



Privacy Impact Assessment for Non-Ministry Public Bodies

JIBCLive Training Site

PIA# 2017.001

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:	Human Resources		
PIA Drafter:	Melanie Chernoff, George Jones		
Email:	Mchernoff@jibc.ca	giones@jibc.ca	Phone: 604.528.5606 604.528.5501
Program Manager:	Melanie Chernoff		
Email:	Mchernoff@jibc.ca		Phone: 604.528.5606

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

1. Description of the Initiative

This is a system that will track JIBC employee training. Employees will be able to track and plan their efforts related to personal development.



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2. Scope of this PIA

This PIA covers the development, implementation and operations phases of this initiative.

3. Related Privacy Impact Assessments

There are no other related PIA's.

4. Elements of Information or Data

Employees name, work email, photo, and educational history.

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



S.15(1)(l)

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);	No
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.	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

N/A Does not include a common or integrated program or data linking initiative.

9. Risk Mitigation Table



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Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Code of Employment; contractual terms, etc.	Low	High
2.	System could be compromised by malicious third party	Security systems in place to protect data	Low	High
3.				
4.				

10. Collection Notice

The following notice will be displayed in a location on the website that is prominent and seen prior to employees participating in sharing information.

Any information you voluntarily enter into this website, including personal information, can be viewed by all employees of the Justice Institute of British Columbia. Information used on this site will not be used to make decisions that will directly impact individuals. This notification is given under S. 27(2) FOIPP Act. Please contact Barb Kidd to discuss any concerns about participating in this site at 604-528-5671. 715 McBride Blvd., New Westminster, BC, V3L 5T4.

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).

[Redacted]

S.15(1)(l)

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



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[REDACTED]

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

We have institute policies for security.

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.

We limit access within this system using role based access controls.

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

Access is controlled with the system.

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?

Individual employees have access to correct their own training information.

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

N/A

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?

N/A

Part 5 – Further Information



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

Only in the sense that any personal information an employee places on the site will be visible to all JIBC employees.

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).

N/A

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No

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).

N/A

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.

- 1. Title and Location: JIBCLive website: 715 McBride Boulevard New Westminster, B.C.*
- 2. Description and type of individual: Training and event attendance information of JIBC Employees.*
- 3. Authority to Collect: Employees are voluntarily entering this information.*
- 4. Purpose of Collecting: Encouraging JIBC employees to enhance their job related skills.*
- 5. Who uses the information: Used by JIBC Employees to help enhance their job related skills.*

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



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Part 6 - Privacy Office(r) Comments

This initiative is designed to share training and team building information voluntarily provided by employees. The shared information is accessible to all JIBC employees and the access is not logged. This information should not be used to make decisions about future employee prospects for advancement.

PETER KINGSTON

Privacy Officer/Privacy Office
Representative

[Handwritten Signature]

Signature

FEB. 7, 2017

Date



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Part 7 - Program Area Signatures

Dean SHCSJ

Program/Department Manager

Bleed

Signature

Feb 27/17

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 M

Date

VP, FINANCE

Head of Public Body, or designate

[Signature]

Signature

PETER KINGSTON

2/7/2017

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.

