



Privacy Impact Assessment for Non-Ministry Public Bodies

VIU Online exam booking System

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:	Vancouver Island University – Assessment and Invigilation Exam Services		
PIA Drafter:	Felicity Blaiklock		
Email:	Felicity.blaiklock@viu.ca	Phone:	250-740-6276
Program Manager:	Felicity Blaiklock		
Email:	Felicity.blaiklock@viu.ca	Phone:	250-740-6276

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

1. Description of the Initiative

In order to create a more efficient service to students and the community, we are implementing an online exam booking system where students – rather than calling or emailing to book their exam sittings – will access an online system where they will book the date and time of the exam they wish to sit. This information (including name and email) will be available to Assessment and Exam Invigilation Services for scheduling purposes.



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2. Scope of this PIA

The scope is prospective VIU students and external community members wishing to book exam invigilation services.

3. Related Privacy Impact Assessments

NA

4. Elements of Information or Data

Name, e-mail, telephone number, exam institution

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

The company providing the platform is a US company Registerblast.com – but the server is in Montreal, QB

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.	



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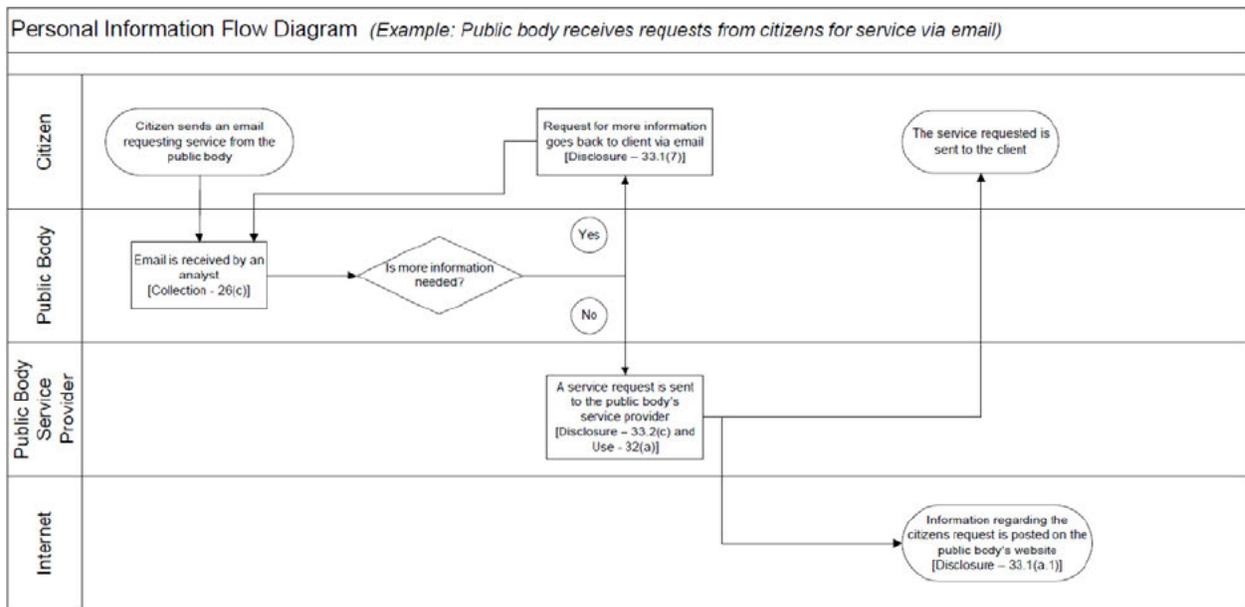
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Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.

For ease of reference, the collection, use, and disclosure authorities in FOIPPA can be found in the appendices. If you do not know what the relevant authorities are, please contact your privacy office(r).

Depending on the complexity of your initiative, you may choose to provide one general diagram for the initiative, and more specific diagrams for particular components. If multiple organizations will collect, use, or disclose personal information, the diagram should identify how each organization is involved in the initiative.

Example:



Examples can be removed and additional lines added as needed.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Email received from client requesting service	Collection	26(c)
2.	Email client back requesting more information	Disclosure	33.1(7)
3.	Service request transferred to service provider contracted by public body	Disclosure & Use	33.2(c) and 32(a)



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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.	Employees could access personal information and use or disclose it for personal purposes	Oath of Employment; contractual terms, etc.	Low	High
2.	Request may not actually be from client (i.e. their email address may be compromised)	Implementation of identification verification procedures	Low	Low
3.	Client's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure line	Low	High
4.	Inherent risks in sending personal information to a client via email	Policy developed to inform clients of risk and ask if they would like the information via a different medium, such as through the mail	Low	Medium

10. Collection Notice

If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:

1. The purpose for which the information is being collected
2. The legal authority for collecting it, and
3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

Please include your proposed wording for a collection notice and where it will be located for individuals to read before collection takes place. You can also attach a screen shot or a copy of your form where the collection notice would be located. For further help with collection notices please see the "Collection Notice Tip Sheet" located on the [CIO's website](#).



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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).

Only two people have access to the online booking system (the coordinator and assistant). The computers are all locked with individual passwords and usernames.

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

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

No.

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.

As #11.

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

As #11.

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?

Printed lists of daily schedules (including names of those coming in to do exams) will be shredded at close of day.

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

NO



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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.

For example: check to see that the information was obtained from a reputable source such as another government agency.

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?

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 FOIPPA. Please contact your public body’s privacy office(r) and/or records office(r) if you require assistance.

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).

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.



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A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual.

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



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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).

Privacy Officer/Privacy Office
Representative

Signature

Date



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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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_____ Head of Public Body, or designate	_____ Signature	_____ 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.