

# Privacy Impact Assessment

*[Insert Initiative Title]*

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

PIA# \_\_\_\_\_ (Office of the University Secretariat to assign)

## 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 Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FOIPPA generally, please contact Adam Cullum (Information Governance Officer) at adam.cullum@unbc.ca or (250) 960-5878 or visit <http://www.unbc.ca/foippa>.

## 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:	UNBC Athletics		
PIA Drafter:	Geordie Carragher		
Email:	<a href="mailto:Geordie.Carragher@unbc.ca">Geordie.Carragher@unbc.ca</a>	Phone:	250 960 6009
Program Manager:	Loralyn Murdoch		
Email:	<a href="mailto:Loralyn.Murdoch@unbc.ca">Loralyn.Murdoch@unbc.ca</a>	Phone:	250 960 6368?

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

### 1. Description of the Initiative

### 2. Scope of this PIA

*This section should explain exactly what part or phase of the initiative the PIA covers and, where necessary for clarity, what it does not cover. This section may also describe what phase of the initiative this PIA covers.*

### 3. Related Privacy Impact Assessments

N/A.

# Privacy Impact Assessment

*[Insert Initiative Title]*

*Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014*

PIA# \_\_\_\_\_ (Office of the University Secretariat to assign)

## 4. All Elements of Information or Data

*Please list the elements of information or data involved in the initiative, even if no personal information is involved. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area.*

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.

COMPLETED INITIATIVE

## 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

*Please provide a brief description of whether your information can be accessed from outside Canada, for example, by a service provider that is repairing a system, or if your information is being stored outside Canada, for example, in the “cloud”. If your data is stored within Canada and accessible only within Canada, please indicate this. The University Secretary or CIO will require proof from the vendor on server storage and back-up.*

### 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 the University Secretary to discuss the requirements of a data-linking initiative.</b>	

## 7. 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>	
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
<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>	

**\* Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC) as well. Contact the Information Governance Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.**

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

*Please provide a diagram and/or table that shows how your initiative, program or IT solution will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged. **Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.***

*For ease of reference, the collection, use, and disclosure authorities in FOIPPA can be found in the appendices. If you do not know what the relevant authorities are, please contact the Information Governance Officer.*

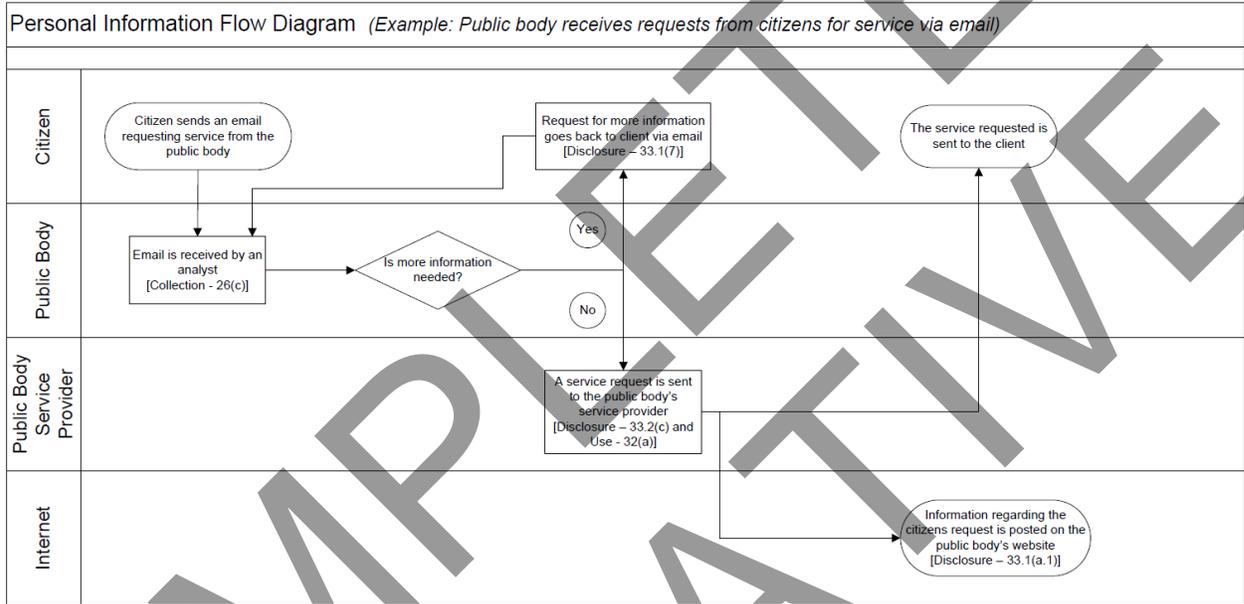
[Insert Initiative Title]

