



Privacy Impact Assessment for:

## VIU Departing Employee Survey

<b>Initiative:</b>	Departing Employee Survey
<b>Department or Service Area Name:</b>	Human Resources

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### Part 1 – General Information and Overview

#### 1.1 What is the Initiative?

Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.

Departing VIU employees are sent an email containing a link to a survey, which they may complete on a voluntary basis. The survey takes approximately 15 minutes to complete and includes 35 questions with rated/spectrum, checked answer and open comment style questions.

#### 1.2. What is the scope of the PIA?

Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?

This survey is a result of a commitment made under the People Plan and is standalone.

#### 1.3. Are there any related Privacy Impact Assessments?

Please indicate if this an update on an existing PIA or an additional module that was not covered in the original PIA.

This is an update of an existing PIA as result of change from the original survey platform (Qualtrics) to SurveyMonkey

#### 1.4. What are the data or information elements involved in your initiative?

In the table below, please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in an appendix.

Information Type	Information Collected
Personal Information	<b>From Students:</b> <b>From Third Parties:</b> <b>From VIU Employees:</b> Demographic information by category, the nature of workplace interpersonal relationships and experiences with others; employment history and future employment plans. Names of participants is ascertainable but not requested on the survey itself.
Contact details	<b>From Students:</b> <b>From Third Parties:</b>



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	<b>From VIU Employees:</b> not requested
Account information: what info is required to set up an account?	<b>n/a</b>
Commercial information	<b>n/a</b>

### 1.4a. Did you list personal information in question 1.4?

**Personal information** is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference- see the table below for examples of Personal Information.

**Business contact information**, in turn, is defined as information to enable an individual at a place of business to be contacted and includes the name, position name or title, as well as business telephone number, address, email or fax number of the individual. BC FIPPA does not protect business contact information.

Examples of Personal Information	
<ul style="list-style-type: none"> <li>Name, age, sex, weight, height</li> <li>Home address, phone number</li> <li>Race, ethnic origin, sexual orientation</li> <li>Medical information</li> <li>Health history</li> <li>Number or symbol assigned to the individual</li> <li>Income, purchases and spending habits</li> <li>Blood type, DNA code, fingerprints</li> </ul>	<ul style="list-style-type: none"> <li>Marital or family status</li> <li>Religion</li> <li>Education</li> <li>Financial information</li> <li>Criminal information</li> <li>Employment information</li> <li>Personal views or opinions, except if they are about someone else</li> </ul>

- If yes, go to [Part 2](#)
- If no, answer question 1.5 and submit questions 1 to 1.5 to pia@viu.ca. You do not need to complete the rest of the PIA template.

Click or tap here to enter text.

### 1.5. How will you reduce the risk of unintentionally collecting or disclosing personal information?

Some initiatives that do not require personal information are at risk of collecting, using, or disclosing personal information inadvertently, which could result in an information incident.



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### Part 2 – Collection, Use, and Disclosure

This section will help you identify the legal authority for collecting, using, and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

#### 2.1 Four point “Necessity Test” for the collection, use, and disclosure of Personal Information.

To determine if the Personal Information from your initiative meets the necessity threshold, apply the following four-point test to each element of PI from 1.4 above. Note that each element of PI must meet all four points of the test.

#### Four point “necessity test” for collecting personal information ([OIPC Canada, 2016](#)).

1. The information is rationally connected and demonstrably necessary to an operating program or activity
2. The information is likely to be effective in meeting the objectives of the program or activity
3. There are no other less privacy-invasive ways to effectively achieve the objectives of the program or activity
4. The loss of privacy is proportional to the objectives of the program or activity

Personal Information element	Does it meet all four points of the necessity threshold?	Reasons for keeping or excluding from initiative

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### 2.2 Does your initiative involve the use of Artificial Intelligence (AI)? If so, please fill out Appendix One: GenAI Analysis Questions

### 2.3 Personal Information Flow Diagram and/or Personal Information Flow Table

In the table below, list the personal information from question 1.4. Think about how each element of information flows through your project. Your Privacy Officer can help you figure out whether each step is a collection, use, or disclosure, and whether you have the legal authority for the way you're working with the information. Alternatively, you can attach a flow diagram to this PIA. Add rows as necessary.

	<b>Describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.</b>	<b>(Collection, Use or Disclosure)</b>	<b>FIPPA or other legal authority</b>
<i>E.g.</i>	<i>E.g., Student email, password, and IP address collected by software platform for account creation.</i>	<i>Collection</i>	<i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i>
1.	1.Information is collected via a request to complete the departure survey. Information collected includes personal information, from employees departing VIU. Personal information may also include survey participants' opinions of other employees.	Collection	26(c) 26(e)
2.	Surveys are completed via a web-based form and sent back to human resources; employees are asked not to forward the survey on to others.	Collection	26(c) 26(e)



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3.	Completed surveys are collected by designated/authorized HR employees and reviewed quarterly in aggregated groups of 10 or more surveys. Survey data will be reported in aggregate form.	Use	32(a)
4.	The general nature of comments made about other VIU employees may be shared with those employees in circumstances where the identity of the surveyed departing employee cannot be determined by those comments or their context.	Disclosure	33(d)
5.			
6.			

