy Impact Assessment
Employment Equity Census – “Everyone Counts”**

Part 1 – General

Name of Department/Branch:	Human Resources		
PIA Drafter:	Bev Hooper		
Email:	Bev.hooper@royalroads.ca	Phone:	250 391-4579
Department Contact:	Lisa Robinson, Associate Director, Human Resources		
Email:	Lisa.robinson.2robinson@royalroads.ca	Phone:	(250) 391-2600 ext. 4431

1. Description of the Initiative

Equity, diversity, and inclusion (EDI) initiatives carry great value for individuals, Royal Roads University, and the future. Universities as cultural change institutions, with their research, teaching and community engagement mandates, are uniquely positioned to affect national and international conversations; Royal Roads University (RRU) is a leader in this regard, taking its responsibility seriously to provide opportunities and venues to foster intercultural understanding and connection and to be a catalyst for reconciliation, diversity, equity and inclusion.

RRU is in the process of building its equity portfolio and increasing resources aimed at developing equity, diversity, and inclusion policies and practices. RRU is collecting data on current employees via an on-line census to accurately gauge the current workforce composition including those who identify as women, persons with disabilities, Indigenous peoples, members of visible minorities, sexual minorities, and/or gender minorities. The Canada Research Chairs as well as a review of comparative institutions locally, regionally and nationally best practices for collecting equity and diversity data were used to develop the census methodology, including efforts to encourage self-identification, how data would be used, and communication privacy measures. Consultations with the Diversity Action Group and various RRU stakeholders were conducted in the development of the census around language and the census questions.

Participation in the census is voluntary. Employees are strongly urged to complete the census as the responses contribute directly to having an accurate picture of the diversity of RRU's workplace. Employees are also encouraged to self identify to help set RRU equity, diversity, and inclusion

goals, measure goals, develop plans and strategies that improve the experiences of RRU faculty, staff and students. Employees are also advised that if they do not wish to self identify they can simply choose to not answer certain questions.

The census responses are not anonymous, however the census results will only be shared in aggregate form (fewer than 5 responses to any question will not be noted in order to protect the individual identities) with RRU's Census Administration team.

Data is being gathered on four designated groups – women, Indigenous people, visible minorities, and persons with disabilities) in RRU's workforce. In addition, gender diversity and sexual orientation are included in the equity census as RRU recognized that the four designated groups do not reflect all barriers.

RRU has adopted the questions and terminology provided by the Federal Government of Canada, specifically Statistics Canada, the BC Human Rights Commission, the UN and Convention on Human Rights of Persons with Disabilities.

The census will be sent out to employees by the RRU administrator via email. Employees complete the census and the results are collected by SurveyMonkey. The Census Administrator will only see numbers of completed census only. Hard copies of the census will also be provided to employees who do not have electronic access. These copies can be completed and placed into a sealed envelope that will be sent to Human Resources for manual entry. The employees who complete the manual copy will not be providing their identity on the form.

SurveyMonkey's servers will store all personal information on its servers located in Ottawa, Canada.

The census data will be used to develop actions and objectives to address equity, diversity, and inclusion at RRU.

RRU is committed to ensuring that this project meets privacy and security policies and practices and will manage the privacy risks associated with legislative requirements accordingly. Initiative risks are managed through a combination of technical, administrative and physical controls that mitigate the associated risk. This privacy impact assessment (PIA) is intended to ensure that this program is offered in a way that is compliant with the *Freedom of Information and Protection of Privacy Act* (FIPPA).

2. Scope of this PIA

This Privacy Impact Assessment (PIA) covers the collection, use, disclosure and security of personal information provided by employees who participate in the Equity, Diversity and Inclusion Census.

3. Related Privacy Impact Assessments

No other PIA's have been completed related to this initiative however a general SurveyMonkey PIA has been completed that speaks to the services that SurveyMonkey provides.

