



Privacy Impact Assessment for Non-Ministry Public Bodies

The FJSD Online Parenting After Separation Courses

PIA# 2020.005

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. Do

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:	Family Justice Services, Corrections & Court Services Division, School of Criminal Justice & Security		
PIA Drafter:	Helen Lee		
Email:	hlee@jibc.ca	Phone:	6045285858
Program Director:	Colleen Shaw		
Email:	Colleen.Shaw@gov.bc.ca	Phone:	6045515689

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

1. Description of the Initiative

Parenting After Separation and the Parenting after Separation for Indigenous Families are free information courses for B.C. parents and other family members experiencing separation or divorce and who are dealing with family issues including guardianship, parenting arrangements, contact, child support and spousal support. Sessions are sponsored by the Family Justice Services Division (FJSD) of the Ministry of Attorney General. The purpose of the courses is to help people make informed choices that focus on the best interests of the children.



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In some communities in British Columbia, parents must complete a Parenting After Separation course before going to court on matters such as guardianship, parenting arrangements (including parental responsibilities, parenting time), contact with a child and/or support as per Rule 21 of the Provincial Court (Family) Rule. This also includes changing an existing order for these matters.

The courses are currently offered online and FJSD is contracting the Justice Institute of BC (JIBC), a public body under the *Freedom of Information and Protection of Privacy Act* (FoIPPA), to deliver the courses.

The courses will be delivered online using a Wordpress course site (using Learndash plugin for course management). Learner tracking will include registration details and course completion. Wordpress and Learndash are downloaded onto servers located on JIBC New Westminster campus and back up in BCNet. The servers are maintained by JIBC.

Note that as part of the development of the course content, some stock photo, external videos and link will be used. The stock photo will be purchased and will be royalty free. Some of the videos will be internally developed by JIBC and stored on the Kaltura video hosting platform located in the Q9 Data Centre within BCNET'S network in Kamloops BC and some others will be linked within the course content that will direct learners to internet videos.

The Kaltura video platform service is a digital asset management system used by JIBC, a BCNET member, to make educational learning more interactive, engaging, and accessible. The shared Kaltura service offered by BCNET is a video platform that integrates with an JIBC'S Learning Management System and is hosted in the UBC EduCloud instance on premises at their UBC data centres. This ensures that it is secure, easily accessible and FoIPPA compliant. While JIBC manages the services as required, UBC and BCcampus provide staff to support, operate and maintain the service.

The Government Communications & Public Engagement (GCPE)'s Government Digital Experience (GDx) tool for analytic will be used to collect Web Analytics and assess the traffic to the website. Note that the GCPE'S GDx web analytics tool has been assessed as part of a previous GCPE PIA and will not be reassessed here. The information will be shared with FJSD for information purposes about the site performance. Aggregate learners data will also be provided to FJSD for course improvement and evaluation purposes only.



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2. Scope of this PIA

This PIA will assess the privacy implications of the development and implementation of the FJSD online Parenting after Separation courses.

3. Related Privacy Impact Assessments

Family Services:

PSSG16015 – Organizational Diagnostics Assessments

GCPE17011 – Core Analytics Pipeline Service (CAPS)

4. Elements of Information or Data

Learners will create an account and provide the following information:

- Full Name
- Email address
- Court location they will be attending
- Community and City
- Mailing address (if option to mail a hard copy of certificate is selected at the end of the course)

See the following link for an example of the data collected:

<https://parenting.familieschange.ca/user/register>

Additionally, the collected information will also imply that someone has taken the course, has children, and is going through separation or divorce.

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.

S.15(1)(l)

5. Storage or Access 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;	NA
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.	NA
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*

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.

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.	NA
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

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

Personal Information Flow Table – Course Creation			
	Description/Purpose	Type	FOIPPA Authority
1.	JIBC will create videos as part of the course content.	Collection	26(c)
2.	The videos will be posted on the website as part of the course.	Use	32(a)
3.	As part of providing learners with access to the course content, the personal information associated with the videos will be disclosed within and outside of Canada with consent.	Disclosure	33.2(a) 33.1(1)(b)
4.	Any stock pictures used are purchased.	Out of Scope of FOIPPA	3(j)



