

## A GUIDE TO THE COMPLETION OF A PRIVACY IMPACT ASSESSMENT (PIA)

### What is a PIA?

A PIA is a privacy risk assessment tool that is used in identifying and assessing privacy related impacts for any system/program/legislation which collects, uses, discloses, and/or secures personal information. A PIA is also used when a change occurs to an existing system/program/legislation that collects, uses, discloses and/or secures personal information.

### Why Complete a PIA?

PIA's are a legal requirement for all public bodies under S.69 (5.3) of the *Freedom of Information and Protection of Privacy Act (FIPPA)*. In addition to being a legal requirement, PIA's act as an "early warning system" by identifying deficiencies with regards to privacy protection. It can assist management in making informed decisions and avoid privacy breaches by ensuring an organization is complying with *FIPPA*. The PIA demonstrates accountability by including privacy as part of the design of new initiatives or systems. When designing a new initiative or program with privacy in mind, unnecessary costs are avoided throughout the process as it is inclusive from the beginning. Initiatives cannot proceed to implementation without completion and formal signoff of a PIA.

### When to Complete a PIA?

PIA's should be drafted during the initial development stage of any new system/program/legislation. PIA's should also be drafted for *amendments* to existing programs/systems/legislation that detail the privacy impacts of the changes. In many circumstances, the PIA is an evolving document that becomes more detailed over time as the initiative progresses.

If the initiative involves data-linking or a common or integrated program or activity, as defined by *FIPPA*, the Office of the Information and Privacy Commissioner of British Columbia (OIPC) must be notified at an early stage in the development of the document by UFV's Privacy Consultant.

The PIA must be completed and signed off prior to the implementation of a new initiative or "launch" date of a new system or program.

### Who is Responsible for a PIA:

PIA's should be drafted by the program area project manager responsible for the implementation of the system/program/legislation. Program area managers are responsible for the approval of the PIA ensuring compliance with *FIPPA* before implementation. In developing a PIA, the project manager must work closely with both Legal Counsel and the Information Technology Department.

### How to Write a PIA:

The Province of British Columbia provides a template for the writing a PIA:

<http://www2.gov.bc.ca/gov/content/governments/services-for-government/information-management-technology/privacy/privacy-impact-assessments>

If you have any questions regarding the completion of a PIA, please contact Maureen Murphy, UFV Legal Counsel, at 604-854-4572 or [Maureen.murphy@ufv.ca](mailto:Maureen.murphy@ufv.ca).

## **Part 1 – General**

Name of Department/Branch:	UFV Advancement & Alumni Relations		
PIA Drafter:			
Email:		Phone:	
Program Manager:	Whitney Fordham		
Email:	Whitney.fordham@ufv.ca	Phone:	604-557-4086

### **1. Description of the Initiative**

The Office of Advancement & Alumni Relations exists to build life-long relationships and raise funds to support the University of the Fraser Valley (UFV). We engage and steward donors, UFV alumni, and our internal and external community to garner resources, time and talent to support UFV in achieving its mission. We provide benefits and opportunities for UFV Alumni, help to grow and strengthen UFV's reputation, and fund student awards, programs and capital expenditures.

The UFV Connect (Graduway) platform will allow us to:

- Build institutional strength through a strong engaged alumni base who volunteer, mentor students, donate and refer
- Enable faculties to engage their alumni
- Create an up-to-date and relevant alumni data pool which includes valuable employment information

The UFV Connect platform is a technology solution developed by third party service provider, Headhunter Systems Limited (doing business as "Graduway"). The platform offers the following features: groups (grouping alumni on pages according to interest/faculty/chapters), events (listing, registration and online events), news feed & communications (customizable newsletters, sharing of information, etc.), alumni directory for networking, mentorship and volunteering, jobs board, and business directory.

While UFV has contracted with Graduway to develop and host the platform, users of the Graduway platform will be required to consent to Graduway's terms of use and privacy policy prior to using the platform.

Users, when joining the platform, will either sign up via email and fill out their profile manually; or link to their Linked In profile, which prepopulates their profile using an API link from Linked In. Users have the ability to manage their own privacy settings within the platform.

### **2. Scope of this PIA**

This PIA relates to the first phase of the initiative, open to UFV alumni, faculty and staff. In the future, students will have the ability to sign up to the platform to receive mentorship from alumni. UFV donors may also be invited to join at a later phase.

### 3. Related Privacy Impact Assessments

New initiative, no other PIAs have been completed.

### 4. Elements of Information or Data

When a user signs up to join the Graduway Platform they will be required to provide the following minimum information:

- Full name
- Email address

Users can provide other optional information as follows:

The following fields pre-populate when linking Linked-In account:

- Title
- Business
- Affiliation with UFV (ie. Alumni, staff and faculty, etc)
- UFV education
- Other education
- Career summary/experience

Other optional fields that they may choose to fill out in their profile include:

- Phone number
- Location (city or country)
- Social media URLs (facebook, LinkedIn, Twitter, Flickr, Instagram, Skype, YouTube, Google)
- Whether they would like to offer mentorship or seek mentorship and what type
- What kind of help they are offering or seeking

Users have an option to login using their LinkedIn account. If this option is selected, information in the user's LinkedIn profile is shared with Graduway. Graduway in turn, shares these details with UFV.

