



# Privacy Impact Assessment for Non-Ministry Public Bodies

## Road Safety at Work – Online Courses

PIA 2019 015

### 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 BC, Driver Education Centre		
PIA Drafter:	Paul Monk		
Email:	pmonk@jibc.ca	Phone:	604-528-5660
Program Manager:	Joan Glover		
Email:	jglover@jibc.ca	Phone:	604-528-5784

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

### 1. Description of the Initiative

Road Safety at Work was a joint initiative between WorkSafeBC and Justice Institute of BC to help employers improve the safety of workers who drive for work or who work at the roadside. The mandate is to increase employers' awareness of their responsibilities for the "workplace on wheels" and deliver programs and resources to help reduce the number of work-related motor vehicle crashes, deaths and injuries on British Columbia roads.

Free online road safety courses have been developed for employers and employees. These courses are developed to provide practical, easy-to-use learning to help you improve road safety in the workplace.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015

The goal of this initiative is to reduce the costs, risks, and improve the quality of the site by:

- Transferring the responsibility for patching, security, and system administration to an expert Software-as-a-Service (SaaS) provider with demonstrated delivery capability and economy of scale in these areas.
- Transferring the operation of the platform to a SaaS provider who demonstrates contemporary best practices in architecture, security, and service management, in full-compliance with the Freedom of Information and Protection of Privacy Act (BC), notably sections 30, 30.1, and 33.1.
- Deliver consistency of content & configurations across development, staging, and production WordPress environments.

### 2. Scope of this PIA

To date, 7 online road safety courses have been developed and are active. There will be two additional courses developed in 2019 and 2020.

These courses are developed for the employer or supervisors of people who drive as part of their job, or someone that has role in making or implementing road safety decisions in their organization. An employer, supervisor or manager is responsible for the health and safety of employees when they are behind the wheel. These courses provide relevant information and guide participants through the free toolkits and resources available on the Road Safety At Work and Shift into Winter websites. The goal of these courses is to help build, implement and monitor policies, practices and procedures that work for each organization.

The scope of this PIA is the migration of the site (<https://roadsafetyatwork.jibc.ca/> and its alias <https://winterdrivingsafety.jibc.ca/>, including all subpages) to a selected, compliant WordPress SaaS provider.

### 3. Related Privacy Impact Assessments

No PIAs have been completed related to this initiative.

### 4. Elements of Information or Data

Each person registering for a course provides the following information:

