



# Privacy Impact Assessment for Non-Ministry Public Bodies

## Wordpress EMS Website

PIA# 2018.001

### 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:	JIBC School of Health, Community and Social Justice		
PIA Drafter:	Tannis Morgan		
Email:	tmorgan@jibc.ca	Phone:	7789916246
Program Manager:	Kathy Harms		
Email:	kharms@jibc.ca	Phone:	

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

### 1. Description of the Initiative

*EMR Microlearning is a Wordpress microlearning site produced for JIBC EMR training purposes. It was produced to support face-to-face EMR training for Indigenous communities, with funding from INAC. This site is a pilot project, hosted on [REDACTED] and it is anticipated that it will be moved to JIBC Wordpress infrastructure following the pilot.* S.15(1)(l)

### 2. Scope of this PIA

*This PIA covers the pilot of EMR Microlearning Site, which uses Wordpress hosted on Digital Ocean.*



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### 3. Related Privacy Impact Assessments

### 4. Elements of Information or Data

*There is no personal information or personal data being collected. Student registration information is held in Colleague. For the pilot, JIBC will manually authenticate (approximately 20) students into the Wordpress site. The site tracks user progress associated with the Wordpress ID but does not collect any personal information.*

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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### 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

S.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;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	NA
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.	NA
<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);	Yes
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><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></p>	

### 8. 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.	Employees could access personal information and use or disclose it for personal purposes	Oath of Employment; contractual terms, etc.	Low	High



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2.	<i>Request may not actually be from client (i.e. their email address may be compromised)</i>	<i>Implementation of identification verification procedures</i>	<i>Low</i>	<i>High</i>
3.	<i>Client's personal information is compromised when transferred to the service provider</i>	<i>Transmission is encrypted and over a secure line</i>	<i>Low</i>	<i>High</i>
4.	<i>Inherent risks in sending personal information to a client via email</i>	<i>Policy developed to inform clients of risk and ask if they would like the information via a different medium, such as through the mail</i>	<i>Medium</i>	<i>Medium</i>

### 9. Collection Notice

*No personal information is collected, related to this website.*

### **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).*

This initiative collects no personal or confidential information. There are no privacy concerns.



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### Part 7 - Program Area Signatures

Kathryn Harms  
Program/Department Manager

[Signature]  
Signature

2018 Jan 25  
Date

George Jones  
Privacy Officer/Privacy Office Representative

[Signature]  
Signature

2018 Jan 25  
Date

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

[Signature]  
Signature

2018 Jan 25  
Date

Kayoko Takami  
Head of Public Body, or designate

[Signature]  
Signature

2018 Jan 25  
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.***