

# Privacy Impact Assessment

## UNBC Donor Surveys – Internal Donors

PIA#17-002 (Office of the University Secretariat to assign)

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

### Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. 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 FIPPA generally, please contact Adam Cullum (Information Governance Officer) at [adam.cullum@unbc.ca](mailto:adam.cullum@unbc.ca) or (250) 960-5139 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 Information Governance Officer 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:	Development and Alumni Relations		
PIA Drafter:	Stacey Linton, Development Officer		
Email:	<a href="mailto:Stacey.Linton@unbc.ca">Stacey.Linton@unbc.ca</a>	Phone:	250-960-5884
Department Manager:	Kathie Scouten, Director, Development and Alumni Relations		
Email:	<a href="mailto:Katherine.Scouten@unbc.ca">Katherine.Scouten@unbc.ca</a>	Phone:	250-960-5751

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

### 1. Description of the Initiative

*Create and distribute a survey to evaluate the effectiveness of UNBC's donor engagement, including solicitation and stewardship initiatives; to build relationships with our donors; to inform future decisions regarding related donor engagement initiatives.*

### 2. Scope of this PIA

*This PIA applies to managing the surveys of internal donors only. External donor surveys will be addressed in a separate PIA.*

### 3. Related Privacy Impact Assessments

N/A

# Privacy Impact Assessment

*UNBC Donor Surveys – Internal Donors*

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## 4. All Elements of Information or Data

*First name, last name, email address, attendance at events, donation preferences, opinions, affiliations (depending on event type).*

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 the Information Governance Officer for review. You will receive support completing the remaining steps of the 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**

*All data will be managed on UNBC servers and handled by UNBC employees.*

**6. Data-linking Initiative\***

<p><b>In FIPPA, "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.</b></p>	
<p>1. Personal information from one database is linked or combined with personal information from another database;</p>	No
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	No
<p>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.</p>	No
<p><b>If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.</b></p>	N/A

# Privacy Impact Assessment

## UNBC Donor Surveys – Internal Donors

PIA#17-002 (Office of the University Secretariat to assign)

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

<p><b>In FIPPA, “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
<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>	N/A

**\* 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

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	An Advancement employee will directly send a letter (by internal mail or email) inviting the donors to complete the attached survey. The donor will complete the survey as a fillable document (either MS Word or PDF) attached to the invitation. The donor will submit the completed survey to the Advancement Officer acting as Survey Administrator.	Collection	26(e)

# Privacy Impact Assessment

## UNBC Donor Surveys – Internal Donors

PIA#17-002 (Office of the University Secretariat to assign)

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2.	Advancement employees will input a summary of the donor's preferences in the donor's file. This information will be used to accommodate the needs and preferences of the donor	Use	32(a)
3.	Advancement employees will aggregate and compile the summaries to evaluate and improve the delivery of fundraising events.	Use	32(a)
4.	Raw data in the form of the completed survey will be disposed of after a year	Disposition	31

### 9. Risk Mitigation Table

Please identify any privacy risks, even very unlikely ones, 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.				
2.				

### 10. Collection Notice (only notes)

The Collection Notice will vary depending on the specific survey. Each collection notice will mention that the purpose for collecting feedback and individual opinions is for the planning and evaluation of fundraising and donor appreciation events as per section 26(e) of the Freedom of Information and Protection of Privacy Act.

Each collection notice will indicate whether Advancement intends to use the information for a purpose besides evaluation of Advancement events and services. If Advancement does intend to use the submitted survey information for a purpose that is not consistent with the evaluation of

# Privacy Impact Assessment

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*Advancement events and services, an amendment to this PIA will need to be made to ensure privacy concerns have been addressed.*

*Each collection notice will indicate whether Advancement will be adding information to an existing donor file and provide instructions to the donor on how to request a correction to any information submitted.*

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# Privacy Impact Assessment

UNBC Donor Surveys – Internal Donors

PIA#17-002 (Office of the University Secretariat to assign)

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

## Part 3 – Security of Personal Information

*Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.*

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

[REDACTED]

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

[REDACTED]

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

[REDACTED]

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.

[REDACTED]

15. Please describe how you track who has access to the personal information.

[REDACTED]

## 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?

*The Survey Administrator will annotate any corrections that need to be made during the transfer of information from the survey submission to their file.*

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

Yes?

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.

# Privacy Impact Assessment

## UNBC Donor Surveys – Internal Donors

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The Survey Administrator will invite donors to make additions and corrections on any survey submissions they make after the survey has been returned to Advancement.

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?

Go over this!

### Part 5 – Further Information

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

No. Multiple surveys may be done but this is not a systematic process and not all donors will be required to complete all surveys.

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

21. 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 the Information Governance Officer, 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 FIPPA. Under this same section, this information is required to be published in a public directory.

Survey submissions will be added to an already existing PIB (Advancement Donor Files)

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

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## **Part 6 – Comments, Conditions & Concerns**

*This PIA is based on a review of the material provided to the Information Governance Officer 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.*

*The Information Governance Officer will support Advancement by providing feedback on collection notices before donor surveys are sent out.*

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# Privacy Impact Assessment

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## Part 7 – Program Area Signatures

Stacey Linton

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

Signature

Date

N/A

Department Head

Signature

Date

Kathie Scouten

Director or Dean Overseeing the Program/Project

Signature

Date

N/A

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

Signature

Date

Adam Cullum

Information Governance Officer  
(Privacy Officer)

Signature

Date

Heather Sanford

Head of Public Body or Designate

Signature

Date

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

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