

# Privacy Impact Assessment

*Wildlife Danger Tree Assessor's Course Administration*

PIA#19-011 (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 (Privacy Impact Assessment)?

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](mailto: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 Information Governance Officer 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:	Continuing Studies		
PIA Drafter:	Lesley Haines		
Email:	Lesley.Haines@unbc.ca	Phone:	<b>250 960 5171</b>
Department Manager:	<b>Jennifer Cole</b>		
Email:	Jennifer.Cole@unbc.ca	Phone:	<b>250 960 5912</b>

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

### 1. Description of the Initiative

*The Wildlife Dangerous Tree Assessor Certificate is a two-day training course including a mix of classroom work, field exercises, and qualifying exams pertaining to information and technical procedures for assessing tree hazards and establishing appropriate safe work practices in situations where there is potential exposure from dangerous trees to workers involved in wildland firefighting. These courses are provided throughout British Columbia. This course primarily focuses on worker safety and tree defects which are visually inspected and rated as having "high defect failure potential". This certificate is recognized by WorkSafe BC. UNBC Continuing Studies manages the submitted grades and tracks individuals that have taken courses and a list of individuals that are qualified tree assessors.*

*The Wildlife Tree Committee is the advisory body that represents all wildlife tree matters in British Columbia. It is a multi-agency committee composed of representatives from the provincial government, WorksafeBC, industry and labour, and public interest groups from across the province.*

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The Wildlife Tree Committee is responsible for coordinating and developing Wildlife/Danger Tree Assessor's courses for the province, while UNBC Continuing Studies is responsible for retaining assessor certification records.

## 2. Scope of this PIA

All student personal information related to course delivery transferred to and from UNBC by the BC Wildfire Service Instructors, or the Wildlife Tree Committee, whether or not individuals holds a contract with UNBC Continuing Studies. Seven of the Wildlife Danger Tree Assessor's Course instructors are contracted directly with UNBC Continuing Studies. Information transfer may be for the purpose of contact information management, identity verification, eligibility for certification, and management of performance data.

## 3. Related Privacy Impact Assessments

N/A

## 4. All Elements of Information or Data

Assessors database information including: name, address, phone number, email address, grades, pass/fail, organization, certificate number, date of birth.

Grade sheet information including: name, date of birth, company, division, address, phone number, email, marks, final course grade.

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 the Information Governance Officer for review. You will receive support completing the remaining steps of the 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

*UNBC will be storing all relevant information inside our network drives located in Prince George and backed up in Kamloops. Data transfer and access occurs through UNBC's SharePoint site which is on premise.*

### 6. Data-linking Initiative\*

**In FIPPA, "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
<b>If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.</b>	N/A

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## 7. Common or Integrated Program or Activity\*

<p><b>In FIPPA, “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.</b></p>	
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;	Yes
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No <sup>1</sup>
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	N/A

<sup>1</sup> No formal agreement about delegation of responsibility or scope of services was developed. Change in responsibility has been ongoing between the Wildlife Tree Committee and Continuing Studies at the University of Northern British Columbia. Documentation does not meet parameters set out in section 12 of the regulations.

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

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
<i>Public Course Management</i>			
1.	<i>The student registers online or over the phone. The student completes informed consent regarding how UNBC Continuing Studies will manage personal information.</i>	<i>Collection</i>	<i>33.1(7)</i>
3.	<i>The student is sent course confirmation through the preferred email provided during registration. The preferred email address could be personal or a business address. All</i>	<i>Disclosure &amp; Use</i>	<i>33.2(c) and 32(a)</i>

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<p>registration information including email address is stored in BookKing <b>(is this on premise or cloud?)</b>.</p>		
<p>The instructor is given an on premise, individual course SharePoint sub site that can only be accessed by that instructor and UNBC Continuing Studies administrative staff. The UNBC Continuing Studies administrative staff transfer the course roster from BookKing to the course's SharePoint sub site. The instructor receives the course roster through the course's SharePoint sub site.</p>		
<p>The student attends the course and instructor records grading information correlated to each individual student.</p>		
<p>The Instructor submits the grading sheet through the course's SharePoint sub site back to UNBC.</p>		
<p>Grades are processed by being transferred from the course's SharePoint sub site into the collective Access database that stores ongoing qualified assessor information. Administrative assistant also ensures that information extracted from matches each registrant with a registration entry in BookKing.</p>		
<p>UNBC Continuing Studies administrative staff print wallet cards for successful candidates and deliver them to candidates through physical mail. Letters are sent to individuals that do not successfully complete the course containing feedback about why the student was not successful.</p>		
<b>Contracted courses for employers</b>		
<p>The employer registers individuals on behalf of the employees. The employer is responsible for collecting the necessary consent documentation for each employee.</p>		
<p>Course confirmation only goes to contact.</p>		
<p>The instructor is given an on premise, individual course SharePoint sub site that can only be accessed by that instructor and UNBC Continuing Studies administrative staff. The UNBC Continuing Studies administrative staff transfer the course roster from BookKing to the course's SharePoint sub site. The instructor receives the course roster through the course's SharePoint sub site.</p>		

