



# Privacy Impact Assessment for Non-Ministry Public Bodies

## Not Myself Today

PIA#2019 006

### 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:	Jon Marks		
Email:	<a href="mailto:jmarks@jibc.ca">jmarks@jibc.ca</a>	Phone:	604-528-5644
Program Manager:	Jon Marks, Vice President, Human Resources		
Email:	<a href="mailto:jmarks@jibc.ca">jmarks@jibc.ca</a>	Phone:	604-528-5644

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

### 1. Description of the Initiative

*This section should provide a general description of the initiative and the context in which it functions. This could include the purpose of the initiative, its benefits, the larger process (if any) that it is part of, how it functions, the parties involved, etc. For example, the public body may want to overhaul its citizen engagement processes to better align with emerging self-service trends, or a program is moving forward because it is a priority project of the head of the public body.*

The Not Myself Today Mental Health Program is creating a web portal for training purposes. This will be in addition to the existing offline program. It is designed as a supplement to that existing program.

The program is designed to improve the mental health of JIBC employees.



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It is hosted by the Canadian Mental Health Association.

### 2. Scope of this PIA

*This section should explain, where applicable, exactly what part or phase of the initiative the PIA covers and, where necessary for clarity, what it does not cover. For example, if a public body is overhauling its citizen engagement process to better align with emerging self-service trends and is launching new website features, this particular PIA may only be about the public body's new blog. This blog would then be the "scope" of the PIA. This section may also describe what phase of the initiative this PIA covers.*

The scope of this PIA is the web portion of the Not Myself Today Mental Health Programme.

### 3. Related Privacy Impact Assessments

*This section should identify, where applicable, PIAs for other parts of the initiative or any PIAs that were previously completed for this initiative. To follow on from the above example, this section may cite a PIA that has already been completed on the public body's website or on the video site that the new blog will sometimes link to.*

None

### 4. Elements of Information or Data

*Please list the elements of information or data involved in the initiative. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area, like stumpage totals, fish license numbers, visitor centre stats, or hiring data.*

The web portal contains training material. Users create their own anonymous accounts to maintain confidentiality. The individuals are identified as JIBC employees. The system tracks completion of training material by individual.

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**

*Please provide a brief description of whether your information can be accessed from outside Canada, for example, by a service provider that is repairing a system, or if your information is being stored outside Canada, for example, in the “cloud”. If your data is stored within Canada and accessible only within Canada, please indicate this.*

All data will reside in 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;	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
<i>If you have answered “yes” to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</i>	



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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);	<b>No</b>
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;	<b>No</b>
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	<b>No</b>
<p><b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b></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.*



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

*Please provide a diagram and/or table that shows how your initiative will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged.*

*Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.*

*For ease of reference, the collection, use, and disclosure authorities in FOIPPA can be found in the appendices. If you do not know what the relevant authorities are, please contact your privacy office(r).*

*Depending on the complexity of your initiative, you may choose to provide one general diagram for the initiative, and more specific diagrams for particular components. If multiple organizations will collect, use, or disclose personal information, the diagram should identify how each organization is involved in the initiative.*

#### Personal Information Flow Table

	Description/Purpose	Type	FOIPPA Authority
1.	Use of material on the site is tracked by individual.	Collection	26(c)



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### 9. Risk Mitigation Table

*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.*

***Examples can be removed and additional lines added as needed.***

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Personal data is stolen.	Information is not personally identifiable.	Low	Low
2.	Support staff accesses information inappropriately.	Information is not personally identifiable.	Low	Low



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### 10. Collection Notice

*If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:*

1. *The purpose for which the information is being collected*
2. *The legal authority for collecting it, and*
3. *The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*

*Please include your proposed wording for a collection notice and where it will be located for individuals to read before collection takes place. You can also attach a screen shot or a copy of your form where the collection notice would be located. For further help with collection notices please see the "Collection Notice Tip Sheet" located on the [CIO's website](#).*

Upon accessing the website, employees are informed of the following:

Mental health is everyone's business.

Many of us are personally affected by mental health issues or illnesses. Join us in raising awareness and building a mentally healthy workplace through participation in *Not Myself Today*®.

We encourage you to explore this site and the tools and resources offered to support your own mental health and those who may be facing challenges.

Thank you for making mental health matter in your workplace.



