



# Privacy Impact Assessment for Non-Ministry Public Bodies

## Qualtrics Survey Software

PIA#2018-003

### 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:	Justice Institute of British Columbia		
PIA Drafter:	Tracey Carmichael		
Email:	<a href="mailto:tcarmichael@jibc.ca">tcarmichael@jibc.ca</a>	Phone:	604-528-5638
Program Manager:	Tracey Carmichael		
Email:	<a href="mailto:tcarmichael@jibc.ca">tcarmichael@jibc.ca</a>	Phone:	604-528-5638

### 1. Description of the Initiative

Qualtrics is a web-based tool that allows authorized JIBC staff, faculty, and students (with a faculty supervisor) to create, manage, and analyze their own web-based surveys. It is used for research projects and to gather stakeholder insights primarily for program planning and evaluation. It forms part of our quality assurance program and feeds data into JIBC performance metrics regarding student satisfaction.

Surveys are administered on an external server and may be distributed to respondents in numerous ways: sent by email, a web link, or off-line mobile app. They may be open and anonymous or require authentication by the respondent.



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All requests to administer surveys must be approved by the appropriate division. All applied research, including student projects, must demonstrate high ethical standards and be approved by JIBC's Research Ethics Board. Evaluation of respondent privacy and information security are paramount to that process and a part of all survey deployments. All surveys inform potential respondents about the research goals, reasons for information collection, and opt-out options.

Information is managed to meet Freedom of Information and Protection of Privacy requirements and JIBC policies related to:

- Records and Information Management,
- Information Security,
- Information and Educational Technology Acceptable Use,
- Research on Human Participants Ethics,
- Code of Conduct.

## **2. Scope of this PIA**

This PIA covers survey data collected and stored by Qualtrics.

## **3. Related Privacy Impact Assessments**

A general Fluidsurvey PIA for the BC government is available from Knowledge and Information Services, Office of the Chief Information Officer, Ministry of Labour, Citizen's Services, and Open Government.

## **4. Elements of Information or Data**

JIBC owns and controls all surveys, responses, and reports created with Qualtrics. Most surveys contain personal opinions and some may also contain identifying data for individuals when this is essential for the research purpose. Personal information is contained and available only to identified researchers and survey administrators. Information collected is reported in aggregate and anonymized to protect the identity of all individuals providing responses.

Hundreds of course evaluations are executed each year with Qualtrics, generating thousands of responses. Specific data collected includes:

- Student satisfaction
- Suggestions for improvement
- Instructor performance feedback
- Enrolment goals
- Demographics (age, educational attainment, gender)



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Other surveys have different goals and additional types of personal information may be collected including:

- Name
- Address, phone number, email (personal and business)
- Student number
- Educational history
- Employment history
- Citizenship, immigration status
- Self-declaration of Indigenous or disability status
- Financial information (student aid, income range)
- Health status/evaluation (stress, physical activity, history of trauma, etc.)

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 the 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**



15(1)(l)

**6. Data-linking Initiative\***

<p>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.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	Yes
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
<p><b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b></p>	



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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.	N/A
<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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority



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1	Optional - Survey invitation list created in Qualtrics by uploading invitees' email addresses	Use	32(a) 34
2	Optional – Additional personal information may be added to invitation list for the following purposes: <ul style="list-style-type: none"> <li>• To insert values into the survey. For example, to add a student's program of study into a question that asks them to about their experience in that program.</li> <li>• To add values to the response dataset that will permit more detailed analysis. For example, to add address (from student information system) to support geographic analysis.</li> </ul>	Use	32(a) 34
3	Survey sent from Qualtrics to respondents: <ul style="list-style-type: none"> <li>• By email from the invitation list, or</li> <li>• By sending anonymous link through Outlook, or</li> <li>• By posting a link on a JIBC website.</li> </ul>	Use	32(a)
4	Respondents receive the survey with the following options: <ul style="list-style-type: none"> <li>• Complete the survey, or</li> <li>• Click on a link to opt-out, or</li> <li>• Ignore the invitation.</li> </ul>	Collection	26(c), (d)(i), (e) 27(2)
5	Survey administrator creates a report of aggregate responses, ensuring no individual can be identified	Use	32(b)
6	Report is shared with stakeholders (program managers, directors, faculty, Deans, or contract training clients, etc.) through a web-link or downloaded to Word, CSV, PDF, or PowerPoint	Disclosure and use	32(b) 33.2(a),(c),(d),(l) 35
7	Optional – response dataset is exported in CSV, XML, SPSS to conduct more detailed analysis and reporting	Disclosure and use	32(b) 33.2(a),(c),(d),(l) 35

### 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*



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*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	
<b>1</b>	Survey operators leak personal information to other staff through reports and dataset downloads	Code of conduct; policies; training including data suppression policy for low response rates; Qualtrics account administration based on “need to know”	Low	Low
<b>2</b>	Respondents not informed about data collection authority and permitted uses	Notice incorporated into templates; training; ethics reviews for applied research	Low	Low
<b>3</b>	Data used to make decisions about individuals	Limits on data access; policies; training on data suppression; inquiries escalated to Privacy Officer	Low	Medium
<b>4</b>	Insecure data transfer	Secure storage through Qualtrics or on secure JIBC drives; policy and training to avoid sharing by email	Low	Medium
<b>5</b>	Disclosure outside of Canada	Data stored on secure servers in Canada; Qualtrics customer support not permitted to access JIBC surveys without IR Director review to assure not personal information is recorded	Low	Low

### 10. Collection Notice

Each survey provides a notice to respondents informing them about the purpose for which the information is collected, the legal authority for collecting it, and a contact at JIBC. The notice is provided in the invitation (typically email) and in the introduction to the survey.