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<p>The student attends the course and instructor records grading information correlated to each individual student.</p>		
<p>The Instructor submits the grading sheet through the course's SharePoint sub site back to UNBC.</p>		
<p>Grades are processed by being transferred from the course's SharePoint sub site into the collective Access database that stores ongoing qualified assessor information. Administrative assistant also ensures that information extracted from matches each registrant with a registration entry in BookKing.</p>		
<p>UNBC Continuing Studies administrative staff print wallet cards for successful candidates. If the employer paid, they get PDF copies for the wallet cards of successful assessors. Wallet cards get mailed to the employers' business address provided during registration.</p>		
<p>BC Wildfire Service managed courses</p>		
<p>Instructors employed by BC Wildfire Service run the course outside of the custody and control of UNBC. These courses do not utilize UNBC Continuing Studies resources before or during the delivery of the course.</p>		
<p>A BC Wildfire Service designated contact is provided a SharePoint sub site to submit course grades for courses that were not administered by UNBC Continuing Studies.</p>		
<p>UNBC Continuing Studies administrative staff process grades by transferring them from the course's SharePoint sub site into the collective Access database that stores ongoing qualified assessor information.</p>		
<p>UNBC Continuing Studies administrative staff print wallet cards for successful candidates. PDF copies for the wallet cards of successful assessors are emailed to the BC Wildfire Service contact. Wallet cards get mailed to the BC Wildfire Service office <b>in Victoria?</b></p>		
<p>A list of successful candidates is submitted to the BC Wildfire Service designated contact through the SharePoint sub site for the purpose of annual invoicing.</p>		

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<p><i>The designated contact from BC Wildfire Service can request the database of qualified assessors at any time to meet operational requirements or conduct quality assurance. Requests can also be made on behalf of the provincial committee. The database is transferred to BC Wildfire Service through the SharePoint sub site.</i></p>		
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## 9. Risk Mitigation Table

*Please identify any privacy risks, even very unlikely ones, 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.				

## 10. Collection Notice

### *Continuing Studies Privacy Statement for Wildlife Dangerous Tree Assessor Certificate Program*

*The University of Northern British Columbia manages information provided on this form according to the Freedom of Information and Protection of Privacy Act [RSBC 1996 c. 165]. The information you provide will be used to enroll you, confirm your identity, confirm sponsorship arrangements, process your payment, generate a class list for your instructors, and ensure that grades and certificates are assigned to the correct student. Information from your registration form may be used for statistics to plan future courses and programs.*

*Continuing Studies must directly disclose some information on this form to your sponsor, including your employer, if your employer is sponsoring you. Continuing Studies may need to share the information on this form with anyone repairing or maintaining electronic systems involved in delivering this Continuing Studies course.*

*UNBC Continuing Studies is the training agency chosen to deliver the Wildlife Dangerous Tree Assessor courses on behalf of the Wildlife Dangerous Tree Committee of BC (WDTC). Under the terms of our agreement with the WDTC, Continuing Studies provides a list of current assessors to the WDTC upon request. Personal information on this form will be shared confidentially with members of the WDTC and upon request by contractors for the purpose of confirming qualifications.*

*You have the right to revoke consent to the collection, use, retention, and disclosure of personal information at any time, but doing so will result in consequences including, but not limited to, forfeiting registration in the course. For more information about how personal information and privacy are managed at UNBC, visit [www.unbc.ca/foippa](http://www.unbc.ca/foippa).*

*By registering for this course, you indicate you have read, understand, and agree to the privacy statement. You also understand that you have the option to ask questions about any part of this statement before registering.*

*[Online Only]*

*I ACCEPT*

*I REFUSE*

## Part 3 – Security of Personal Information

*Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.*

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).

*Check with ITS!*

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]  
[REDACTED]

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

[REDACTED]  
[REDACTED]  
[REDACTED]  
[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?

*Continuing Studies staff will complete any updating or correcting information relating to grades and or registration information.*

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

Yes, whether or not they pass the course.

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**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.**

*Instructors will directly place information into SharePoint to limit the recreation and mistakes.*

**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?**

*[START HERE] If you do not yet have a schedule, please document how these records will be kept until the schedule is in place. Please describe retention schedules that apply where retention exceeds the one year requirement of FIPPA. Please contact the Information Governance Officer if you require assistance.*

## Part 5 - Further Information

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

*For example: your department has a regular exchange of personal information (both collection and disclosure) to provide services to your clients.*

**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.**

N/A

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

*For example: your public body will be disclosing information to PhD students so that they can conduct research.*

**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.**

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 FIPPA. Under this same section, this information is required to be published in a public directory.**

Yes. The following required descriptors are meant to satisfy the criteria set forth in section 69(6) of FIPPA.

*Danger Tree Assessors Database*

*Contains name, address, phone number, email address, grades, pass/fail, organization or employer, certificate number, date of birth*

*The authority for collecting the personal information: section 26(c)*

*This information is compiled to the purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed;*

*(e) the categories of persons who use the personal information or to whom it is disclosed;*

*(f) information required under subsection (7).*

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

## **Part 6 – Comments, Conditions & Concerns**

*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.*

*Approval subject to clear distinction within contractual language indicating allocation of responsibility between UNBC, BC Wildfire and the Danger Tree Assessor's Committee.*

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## Part 7 – Program Area Signatures

Leslie Haines

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Jennifer Cole

\_\_\_\_\_  
Department Head

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Lisa Haslett

\_\_\_\_\_  
Director or Dean Overseeing the  
Program/Project

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Trevor Fuson

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Adam Cullum

\_\_\_\_\_  
Information Governance Officer  
(Privacy Officer)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

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