

# Privacy Impact Assessment

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Use this privacy impact assessment (PIA) template if you are starting a new initiative or significantly changing an existing initiative.

## Before you start

- An initiative is an enactment, system, project, program or activity
- Find information on the [PIA review process](#) and [question-by-question guidance](#).
- If you have any questions, contact the CNC Privacy Office at [foipp@cnc.bc.ca](mailto:foipp@cnc.bc.ca)

## PART 1: GENERAL INFORMATION

PIA file number:

<b>Initiative title:</b>	PIA People Admin
<b>Organization:</b>	College of New Caledonia
<b>Branch or unit:</b>	Human Resources
<b>Your name and title:</b>	Thuy Littler/Lorraine Ducharme – HR Advisors
<b>Your work phone:</b>	Local 5500/5466
<b>Your email:</b>	littler@cnc.bc.ca, ducharmel2@cnc.bc.ca
<b>Initiative Lead name and title:</b>	Thuy Littler – HR Advisor, Analyst
<b>Initiative Lead phone:</b>	Local 5500
<b>Initiative Lead email:</b>	littler@cnc.bc.ca
<b>Privacy Officer:</b>	Elyse Giddens
<b>Privacy Officer phone:</b>	Local 5479
<b>Privacy Officer email:</b>	foipp@cnc.bc.ca

General information about the PIA:

<p><b>Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.</b></p>
No
<p><b>Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.</b></p>
No
<b>Related PIAs, if any:</b>

None

## 1. What is the initiative?

**Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.**

People Admin offers an Applicant Tracking System that covers the following:

1. Data management to make sure future hiring is easier and more accurate:
  - Maintain approved job posting templates making new postings easy to create and effective;
  - Create or import CNC's job descriptions (i.e. only job summary, duties, skills and qualifications, and grade/band/step) to ensure requisitions and postings accurately reflect the position to be filled;
  - Customize personnel requisitions to ensure the proper approvals are secured and the procedure is followed;
  - Automate multiple approval steps to ensure offers are made in a timely manner (i.e., appointment letters);
  - Maintain a library of screening questions to identify minimum and preferred qualifications for potential employees.
2. Selection and hiring processes - to manage the influx of applications at all stages of the hiring process:
  - Screening tools to ensure that the best possible candidates are identified by eliminating time-consuming and inconsistent applicant screening methods;
  - Hiring Proposals to ensure offers are made in a timely manner.
3. Provide interface via the web (Portal) to improve services to the public through a mobile-friendly job site in addition to a branded job portal:
  - Broaden CNC's reach and ensure that the postings appear where top candidates are looking;

- 
- The mobile-friendly job site uses Google preferences for searching requirements and is compatible with all browser engines (i.e., Internet Explorer, Firefox, Google Chrome, Microsoft Edge).
4. Produce comprehensive reports in an easy to use format that will address compliance requirements:
- Track aboriginal ancestry for Human Rights Special Program offerings;
  - Track qualifications for job posting requirements;
  - Sort between demographics such as age groups, gender, and internal vs. external applicants;
  - Clarify the types of applicants CNC is attracting (with vs. without skills, experience, and qualifications) (Currently Hiring Administrators are not utilizing the option of short listing ALL applicants through the PeopleAdmin shortlisting process).
  - Ability to find candidates from earlier recruitments within three years of the closing date of the posting.

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## 2. What is the scope of the PIA?

**Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?**

This PIA covers the Applicant Tracking System (ATS) or PeopleAdmin SelectSuite PA7. This electronic system allows us to utilize the following:

- Applicant portal - accept online resume & save documents within appropriate competitions;
- Initiate Personnel/Posting requests for:
  - New positions
    - Extensions
    - Acting
    - Casuals
  - Ability to transition all these requests through various approval workflows, such as:
    - Hiring Administrator
    - Finance
    - Executives
    - HR Compensation
    - HR Recruitment
- Ability to either exclude/include applicants by using specific questions during various stages;
- Ability to allow Search Committee members, Hiring Administrators, Admin Assistants to review applicants' submissions;
- Hiring abilities once the successful applicant has been found.

**3. What data or information elements are involved in your initiative?**

Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix. *(types of information listed in point form)*

Information Subject	Information Elements
<b>Applicant Personal Information</b>	<ul style="list-style-type: none"> <li>• <b>First, middle, and last name</b></li> <li>• <b>Address</b></li> <li>• <b>Phone number</b></li> <li>• <b>Email</b></li> <li>• <b>Educational history</b></li> <li>• <b>History of working at CNC</b></li> <li>• <b>Skills and capabilities</b></li> <li>• <b>Eligibility to work in Canada</b></li> </ul>
<b>Application Documents</b>	<ul style="list-style-type: none"> <li>• <b>Resumes</b></li> <li>• <b>Cover letter</b></li> <li>• <b>Credentials</b></li> </ul>
<b>References Personal Information (only during final stages of hiring)</b>	<ul style="list-style-type: none"> <li>• <b>First and last name</b></li> <li>• <b>Job title/employer</b></li> <li>• <b>Phone number</b></li> <li>• <b>Email</b></li> </ul>
<b>Human Rights Special Program *</b>	<ul style="list-style-type: none"> <li>• <b>Whether they identify as an aboriginal person</b></li> <li>• <b>Proof of ancestry</b></li> </ul>

