

PRIVACY IMPACT ASSESSMENT

Part 1

Name of Initiative	Mandatory Survey of COVID-19 Vaccination Status
Responsible Department	Various: CFO/VP Admin, Provost and VPA
PIA Drafter	Stephen Gaspar

A. Description of the Initiative

UFV is going to complete a survey of vaccination status of students, faculty and staff. The results of the survey will be used, on an aggregated basis, to generate a report which will be used to determine if further health measures are required on our campuses.

B. Scope of the Initiative

This PIA covers the mechanics of the survey initiative and the UFV and UFV procedures for safeguarding the sensitive health information that respondents are being asked to provide. This PIA does not cover the SurveyMonkey Platform as a whole but, rather, considers the implications of using UFV's implementation of the SurveyMonkey Platform as a tool to administer the survey.

C. Related Privacy Impact Assessments

Not applicable.

D. Elements of Information or Data

The survey will ask for the following:

- Name
- Student / employee number
- Whether the respondent is faculty / staff / student
- Age group
 - o Under 18
 - o 18-24
 - o 25-34
 - o 35-44
 - o 45-54
 - o 55 and over
- Whether or not someone has received a full or partial series of a COVID-19 vaccine
- If not fully vaccinated, whether a respondent intends to be fully vaccinated
- Which campuses a respondent will attend in the Fall 2021:
 - o Abbotsford
 - o CEP Chilliwack

- Mission
- Hope
- Clearbrook Centre
- Online only
- Other

Before proceeding to part 2, answer the following question: Is any of the information identified in 1.D above personal information (i.e. is it information about an identifiable person)?

- Yes

If the answer is no, please go to part 6 below.

If the answer is yes, please proceed to next part and complete the PIA.

Part 2: Protection of Personal Information

5. Storage or Access outside Canada

- UFV's implementation of SurveyMonkey stores survey responses in Amazon Web Services' Canadian Data Centres. SurveyMonkey employees (including those located outside of Canada) will not access survey responses unless requested by UFV to implement, maintain, repair, troubleshoot, or upgrade the service

6. 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
<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>	

7. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>An email is sent to staff, faculty, and student respondents to request that they complete the survey</i>		
2.	<i>A recipient is given the opportunity to request a unique survey link in order to participate in the survey</i>	<i>Collection(? TBD)</i>	
3.	<i>A recipient participates in the survey by answering each question in the survey using the SurveyMonkey tool</i>	<i>Collection</i>	<i>26(c)</i>
4.	<i>The responses will be available to be viewed by s. 22, s. 15(1)(l) [REDACTED] The identifiers regarding the survey respondents (name and student/employee number) will be separated from the remaining survey</i>	<i>Use</i>	<i>32(a)</i>

	<i>responses so that UFV will not have a record of responses that can be linked to an individual.</i>		
5.	<i>UFV will use the name and student/employee numbers provide by survey respondents only to determine whether actual UFV community members have completed the survey.</i>	Use	32(a)

8. Risk Mitigation Table

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees with access to survey data could access an individuals' vaccination status</i>	<ol style="list-style-type: none"> 1. Only the ^{s. 22, s. 15(1)(f)} [redacted] will have access to the initial survey responses 2. Employees are bound to comply with FIPPA in carrying out their duties with UFV 3. The survey response data is to be used only in accordance with the collection notice 4. Survey responses will be disconnected from the identity of survey respondents as soon as practical after the survey has closed. The identities of those who 	Low	High

		<i>completed the survey will be kept separate from the remainder of that individual's responses.</i>		
3.	<i>Recipient's personal information is compromised when transferred to SurveyMonkey</i>	<i>Transmission is encrypted and SurveyMonkey meets or exceeds data security standards such as ISO27001 and GDPR</i>	<i>Low</i>	<i>High</i>
4.	Personal information is retained longer than is required	<ol style="list-style-type: none"> 1. The survey responses will be disconnected from identifiable respondents as soon as is practical. 2. Only one individual will have access to the file that connects an individual with their survey responses. 3. The name and student/employee number will be separated from the remainder of survey response data and the original survey response file will be destroyed 	<i>Low</i>	<i>High</i>

9. Collection Notice

UFV will use the following collection notice:

The personal information requested on this survey is collected under the authority of the University Act, and in accordance with sections 26 (c) of the Freedom of Information and Protection of Privacy Act (FIPPA). You will be asked for your name and student/employee number. Name and student/employee numbers will only be used by UFV for the purpose of determining whether or not an individual has completed the survey. Survey responses will be stored in Canada.

Please be aware that your name and student/employee number will not be used to ascertain your vaccination status.

Responses provided to survey questions will be aggregated on an anonymous basis to generate a report which shall be used to inform UFV's decision on the appropriateness of further health measures on campus.

If you have questions about the collection and use of survey responses in accordance with the Freedom of Information and Protection of Privacy Act please contact UFV.Info@ufv.ca.

Part 3 – Security of Personal Information

10. Please describe the physical security measures related to the initiative (if applicable).

UFV will collect survey responses in the SurveyMonkey platform in digital form and will not be transferred into physical files.

Survey response data is maintained in s. 15(1)(b) servers used by SurveyMonkey described here: <https://www.surveymonkey.com/mp/legal/security/>

Physical security measures at s. 15(1)(b) data centres include: s. 15(1)(l), s. 17
[REDACTED]

11. Please describe the technical security measures related to the initiative (if applicable).

At UFV – only one individual will have access via a password-protected account to the survey responses in their original form. The identities of the respondents will be disconnected from the remainder of survey responses at the earliest practical stage and the original survey response file will be destroyed once this is complete.

12. Does your branch/department rely on any security policies?

UFV employees involved with this survey are aware of the sensitivity of the personal information being collected and access to responses will be limited to one individual with a

password protected account. No one else will have access to the personally-identifiable survey results.

13. 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.

For example: role-based access.

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

For example: audit trails or physical sign-in and sign-out of files.

Part 4 – Accuracy/Correction/Retention of Personal Information

15. 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?

Individual survey responses will not be linked in a personally identifiable manner.

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

No – survey responses will not be kept in a personally identifiable manner and UFV will not have the capability nor desire to make a decision that directly effects an individual based on survey responses.

17. 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.

N/A

18. 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?

N/A

Part 5 – Further Information

19. 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 your privacy office(r).

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

No

<p><i>Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).</i></p>	<input type="checkbox"/>
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21. 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