

Privacy Impact Assessment

Sunlife Benefits Administration

PIA#16-011 (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* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. 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 FIPPA 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:	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

Changing Benefits providers from a broker system with D.A Townley to Sunlife as one total provider for all benefits.

2. Scope of this PIA

Employee Benefits and Affiliate Organization Benefits (Aleza Lake and the Daycare).

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

Name, age, address, position title, work status, personal health information, salary/wage information, family status, sex/gender, beneficiary name and contact information, children (including age, sex, name), education status for students, MSP number, SIN,

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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

D.A Townley stores information in Canada. Sunlife stores information in Canada. [REDACTED]

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 Information Governance Officer to discuss the requirements of a data-linking initiative.	

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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>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	Yes
<p>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;</p>	No
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	No
<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 Information Governance Officer 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

Examples can be removed and additional lines added as needed.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<p><i>Representative from D.A Townley transfers information pertaining to Project Implementation Lead at Sunlife time maximums for fertility drugs, status of yearly maximums for orthopedic shoes, orthotics, and paramedical practitioner, status of five year maximums hearing aids, status of two</i></p>	Disclosure	33.1(1)(e.1)(i)

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	year maximums for vision care and eye exams, status of orthodontics lifetime maximums, status of basic/major combined annual maximums for dental care directly to Sunlife through reports submitted in October 2016.		
2.	UNBC will send Sunlife a report that includes employee id number (which will be the employee's Sunlife account number), first name, last name, benefit entitlement class, work status code (active, on leave, sabbatical), birthdate, first date worked, residence code (province), gender, dependent status, salary, hours per week, address type, mailing address and UNBC email address.	Disclosure	33.1(1)(e.1)(i)
3.	Sunlife sends instructions to each employee's UNBC email detailing how to enrol with Sunlife. Employee has three weeks to enrol with Sunlife starting October 20 th 2016. Employee will need to enter names of dependents and spouse and the original beneficiary form will have to be filled out.	Collecting & Use	26(c) and 32(a)
4.	UNBC communicates changes in employment status to Sunlife as they happen in weekly file transfers.	Disclosure	33.1(1)(e.1)(i)
5.	Sunlife would report if anything changes with the employees' premiums in weekly file transfers including family/single coverage and premium adjustments.	Collection	26(c)
6.	If information transferred from D.A. Townley to Sunlife is identified as inaccurate, Sunlife will flag the information and confirm the accuracy of that information with Manager, Health & Wellbeing	Collection & Use	26(c), 28, 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.			

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3.	
4.	

10. Collection Notice/Transfer Notice/

Orientation by Sunlife paired with Sunlife's Privacy Policy will make the handling of information by Sunlife transparent. A Sunlife employee will be available to answer any questions regarding how the benefits information is managed during orientations and for ongoing customer service. Any concerns regarding a lack of transparency will be reported to the Manager, Health & Wellbeing and/or the Information Governance Officer.

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 Information Governance Officer, 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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UNBC updates employment changes, including position and remuneration. Sunlife would only send UNBC information that would impact benefit premiums including marital status and number of children. The benefits recipient is responsible for the accuracy of all demographic information. Sunlife is responsible for accuracy of claims processing.

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

Yes, eligibility and premium amounts are affected.

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 provided the opportunity to update and monitor their Sunlife benefits account and UNBC information to reflect changes made to their personal information. Banner and FAST will be used by Human Resources to confirm accuracy and completeness of personal information. Sunlife will be responsible for ensuring that information they receive is confirmed and supported by appropriate documentation.

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?

Reports from D.A. Townley will be generated to transfer information to Sunlife. Supporting documentation will not be transferred to Sunlife and will be kept with D.A Townley for sixteen years to reflect Limitation Act requirements. Sunlife keeps information as per their data retention policy and the benefits recipient would need to contact Sunlife to inquire about information management practices of their own claim records.

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

Yes. Weekly reports are submitted between Sunlife and UNBC for the purpose of managing benefits costs in comparison to the recipient's eligibility. The contract with Sunlife covers requirements to comply with FIPPA when managing our information which means an ISA is not required. Benefits administration is a required service for the operation of the university.

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.

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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 Information Governance Officer, the UNBC Research Office or UNBC Archives.

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 new personal information bank will be created but it will be under the custody or control of Sunlife. Records kept in the PIB for benefits administration by UNBC will be reduced because original enrolment forms, orientation materials, benefits application forms, beneficiary forms will now go directly to Sunlife. UNBC will no longer act as intermediary between the employee and the benefits provider.

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

Part 6 – Information Governance Officer 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.

This signed PIA reflects plans determined before the contract was signed with Sunlife Financial to begin managing payment processing of all UNBC benefits. Future PIA amendments will reflect any change in plans in the execution of the plans defined here. PIA amendments will be stored electronically with the PIA, and convenience copies will be provided to all signatories.

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Part 7 – Program Area Signatures

Carleigh Benoit

Name of Individual leading the
Program/Project



July 25 2016

Date

Barb Daigle

Program/Department Manager or
Project Sponsor

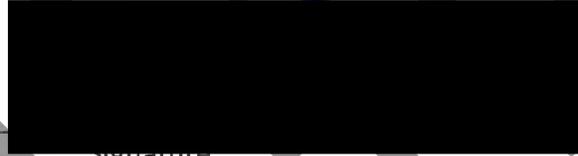
Sig


July 25 2016

Date

Greg Condon

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

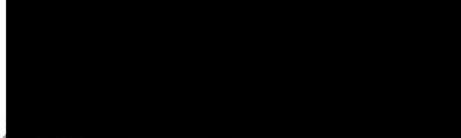
Signature


July 25 2016

Date

Adam Cullum

Information Governance Officer

Signature


July 25 2016

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 Officer.

ACTIVE
INITIATIVE