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

PIA# \_\_\_\_\_ (Office of the University Secretariat to assign)

Depending on the complexity of your initiative, you may choose to provide one general diagram for the initiative, and more specific diagrams for particular components. If multiple organizations will collect, use, or disclose personal information, the diagram should identify how each organization is involved in the initiative.

**Example:**



Examples can be removed and additional lines added as needed.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Email received from client requesting service	Collection	26(c)
2.	Email client back requesting more information	Disclosure	33.1(7)
3.	Service request transferred to service provider contracted by public body	Disclosure & Use	33.2(c) and 32(a)

**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.

Examples can be removed and additional lines added as needed.

*[Insert Initiative Title]*

*Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014*

PIA# \_\_\_\_\_ (Office of the University Secretariat to assign)

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.				
2.				
3.				
4.				

## 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.*

*Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place. You can also attach a screen shot or a copy of your form where the collection notice would be located.*

## **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 the UNBC University Secretary, the Chief Information Officer or the IT Security Officer when filling out this section.***

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

*For example: locked cabinets, securely stored laptops, or key card access to the building.*

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

*For example: use of firewalls, document encryption, or user access profiles assigned on a need-to-know basis.*

**13. Does your department rely on any security policies? If so, indicate here:**

*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?**

*For example: users have access to update their own information or, notes will be made on a case file.*

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

*[Insert Initiative Title]*

PIA# \_\_\_\_\_ (Office of the University Secretariat to assign)

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

- 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.**

*For example: check to see that the information was obtained from a reputable source.*

- 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?**

*If you do not yet have a schedule, please document how these records will be kept until the schedule is in place. Please describe retention schedules that apply where retention exceeds the one year requirement of FOIPPA. Please contact the University Secretary and/or records coordinator if you require assistance.*

## **Part 5 – Further Information**

- 20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

*For example: your department has a regular exchange of personal information (both collection and disclosure) to provide services to your clients.*

***Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the University Secretary.***

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

*For example: your public body will be disclosing information to PhD students so that they can conduct research.*

***Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the University Secretary, the UNBC Research Office or UNBC Archives.***

- 22. 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.**

# Privacy Impact Assessment

*[Insert Initiative Title]*

*Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014*

PIA# \_\_\_\_\_ (Office of the University Secretariat to assign)

*A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual.*

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

## **Part 6 - University Secretary Comments**

*This PIA is based on a review of the material provided to the University Secretary 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 for approval.*

COMPLETED INITIATIVE

*[Insert Initiative Title]*

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

PIA# \_\_\_\_\_ (Office of the University Secretariat to assign)

## Part 7 – Program Area Signatures

\_\_\_\_\_  
Name of Individual leading the  
Program/Project  
*(Normally the individual who  
completed the PIA)*

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Program/Department Manager or  
Project Sponsor

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Contact Responsible for Systems  
Maintenance and/or Security  
*(if applicable)*

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Information Governance Officer

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please send a copy of this PIA with the respective signatures to Adam Cullum, Information Governance Officer for comment, review, approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.