



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

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:	Jon Marks, Vice-President, Human Resources, JIBC		
PIA Drafter:	Jon Marks		
Email:	jmarks@jibc.ca	Phone:	
Program Manager:			
Email:		Phone:	

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

1. Description of the Initiative

This is an online training program called “Respect in the Workplace”. The program addresses a number of topics pertaining to respectful behaviour in the workplace including: harassment, bullying, discrimination and human rights. In addition to providing very beneficial and important training, this program assists JIBC in ensuring it is compliant with BC’s Human Rights legislation.



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

2. Scope of this PIA

All JIBC faculty and staff are expected to successfully complete this program. Successful completion requires a score of 80% or higher.

3. Related Privacy Impact Assessments

NA

4. Elements of Information or Data

To log onto the program, users must provide their first and last name and their division. These are the only identifiers which are asked. The system retains their test score.

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.



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

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

The data is only stored 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
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

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.	No
<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

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.



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

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.	JIBC Employees could access personal information and use or disclose it for personal purposes	This information is only available to staff in HR who are governed by acceptable use policies.	Low	Low
2.	Vendor's system is breached and test results released.	The vendor has taken appropriate steps to manage the risks of this occurring. The test results are not of a highly sensitive nature.	Low	Low

10. Collection Notice

The information collected will be used by Human Resources to ensure that JIBC employees have successfully completed the training program. The information is collected under the legal authority of the FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT [RSBC 1996] CHAPTER 165. Sections 31, 31.1, and 32. Only Human Resources has access to the test results. Any questions regarding access to the program and/or the collection of data from the program, should be directed to Linda Kydd, HR Advisor at hr@jibc.ca. 715 McBride Boulevard, New Westminster. 604 528 5508.

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).





Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

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



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



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.

A few individuals at Frame have access to the test results. The test taker has a single session and cannot see their test results on a second login. JIBC HR is the only group that can see only the completed test results by person's name.

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

There is no tracking. Only HR can access the test results.

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 information could be corrected by HR contacting Frame.

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

Yes, it could be reviewed to ensure that the employee had completed the course.

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.

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?



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

If you do not yet have a schedule, please document how these records will be kept until the schedule is in place. Please describe retention schedules that apply where retention exceeds the one year requirement of FOIPPA. Please contact your public body's privacy office(r) and/or records office(r) if you require assistance.

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.

No

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



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

Part 6 – Privacy Office(r) Comments

The system consists of a training module and a test. The individuals who take the test are given a shared userid and password account to access the system. They self identify with their first and last name and division. Once they complete the test, they can see the score and decide if they want to “submit” it. Once they submit the score, it is visible to staff in HR. They cannot log back in and see their score.

S.15(1)(l)



Any information that is used for making a decision about an employee must be retained for one year after the decision is made. This is not very sensitive data and the security measures in place are fit to the sensitivity of the data and the risk.

George Jones

Privacy Officer/Privacy Office Representative

Signature

2019 Jan 21

Date



Privacy Impact Assessment for Non-Ministry Public Bodies

Respect in the Workplace Training

PIA#2019-01

Part 7 – Program Area Signatures

Jon Marks

Program/Department Manager

[Handwritten Signature]

Signature

Jan 21/19

Date

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

Signature

Date

KAYOKO TAKEMURA

Head of Public Body, or designate

[Handwritten Signature]

Signature

3/29/2019

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.

