



# Privacy Impact Assessment for Non-Ministry Public Bodies

## 2017 Employee Engagement Survey

### 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:	Human Resources, Camosun College		
PIA Drafter:	Daryl Thomson		
Email:	<a href="mailto:thomsond@camosun.bc.ca">thomsond@camosun.bc.ca</a>	Phone:	250-370-3019
Program Manager:	Daryl Thomson		
Email:	<a href="mailto:nansly@camosun.bc.ca">nansly@camosun.bc.ca</a>	Phone:	250-370-3019

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

### 1. Description of the Initiative

Camosun College is undertaking a comprehensive voluntary employee engagement survey between October 17 and October 31, 2017. The survey is being conducted in accordance with the organizational goals and strategies outlined in the 2014 People Plan – a guiding framework and strategy document created to position the college as a leading employer in the post-secondary sector. Employee engagement is recognized as critical to the college's recruitment and retention efforts and also supports high levels of work-related performance. The ultimate goal of improving employee engagement at Camosun College is to ensure the attraction of the best students and a sustainable future for the college [*Camosun College People Plan, 2014*].



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

---

In June 2017, the college signed a Memorandum of Understanding with BC Stats to design, deliver, analyze, and report the findings of an online voluntary engagement survey accessible to all continuing and term employees.

BC Stats was selected by Camosun College to administer the 2017 employee engagement survey due to their prior involvement administering and analyzing Camosun's 2015 survey. Additionally, BC Stats was reconfirmed as Camosun's survey provider due to its international reputation and experience with data collection and analysis services with a specialization in surveys of individuals (including employees) and other research related to the public sector. The expertise provided by BC Stats includes advice on establishing research objectives, developing population lists, appropriate sampling techniques, questionnaire design, pretesting questions, editing and tabulating data, and reporting accurately on the findings.

BC Stats has garnered extensive experience with employee engagement theory, metrics, modelling and survey administration by delivering the BC Public Service's employee engagement survey since 2006. In addition, third party-delivery of Camosun's survey provides scope for an independent, unaffiliated, and unbiased analysis of survey results.

BC Stats has the authority to "collect, compile, compare, analyse, abstract, project and distribute statistical information" pursuant to section 5(1) of the *Statistics Act*, and, under FOIPPA, to collect personal information under 26(a), (c), (e), and 27(1)(b), and, to use this information under 32 (c).

In general, employee engagement surveys are valuable sources of employee feedback regarding the various drivers and dimensions of employee engagement. The survey results at Camosun College will be used to:

- facilitate conversation among workgroups in order to validate aggregate survey results;
- recognize existing workplace practices that are currently supporting engagement; and
- create action plans that address aspects of the workplace experience that require improvement.

Camosun's 2017 engagement survey will also provide benchmark data that can be used to measure organizational progress against future engagement survey administrations which are currently scheduled for every two years.

At present, Camosun College does not have dedicated resources assigned to the Privacy role. In the interim, the college retains privacy advisory services from an external consultant to ensure they are managing and meeting all of their privacy obligation under FOIPPA. Once the Privacy Impact Assessment for this current project has been reviewed by the Executive Director of Human Resources



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

and Camosun's external privacy consultant, it will be sent to the college's VP, Administration for final sign off and filing.

In order to facilitate BC Stats' administration of Camosun's survey, a transfer of personal information will occur between the two organizations wherein the personal information and employee contact information associated with all eligible survey respondents is electronically transferred from Camosun College to BC Stats.

This information transfer is required for two primary reasons:

- it enables BC Stats to send individualized email invitations to eligible survey respondents on the first day of the survey using Camosun College email addresses. Each personalized email will contain a link to Camosun's survey located on BC Stats' secure survey site as well as an individualized survey access code that is required prior to starting to complete the survey; and
- it enables BC Stats to link individual employee responses to individual survey questions which is critical in the creation of aggregate response reports based on employee affiliation with various criteria including: workgroup, school/department, bargaining unit, length of service, age cohort, appointment status, and campus location.

BC Stats has indicated that the college-level quantitative results will be available in early January, 2017 with the qualitative data themes presented a few weeks following. At no time will BC Stats provide Camosun College with individual employee-level responses but will only provide aggregate results for workgroups equal to or greater than twenty employees and where more than fifty percent of possible respondents complete the survey.

Post-survey quantitative reports will only be generated for the following groups:

- Overall college-wide results;
- School or Department-level results;
- Program-level results where there are twenty or more eligible employees and where at least fifty percent of eligible respondents complete the survey.