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Personal Information Flow Table – Course Completion			
	Description/Purpose	Type	FOIPPA Authority
1.	The individual will register for the course and create a profile, user ID, and password.	Collection	26(c) and (e)
2.	The course site will send a validation email to the registrant.	Use Disclosure	32(a) 33.1(7)
3.	The registrant will validate the email. The information is used to provide the individuals with access to the course.	Collection Use	26(c) 32(a)
4.	The system will collect the individual course progress and completion. Once the individual has completed the course, they will have the ability to print or request a hard copy of the course certificate.	Collection Use Disclosure	26(c) and (e) 32(a) 33.2(a) or 33.1(7)
5.	Once the individual has completed the course, the system will invite them to complete an exit survey. Note FJSD will use the survey tool assessed as part of PSSG16015.	No Personal Information	N/a
6.	Once the individual has participated in the survey, they will receive the option of providing additional feedback about the experience in a telephone interview. If interested, the individual will be asked to provide an email address and will be contacted by email to set up a time to discuss their experience.	Collection Use Disclosure Collection Use	26(c) 32(a) 33.1(7) and 33.2(a) 26(c) 32(a)
7.	JIBC will provide aggregate information about the course to FJSD.	No Personal Information	N/a
8.	JIBC technical team may access the information for maintenance and trouble shooting.	Disclosure Collection Use	33.1(1)(p) 26(a) 27(1)(b) 32(a) and (c)



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9.	BCNet technical team may access the information for maintenance and trouble shooting.	Disclosure Collection Use	33.1(1)(p) 26(a) 27(1)(b) 32(a) and (c)
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9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes.	Privacy Protection Schedule Privacy Training Code of Conduct	Low	High

10. Collection Notice

The following collection notice will be provided to course participants when they register for the courses:

“Your personal information is being collected in accordance with section 26(c) of the BC Freedom of Information and Protection of Privacy Act (FoIPPA). Your personal information will also be collected as per section 26(e) of FoIPPA in order to evaluate the course.

If you have questions about the collection of your personal information, please contact the

Should you have any questions about the collection, use, or disclosure of personal information, please contact the Program/Policy Analyst, Family Justice Services Division at:

*PO Box 922 Stn Prov Govt
Victoria, BC, V8W 9J1
or by phone at 778-698-8258.”*

The following collection notice will be provided to video/audio/photo participants:

“Your personal information is being collected as per section 26(c) of the Freedom of Information and Protection of Privacy Act to inform the Parenting after Separation courses. If



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you have questions regarding the collection of your personal information, please contact *the Program/Policy Analyst, Family Justice Services Division* at:

*PO Box 922 Stn Prov Govt
Victoria, BC, V8W 9J1
or by phone at 778-698-8258."*

Part 3 – Security of Personal Information

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

S.15(1)(l)

[Redacted]

[Redacted]

[Redacted]

[Redacted]



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[Redacted]

[Redacted]

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

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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

No.

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.

The access to the JIBC systems and email will be restricted based on roles and responsibilities.

[Redacted]



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

The website, the JIBC email system, and the related database have audit logs.

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 learners will have access to their own information in the system. If the learners need to update or correct information that is not available to them, the information will be either corrected or annotated and the information would not be provided to another party.

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 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



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Part 5 – Further Information

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

No

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).

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).

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.

Yes, a PIB will be created as part of this initiative.

Personal Information Bank – Required Information

Description	The personal information of individuals who have taken the online Parenting After Separation and the Parenting after Separation for Indigenous Families.
Primary ministry/government agency involved	Ministry of Attorney General, Justice Services Branch
All other ministries/government agencies and public bodies involved	Justice Institute of BC



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Business contact title	Program/Policy Analyst Family Justice Services Division
Business contact telephone number	778-698-8258

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).

Procedures need to be in place to delete personal information off of the site once the certificate is issued. The number of individuals who take the course is anticipated to be less than 100 per year. The risk is reasonable with this number. the number exceeds this amount, the security measures in effect should be reviewed and adjusted.



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George Jones Digitally signed by George Jones
Date: 2020.05.07 13:42:44 -07'00'

Privacy Officer/Privacy Office
Representative

Signature

Date



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Part 7 – Program Area Signatures

Rob Chong (Director CCSD)
Program/Department Manager

April 20, 2020

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

Mike Proud

Digitally signed by Mike Proud
DN: cn=Mike Proud, o=JIBC,
ou=Finance,
email=mproud@jibc.ca, c=CA
Date: 2020.05.08 06:54:51 -0700

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.