PRIVACY IMPACT ASSESSMENT (PIA)
CLOSURE SUMMARY

Initiative	VidCruiter
PIA Reference #	2023-xxx
PIA Completion Date	April 19, 2023
Project Sponsor	Kulwinder Sall – Director, People & Culture
Unit	People & Culture

The purpose of a PIA is to determine whether an initiative complies with the *Freedom of Information and Protection of Privacy Act* ("**FIPPA**") and JIBC's policies and procedures. This document is to advise that the PIA review of this initiative has been completed. The following outlines the scope, issues, legal basis and conclusions associated with this PIA.

Initiative Description & Scope

People & Culture have implemented VidCruiter as an applicant management system solution in support and furtherance of JIBC's recruitment activities.

Information Reviewed

Our review is based on the following information provided by the project team:

a) Completed PIA Risk Classification Tool, the summary of which is at Schedule A.
b) Completed PIA Questionnaire, completed by Kulwinder Sall, which is attached at Schedule B.
c) VidCruiter's SaaS Agreement, which is attached at Schedule C.
d) VidCruiter's Order Form, which is attached at Schedule D.

Risk Classification

Based on the information in the PIA Risk Classification Tool, JIBC's use of VidCruiter has a risk classification level of "**Very High**". Please see Schedule A for more information.

Legal Basis - Privacy

According to the PIA Questionnaire, the use of VidCruiter for its intended purpose will involve collection, use and disclosure of the following personal information:

• personal contact information;
• biographical and demographical information;
• academic and educational information;

- employment information; and
- opinions about individuals with respect to interview assessments.

Such information is permitted to be collected pursuant to section 26(c) of FIPPA, which states that a public body may collect personal information if the information relates directly to and is necessary for a program or activity of a public body. Pursuant to section 27(2) of FIPPA, a public body must ensure that an individual from whom it collects personal information is told: (a) the purpose for collecting it; (b) the legal authority for collecting it; and (c) the contact information of an officer or employee of the public body who can answer the individual's questions about the collection.

Pursuant to section 32(a) of FIPPA, a public body may use personal information in its custody or under its control for the purpose for which the information was obtained, or compiled, or for a use consistent with that purpose.

Pursuant to section 33(2)(d) of FIPPA, a public body may disclose personal information for the purpose for which the information was obtained or compiled, or for a use consistent with that purpose.

Pursuant to section 34 of FIPPA, a use or disclosure of personal information is consistent with the purpose for which the information was obtained or compiled if the use: (a) has a reasonable and direct connection to that purpose; and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Section 33.1 of FIPPA requires additional analysis be conducted when personal information will be stored outside of Canada. According to the PIA Questionnaire and the Order Form, personal information will be stored in Canada on the Amazon Web Services (AWS) Network.

VidCruiter is being used to support and further JIBC's recruitment activities. The personal information collected, used and disclosed in connection with VidCruiter's use for such purposes is supported under FIPPA, provided that individuals are provided a collection notice in accordance with section 27(2) of FIPPA.

Legal Basis - Security

Pursuant to section 30 of FIPPA, a public body must protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized collection, use, disclosure or disposal.

Conclusions

Based on the information provided, our review has concluded that there are no significant privacy or security risks introduced by this initiative provided People & Culture complies with the responsibilities listed below.

Responsibilities

People & Culture are responsible for informing individuals that we will be collecting personal information about the individual. Here is the form of collection notice that should be used:

"Your personal information is collected under the authority of section 26(c) of the *Freedom of Information and Protection of Privacy Act*. This information will be used in connection with JIBC's use of VidCruiter to support and further its recruitment activities. If you have any questions about the collection of this information, please contact _____."

Furthermore, People & Culture are responsible for Informing the General Counsel of any material omissions or inaccuracies in the information relied upon in this PIA, and submitting to the General Counsel a new PIA request if there are any significant changes to this initiative.

If you have any questions or concerns about this PIA, please contact the General Counsel.

Please see attached.

	IMPACT		Score
1	How many individual records will be stored, accessed or used?	1-1000	1
2	What is the most sensitive type of Personal Information in these records?	Student Information and Employee Information	7
3	Is any of the information owned by another organization?	No	2.5

	PROBABILITY		Score
4	Where will the information be stored?	██████	3
5	How many users will have access to the information?	101-250	3
6	Will a third party (e.g. vendor or service provider) have access to the information?	No	5.0

PIA Priority Rating Table						Colour Coding Key	Classification for this Project
Impact	Probability						
	1	2	3	4	5	LOW	21.5
1	1	2	3	4	5	MEDIUM	VERY HIGH
2	2	4	6	8	10	HIGH	
3	3	6	9	12	15	VERY HIGH	
4	4	8	12	16	20		
5	5	10	15	20	25		

S.15(1)(l)

Legend

CLASSIFICATION	
Risk_No.	Risk_Rank
1	LOW
2	LOW
3	MEDIUM
4	MEDIUM
5	MEDIUM
6	MEDIUM
7	HIGH
8	HIGH
9	HIGH
10	HIGH
11	HIGH
12	HIGH
13	HIGH
14	VERY HIGH
15	VERY HIGH
16	VERY HIGH
17	VERY HIGH
18	VERY HIGH
19	VERY HIGH
20	VERY HIGH
21	VERY HIGH
22	VERY HIGH
23	VERY HIGH
24	VERY HIGH
25	VERY HIGH