BC Stats will complete a thematic analysis of qualitative data received in response to one open-ended question posed to survey respondents. At no point will Camosun College be provided with all of the verbatim comments provided by participants. Instead, the data will be presented back to Camosun as generalized, themed, representative categories that render it impossible to identify an individual respondent. A limited number of full quotes or fragments of quotes may be included in the final report as illustrative examples of the type of comments that constitute each theme.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

### 2. Scope of this PIA

This Privacy Impact Assessment (PIA) covers the collection and use of personal employee information in support of Camosun College's 2017 employee engagement survey. In particular, this PIA details the creation of a master data list that contains specific fields of personally identifying information of eligible survey respondents. The personal information contained in the master list will be transferred from Camosun College to BC Stats in order to:

- Email personalized invitations and completion reminder notices to all eligible survey participants;
- Enable BC Stats to reconstruct Camosun's organizational hierarchy for the purposes of creating multi-level statistical survey reports; and
- Enable BC Stats to sort, group, analyze, and report on survey results stratified by employee demographics and employment-related categories (e.g., age, gender, campus location, bargaining unit affiliation, etc.).

### 3. Related Privacy Impact Assessments

A privacy impact assessment was created in relation to the College's 2015 engagement survey. In addition, BC Stats has filed a General PIA (CITZ13091) with the provincial Office of the Chief Information Officer (OCIO) which details how BC Stats manages the receipt, security, storage, and use of personal information transferred or exchanged during the course of their data collection processes.

An Information Sharing Agreement (ISA) between Camosun College and BC Stats was signed into effect on 08/18/15 and remains in force for the 2017 engagement survey process. A copy of the signed ISA is attached for reference.

### 4. Elements of Information or Data

The specific elements of data transferred to BC Stats that are considered personal information under FOIPPA are:

- Name (First and Last)
- Colleague ID Number (Employee Number)
- Bargaining Unit Affiliation (BCGEU/CCFA/CUPE/EXEMPT)
- Age (given in years, not transferred to BC Stats as employee birthdate)
- Gender
- Employment Status (Continuing FT/PT or Term FT/PT)
- Length of Service (given as years, not transferred to BC Stats as calendar start date)



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

---

The following data elements transferred to BC Stats are considered employee contact information according to FOIPPA and are therefore not identified as personal information:

- Work email address
- Work location (Lansdowne campus / Interurban campus)
- School or Department affiliation
- Program or service delivery affiliation.

No other data elements other than those identified above will be shared between Camosun College and BC Stats.

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

## *2017 Employee Engagement Survey*

---

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

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

Personal employee information is collected by Camosun College at the point of hire in order to initiate payroll transactions, confirm appointment status, work location, program and school affiliation, and employee group. Human Resource Assistants manually input personal information from paper documents (e.g.: TD1, TD1BC, applicant resume, appointment notice generated by the hiring school/department) into “**Colleague**” – the College comprehensive database that stores all student and employee information. The legislative authority for the College to collect personal information upon hire is found in sections 26 and 27(f) of the FOIPPA. Access to Colleague is granted to various individuals throughout the college based on role-specific job duties and a need-to-know basis. Access to detailed employment and payroll information is restricted based on system permissions created at the time a password is issued. All data entered into the Colleague database is stored on Camosun College servers located onsite.

All data provided to and acquired by BC Stats from Camosun College will be stored on BC Stats secure servers located in Canada. Once Camosun’s employee data is received by BC Stats, it is their responsibility to ensure the protection and privacy of the college’s information as prescribed by the Memorandum of Understanding between Camosun College and BC Stats and as further detailed an Information Sharing Agreement signed by both parties.

As a public body, BC Stats collects, stores, and uses third party data according to the terms and conditions contained in their *Public Sector Research & Evaluation Surveys Privacy Impact Assessment (CITZ13091)* signed in June 2014 and on file with the provincial government’s Office of the Chief Information Office (OCIO).



# Privacy Impact Assessment for Non-Ministry Public Bodies

## 2017 Employee Engagement Survey

### 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

## 2017 Employee Engagement Survey

### 6. Common or Integrated Program or Activity\*

<p><b>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.</b></p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	No
<p>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;</p>	No
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	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>	

### 7. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1	Camosun College accesses the <i>Colleague</i> information system to extract employee data based on a pre-determined list of required fields and extracted data is set into an Excel spreadsheet (master list)	<i>Use</i>	32.a
2	Data in Master List is audited internally in Human Resources for accuracy and validity	<i>Use</i>	32.a
3	Encrypted and password protected Master List Excel spreadsheet uploaded to BC Stats' SharePoint Site using Microsoft Internet Explorer	<i>Disclosure</i>	33.1 (1) (e.1)



