Privacy Impact Assessment for Non-Ministry Public Bodies

[Praxis]
PIA# *2016.001*

Part 1 – General

Name of Department/Branch:	Office of Applied Research and Graduate Studies
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In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

The JIBC Praxis Project aligns with Western Economic Diversification's strategic direction of innovation and skills development and training. This development of an enhanced Praxis environment (Praxis II) addresses innovation by capacity building in support of the commercialization of Praxis, the JIBC's web-based scenario simulation software, as well as related simulation design and development services.

This project will develop and expose Praxis, a made-in-BC technology developed by JIBC, to the marketplace and help demonstrate its pre-commercial application to engage commercial partners through the

establishment of the Praxis Industry Consortium. The Praxis Industry Consortium, already in place, is part of the Western Economic Diversification initiative and acts as an advisory group on Praxis features.

The intent is to add many external public and private clients to a list currently including Kinder Morgan and Enbridge. This project addresses skills development and training by increasing capacity of both JIBC and industry to train skilled workers in many sectors.

Through the Consortium, JIBC will work with members, such as Enbridge Inc., to develop and pilot simulations running on the Praxis platform across remote locations. Praxis is particularly suited to the expanding energy/natural resource sector in Western Canada, which has heavy regulatory requirements, a focus on safety, and a high demand for training.

Praxis I and Praxis II bring Industry and JIBC, an innovative post-secondary institution, together to explore training partnerships and approaches to increase training capacity related to safety and emergency management training. This has been identified by industry as critical to growth and success. The Praxis Advisory Council, consisting of major stakeholders in industry and post-secondary, will help guide the project towards its objectives.

WorkBC recognizes the role liquefied natural gas will play in BC's economic growth, while also recognizing that growth in the natural resource sector will require innovation. The Praxis project advances the Government of Canada's economic priorities in Western Canada such as responsible resource development. With the growing focus on transportation safety and emergency response planning following incidents such as those in Lac-Mégantic in 2013, Praxis is an ideal platform to train industry employees, communities, and first responders, as well as test and evaluate Emergency Response Assistance Plans.

As the JIBC has come to rely on the availability of the Praxis I and Praxis II for simulations with external clients, the applications are being moved to a cloud infrastructure for high availability and failover redundancy.

2. Scope of this PIA

The scope of this PIA covers both the Praxis I and Praxis II applications and their compliance with the Freedom of Information and Protection of Privacy Act of British Columbia. This PIA is initiated as a result of a change to the Praxis I and Praxis II application(s) and the potential requirement to have the supporting architecture to be hosted in a Microsoft Azure or other 'cloud' providers, potentially and predominantly hosted outside of Canada.

Related Privacy Impact Assessments

No other PIAs have been conducted at the JIBC with respect to Praxis I and Praxis II applications

