

# Privacy Impact Assessment

## [Employee Opinion Survey - 2018]

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

PIA#                      **#18-015** (Office of the University Secretariat to assign)

**RFP STAGE / PRE-CONTRACTOR SELECTION**

**Part 1 – General**

|                     |  |        |              |
|---------------------|--|--------|--------------|
| Name of Department: | Human Resources / AVP People, OD & Risk                                |        |              |
| PIA Drafter:        | Shelley McKenzie   |        |              |
| Email:              | <a href="mailto:Shelley.McKenzie@unbc.ca">Shelley.McKenzie@unbc.ca</a> | Phone: | 250-960-5177 |
| Program Manager:    | As above   |        |              |
| Email:              |  | Phone: |              |

**1. Description of the Initiative**

Brief (bi-)annual survey that provides an opportunity for employees to identify UNBC’s strengths and weaknesses as a workplace. It is an ongoing opportunity to identify issues and help make positive changes in the workplace. The survey data will be used to develop unit action plans.

**2. Scope of this PIA**

The Employee Opinion Survey (EOS) requires a consultant to collect and aggregate data extracted from employee responses to generate reports and statistics for UNBC departments. All UNBC faculty and staff (on and off-campus) will be invited to participate in this voluntary survey.

**3. Related Privacy Impact Assessments**

PIA from 2016 EOS may be relevant.

**4. All Elements of Information or Data**

No personal information collected. Will include information specific to an employee’s department or subject area. Initial UNBC email addresses (public information) will be used to distribute the survey invitation. Survey will include personal opinions, but no correlation to identifiers will be present.

The consultant will be collecting the information anonymously. In order to know which people to group together for department/program reports, they need to be able to identify which people belong to which department/program. Any information provided to the consultant is kept completely confidential. Identity and answers will not be revealed or released. The consultant will ensure aggregated data remains anonymous and cannot be attributed to a specific employee.

**Commented [s1]:** The assumption is that you are only using closed ended questions to prevent information that could be used to identify managers and coworkers that may be evaluated in this process? Or are you aggregating groups to the point in which small departments would not be identified in individual responses? Either way, open ended questions will pose a risk of identifying individuals which will generate personal information.

# Privacy Impact Assessment

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PIA#                      **#18-015** (Office of the University Secretariat to assign)

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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# Privacy Impact Assessment

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Part 2 – Protection of Personal Information

**5. Storage or Access outside Canada**

We will select a contractor who collects, stores, maintains, backs-up and disposes of personal information on servers ONLY in Canada. The contractor must be a Canadian employee/company.

**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> |     |
| 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  |
| If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.  | N/A |

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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:<br>(a) a public body and at least one other public body or agency working collaboratively to provide that service; or<br>(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.   | N/A |
| <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.**

# Privacy Impact Assessment

## [Employee Opinion Survey - 2018]

PIA#                      **#18-015** (Office of the University Secretariat to  
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8. **Personal Information Flow Diagram and/or Personal Information Flow Table**

**Commented [s2]:** To confirm processes once we have the proposal from the successful contractor

COMPLETED  
INITIATIVE

# Privacy Impact Assessment

## [Employee Opinion Survey - 2018]

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PIA#                      **#18-015** (Office of the University Secretariat to assign)

| Personal Information Flow Table |                     |      |                 |
|---------------------------------|---------------------|------|-----------------|
|                                 | Description/Purpose | Type | FIPPA Authority |
| 1.                              |                     |      |                 |
| 2.                              |                     |      |                 |
| 3.                              |                     |      |                 |

### 9. Risk Mitigation Table

| Risk Mitigation Table |            |                     |                   |
|-----------------------|------------|---------------------|-------------------|
|                       | Risk       | Mitigation Strategy | Likelihood Impact |
| 1.                    | [REDACTED] |                     |                   |
| 2.                    |            |                     |                   |

### 10. Collection Notice

This will depend on vendor selected and approved wording from the Information Governance Officer.

Sample Notice:

#### COLLECTION, PRIVACY AND INFORMATION RELEASE STATEMENT

This survey information is collected by [CONTRACTOR NAME], hired on contract for The University of Northern British Columbia, under Section 26 of the British Columbia *Freedom of Information and Protection of Privacy Act* and will be used in strict confidence for .....

The use of information provided on this form complies with the BC *Freedom of Information and Protection of Privacy Act*, with the policies and procedures of the University of Northern British Columbia, and the contract. All individuals are advised that the information they provide will be protected and used in compliance with the BC *Freedom of Information and Privacy of Protection Act* (RSBC 1996).