# Privacy Impact Assessment for Non-Ministry Public Bodies

## 2017 Employee Engagement Survey

4	BC Stats uses the master listing to launch the CC Employee Engagement Survey	<i>Use</i>	<i>32.a</i>
5	BC Stats uses the data collected through the survey to conduct statistical analysis of the information and provides CC with aggregate quantitative and themed qualitative data reports	<i>Use</i>	<i>32.a</i>

### 8. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized individuals could access survey Master List information prior to transfer to BC Stats	Oath of Employment and policy framework; <b>Section 15(1)(I)</b> <b>Section 15(1)(I)</b> user access to file based on need to know; file stored on SharePoint site with restricted access permissions	<i>Low</i>	<i>High</i>
2.	Master List data is accessed by unauthorized individuals during data transfer to BC Stats SharePoint site	<b>Section 15(1)(I)</b>	<i>Low</i>	<i>High</i>
3.	Camosun employee data is compromised within BC Stats	Access to BC Stats' SharePoint site is strictly limited to the Camosun College survey project team members and BC Stats project team who have an authorized IDIR or BCeID account (based on user need to know) and have been granted access to the site. <b>Section 15(1)(I)</b>		



# Privacy Impact Assessment for Non-Ministry Public Bodies

## 2017 Employee Engagement Survey

Section 15(1)(I)			
	<p>All individuals who have access to BC Stats' data servers have been sworn in under the Statistics Act with respect to protecting the confidentiality of individual-level data.</p>		

### 9. Collection Notice

A college-wide communication notice will go out in advance of the launch notifying all employees of this initiative and indicating that personal information provided at the time of hire will be provided to BC Stats. The same notification will be provided at the time the survey is launched.

Recommended language to be used to inform employees about the transfer of Personal Information to BC Stats is:

*Please be advised that in order to facilitate and administer this survey, Camosun College will be sharing a minimum amount of personal information with BC Stats that was collected from you when you were hired at the college. Personal information shared with BC Stats includes:*

- *Name (first and last)*
- *Colleague ID Number*
- *Employee Group (BCGEU, CCFA, CUPE, Exempt)*
- *Age (in years)*
- *Gender*
- *Employment Status*
- *Years of Service at Camosun.*

Survey respondents will be informed at multiple points during the survey process about the purpose of the survey, of the confidentiality of the information provided, and the voluntary nature of the survey.

[Email invitation] *Your answers will be kept confidential in accordance with the Statistics Act and will only be used for statistical research purposes. When survey results are provided to*



# Privacy Impact Assessment for Non-Ministry Public Bodies

## 2017 Employee Engagement Survey

*Camosun College, your responses will be combined with the responses of others so that you cannot be identified.*

[Survey Intro] Include statement to the effect that:

- *the survey is voluntary but that participation is strongly encouraged;*
- *the information in the survey is collected and kept confidential in accordance with the Statistics Act and will be used exclusively for research purposes that support Camosun College's employee engagement efforts;*
- *BC Stats will be reporting on aggregate survey responses only, and according to various demographic variables including age, service years, gender, employee group affiliation, and current employment status;*
- *When survey results are published, individual responses will be combined with the responses of others so that no single person can be identified; and*
- *BC Stats adheres to stringent legislative requirements that ensures all information provided by Camosun College is securely stored, retrieved and deleted as agreed to by both BC Stats and Camosun College.*
- *[End of Survey] The information in this survey is collected and disclosed under Section 26 and 33 of the Freedom of Information and Protection of Privacy Act (FOIPPA). It is collected and kept confidential in accordance with the Statistics Act for statistical and research purposes. When survey results are published, your responses will be combined with the responses of others so that you cannot be identified.*

### **Questions?**

*Please consult Frequently Asked Questions if you have any questions or run into technical difficulties.*

### **Contact information for questions about the FOIPPA, access and privacy**

*Martin Monkman  
Provincial Statistician, BC Stats  
Service BC  
PO Box 9410 Stn Prov Govt  
Victoria, BC V8W 9V1  
Telephone: (250) 216-5848*



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

---

Contact details for additional information regarding the transfer or use of personal information will be available in a FAQ document located on Camosun's employee engagement intranet site. Employees will also be informed they can contact Daryl Thomson, HR Specialist within Camosun's HR department with privacy related questions. Questions can also be sent to a dedicated email at BC Stats that is monitored by the Project Analyst.