1- NUMBER OF RECORDS	
Records	Rec_Rank
1-1000	1
1,001-10,000	2
10,001-100,000	3
100,001-1,000,000	4
1,000,000+	5

2- INFORMATION TYPE	
PI_Risk	PI_Type
N/A - No Personal Information	0
Student Information	3
Donor, Alumni & Other Third Party Information	3
Credit Card Information	5
Employee Information	7
Health Information	7

4- LOCATION OF INFORMATION	
Location	Loc_Rank
▮▮▮▮▮▮	1
▮▮▮▮	2
▮▮▮▮▮	3
▮▮▮▮▮	5

3/6 - YES/NO	
Yes/No	Pos_Rank
Yes	5
No	2.5

5- NUMBER OF USERS	
Users	Use_Rank
1-10	1
11-100	2
101-1,000	3
1,001-10,000	4
10,001+	5

S.15(1)(I)

SCHEDULE B
PIA QUESTIONNAIRE

Please see attached.

SCHEDULE C
VIDCRUITER'S SAAS AGREEMENT

Please see attached.

SCHEDULE D
VIDCRUITER'S ORDER FORM

Please see attached.

PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE

for

Vid cruiter

1. Purpose of the Privacy Impact Assessment Questionnaire

This form is used by JIBC to provide a high-level overview of the potential privacy risks of a current or proposed policy, system, project, program or activity. The results of these screening questions help judge the level of potential risk, the extent to which risk mitigation strategies may be needed and when completion of a privacy impact assessment is required under the *Freedom of Information and Protection of Privacy Act* (British Columbia) (the "**Act**").

2. Privacy Questions

Questions	Answers
Does the program involve personally identifiable information (PII) (as defined by the Act)? [Y/N]	Yes
Will the program involve the collection or creation of new information about individuals? [Y/N]	Yes
Will personal information about individuals be disclosed to organizations, programs, processes or people who have not previously had routine access to the information? [Y/N]	Yes
Will personal information about individuals be used for a purpose it is not currently used for, or in a way it is not currently used? [Y/N]	No
Will the program require contacting individuals in ways that they may find intrusive? [Y/N]	No
Does the program have a collection notice or use policy? [Y/N]	?

3. Technology Questions

Questions	Answers
Does this program involve the implementation of a new electronic system or use of a new application or software to support the creation, collection, updating or storing, backing-up or disposition of personal information? [Y/N]	Yes
Does this program require any modifications to existing information technology (IT) systems (e.g., integration with or consolidation of other IT systems)? [Y/N]	No
Will a new or modified electronic system change the existing business workflow? [Y/N]	Yes
Does the program involve the use of new technology that might be perceived as being privacy intrusive? [Y/N]	No

4. Impact Questions

Questions	Answers
What are the purpose of collection, use and/or disclosure of the personal information? [Internal/External/Both]	Internal
Will personal information about the same individual that was previously maintained separately now be aggregated and stored together? [Y/N]	No
How would you describe the information classification level of the personal information? (Select all that apply) • Highly Confidential • Confidential • Public	Confidential
What are the type(s) of personal information? (Select all that apply) • Bio/demographic information • Academic/education Information • Employment information • Medical/health Information • Financial Information • Criminal information • Images • Opinions about individuals • Individuals' personal views and opinions • Business contact information • Personal contact information • Other	Bio/demographic information Academic/education Information Employment information ~~Medical/health Information~~ ~~Financial Information~~ ~~Criminal information~~ ~~Images~~ Opinions about individuals (Interview assessments) ~~Individuals' personal views and opinions~~ Business contact information Personal contact information
What are the type(s) of individuals? (Select all that apply) • Prospects • Applicants • Students • Employees • Donors/alumni/other 3rd parties • Volunteers • Service providers • Other	Applicants Students Employees

How many records documenting individuals will be stored, accessed, used or disclosed? [1-1000], [1001-5000], [5,001-50,000], [50,001-100,000], [100,000+]	1-1000
How many JIBC employees, volunteers and service provider employees will be able to access, collect, use or disclose the information? [1-10], [11-50], [51-100], [101-250], [251-500], [501-1,000], [1,000+]	101-250
Is any of the information owned by another organization? [Y/N]	

5. Probability Questions

Questions	Answers
Where will the information be stored? (Select all that apply) • On campus – JIBC servers • On campus – other • Off-campus – inside Canada • Off-campus – outside Canada	▬▬▬▬▬▬ S.15(1)(I)
Is any of the information accessed from outside of Canada? [Y/N]	N
Will personal information be transmitted? (Select only one) • Personal information is used in a closed system (i.e., no connections to the Internet, Intranet or any other system and the circulation of hardcopy documents is controlled) • Personal information is used in a system that has connections to at least one other system • Personal information is transferred to a portable device (i.e., USB key, diskette, laptop computer), transferred to a different medium or is printed • Personal information is transmitted using wireless technologies	Personal information is transmitted using wireless technologies
Will a third party (e.g., vendor or service provider) have access to the information? [Y/N]	?
Will the program result in different record keeping systems converging? [Y/N]	? (Does sharing onboarding information shared with Unit 4 count?