**Commented [s3]:** See template document. Once we agree on wording we can integrate that wording into this section. Template document will be as posted into SurveyMonkey.

# Privacy Impact Assessment [Employee Opinion Survey - 2018]

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~~Personal information collected for the purpose of this survey is considered business contact information. Only employee name, department and UNBC email address are obtained by the contractor.~~

~~Your personal information will be stored on a secure server located in Canada and accessed by the contractor hired to conduct the Employee Opinion Survey. The survey data will be downloaded and removed the server immediately upon survey closure.~~

~~The University of Northern British Columbia will receive only final survey results and reports directly from the contractor. No names or other personal identifiers will be available or included.~~

~~Should you have any questions about the collection, use or disclosure of this personal information, please contact:~~

~~Shelley McKenzie, Senior Human Resources Consultant  
University of Northern British Columbia – Human Resources  
(250) 960-5177, Shelley.McKenzie@unbc.ca~~

~~This online survey is hosted by FluidSurveys, an American owned company (SurveyMonkey). While Fluid Surveys currently stores survey data in Canada and has put measures in place to adhere to Canadian privacy legislation, the information you provide through this survey may now be subject to U.S. laws, including the U.S. Patriot Act which allows authorities access to the records of internet service providers.~~

~~I hereby consent to the University of Northern British Columbia using my personal opinions pertaining to my participation in the Employee Opinion Survey. I understand that my opinions are anonymized through the hyperlink I am provided in my invitation email. I understand that I only have one hyperlink available to the Employee Opinion Survey and it is my choice how the hyperlink is used or whether it is used. Neither the consultant handling my information? (remove these instructions, highlight, and the ? if this part of the sentence is accurate) nor Human Resources who receive the summary of the results will know which individual survey submitted is connected to me.~~

~~The University of Northern British Columbia collects personal information under section 26(e) of the Freedom of Information and Protection of Privacy Act for the purposes of collecting feedback to evaluate and improve institutional operations and communication.~~

~~I will be responsible for accurately and completely recording my opinions. I understand that I can only make changes to my responses while my survey is open. Once I have submitted my responses at the end of the survey, making changes to my opinions will not be possible.~~

~~By selecting yes I am stating I understand the collection notice, and consent to completing the Employee Opinion Survey~~

**Consent**

# Privacy Impact Assessment

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~~Checking the box below indicates that you have read and understand the above information.~~

~~I have read and agree to the terms of the above Collection, Privacy and Information Release Statement, and consent to participate in this survey.  
(box must be checked in order to proceed with survey)~~

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### 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]

**Commented [s4]:** We will update this with more precise information once we know who will be contracted to manage the EOS.

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

# Privacy Impact Assessment

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**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?**

~~N/A~~ —only emails, name and department are produced from Human Resources' official records.

Survey respondents will be responsible for ensuring the accuracy of their information. They will be able to make changes to the survey up until they y completed & their instance of the survey. ~~is submitted by them.~~

**17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.** Yes. Indirectly, the opinions of the employees (as aggregate data) may shape organizational or behavioural changes of departments or managers.

**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.**

Employees are given a link registered to the capacity to complete the survey. It is the employee's responsibility to ensure opinions are recorded accurately and completely.

**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?**

Contractor will be asked to download the raw data and then immediately remove from the server. Upon contract end date, the contractor/consultant will destroy all data.

### Part 5 – Further Information

**20. 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 the Information Governance Officer.*

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

~~No~~ YES, for research purposes (survey).

**Commented [s5]:** To clarify, a quality assurance study like this one, isn't research under section 35. A service provider is collecting the information on our behalf and formulating the results, but we aren't releasing the raw data or the identifiable results outside of the organization. If a faculty member, or external party was accessing the raw data for their own research purposes, we would need an Access to Restricted Records Agreement signed to comply with section 35.

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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.

N/A

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.

N/A

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

### **Part 6 – Information Governance Officer Comments**

**Commented [s6]:** Conditions will be added if need be once the contractor's methodology is available.

*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.*

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### Part 7 – Program Area Signatures

|  |           |      |
|--|-----------|------|
| Name of Individual leading the Program/Project<br><i>(Normally the individual who completed the PIA)</i> | Signature | Date |
| Program/Department Manager or Project Sponsor  | Signature | Date |
| Contact Responsible for Systems Maintenance and/or Security<br><i>(if applicable)</i>                    | Signature | Date |
| Information Governance Officer   | 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.