3. Elements of Information or Data   S.15(1)(I)

The elements of information of data involved in the initiative are documents, images, streaming media and audio. A Praxis administrator will administer the credentials that allow users (all external) to gain access to Praxis content by simulation. There are no personal information data elements involved with this initiative
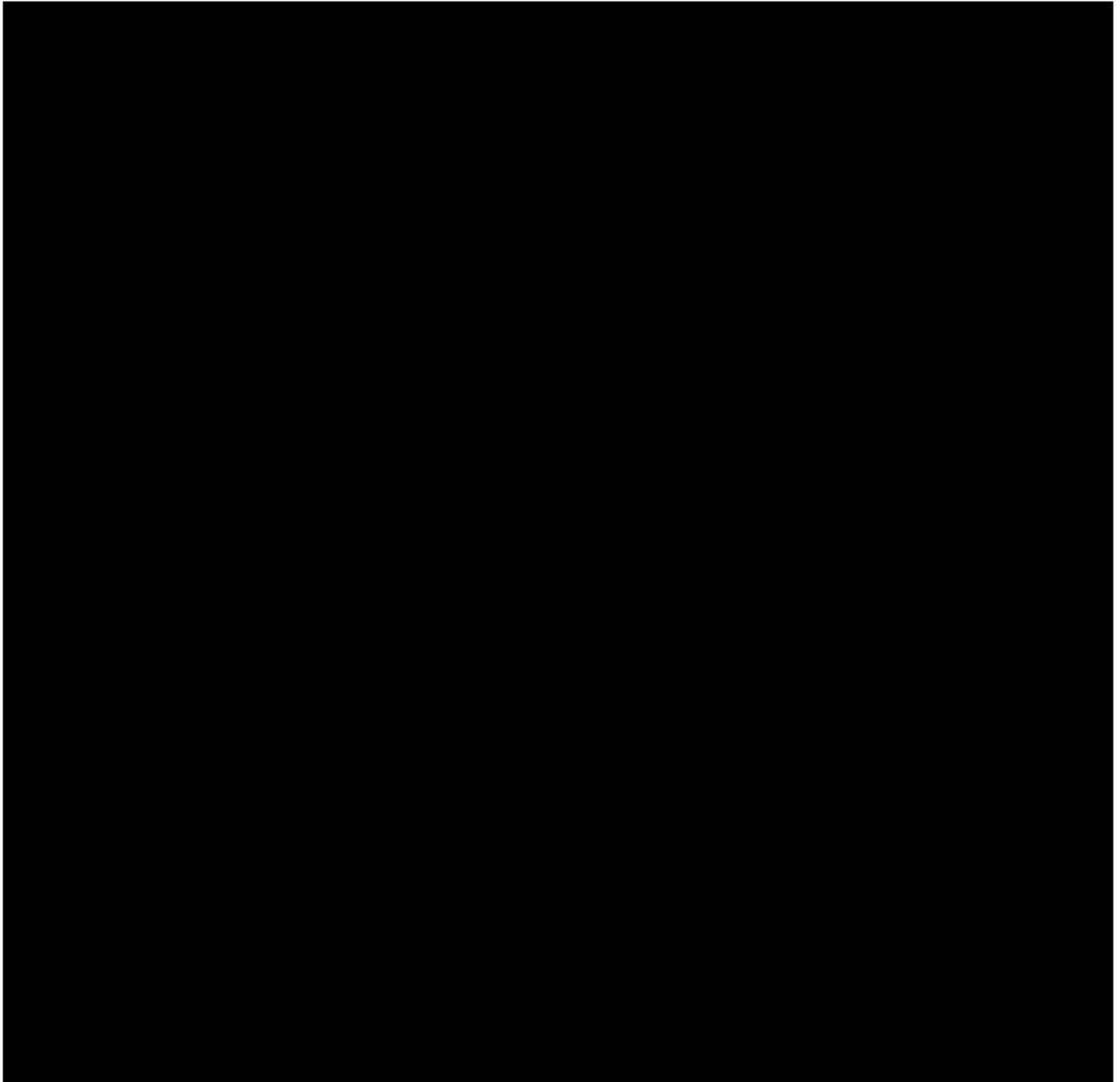
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> If personal information is involved in your initiative, please continue to the next page to complete your PIA.

> 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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As no personal information is involved, Only Parts 6 and 7 are attached to this PIA.

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).

1. *Confirm and ensure that UBC / OSCAREMR screens used in UBC simulations use a TEST instance of OSCAREMR and that test data contains no personal information*

2. *Recommend as an additional control that results (decisions, logs, products of simulations) of unique simulations be deleted and removed from storage areas of Praxis I and Praxis II following a successful simulation and reporting on same unique simulation*

3. *Continue to control and ensure anonymization of simulation participants (admin, pod1, pod2 vs John, Jake, Joan)*

4. *Recommend a preamble to participants not to provide or 'volunteer' personal information during a simulation*

5. *Observed weak Information Technology General Controls while conducting PIA – Recommend following stronger controls:*

    a. *Admin password expiry and reset after 60 days or following a unique simulation*
    b. *Pod password expiry and/or reset after 60 days of following unique simulation*
    c. *Mandate use of complex passwords for admin / pod participants*

6. *Inventory and control unique simulations and products of simulations with admins*

7. *Inventory, control and administer admin and pod accounts centrally.*

8. *Avoid re-using admin and pod account credentials for multiple simulations*

9. *Implement change control at the application administrative level*

10. *Depending on TBD Praxis model for licensing, develop own Privacy Notice or use and refer to JIBC's Privacy notice in Praxis application*

Additional Privacy Office(r) comments

NONE

Part 7 – Program Area Signatures

Robert Walker	_Walker_	2016, 07, 14
Program/Department Manager	Signature	Date
Luc Lang	_signature_	2016.07.14
Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)	Signature	Date
PETER KINGSTON	_Peter R. Kingston_	7/14/2016
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.