

# Privacy Impact Assessment

Online WHMIS Training 2015 by KnowledgeWare

PIA# 16-001 (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 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 FOIPPA generally, please contact Adam Cullum (Information Governance Officer) at [adam.cullum@unbc.ca](mailto:adam.cullum@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: | Safety, Security and Emergency Management |        |              |
| PIA Drafter:        | Sarah Elliott                             |        |              |
| Email:              | sarah.elliott@unbc.ca                     | Phone: | 250-960-5535 |
| Program Manager:    | Sarah Elliott                             |        |              |
| Email:              | sarah.elliott@unbc.ca                     | Phone: | 250-960-5535 |

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

### 1. Description of the Initiative

*In 2015, a new version of the Workplace Hazardous Materials Information System was implemented. KnowledgeWare provides WHMIS training to ensure compliance with the Hazardous Products Regulations. The online computer based individualized training accommodates varying schedules of both employees and students at UNBC as an alternative to in-person training sessions that may be difficult to schedule. Using KnowledgeWare's training program will allow UNBC to track employees and students that have completed WHMIS training.*

### 2. Scope of this PIA

*The use of KnowledgeWare's online training and completion tracking system will require some personal data including the test taker's potential failure to acquire WHMIS training that could be used as part of a personnel evaluation to be transmitted between UNBC and KnowledgeWare's servers. Minimal additional personal data needs to be transferred to allow participants to register and UNBC will receive notification of successful WHMIS training which is available to disclose to*

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the public upon request as per section 33.1(a.1) of the Freedom of Information and Protection of Privacy Act.

### 3. Related Privacy Impact Assessments

NA

### 4. All Elements of Information or Data

Information that will be available to the service provider will include the trainees' names, employee/student numbers, UNBC email address, and a pass/fail grade for the required WHMIS training.

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**

*KnowledgeWare does not transmit or store any personal information pertaining to UNBC participant’s WHMIS training outside of Canada. Currently the data is stored on a Peer1 server in Toronto, Canada, with commercial backups at the same location. Within the next quarter KnowledgeWare expects to move to a new server (4GoodHosting) in Vancouver, with commercial backups at that downtown Vancouver location.*

*KnowledgeWare also commonly have a copy of the data on a hard drive in their office in Maple Ridge, BC, which is behind a sonicwall router for operational purposes. Ron McNutt (the owner) and one programmer will sign a confidentiality agreement because they are able to access the data when necessary.*

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

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

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

*\* 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.*

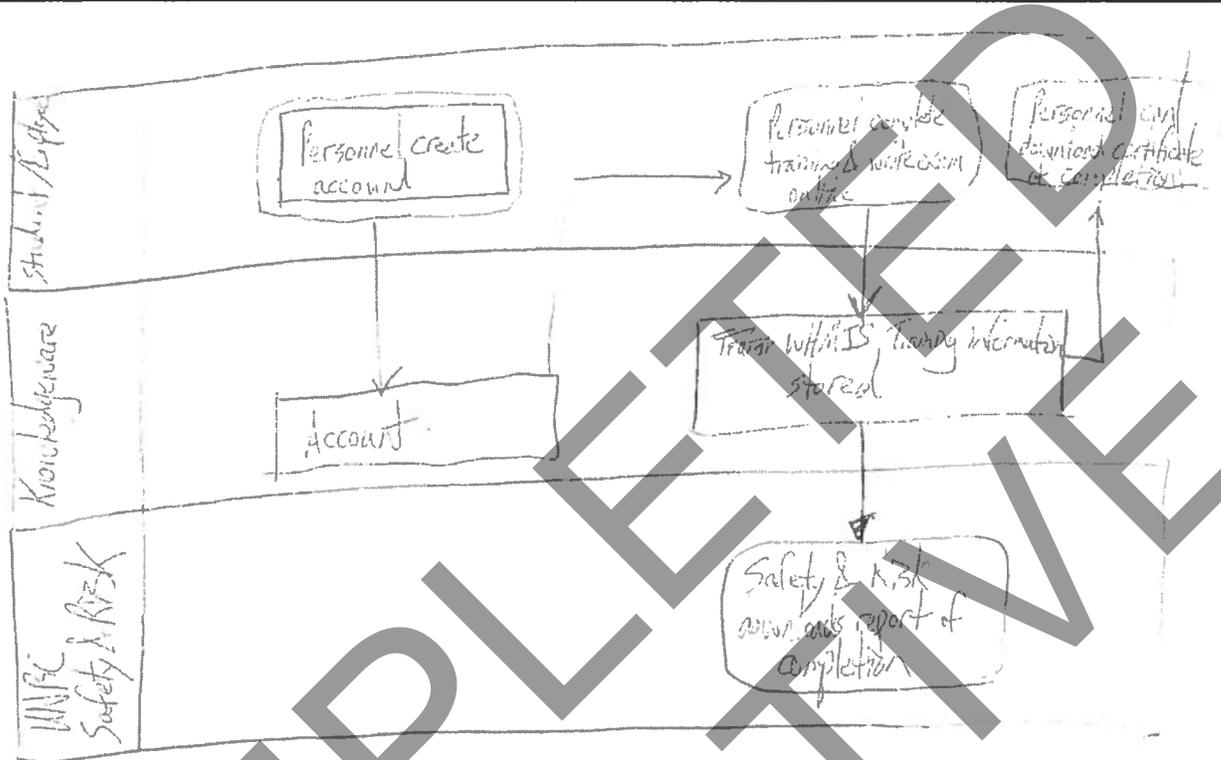
## 8. Personal Information Flow Diagram and/or Personal Information Flow Table

