



Privacy Impact Assessment for Non-Ministry Public Bodies

Data extract for web profiles
 PIA#[assigned by your privacy office(r)]

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 privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

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/Branch:	VIU Office of the AVP, Scholarship and Community Engagement		
PIA Drafter:	Trevor Davis		
Email:	Trevor.davis@viu.ca	Phone:	250-740-6291
Program Manager:	SAME		
Email:		Phone:	

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

1. Description of the Initiative

A faculty/staff web profiling tool is being developed that would allow self-reporting of applied research, teaching activities and teaching specialties/interests. The underlying database would require an initial extract and regular updates of limited information from our Human Resources data store. While web display of information is completely optional for the individual, almost all employees at the university would be represented in the database (in order to provide the option). Both the data transfer and web display involve limited personal information.



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2. Scope of this PIA

The scope of the PIA covers the transfer of faculty and staff usernames and specific contact information from the HR database to a second database located in the BCNET EduCloud facility. In order to facilitate identifying unique individuals (as usernames may change during a marriage or divorce), employee ID numbers would also be extracted. However, the ID to user match would occur locally and IDs would not be transferred. The PIA also includes web display of some of the information.

3. Related Privacy Impact Assessments

NA

4. Elements of Information or Data

Employee number – NOTE: removed before transmission out of the local data centre

Surname

Preferred (First) Name

Username

Email Address (work)

Position Status (either REG or TEMP)

Instructional (Y,N)

Dept Code

Title

Chair (Y,N)

Office Location

Phone (work)

Personally-written profile and list of activities

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.



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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

s. 15(1)(l)

The information will be stored in Canada, using the [redacted] facility. It will be accessible (edit) through an https web interface to the named individual only, restricted to on-campus (Canadian) IPs only. The final web display of limited information will be open to the entire web.

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

Note: Data will be replicated, and then kept up to date. There is no new personal information in the second database.



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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: (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
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

** 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). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.*

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.

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

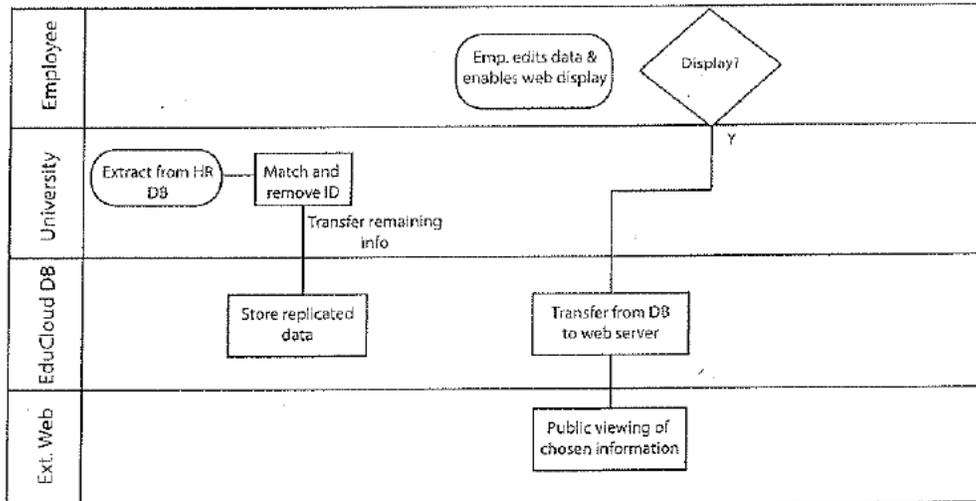
Please provide a diagram and/or table that shows how your initiative will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged.



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Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.



9. Risk Mitigation Table

Note: Once a transfer has occurred, the impact of any intrusion or data loss is limited to this system only. As it exists solely for informational web display the impact of downtime is minimal.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employee personal information could be compromised in data transfer	Transmission encrypted over SSL connection, employee ID removed prior to transit. All other info is intended for public display.	Low	Low
2.	Attack on DB from web server	DB located on different server, communicates through dedicated port; Regular backups	Low	Low
3.	Intrusion into employee editing system – alter or remove data		Low	Low

s. 15(1)(l)



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		Regular backups. Data does not replicate back to original data store, so it is never at risk		
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10. Collection Notice

NA.

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 your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

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

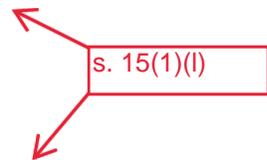
[Redacted]

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

IDs not transferred. [Redacted] DB separated from web server.

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

VIU IT security policies.



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.

Server logs and software logs.

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



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personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

Users can update (or remove or disable) any information about themselves in the replicated to for web display. This system does not update source data. .

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.
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?

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 your privacy office(r).

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 your privacy office(r).



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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.

No, using the definition from FOIPPA.

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



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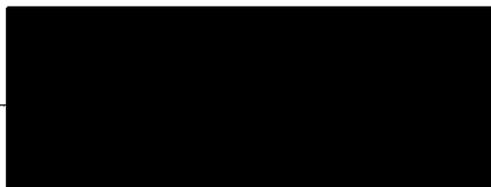
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Part 6 - Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) 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 Privacy Office(r).

Project is fine to proceed as described.

Mark Armstrong
Privacy Officer/Privacy Office Representative



Sept. 22 / 15
Date

s. 22(1)



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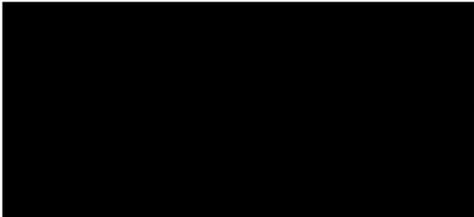
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Part 7 – Program Area Signatures

Program/Department Manager	Signature	Date
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Contact Responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in this PIA.)	Signature	Date
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<i>Marie Armstrong</i> Head of Public Body, or designate		<i>Sept. 22/15</i> Date
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A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.