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**

Personal information is stored and accessed only in Canada.

Graduway is contractually obligated to store personal information in Canada. Graduway has advised that user personal information will be stored on Canadian instances of § 15(00)s 17.2 and Amazon Web services (AWS).

## 6. Data-linking Initiative\*

<p><b>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.</b></p>	
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
<p><b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b></p>	

## 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;	NO
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	NA
<p><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></p>	

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

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Individual registers with Graduway, creates password and registers through web portal. Individual creates their profile and settings. This information may or may not include information from linked social media accounts.	Collection	26(c)
2.	System identifies and provides appropriate assessment of "current education and experience" and identifies educational gaps	Use	32(a)
3.	Individual voluntarily shares information on their profile with other users.	Disclosure	33(2)
4.	Information is downloaded by Alumni Relations and uploaded into Raiser's Edge database, where it is linked to the alumni's constituent record	Collection	26(c)
5.	Information from constituent record in Raiser's Edge database is used for the purposes of alumni engagement and providing benefits and services to alumni	Use	32(a)

## 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	User account is wrongfully accessed by another individual.	User assigns their own unique password to protect their information and self manages changes.	Low	Medium
2.	Wrongful access by a UFV employee to personal	UFV employees that will have access to user personal information collected through the Graduway platform and stored in Raiser's Edge are informed of their obligation to maintain confidentiality. Only University Relations Employees with a need to know the information are granted access to the Raiser's Edge database.	Low	Medium

## 10. Collection Notice

Users will interact directly with the Graduway platform and will be required to consent to Graduway's privacy policy prior to using this service. The privacy policy indicates that user information will be shared with UFV.

The following collection notice will be presented to individuals that wish to sign up for UFV Connect.

Collection notice – Personal information that you supply to Headhunter Systems Limited (doing business as "Graduway") in order to access and use the UFV Connect platform will be shared with UFV and is collected pursuant to the *University Act* and section 2(c) of the *Freedom of Information and Privacy Protection Act*. It will be used for the purpose of sending you newsletters, other informational materials, statistical purposes and for fundraising purposes. Should you have any questions about the collection of information, please contact \_\_\_\_\_ [Person name] at UFV Alumni Relations at B214T, 33844 King Road, Abbotsford, BC V2S 7M8 [phone number and email address of relevant individual].

## Part 3 – Security of Personal Information

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

s. 15(1)(l), s. 17, s. 21



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

s. 15(1)(l), s. 17, s. 21

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

Yes – access to the information that is obtained from Graduway and stored in an individual’s constituent record is limited to a select few UFV employees who receive an orientation regarding access to the system. Only UFV employees with a need to know are provided with access and access privileges are removed from those employees who no longer have a need to know due to a change in job description. Further questions regarding these procedures may be directed to s. 22

**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.**

UFV employees that have access to the personal information stored in an individual’s constituent record in Raiser’s Edge are obligated to maintain such information in confidence. Only UFV employees that have a need to know such information have credentials to access it in Raiser’s Edge.

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

When an employee’s role changes within UFV or if they leave UFV, their credentials to access personal information stored in Raiser’s Edge are modified or eliminated as appropriate.

**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?**

An individual user of the Graduway service will be responsible for ensuring that the information that they provide to Graduway is accurate. If a user needs to correct any information held by Graduway then they can do so by editing their Graduway profile.

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

No.

**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.**

*Describe this process and the procedures in detail (including the source used to update the information and if personal information is amended, how all other public bodies that it has disclosed that information to will be notified of the change).*

N/A

**19. If you answered "yes" to question 17, do you have 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

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

*Outline in detail any systematic and/or repetitive external disclosures of personal information that occur as part of this initiative. Note access provisions to personal information from all parties and how/type of information is disclosed.*

*Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact UFV's legal counsel.*

*If there are external third parties receiving personal information on a regular basis an Information Sharing Agreement or similar should developed and annotated in this section.*

**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 UFV's legal counsel.*

**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.**

No

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

**Part 6 – UFV’s legal counsel /or individual responsible comments**

*This PIA is based on a review of the material provided to UFV’s legal counsel 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 it to UFV’s legal counsel.*

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Stephen Gaspar,  
Legal Counsel,  
University of the Fraser Valley

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Signature

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Date



**Part 7 – Program Area Signatures**

<hr/> Insert name of Program/project manager responsible. Department University of the Fraser Valley	<hr/> Signature	<hr/> Date
<hr/> (insert name of contact responsible for information systems), Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.) University of the Fraser Valley	<hr/> Signature	<hr/> Date
<hr/> (insert name of Chief Information officer) University of the Fraser Valley	<hr/> Signature	<hr/> Date
<hr/> Head of Public Body, or designate University of the Fraser Valley	<hr/> Signature	<hr/> Date

A final copy of this PIA (with all signatures) must be kept on record.