

Privacy Impact Assessment

English Talk Shop – Canadian Speech Sounds Online

PIA# 16-008 (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?

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 University Secretary 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) 960-5139 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 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:	International Education		
PIA Drafter:	Bjorn Petersen		
Email:	Bjorn.Petersen@unbc.ca	Phone:	250-960-5986
Program Manager:	Sylvester Chen		
Email:	Sylvester.Chen@unbc.ca	Phone:	250-960-5361

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

1. Description of the Initiative

International Education will, on a trial basis, use English Talk Shop's Canadian Speech Sounds to determine its usefulness in assisting English Language Studies students to improve their pronunciation skills.

2. Scope of this PIA

The PIA will apply to all students that register in English Language Studies courses for the purposes of testing the program for its effectiveness in improving student pronunciation skills.

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

Test scores, name and association as a UNBC student which will be anonymized on the software.

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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.

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

Storage of tracking completion of modules will be on an Amazon server in Northern California. To protect privacy, all data transferred with be anonymized.

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
If you have answered "yes" to all three questions, please contact the University Secretary to discuss the requirements of a data-linking initiative.	

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7. Common or Integrated Program or Activity*

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.

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
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

* 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 University Secretary 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

Example:

Examples can be removed and additional lines added as needed.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	An employee in the International Education department will generate a generic user id/password for students to be able to log onto Canadian Speech Sounds	Collection	26(c)

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2.	Students will complete modules in Canadian Speech Sounds and receive a score.	Disclosure	33.1(7)
3.	Student records their own score and logs out.	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.

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

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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.

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

For example: N/A - Information will be anonymized. Use of the program will be monitored and supervised.

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

For example: N/A – Information will be anonymized. Use of the program will be monitored and supervised. Periodic assessments will be made to ensure the account remains anonymized and does not contain personal information.

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

[REDACTED]

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.

[REDACTED]

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

[REDACTED]

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?

Information will be anonymized and not associated with the student thereby eliminating any issues surrounding updates, corrections or annotations.

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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 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?

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 the University Secretary.

N/A

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 the University Secretary, the UNBC Research Office or UNBC Archives.

N/A

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

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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 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.

COMPLETED
INITIATIVE

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Part 7 – Program Area Signatures



Bjom Petersen
Signature

June 10/2016
Date

Sylvester Chen
Signature

June 10, 16
Date

N/A

N/A

N/A

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

Signature

Date

Adam Cullum
Adam Cullum
Information Governance Officer

Signature

June 10/2016
Date

Please send a copy of this PIA with the respective signatures to Heather Sanford, University Secretary for comment, review, approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Access, Privacy & Records Office.