For Applied Research, each ethics application includes the wording of the notice.



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Sample notice:

Your participation in this survey is both voluntary and important—only you can tell us about the quality and impact of a JIBC education.

Personal information, specifically the survey questions and your answers, are collected under the authority of the Colleges and Institute Act and the Freedom of Information and Protection Privacy for statistical research and administrative purposes. JIBC reports your responses without identifying information to provide confidentiality and protect your privacy.

If you have any questions or concerns about this survey, please contact: Tracey Carmichael, Director Institutional Research: 604-528-5638 or [tcarmichael@jibc.ca](mailto:tcarmichael@jibc.ca).

### **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]

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

S.15(1)(l)

[Redacted]

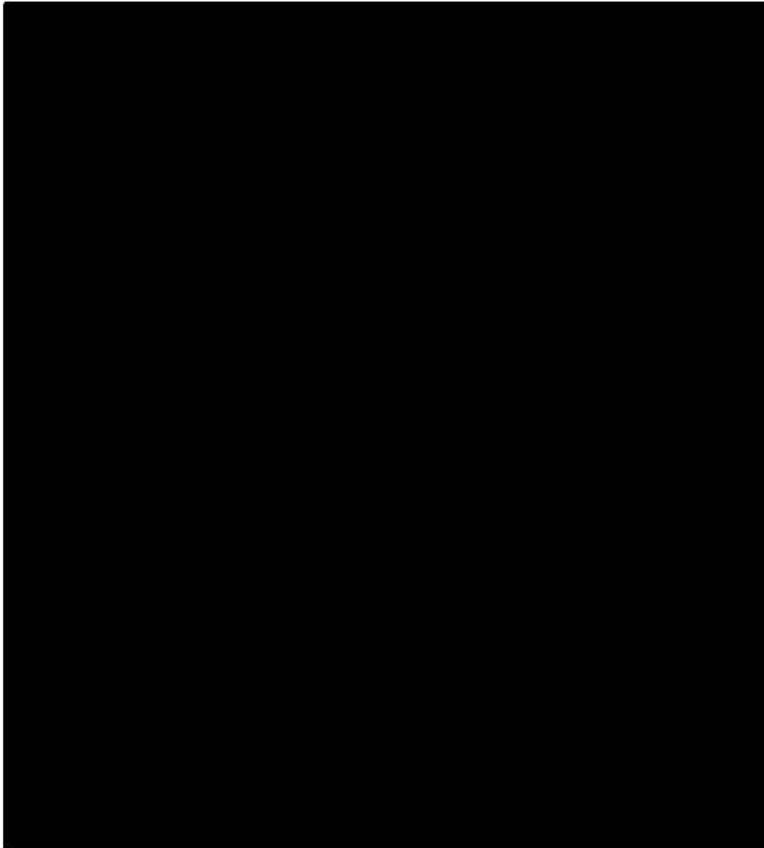


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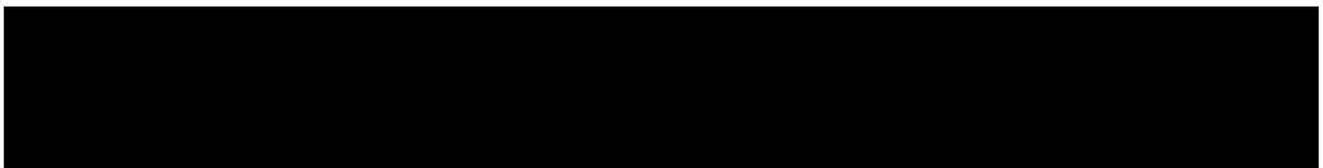
**13. Does your branch/department rely on any security policies?**

*Please describe any specific policies and procedures and provide contact details for someone who could answer further questions regarding these policies and procedures.*

**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.**

User access to Qualtrics is provided to JIBC employees with approved research purposes authorized by their supervisor. Surveys and data are shared only on a need-to-know basis to support research collaboration. When users change roles or leave JIBC employment, their access to Qualtrics is revoked.

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





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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?**

Respondents are typically permitted to withdraw their consent to participate in a survey or change their responses at any time. The survey owner is able to delete responses and relaunch the survey to provide a fresh opportunity to contribute or correct information.

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

Survey responses are reported in aggregate and do not identify individuals or their responses. However, aggregated feedback about the effectiveness of faculty through course evaluations may contribute to evaluation of an individual's performance.

- 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.**

Course evaluations are one of many feedback and evaluation mechanisms for faculty. Information will be suppressed and omitted from reporting where there is not a representative sample.

- 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?**

Yes.

### **Part 5 – Further Information**

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

No



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*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.**

Possibly. Each applied research proposal and agreement must be approved by JIBC Research Ethics Board.

*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.**

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).*

I am satisfied that sufficient security controls are in place.

George Jones  
Privacy Officer/Privacy Office  
Representative

George Jones  
Signature

2018 May 9  
Date



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### Part 7 - Program Area Signatures

Tracy Carmichael  
Program/Department Manager

[Signature]  
Signature

May 22, 2018  
Date

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

[Signature]  
Signature

2018 May 9  
Date

Kayoko Takachi  
Head of Public Body, or designate

[Signature]  
Signature

June 1, 2018  
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.***