- First and last name
- Email address

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

## *Road Safety at Work – Online Courses*

PIA 2019 015

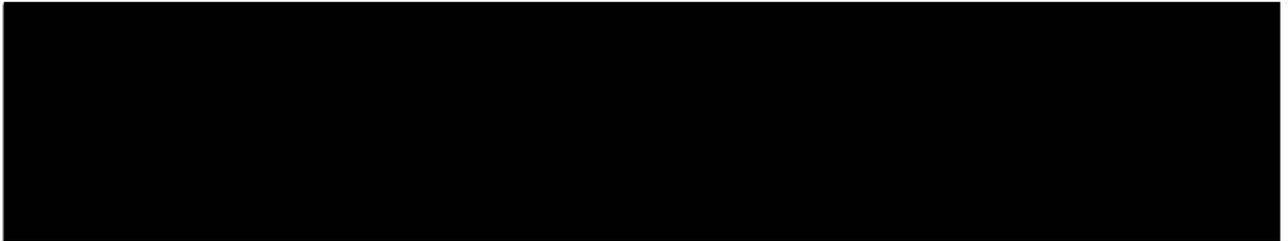
---

### **Part 2 – Protection of Personal Information**

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

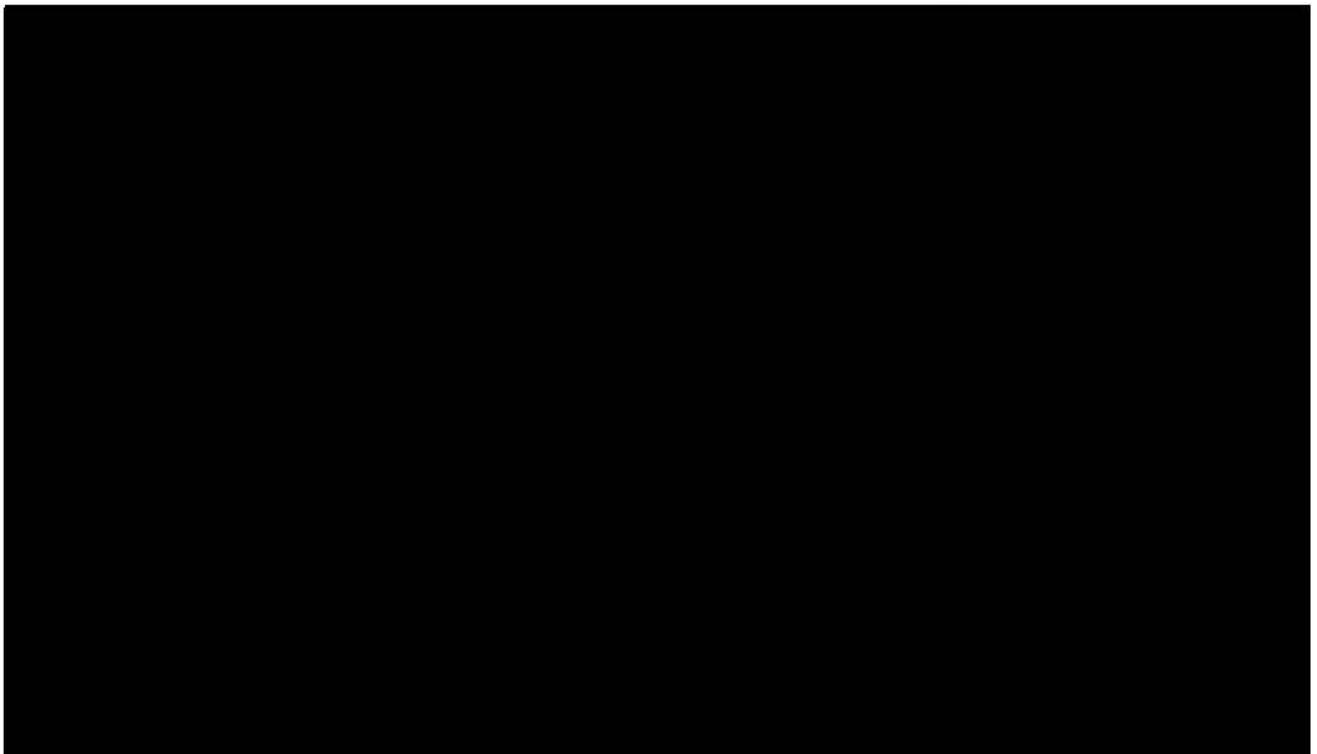
#### **5. Storage or Access outside Canada**

Storage



Access

S.15(1)(l)





# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015

### 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
<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>	



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015

### 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
<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>	

### 8. Personal Information Flow Diagram and/or Personal Information Flow Table Not Applicable



# Privacy Impact Assessment for Non-Ministry Public Bodies

## Road Safety at Work – Online Courses

PIA 2019 015

### 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.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	JIBC staff follow a code of conduct policy  All RSAW contractors and relevant JIBC staff have completed online privacy training	Low	High
2.	Request may not actually be from client (i.e. their email address may be compromised)	Implementation of identification verification procedures	Low	High
3.	Client's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure connection	Low	High
4.	Inherent risks in sending personal information to a client via email	Policy developed to inform clients of risk and ask if they would like the information via a different medium, such as through the mail	Medium	Medium

