



Privacy Impact Assessment for Non-Ministry Public Bodies

[FIRE-1186 ISO Website]

PIA#[assigned by your privacy office(r)]

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch:	Fire and Safety Division		
PIA Drafter:	Adam Lossing		
Email:	alossing@jibc.ca	Phone:	6045285668
Program Manager:	Charlene Jordan-Jones		
Email:	Cjordan-jones@jibc.ca	Phone:	6045285669

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

This initiative will create a publically accessible web site that contains information related to Incident Safety Officer information.

Project Description

This project is sub-project of FIRE-1186 Incident Safety Officer (ISO) course rebuild. As there are many modular learning objects in the ISO project, it has been agreed that a public facing WordPress site will be developed to share some of these objects.

Purpose

Given the high level of change that has occurred within the NFPA standards that ProBoard and IFSAC accreditation bodies adhere to, there is an attendant high need for a change management effort required to launch this course to our fire service clients.

Objectives



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This sub-project will heighten the profile of the course.

This sub-project will provide warm leads for course registrations.

This sub-project will lead potential students to JIBC's registration landing page for the course via a "Register Now" button

This sub-project will tie-in with the work of the JIBC Communications department, to leverage the work that they do to promote the FSD.

2. Scope of this PIA

This PIA covers the JIBC hosted website. The website uses JIBC hosted Wordpress as its platform. (A PIA for JIBC's Wordpress has already been submitted and approved).

3. Related Privacy Impact Assessments

JIBC Wordpress PIA, approved.

PIA Industry Mailout 2014.05.14

4. Elements of Information or Data

Visitors who want to access more than one chapter of the available courses are requested to provide their email contact information.

if personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.



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Part 2 - Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

No data is stored outside Canada.

6. Data-linking Initiative*

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.

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;	N/A
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.	N/A
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	



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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>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	Yes
<p>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;</p>	No
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	N/A
<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>	

**** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.***

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.

likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.



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Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access contact information and use or disclose it for personal purposes</i>	<i>Oath of Employment; contractual terms, etc.</i>	<i>Low</i>	<i>High</i>
2.	<i>Request may not actually be from client (i.e. their email address may be compromised)</i>	<i>There is no confidential data on the site so there is no value in attempting this.</i>	<i>Low</i>	<i>High</i>
3.	<i>Site could be compromised, exposing email contact information.</i>	<i>The site will be maintained behind a firewall, and other security measures will be applied, including regular patching to keep site up to date. This site will require closer monitoring than other wordpress sites for this reason.</i>	<i>Low</i>	<i>Medium</i>
4.				

8. Collection Notice

This initiative is not collecting any personal or confidential information. Only contact information is being collected and the user is asked if they approve of its use to contact them for future training opportunities. The following is the wording used:

I agree to receive emails containing news and updates. I am aware that I can withdraw consent at any time.

Mailing Address:
715 McBride Boulevard
New Westminster, BC V3L 5T4
Canada

Please ensure Parts 6 and 7 are attached to your submitted PIA.



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Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).

This project collects email contact information, only. The word press site is regularly patched. There is a small risk that the contact information could be compromised, but adequate measures are in place to mitigate against this possibility. A review of this aspect of the design of the website will be required upon completion of the site. Tighter controls on developer access to the production site or separation of the production site from their access is required.

George Jones

Privacy Officer/Privacy Office
Representative

George Jones

Signature

2017 Feb 14

Date



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Part 7 - Program Area Signatures

Peter Grootendorst
Program/Department Manager

[Signature]
Signature

FEB 14/2017
Date

George Jones
Contact Responsible for Systems Maintenance and/or Security
(Signature not required unless they have been involved in this PIA.)

[Signature]
Signature

2017 Feb 14
Date

PETER KINGSTON
Head of Public Body, or designate

[Signature]
Signature

2/15/2017
Date

A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.