- \*The following is the actual verbiage within the applicant portal: CNC applied to the Human Rights Tribunal for a Special Program to recognize Aboriginal ancestry as a bona fide employment qualification. Aboriginal ancestry and heritage have common definitions; however, for the purposes of this Committee it is defined as follows:
  - Aboriginal ancestry is something you are born with whereas heritage is something that can be acquired. For example, a Caucasian person can be

raised by an Aboriginal family therefore s/he has Aboriginal heritage, but not Aboriginal ancestry.

- CNC Special Program allows positions to specify Aboriginal ancestry as a bona fide qualification.

NOTE: Be aware that this will only be used for HRSP positions.

- Eligibility Criteria The candidates for positions covered by this Special Program will be able to provide written proof of Aboriginal ancestry through a nationally or provincially recognized Aboriginal organization. All candidates must fall under the description of Aboriginal as defined in the Constitution Acts of 1982, Part II, Section 35(2), as the “Indian, Inuit and Métis peoples of Canada.” Furthermore, the College reserves the right to request a letter from the First Nation verifying Aboriginal ancestry from those who present status cards issued under the Indian Act of Canada. The College may also use the services of its Aboriginal partners (e.g. Métis Nation of BC, Prince George Friendship Centre, Lheidli T’enneh First Nation) to verify Aboriginal status or ancestry.

### 3.1 Did you list personal information in question 3?

**Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.**

Yes

- If yes, go to [Part 2](#)

## PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

### 4. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a **collection, use or disclosure** of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

<b>Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.</b>	<b>Collection, use or disclosure</b>	<b>FOIPPA authority (PPS can fill this in)</b>
Step 1: Applicants upload resume, cover letter, and credentials through the online applicant portal. Applicants may provide references but they are not requested during this step.	Collection	s. 26(c)
Step 2: Hiring Administrator/Admin Assistants/Search Committee review information in the PeopleAdmin portal to make shortlisting, interview and hiring decisions	Use	s. 32(a)
Step 3: HR employees access information in PeopleAdmin portal to initiate appointment letters	Use	s. 32(a)

For more information see [Appendix C – Shortlisting & Hiring Successful Applicant Manual](#)

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## 5. Collection Notice

**If you are collecting personal information directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).**

*The College of New Caledonia collects your personal information through PeopleAdmin's services under section 26(c) of the Freedom of Information and Protection of Privacy Act. CNC will use your personal information as required to review your qualifications for positions and support your application through the hiring process.*

*Do not include your social insurance number (SIN) or other identification numbers such as driver's license, BCID, visa or passport numbers in your application. CNC will request this information from you separately if you are offered a position.*

*Should you have any questions about the collection of this personal information, please contact the Human Resources at [hr@cnc.bc.ca](mailto:hr@cnc.bc.ca) or 250-561-5828.*

## PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

### 6. Is any personal information stored outside of Canada?

No, As indicated by a PeopleAdmin representative on April 28, 2022, PeopleAdmin hosts their service in [REDACTED] Canada.

15(1)(l)

### 7. Does your initiative involve sensitive personal information?

**Sensitive personal information is personal information with a higher risk of harm to individuals if the information is improperly collected, used, or disclosed. Personal information may be considered sensitive depending on the type of information and the context in which it is collected, used, disclosed, or stored. Examples of sensitive personal information may include personal health information, genetic and biometric data, personal financial information, geolocation data, and criminal records.**

No, CNC does not intend to collect any sensitive personal information while accepting applications through PeopleAdmin's portal. CNC will make it explicit that applicants are not to provide Social Insurance Numbers through the portal.

Type "yes" or "no" to indicate your response.

- If yes, go to [question 9](#)
- If no, go to [question 10](#)

**8. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?**

Type “yes” or “no” to indicate your response.

- If yes, go to [question 10](#)
- If no, go to [Part 4](#)

**9. Where are you storing the personal information involved in your initiative?**

After you answer this question go to [Part 5](#).

**PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA**

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization’s Privacy Officer.

**10. Is the sensitive personal information stored by a service provider?**

Type “yes” or “no” to indicate your response.

- If yes, fill in the table below (add more rows if necessary) and go to [question 13](#)

If no, go to [question 12](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

- 
11. **Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.**
12. **Does the contract you rely on include privacy-related terms?**  
Type “yes” or “no” to indicate your response.
- If yes, describe the contractual measures related to your initiative.
15. **What controls are in place to prevent unauthorized access to sensitive personal information?**
16. **Provide details about how you will track access to sensitive personal information.**

17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.