### 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.

**Not Applicable**



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015

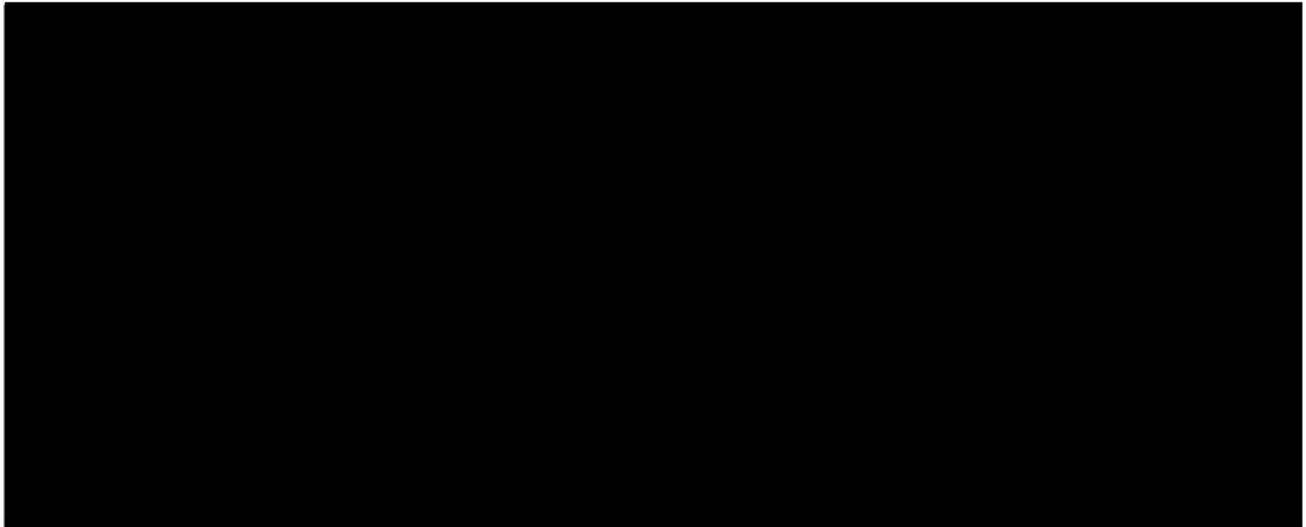
---

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

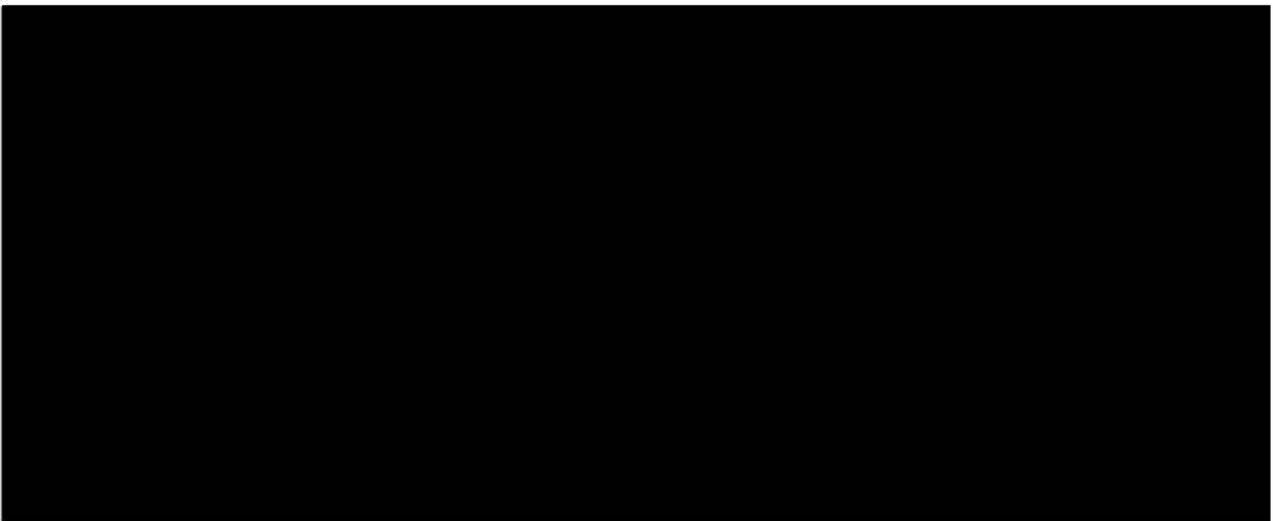
*If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.*

S.15(1)(l)