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**Personal Information Flow Table**

|    | Description/Purpose   | Type             | FOIPPA Authority              |
|----|---|------------------|-------------------------------|
| 1. | Employee or student registers an account with KnowledgeWare by providing only their name, employee or student number and UNBC email address.  | Collection       | 26(c)                         |
| 2. | After logging into the registered account, the employee or student completes the WHMIS training and test.   | Collection       | 26(c)                         |
| 3. | Upon the successful completion of the training, the employee or student is informed that he or she passed the course and can print out a personalized certificate of completion   | Disclosure       | 33.1(a.1)                     |
| 4. | Safety, Security and Emergency Management department receives instant reports of which employees and students have completed their training. These results are separated between employee and student groups. The information is entered into an excel spreadsheet and is used to inform UNBC which students and employees can work with hazardous chemicals. | Disclosure & Use | 32(a), 33.1 (e.1)(i), 33.1(l) |

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|    |   |             |        |
|----|---|-------------|--------|
| 5. | If an error is made during registration and the completion report information does not correspond with the actual employee or student information, corrections are made by the UNBC administrator or the program. | Collection  | 28, 29 |
| 6. | KnowledgeWare disposes of the information one year after the applicant takes the WHMIS test.  | Disposition | 31     |
| 7. | UNBC disposes of test information after the WHMIS certificate has expired. Currently WHMIS certificates are valid for three years.  | Disposition | 31     |

## 9. Risk Mitigation Table

Information that can be compromised:

- Affiliation with UNBC
- UNBC number
- WHMIS training score and status

| Risk Mitigation Table |      |                     |                   |
|-----------------------|------|---------------------|-------------------|
|                       | Risk | Mitigation Strategy | Likelihood Impact |
| 1.                    |      |                     |                   |
| 2.                    |      |                     |                   |
| 3.                    |      |                     |                   |

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### 10. Collection Notice

University of Northern British Columbia  
Safety, Security and Emergency Management Department  
Consent for the Disclosure of Personal Information  
Regarding Student Use of KnowledgeWare  
WHMIS Online 2015

I understand that by using KnowledgeWare's WHMIS Online 2015 tool, I consent to the University of Northern British Columbia, Safety, Security and Emergency Management Department collecting personal information pertaining to my performance in online assessments from KnowledgeWare.

This collection will include contact information and an indication that I have failed to meet requirements for WHMIS certification if I do not pass or complete the online assessment. This collection is required for the purposes of:

- Tracking students/employees to ensure they meet competencies to comprehend WHMIS which is required by the Hazardous Products Regulations SOR/2015-17
- Documenting through the use of an internal database the qualified individuals that are able to use hazardous materials at the University of Northern British Columbia

The University of Northern British Columbia collects, transmits and discloses information between KnowledgeWare servers and UNBC servers under section 26 (c) of the Freedom of Information and Protection of Privacy Act for the purpose of providing the capacity for WHMIS training and completion documentation.

My personal information will be held in KnowledgeWare Servers for a year after I complete my online assessment. My personal information will be held on the University of Northern British Columbia servers for as long as I am certified which is three years.

By continuing to register to WHMIS Online 2015, you authorize to allow collection and disclosure of your information between UNBC and:

KnowledgeWare  
11763 Darby St, Maple Ridge, BC V2X 5G1  
Phone: 800-893-9333  
Email: info@kccsoft.com  
Website: www.kccsoft.com

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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 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?

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Safety, Security and Emergency Management personnel will help correct errors through the administrative interface.

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

The initiative is for the purpose of providing training. Evidence of training can potentially be used for work assignment or discipline.

- 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.**

The information is considered accurate and complete because the user enters the information.

- 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?**

Main data storage will be purged on verified cancellation of the contract. The data back-ups will be copied over within 30-60 days of primary deletion.

### 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.**

*A Personal Information Bank will result from the use of Online WHMIS Training 2015.*

*Title: Excel spreadsheet housed on the UNBC main directory drive.*

*Description: Students – Name, student number, student email address, educational history (acquiring or not acquiring WHMIS certification)*

*Employees – Name, employee number, employee email address, occupational history (acquiring or not acquiring WHMIS certification)*

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

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

*Request that the vendor informs the Safety, Security and Emergency Management department whenever operational or back-up servers containing personal information about University of Northern British Columbia employees or students become stored in new locations.*

*Both the vendor and Safety, Security and Emergency Management employees understand that they can only disclose if an applicant has successfully completed WHMIS training. Failure to complete the training must not be disclosed to anyone but an individual requesting their own information and requests for this information from third parties must be treated as if the student or employee never participated by denying that the record of the inquiry exists.*

*This Privacy Impact Assessment will need to be revised if there are any changes to the training being conducted, any changes to what types of information are being disclosed to KnowledgeWare, or if KnowledgeWare's operational or backup servers become stored outside of Canada.*

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## Part 7 – Program Area Signatures

Sarah Elliott

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

  
Signature

2016/06/15  
Date

Sarah Elliott

Program/Department Manager or  
Project Sponsor

  
Signature

2016/06/15  
Date

N/A

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

N/A

Signature

N/A

Date

Adam Cullum

Head of Public Body, or designate  
(at UNBC, this is the Information  
Governance Officer)



2016/06/15  
Date

Please send a copy of this PIA with the respective signatures to Adam Cullum, Information Governance Officer for comment, review, approval & filing.

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

COMPLETED  
INITIATIVE