#### Outcome of Part 4

The outcome of Part 4 will be a **risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

## PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

### 18. Does your initiative involve digital tools, databases or information systems?

Yes

#### 18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Yes

### 19. What technical and physical security do you have in place to protect personal information?

**Describe where the digital records for your initiative are stored (e.g. on your organization's LAN, on your computer desktop, etc.) and the technical security measures in place to protect those records. Technical security measures include**



- [REDACTED] 15(1)(l)  
[REDACTED]  
[REDACTED]
  - [REDACTED] 15(1)(l)  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- [REDACTED] 15(1)(l)  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- [REDACTED] 15(1)(l)  
[REDACTED]

**20. Controlling and tracking access**

**Please list strategies that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.**

- We only allow employees on the hiring committee or supporting the hiring committee to access information related to applications.
- Employees that need standing or recurring access to personal information must be approved by executive lead
- Rarely do we use external Search Committee members. We only do this if the College doesn't have the expertise in house.

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## PART 6: ACCURACY, CORRECTION AND RETENTION

**In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.**

### 21. How will you make sure that the personal information is accurate and complete?

**FOIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.**

Applicants create their own account and provide all the personal information related to the application. There is a statement within the application portal indicating that individuals are responsible for the accuracy of the information.

### 22. Requests for correction

**FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.**

Applicants can contact HR to provide revised documents or information should there be any corrections needed. HR reactivates the application and applicants can resubmit.

#### 22.1 Do you have a process in place to correct personal information?

Applicant can contact CNC's HR department to revise documents or information.

#### 22.2 Sometimes it's not possible to correct the personal information.

**FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?**

N/A

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**22.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?**

N/A

**23. Does your initiative use personal information to make decisions that directly affect an individual?**

Yes

**24. Do you have an information schedule in place related to personal information used to make a decision?**

**FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.**

Records Retention Schedules are in development. Currently there is a 3-year retention schedule for PR/Posting that are not filled. Currently we are working on figuring out the number of years to keep these PR/Posting requests for those that are filled.

## PART 7: AGREEMENTS AND INFORMATION BANKS

Please provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank.

### 25. Does your initiative involve an information sharing agreement?

No

- If yes, please complete the Information Sharing Agreement Supplement and attach it to your PIA

### 26. Will your initiative result in a personal information bank?

**A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.**

Yes

- If yes, please complete the table below.

<b>Describe the type of information in the bank</b>
Applicant Information, Application Documents, Credentials, References Personal Information Human Rights Special Program information
<b>Name of main organization involved</b>
College of New Caledonia
<b>Any other ministries, agencies, public bodies or organizations involved</b>
PeopleAdmin, a PowerSchool company
<b>Business contact title and phone number for person responsible for managing the PIB</b>
Thuy Littler: 250-561-5828, littler@cnc.bc.ca

## PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

### 27. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Possible Risk	Response
Contractor fails to protect data.	Contractual terms will outline privacy protection commitments.
Privacy breach may go undetected.	Contract terms, tracking and procedures will ensure privacy breaches are identified, reported, and investigated.
CNC is not informed in the event of a privacy breach.	Contractual terms will outline privacy protection and breach commitments.
Potential misuse of information by users.	Training is provided to users, users are subject to confidentiality terms.
Unauthorized individuals at CNC access the stored personal information.	Access will be restricted based on least privilege and need-to-know principles. Employees receive training regarding the confidentiality of information
Anyone who has been provided access could use the contact information for non-related business reasons.	Employees who are no longer active are deactivated from the system so that they cannot access the information
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

15(1)(l)

## PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

### Privacy Office Comments

This PIA has been reviewed as at the date indicated in the Privacy Office Signature. If there are changes to how information is managed within the PeopleAdmin system, Human Resources will complete a PIA update to ensure that CNC maintains compliance with FIPPA.

[REDACTED]

13(1)

### Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

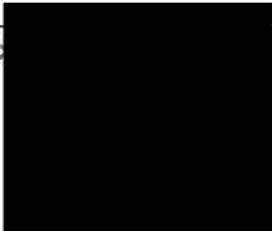
Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative	Elyse Giddens	[REDACTED]	Oct 31 <sup>st</sup> 2023

22(1)

**Program Area Signatures**

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

**Program Area Comments:**

<b>Role</b>	<b>Name</b>	<b>Electronic signature</b>	<b>Date signed</b>
<b>Initiative lead</b>	Thuy Littler	Thuy Littler	September 8, 2023
<b>Contact Responsible for Systems Maintenance and/or Security</b> Only required if they have been involved in the PIA	N/A		
<b>Head of public body, or designate</b> Only required if personal information is involved	Fred Alaggia		October 30, 2023

22(1)