**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).**



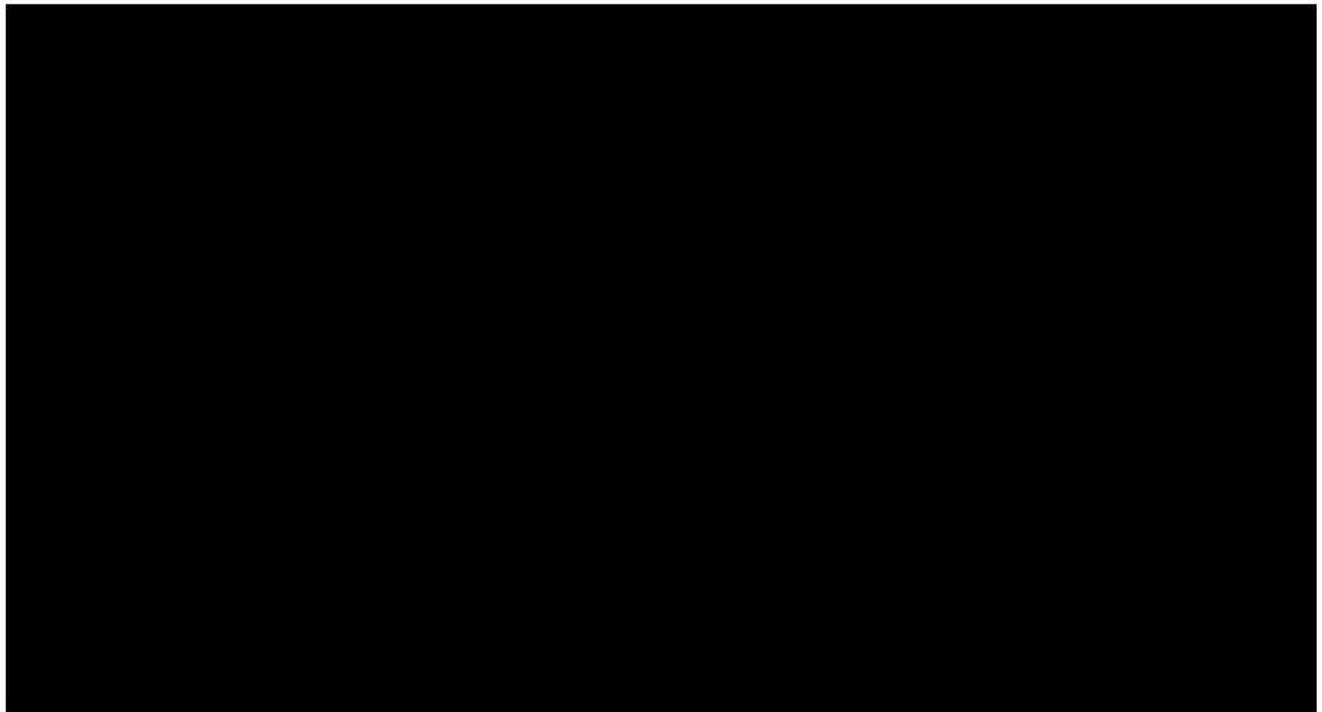


# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015

---

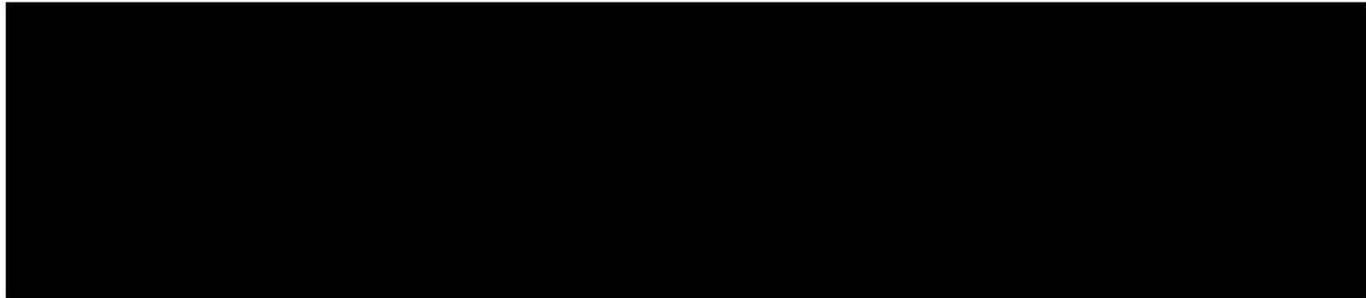




# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015



**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.**

*For example: role-based access.*

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

*For example: audit trails or physical sign-in and sign-out of files.*

### **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?**

Not Applicable

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

Not Applicable

**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



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015

---

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.

Not Applicable

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

Not Applicable

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.

Not Applicable

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



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *Road Safety at Work – Online Courses*

PIA 2019 015

---

### **Part 6 – Privacy Office(r) Comments**

*The site does not collect anything but name and email contact information. The security measures in effect are sufficient to reduce the risks of disclosure of the email and name*

*George Jones*

Privacy Officer/Privacy Office  
Representative

*George Jones*

Signature

*2019 Dec 12*

Date



# Privacy Impact Assessment for Non-Ministry Public Bodies

## Road Safety at Work – Online Courses

PIA 2019 015

### Part 7 – Program Area Signatures

*Joan Glover*

Program/Department Manager

*[Signature]*

Signature

*12/12/19*

Date

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

Signature

Date

*Mike Prood*

Head of Public Body, or designate

*[Signature]*

Signature

*Dec 20/19*

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.***