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

**10. Please describe the physical security measures related to the initiative (if applicable).**

# Section 15(1)(I)



**Privacy Impact Assessment for Non-  
Ministry Public Bodies**  
*2017 Employee Engagement Survey*

---

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

**Section 15(1)(I)**



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

---

# Section 15(1)(I)

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

All employees of Camosun College's Human Resources Branch are required to sign and adhere to the following security-related policies:

- O-1.1: Use of College Resources - To ensure that college resources are used for work-related purposes and that employee actions support and sustain an environment of accountability and responsibility;



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

- O-1.2: Systems and Network Administration - Establishes guidelines for managing College-owned and operated computer networks and services provided on College owned and operated networks;
- O-5.11: Standards of Conduct – Includes parameters for both acceptable and unacceptable use of computing technology at Camosun College;
- O-6.1: Freedom of Information and Protection of Privacy - establishes principles and guidelines that enable the College to comply with the provisions of the Freedom of Information and Protection of Privacy Act; and
- O-6.2: Record Management - establishes commonly understood and efficient practice for the retention and disposition of College records that ensures Camosun meets its legislative, financial and legal obligations as a public body to manage its records in a systematic and consistent manner.

**13. 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.**

Once the relevant data fields are extracted from Camosun College's employee data management system (Colleague) and put into an Excel spreadsheet, the Excel file will be saved in the Employee Engagement SharePoint site which is a sub-site of the Human Resource SharePoint site. Access to the Employee Engagement sub-site is managed through assigned file sharing permissions to only those individuals within Human Resources who are directly involved in the Engagement survey project and includes:

- the HR Consultant who conducts the actual data extraction,
- the HR Specialist managing the overall survey project,
- the HR Operations assistant; and
- System administrators from Information Technology Services.

The Executive Director of Human Resources has also been given access to the Employee Engagement SharePoint site. SharePoint uses version control to indicate when a file has been opened, changed and resaved.

Once the Excel file has been created, the file's unique numerical identifier will be captured using Microsoft's Sha Sum executable file. A comparison of the Sha Sum identifier taken just prior to sending the Excel file to BC Stats will indicate if the file has been altered in any way since its original creation.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

In the event an employee with access to the Employee Engagement SharePoint site is terminated or becomes involved in disciplinary action that may pose a risk to the integrity of the Master List data, their access to Camosun's computer network will be terminated immediately upon request by Camosun's Information Technology Services department.

Once the Excel spreadsheet has been uploaded to BC Stats' secure SharePoint site, BC Stats is responsible for controlling access to the data. Security and access provisions have been detailed in Question # 11 above. In the event any staff leave BC Stats, their access to all data/information used during their employment is immediately revoked.

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

Access to the data extracted from Colleague and shared with BC Stats will be restricted to Camosun College's HR Consultant who performs the data extraction from Camosun's Colleague database and the Camosun HR Specialist managing the overall survey project.

Once the Excel file has been uploaded to BC Stats' SharePoint site, only the BC Stats senior research analyst assigned to Camosun's employee engagement survey will download the file to BC Stats servers. Prior to fielding the survey or completing any analysis of results, the BC Stats senior research analyst will remove personal unique identifiers from each employee record (e.g.: Colleague ID Number) and replace it with a dummy tracking identifier that makes it impossible to identify specific individuals from the original Camosun Excel file.

### **Part 4 – Accuracy/Correction/Retention of Personal Information**

#### **15. 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?**

Survey participants will not be validating their personal information as the data will be extracted directly from Camosun's employee database and there will be no opportunity for individuals to update or correct their personal data before the survey is launched.

A separate file will be created to record any instances where an error is identified in an individual's employment data while compiling the survey's Master List. The HR Consultant who performed the data extraction will make the necessary updates or corrections in the Colleague data base. This audit file will not be shared with BC Stats and will reside on the HR Shared Drive and subject to existing security and access policies and safeguards.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## 2017 Employee Engagement Survey

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

No.

17. 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.

N/A

18. If you answered "yes" to question 17, do you have a record's 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?

N/A

### Part 5 – Further Information

19. 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).*

**X**

20. 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).*

21. 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.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

---

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



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *2017 Employee Engagement Survey*

---

### **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).*

---

Privacy Officer/Privacy Office  
Representative

---

Signature

---

Date



# Privacy Impact Assessment for Non-Ministry Public Bodies

## 2017 Employee Engagement Survey

### Part 7 - Program Area Signatures

Daryl Thomson, HR Specialist

Signature

July 14/17

Date

Barb Severyn, Executive Director  
Human Resources

Signature

July 20, 2017

Date

Shane Busby,  
VP Administration, Camosun College

Signature

July 27/2017

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.***