4. Elements of Information or Data

Employee name;

Select the group that best reflects your role at RRU:

- RRUFA Member
- CUPE Member
- Non-unionized Grades G, 1&2 (Administrative and Support Staff)
- Non-unionized Grades 3&4 (Professional/Technical Staff)
- Non-unionized Grade 5 (Supervisors and Managers)
- Non-unionized Grade 6-9 (President/Vice-Presidents/AVP/Dean/Director)

Self identification as an Indigenous person (yes/no);

Self identification as a visible minority (yes/no);

Self identification as a person with a disability (yes/no);

Self identification as a woman (yes/no);

Self identification as a person who is transgender, transsexual, two-spirit, gender non-conforming, gender variant, non-binary, agender, or who otherwise does not identify with the gender assigned at birth (yes/no);

Self identification as a person who is lesbian, gay, bisexual, queer or who otherwise does not identify as heterosexual (yes/no).

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

All census results will be stored on SurveyMonkey servers located in Ottawa, Ontario, Canada. Under the Special Terms of the Master Services Agreement between BCNET and SurveyMonkey, the Customer's census responses will only be stored in Canada as follows:

"British Columbia, Canada BC1. Privacy Provisions. Despite the provisions of Section 7.3 (Privacy) and the privacy policies of FluidSurveys and SurveyMonkey, the Customer's census responses (the "Census Data") will only be stored in Canada. SurveyMonkey employees and subcontractors (the "Customer Support Staff") will not access the Survey Data from outside Canada, except (a) when authorized by the Customer for the purpose of implementing, maintaining, repairing, troubleshooting or upgrading the customer's account or the Services (the "Customer Support Services"), or (b) for data recovery purposes in the event of a system failure. Customer Support Staff will only ask for authorization to access the Census Data as a last resort, after exploring every reasonable alternative. After receiving such authorization, Customer Support Staff will only access as much Census Data as required to perform the Customer Support Services and will limit the period of access to the minimum time necessary. If the Customer does not authorize access to the Census Data when reasonably requested to do so, the Customer acknowledges and agrees that as a consequence of the constraints imposed above, the Customer Support Services available to it in connection with the Services may be reduced or delayed and that any commitments, representations or warranties made by SurveyMonkey regarding Customer Support Services do not apply to accounts that have not enabled such access."

SurveyMonkey uses Amazon Web Services in the Canada (Central) Region. The data resides in discrete data centers on servers in Montreal, Quebec and at no time is stored or accessed outside of Canada.

6. Data-linking Initiative*

<p>In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	No
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	No
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	

7. Common or Integrated Program or Activity*

<p>In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
1. This initiative involves a program or activity that provides a service (or services);	Yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	No
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA

			Authority
1.	Census Participant completes census by answering all or a portion of the questions being asked. The census is sent to employees via a link provided no password is required to access the questions and/or complete the census.	Collection	26(c)
2.	Survey Monkey receives all census results as submitted by the Respondent. Census administrative team at RRU will aggregate the census results to protect the anonymity of the respondents. All census data will be aggregated to a minimum of five respondents.	Use	32(a)
3.	Each question in the census also has a text box where respondents can provide additional comments. Should this data contain any personally identifying information it will be redacted from the final census report by the EDI Census administrative team lead by Lisa Robinson, Associate Director, Human Resources.	Use	32(a)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized individuals could access the personal information in the system and use or disclose it for personal purposes (within RRU).	Only non-identifying census results are provided to RRU including any census' completed in hard copy format.	Low	High
2.	User's personal information is compromised in transmission to Survey Monkey. User's personal information is compromised in SurveyMonkey	SurveyMonkey has physical and technical security measures in place as well as privacy and security policies and contractual requirement	Low	High
3.	Inherent risks in providing access to the third party (SurveyMonkey)	All SurveyMonkey employees are required to abide by contractual obligations including the appended privacy protection schedule and any RRU related privacy policies and guidelines.	Low	Medium

10. Collection Notice

The following collection notice including notification of storage of personal information is provided prior to the collection of personal information:

RRU is committed to protection your personal privacy and maintaining the confidentiality of your participation in this census. Your personal information is subject to protection under the BC *Freedom of Information and Protection of Privacy Act* (FIPPA).

