

Privacy Impact Assessment

Employee Opinion Survey (FluidSurveys/Gallup)

PIA#16-006

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 Heather Sanford (University Secretary) at heather.sanford@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:	Human Resources		
PIA Drafter:	Carleigh Benoit		
Email:	carleigh.benoit@unbc.ca	Phone:	250-960-5531
Program Manager:	Barb Daigle		
Email:	barb.daigle@unbc.ca	Phone:	250-960-5235

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

1. Description of the Initiative

The Employee Opinion Survey is a brief, annual survey that provides an opportunity for employees to identify UNBC's strengths and weaknesses as a workplace. It is one of the most important ways we have to improve our own work lives and UNBC overall. UNBC is committed to the annual Employee Opinion Survey as an ongoing opportunity for all employees to identify issues and help make positive changes in their workplace.

2. Scope of this PIA

The Employee Opinion Survey requires a consultant to collect and aggregate data extracted from employee responses to Fluid Surveys to generate reports and statistics for Human Resources. These reports and statistics may be used to make operational or behavioral changes in departments.

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3. Related Privacy Impact Assessments

While no other UNBC PIAs relate to this initiative, the provincial government has provided instructions on proper use of Fluid Surveys that will be adhered to during the initiative.

4. All Elements of Information or Data

Employee email addresses (containing employee names), personal opinions will be definitive personal information. Additional information possibly collected from self-reporting will include gender, age, racial identity, ability identity, sexuality, and employment history.

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

Data will be stored on Fluid Surveys servers and within UNBC servers. Consultant will access Fluid Surveys data and compile reports from her home office in Vancouver, British Columbia.

6. Data-linking Initiative*

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

Privacy Impact Assessment

Employee Opinion Survey (FluidSurveys/Gallup)

PIA#16-006

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7. Common or Integrated Program or Activity*

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Fluid Surveys administration settings are set to avoid tracking IP addresses.	Protection	30
2.	Employees are sent invitations to participate in the Employee Opinion Survey. A hyperlink is associated with each email to anonymize the responses and ensure only one entry is made per person.	Protection	30

Privacy Impact Assessment

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PIA#16-006

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3.	Employees voluntarily complete the UNBC Employee Opinion Survey on Fluid Surveys. Personal information is anonymized.	Collection	26(e)
4.	Employees are sent reminders from the consultant if their corresponding hyperlink has not been activated.	Collection	26(e)
5.	Results are aggregated into work groups and if work groups have fewer than five responses these results are rolled into a larger associated group to protect the individual opinions of employees. Only the consultant handles the individual data.	Disclosure & Use	33.2(l) and 32(a)
6.	The consultant aggregates the data from her home office to provide statistical reports to Human Resources	Disclosure	33.1(r)(ii)
7.	The consultant deletes all information pertaining to UNBC once the consultant can confirm through verification from UNBC that no further questions regarding the data will be asked.	Protection	30
8.	Human Resources and the senior leader's group review the statistical information and discuss the strategy to address the results.	Use	33.1(r)(ii)
9.	A report is generated and presented to the President's Executive Council	Use	33.1(r)(ii)
10.	A report is generated and presented to the Senior Leader's Forum	Use	33.1(r)(ii)
11.	President emails the overall university aggregate report through Facstaff to the university community	Disclosure & Use	33.1(r)(ii)
12.	Department leaders receive an email containing department specific aggregated reports and begin meeting with Human Resources to respond to the results	Disclosure & Use	33.1(r)(ii)
13.	Human Resources will dispose of the reports after they no longer serve an operational purpose.	Protection	30

9. Risk Mitigation Table

Privacy Impact Assessment

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PIA#16-006

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

10. Collection Notice

The following Collection Notice will be posted on the first page of the Fluid Survey that all participants must select yes to the question at the end before starting the rest of the survey.

University of Northern British Columbia

*Consent for Participating in the Employee Opinion Survey
Using FluidSurveys*

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

Privacy Impact Assessment

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PIA#16-006

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).

[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?

Survey respondents will be responsible for ensuring the accuracy of their information. Survey respondents are able to make changes to the survey up until the completed surveys are submitted.

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- 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 behavioral 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 hyperlink registered to the capacity to complete the survey. It is the employee's responsibility to ensure opinions are records 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?**

FluidSurveys will hold onto the data until they are instructed to delete the data by Human Resources or UNBC no longer holds a contract with FluidSurveys. The consultant will retain data and aggregate reports until her contractual obligations have been met and then she will destroy all data. Human Resources is currently working with the Records Management Coordinator to determine a Records Retention timelines for these records. An estimate retention period that the aggregate reports will be retained in Human Resources Offices is 5-7 years for statistical analysis.

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 University Secretary.

N/A

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

No

Privacy Impact Assessment

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PIA#16-006

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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 University Secretary, 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 FOIPPA. Under this same section, this information is required to be published in a public directory.

No.

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. (Change to more recent version of the documents)

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Part 7 – Program Area Signatures

Carleigh Benson

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



April 21 / 2016

Date

Program Director or



Barb Daigle

Signature

April 21 / 2016

Date

Maintenance and/or Security
(if applicable)

Grace Conroy

Signature

April 21 / 16

Date

Head of Public Body, or designate
(at UNBC, this is the University Secretary)



HEATHER SANFORD

Signature

April 21 / 16

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.