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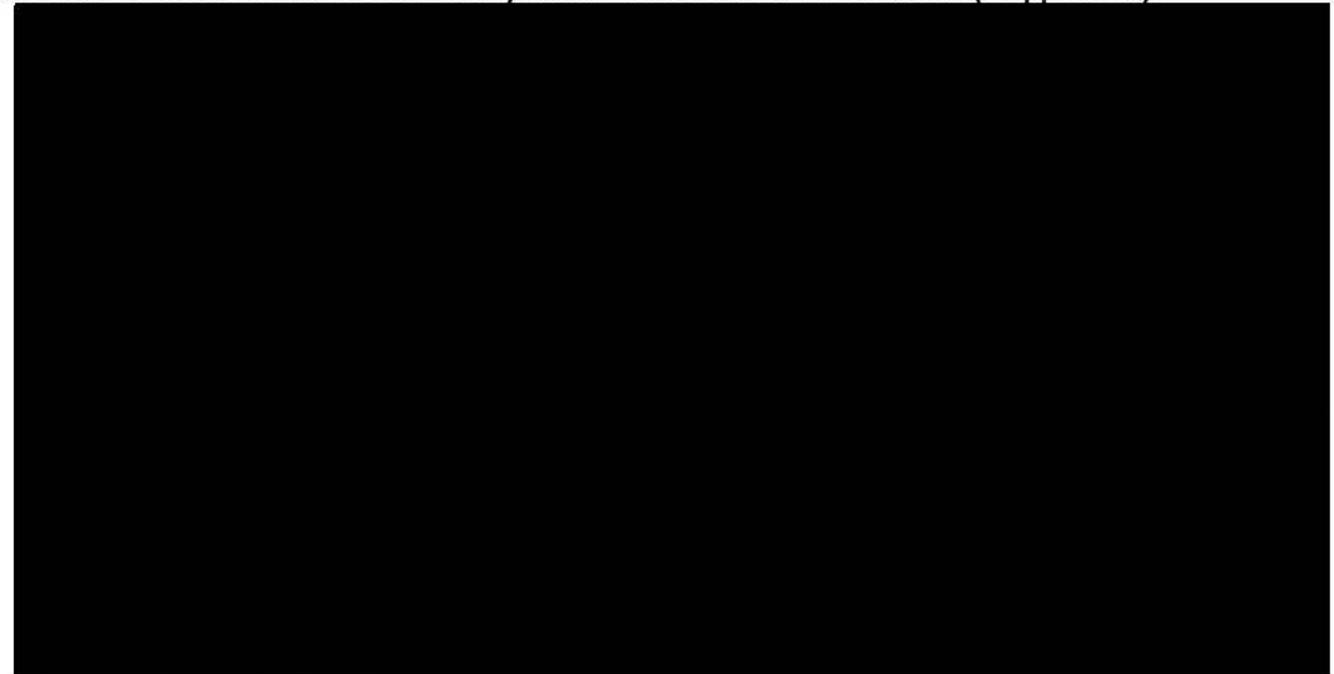
### **Part 3 – Security of Personal Information**

*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).**



**12. Please describe the technical security measures related to the initiative (if applicable).** S.15(1)(l)



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

JIBC Policy 2502 Information Security  
JIBC Policy 2503 Information and Educational Technology Acceptable Use  
JIBC Policy 3106 Freedom of Information and Protection of Privacy

**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.**

Canadian Mental Health Association is the system administrator. They have controls in place to limit access.

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

Canadian Mental Health Association is the system administrator. They have controls in place to limit access.



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### 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?

There is no personally identifiable information being collected.

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.

Not applicable

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?

Not applicable

### Part 5 – Further Information

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

*For example: your department has a regular exchange of personal information (both collection and disclosure) with the federal government in order to provide services to your clients.*

Reports are available to the HR Department at the Justice Institute that allows them to see individual and aggregate usage of the system by individuals. They are not able to identify the individual the information relates to.

***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).***



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

*For example: your public body will be disclosing information to PhD students so that they can conduct research.*

The personal information is identified to the JIBC, not the individual's name or other identifying information. The information is used to track the success of the programme.

***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).***

**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.**

*A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual.*

No

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).*

There have been appropriate steps taken to minimize the risk of personal information being compromised.

George Jones  
Privacy Officer/Privacy Office  
Representative

  
Signature

2019 May 16  
Date

George Jones



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### Part 7 - Program Area Signatures

Jon Marks

March 12, 2019

Program/Department Manager

Signature

Date

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

~~Signature~~

~~Date~~

Head of Public Body, or designate

Signature

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.***