The census will be sent via web link to ensure that all responses are anonymous and that IP addresses of respondents are not collected.

Access to the census responses is limited to the census administration team within Human Resources lead by, Lisa Robinson, Associate Director. The data will be collected via SurveyMonkey and will be stored within Canada. The raw census data will only be accessible to the census administration team lead by Lisa Robinson, Associate Director, Human Resources, and the file is password protected. This information cannot be used to identify any individual and no demographic report will be generated where there are fewer than 5 respondents in any given category.

The census findings will be shared with the HR Governance Committee and the RRU employment community at large.

Your participation in this census will be very helpful to this important work.

Participation in this census is voluntary and the personal information collected by SurveyMonkey is not shared with RRU by SurveyMonkey in any identifying form.

Part 3 – Security of Personal Information

11. Please describe the physical security measures related to the initiative.

RRU:

Section 15(1)(I)

SurveyMonkey:

Section 15(1)(I), Section 21

12. Please describe the technical security measures related to the initiative.

RRU:

Section 15(1)(I)

Section 15(1)(I)

SurveyMonkey:

Section 15(1)(I), Section 21

13. Does your branch/department rely on any security policies?

RRU:

<http://policies.royalroads.ca/policies/information-security-policy>

SurveyMonkey:

SurveyMonkey maintains and regularly reviews and updates its information security policies at least on an annual basis. Employees must acknowledge policies on an annual basis and undergo additional training such as HIPAA training, Secure Coding, PCI, and job specific security and skills development and/or privacy law training for key job functions. The training schedule is designed to adhere to all specifications and regulations applicable to SurveyMonkey.

Security Policy: <https://www.surveymonkey.com/mp/legal/security/>

Privacy Policy: https://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=footer#three-two-respondent

Cookies Policy: <https://www.surveymonkey.com/mp/legal/cookies/>

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

RRU:

Only the Census Administrator for RRU has access to the personal information. Aggregated census results will be shared with the RRU Executive Team, the HR Governance Committee and the RRU employee community at large.

SurveyMonkey:

Section 15(1)(I), Section 21

Section 15(1)(I), Section 21

15. Please describe how you track who has access to the personal information.

RRU:

Access to the system is granted based on an individual's role – Census Administrator only.
RRU tracks access through RRU's active directory.

SurveyMonkey:

SurveyMonkey has a dedicated Trust & Security organization, which focuses on application, network, and system security. This team is also responsible for security compliance, education, and incident response.

Section 15(1)(I), Section 21

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

The census will provide a baseline of information that reflects a certain point in time. As the information is anonymous there is no mechanism for the individual to update their response to the census once submitted. An employee would have the opportunity to update their information in a future census.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

No

18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

NA

19. If you answered "yes" to question 17, do you have records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

NA

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No

<i>Please check this box if the related Information Sharing Agreement (ISA) is attached.</i>	NA
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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

<i>Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).</i>	NA
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22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

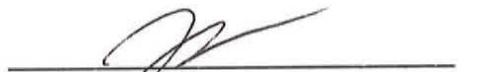
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Signatures:



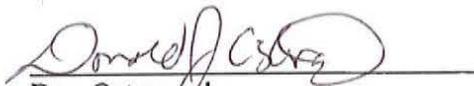
Bev Hooper
Privacy Consultant
Royal Roads University

May 3/19
Date



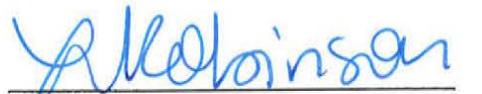
Jessica Spoin
Associate Director, Financial Services
Royal Roads University

May 7/19
Date



Don Ostergard
Chief Information Officer
Royal Roads University

6 May 2019
Date



Lisa Robinson
Associate Director, Human Resources
Royal Roads University

May 7, 2019
Date

Approved by:



Cheryl Eason
Vice-President and CFO
Royal Roads University

May 7, 2019
Date