



# Privacy Impact Assessment for Non-Ministry Public Bodies

## VIU's Ukraine SDI Project

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 |        |                        |
| PIA Drafter:               | Meg Savory                  |        |                        |
| Email:                     | Meg.savory@viu.ca           | Phone: | 250-740-6378           |
| Program Manager:           | Dr. Michael Govorov         |        |                        |
| Email:                     | Michael.govorv@viu.ca       | Phone: | 250-753-3245 ext. 2729 |

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

### 1. Description of the Initiative

*This is an international development project funded by Foreign Affairs, Trade and Development Canada. The purpose of the project is to transfer six Geographic information Systems courses from VIU to two universities in Ukraine, so that Ukrainian civil servants can be trained by those universities. In this way, the civil servants will be prepared for the implementation of a Spatial Data Infrastructure in Ukraine. The project is funded under the Government of Canada's international aid program, specifically under the Universities envelope. It is a five year long project. The main activities include redesigning the courses for the Ukrainian context, training six Ukrainian*



# Privacy Impact Assessment for Non-Ministry Public Bodies

## VIU's Ukraine SDI Project

PIA#[assigned by your privacy office(r)]

---

*instructors who are existing employees of the partner universities, and setting up and piloting the courses in Ukraine. There will be 80 Ukrainian students involved in the project.*

### 2. Scope of this PIA

*This PIA covers the project activities that VIU has control over. It does not cover the activities undertaken by our Ukrainian partners in Ukraine.*

### 3. Related Privacy Impact Assessments

*There are no existing PIA's for this project, and no others are currently planned.*

### 4. Elements of Information or Data

#### **Instructors:**

*Data will be collected from the six Ukrainian instructors of the courses. This data will be the data we need to register them in the VIU Train-the-trainer course – name, address.*

*We are required by the Government of Canada to enroll travellers in a specific insurance program for their travel insurance. This is a requirement of the funding. To do this we require name, address, date of birth, medical conditions and emergency contacts. This information is forwarded through a secure electronic portal to the Government of Canada's chosen travel insurance provider.*

*We book the travel for these six instructors from Ukraine, and for the instructors from VIU who travel to Ukraine for the purposes of this work. We obtain photocopies of the travellers passports so we can complete accurate booking of their flights. This includes place and date of birth, address, name and citizenship.*

*When international travellers arrive at VIU we ask them to complete an emergency contact form, which is voluntary. We ask them to give us two emergency contacts, list their name and local address, and to disclose any medical conditions or medications they wish us to know about.*

#### **Students:**



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *VIU's Ukraine SDI Project*

PIA#[assigned by your privacy office(r)]

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*Data will be collected from students. These students will be registered in Vancouver Island university courses during the life of the project. After the project is completed, the two partner universities will continue to offer the courses, but students will be registered in courses offered by those universities.*

*We will collect:*

*Student's name, address, e-mail address gender, workplace and occupation*

*Please list the elements of information or data involved in the initiative. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area, like stumpage totals, fish license numbers, visitor centre stats, or hiring data.*

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.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *VIU's Ukraine SDI Project*

PIA#[assigned by your privacy office(r)]

### **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

*Information on students is stored in Ukraine, as that is where the activity is taking place.*

#### 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 |
| <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> |    |



# Privacy Impact Assessment for Non-Ministry Public Bodies

## VIU's Ukraine SDI Project

PIA#[assigned by your privacy office(r)]

### 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);  | no  |
| 2. Those services are provided through:<br>(a) a public body and at least one other public body or agency working collaboratively to provide that service; or<br>(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.   | N/A |
| <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.*



# Privacy Impact Assessment for Non-Ministry Public Bodies

## VIU's Ukraine SDI Project

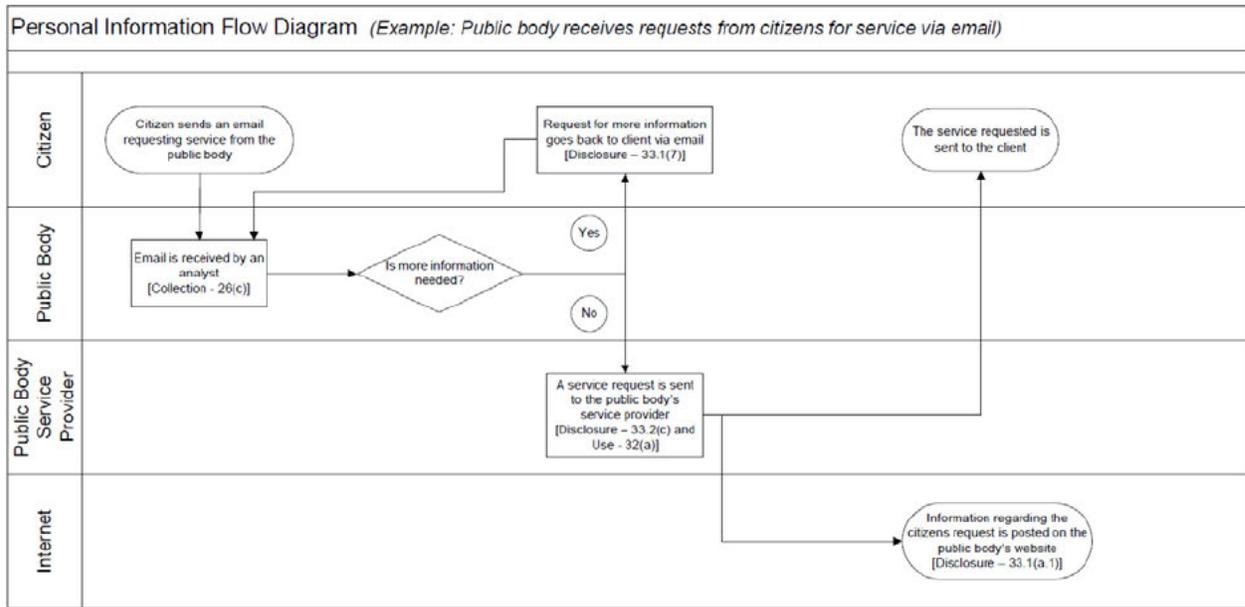
PIA#[assigned by your privacy office(r)]

