



Privacy Impact Assessment for Non-Ministry Public Bodies

Foundation Search Membership

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

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:	Office of Development		
PIA Drafter:	Yasmin Irani		
Email:	yirani@jibc.ca	Phone:	
Program Manager:	Tracy Campbell		
Email:	tcampbell@jibc.ca	Phone:	

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

1. Description of the Initiative

Foundation Search, a funding service offered through Metasoft Systems Inc. (a software development consulting company focusing on resources for the non-profit sector since 1988), provides North America’s leading source of foundation funding information for non-profits and charities. Its online resource includes more than 120,000 foundations, and tools to locate grants by type, value, year, recipient (organizations), donor (organizations) and historical giving trends.

A one-year subscription to Foundation Search will give the Office of Development/The JIBC Foundation access to a database that will help identify organizations to apply to for grants for student financial assistance, specialized equipment, technology, and innovative projects. The Office of Development has subscribed to this service in the past.



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2. Scope of this PIA

The Office of Development is shifting its focus to more grant-based philanthropy for fiscal 2021. The proposed one-year subscription to Foundation Search is a key element of this fundraising strategy. From our initial demonstration of Foundation Search, we understand that the Development Office/The JIBC Foundation will not be collecting or sharing any private information as part of this service. If we come across modules requiring such information and wish to use them, we will revisit the PIA.

3. Related Privacy Impact Assessments

NA

4. Elements of Information or Data

The only information to be collected from the client/subscriber is organization name, individual contact name, mailing address, email address, and method of payment for the subscription.

If personal information is involved in your initiative, please continue to the

If no personal information is involved, please submit Parts 1, 6, and 7 to



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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

S.15(1)(l)

[Redacted]

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;	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
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>	
1. This initiative involves a program or activity that provides a service (or services);	NA
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;	NA
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	NA
<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.

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

NA

9. Risk Mitigation Table

NA



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10. Collection Notice

NA

Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

11. Please describe the physical security measures related to the initiative (if applicable).

NA

12. Please describe the technical security measures related to the initiative (if applicable).

Attached.

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

Only JIBC's policies.

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.

NA

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

NA

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?

NA



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

NA

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 a 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.

NA

<p><i>Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).</i></p>	<input type="checkbox"/>
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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

NA

<p><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></p>	<input type="checkbox"/>
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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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NA

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).

Privacy Officer/Privacy Office
Representative

Signature

Date



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Part 7 – Program Area Signatures

<p>Tracy Campbell</p> <hr/> <p>Program/Department Manager</p>	 <hr/> <p>Signature</p>	<p>Sept. 28, 2020</p> <hr/> <p>Date</p>
<p>Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)</p>	<p>Signature</p> 	<p>Date</p> <p>2020 Sept 29</p>
<p>Derek Deacon</p> <hr/> <p>Head of Public Body, or designate [General Counsel and Chief Privacy Officer]</p>	<p>Signature</p>	<p>September 30, 2020</p> <hr/> <p>Date</p>

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.