Privacy Impact Assessment
[Insert Initiative Title]
PIA#*16-010* *(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 Heather Sanford (University Secretary) at heather.sanford@unbc.ca or (250) 960-5878 or visit http://www.unbc.ca/foippa.

What if my initiative <u>does not include personal information</u>?

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:	Office of the University Secretariat
PIA Drafter:	Kellie Howitt
Email:	Kellie.Howitt@unbc.ca	Phone:	
Program Manager:	**Heather Sanford**
Email:	Heather.Sanford@unbc.ca	Phone:	

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

1. **Description of the Initiative**

   Fluid Survey based voting will provide an online system to allow voters to vote from home or from a university computer when considering candidates in university elections. Additional information such as letter of intent will be able to be put through as "questions" with a NEXT indicator instead of Yes or No answer.

2. **Scope of this PIA**

   The scope will be all Senate and Board of Governors elections for positions that are not acclaimed.

3. **Related Privacy Impact Assessments**

   N/A

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4. All Elements of Information or Data

Status as candidate, type of candidate, Name of candidate, candidate id, candidate UNBC email addresses, candidate letters of interest,

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.

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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**

Storage of candidate information will be on Fluid Surveys servers located in Canada on UNBC's account, but potentially accessible by American or Irish employees. Candidates will be briefed on how Fluid Surveys manages information and will agree that their candidacy is considered public information before their nomination is accepted.

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;	Yes
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.	N/A

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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);	Yes
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
Example:

	Personal Information Flow Table		
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	*An eligible voter's list consisting of name and email address is provided to the applicable Governance Officer from Manager, Student Systems for students that are eligible to vote, or the Faculty Relations Coordinator for faculty that are eligible to vote*	*Collection*	*26(c)*
	The Governance Officer forwards the list to the assigned		

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	System Administrator to generate an anonymized list of eligible voters with anonymous emails linked to each eligible voter's actual UNBC address. Generate email lists for student, staff, and faculty participant lists.		
2.	*Governance Officer tokenizes information in Fluid Surveys and compiles a coding list connecting each code to a participant. (Is this going to be laborous?)*	*Disclosure*	*33.1(7)*
3.	*Email is distributed with the access code out to all participants' UNBC email address. Each participant is provided with a unique code to access the voting poll and will only be able to vote once. Some votes will be for individual candidates and some votes will be for multiple candidates.*	*Disclosure & Use*	*33.2(c) and 32(a)*
4.	*Each participant votes for a candidate within the Fluid Surveys poll. [How do I make this a secret]*		
5.	*Results are analyzed and compiled by the Information Governance Officer and results are provided to the Governance Officer to report*		
6.	*Governance Officer reports the results to the governing body as part of election process*		

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.

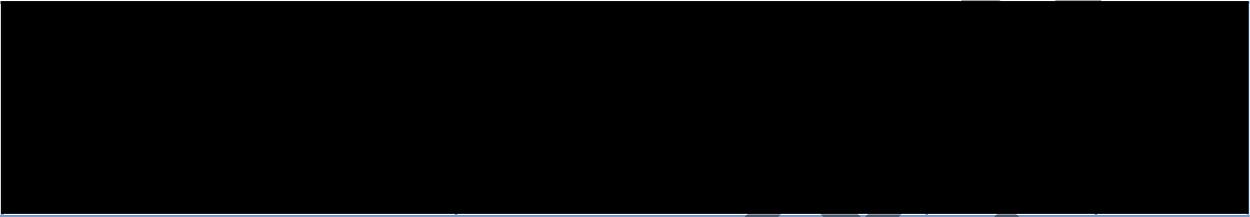**Examples can be removed and additional lines added as needed.**

Risk Mitigation Table			
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	███████████			

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2.

[black redaction box]

10. Collection Notice

Terms of Service to be put here!

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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.

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

████████████████████████

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

████████████████████

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

████████████████████

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.**

██
██
██
███
████████████████████████████████

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

███
██
███████████████████████████████████████

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?**

Corrections will have to be made in Banner/FAST? if there are errors in the participant's records. Once the list has been provided to the Governance Officer and tokenization occurs, the Information Governance Officer will annotate errors to the file where accuracy complaints are made.

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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, voting determines successful candidate

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.

Fluid Surveys will calculate the results which removes human error from counting ballots. Information Governance Officer will assess that system errors didn't result in double voting and inquiries will be made whether tampering has affected the results of the vote.

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?

Polling results will be kept for one year after polls close.

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.	

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 University Secretary, the UNBC Research Office or UNBC Archives.	

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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.

<div style="background-color:#c3d69b">
Please ensure Parts 6 and 7 are attached to your submitted PIA.
</div>

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.

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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 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.