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) |



# Privacy Impact Assessment for Non-Ministry Public Bodies

## VIU's Ukraine SDI Project

PIA#[assigned by your privacy office(r)]

### 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 regarding instructors and use or disclose it for personal purposes  | Employment Terms and Conditions, secure filing system, very limited number of employees with access, internal office procedures for protecting confidentiality, FOIPP training for all staff.   | Low        | High   |
| 2.                    | FOIPP standards in Ukraine are different than in BC. Our Project Manager in Ukraine is used to being able to ask for and share more personal information that would be legal in Canada. (such as asking for a copy of a passport) There is a risk he may revert to the Ukrainian standards. | During the time which the course are offered by VIU, the information is collected as per VIU's internal procedures. The Project Manager is given specific direction as to what information he can require, how that information is to be handled and stored. Only necessary information is collected. | Medium     | High   |
| 3.                    |   |   | 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  | Medium     | 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:



# Privacy Impact Assessment for Non-Ministry Public Bodies

## VIU's Ukraine SDI Project

PIA#[assigned by your privacy office(r)]

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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](#).*

???

### **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).**

*In Canada (Instructor and student Information)*

*Key card access to the building, closed door to employee area, hard copy information stored in a locked file cabinet in an individual employee's office. Employees have received FOIPP training.*

*In Ukraine*

U

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

*User Access profiles assigned on a need-to-know basis, Vancouver Island University's firewall and security systems.*

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

**Policy 41.03 Risk Management**



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *VIU's Ukraine SDI Project*

PIA#[assigned by your privacy office(r)]

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### **Policy 45.01 Use of Information Technology**

Please describe any specific policies and procedures and provide contact details for someone who could answer further questions regarding these policies and procedures.

**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.**

*For example: role-based access.*

**15. 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**

**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?**

*For example: users have access to update their own information or, notes will be made on a case file.*

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

*Students who take the courses must be public servants (this is the purpose of the project). The process includes asking students to identify their employer and occupation.*

**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.*

*The information comes directly from the student and is confirmed with her employer.*



# Privacy Impact Assessment for Non-Ministry Public Bodies

## VIU's Ukraine SDI Project

PIA#[assigned by your privacy office(r)]

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?

*The government of Canada requires us to retain all records until seven years after the end of the project. The Government of Canada requires us to report on the training, including student's name, workplace, contact information and gender.*

### **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) with the federal government in order to provide services to your clients.*

*We are required by our contract with the government of Canada to disclose particular information to the Department of Foreign Affairs, Trade and Development. Specifically we are required to submit student and instructor names, gender and place of work (this is required since the project is about training civil servants working in specific ministries). The report we submit will be in the public domain and will be accessible through the government of Canada.*

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.

*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.

No.



# Privacy Impact Assessment for Non-Ministry Public Bodies

*VIU's Ukraine SDI Project*

PIA#[*assigned by your privacy office(r)*]

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



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## *VIU's Ukraine SDI Project*

PIA#[assigned by your privacy office(r)]

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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).*

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Privacy Officer/Privacy Office  
Representative

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Signature

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Date



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *VIU's Ukraine SDI Project*

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### **Part 7 – Program Area Signatures**

|                                     |                    |               |
|-------------------------------------|--------------------|---------------|
| _____<br>Program/Department Manager | _____<br>Signature | _____<br>Date |
|-------------------------------------|--------------------|---------------|

|  |                    |               |
|--|--------------------|---------------|
| _____<br>Contact Responsible for Systems<br>Maintenance and/or Security<br>(Signature not required unless they<br>have been involved in this PIA.) | _____<br>Signature | _____<br>Date |
|--|--------------------|---------------|

|  |                    |               |
|--|--------------------|---------------|
| _____<br>Head of Public Body, or designate | _____<br>Signature | _____<br>Date |
|--|--------------------|---------------|

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.***