### 2.4 Risk Mitigation Table

Thinking through the information flow, identify where there are risks for privacy incidents or data breaches. For each risk, identify a mitigation strategy, as well as the likelihood of an incident, and level of impact or harm if people's information were breached.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact/harm
1	Survey responses will be intercepted during transmission	IT security measures in place	Low	High
2	Personal information will be shared, intentionally or otherwise, with VIU	VIU employee education and training on FIPPA obligations; employee oversight; accessible privacy breach/incident reporting and response;	Low	High

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	employees who do not need it in their roles, or to the public.	<p>restricting folder access on the HR shared drive to only authorized personnel.</p> <p>The survey will be perpetually active online and accessed with a link every time an employee voluntarily leaves VIU. As such, outgoing employee data will accumulate on the server in the Survey Monkey account. Data will be downloaded quarterly and then deleted from the Survey Monkey server.</p> <p>Directions for deleting data are on the following page:  <a href="https://help.surveymonkey.com/en/surveymonkey/manage/deleting-responses/">https://help.surveymonkey.com/en/surveymonkey/manage/deleting-responses/</a></p>		
3				
4				
5				

### 2.5. Collection or Privacy Notice

If you are collecting personal information directly from an individual the information is about, FIPPA requires that you provide a collection notice, also known as a privacy notification.

A collection notice must contain the following elements:

- The legal authority and section under FIPPA under which you are collecting personal information.
- The purpose for which you are collecting the personal information and how it will be used.



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- The contact information of an employee or officer at VIU who can answer questions about the collection of personal information.

Contact the privacy office for a collection/privacy notice template.

If applicable, paste your privacy notice here.

- **Collection:** Any personal information requested in this survey is collected and used under the authority of the *University Act* and pursuant to sections 26 (c) and (e) of the *Freedom of Information and Protection of Privacy Act*. The personal information will be used to plan, evaluate, monitor and report on the effectiveness of EDI and human resource initiatives and activities in order to improve employee experiences at VIU going forward. For more information regarding the collection and use of the personal information please contact Vancouver Island University's Privacy Office at [privacy.officer@viu.ca](mailto:privacy.officer@viu.ca).

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### Part 3: Storing Personal Information

#### 3.1. Is any personal information being stored outside of Canada?

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

No.

##### 3.1.1. Where is the personal information stored?

SurveyMonkey data is stored on the cloud on Canadian servers; survey data containing personal information is often downloaded as Excel files. SurveyMonkey account access at VIU requires SurveyMonkey login credentials, which are managed by OUPA.

#### 3.2. Does your initiative involve sensitive personal information?

Examples of sensitive personal information include personal health information, genetic and biometric data, personal finances, geolocation data, criminal records, counselling records, HR records, payroll records, racial or ethnic origin, sexual orientation, religious, philosophical, or political beliefs, etc.

No

If **yes**, please complete [Part 4: Assessment for Disclosures of Sensitive Personal Information](#).

If **no**, skip to [Part 5: Security of Personal Information](#)

### Part 4: Assessment for Disclosures of Sensitive Personal Information

Complete this section if you are disclosing sensitive personal information. You may need help from your organization's Privacy Officer.

#### 4.1. Is the sensitive personal information stored by a service provider?

Click or tap here to enter text.

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If yes, fill out the table below, then go to question 4.3. If no, continue to [question 5](#).

### Information about Service Provider

Name of service provider	Name of cloud infrastructure and/or platform provider(s)	Where is the sensitive personal information stored (including backups)?

#### 4.2. Provide details on the disclosure, including where and how the personal information is stored.

Answer this if question 4.1 does not apply. Be specific about where and how the information is being stored.

Click or tap here to enter text.

#### 4.3. Is there a contract that includes privacy-related terms?

If there is a contract with the provider, please describe any privacy-related terms in the contract, or attach the privacy schedule.

Click or tap here to enter text.

## Part 5: Security of Personal Information

Section 30 of FIPPA imposes a duty on the public body to prevent unauthorized access to Personal Information both internally and with any contracted third parties. As such, we need to make sure that personal information is safely secured in both physical and technical environments. **For each item in this section, please describe the security measures for both the service provider and for VIU internally.**

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

For example, physical security measures may include: the security environment of vendor's data centres; storing records containing PI in locked storage rooms, offices, and/or filing cabinets with

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controls over distributions of keys/access; locked workstations that do not permit others to view your screen (including when working remotely, etc.

Information will be provided by respondents on their device (e.g., work PC, home PC, phone) and SurveyMonkey cloud servers. Authorized HR employees will be able to download data in Excel files. HR employees lock their screens when away from their workstations to prevent others from viewing their screens

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

E.g. Encryption standard for data in transit and data at rest; firewalls, strong passwords; MFA; encrypted documents, etc.

Click or tap here to enter text.

### 5.3 Tracking Access / Access Controls. In this section, you will describe how the unit will minimize the risk of unauthorized access to Personal Information.

**5.3.1.** FIPPA section 30 requires public bodies to manage access to PI based on the principle of “need to know” – that users may only access information that is necessary to do their job. This is frequently accomplished by assigning role-based access controls (RBAC), and by establishing a security matrix that describes which positions/roles are permitted to access specific types or groups of Personal Information. Access to personal information should only be permitted to those who demonstrate their right of access on the security access chart. [Please describe how access controls work in the department, or with this initiative.](#)

HR personnel are meant to be the only personnel with access to the survey and its data. OUPA’s understanding is that it is technically possible for SurveyMonkey Brand Administrators (in OUPA) to access data in any SurveyMonkey accounts held by VIU, but the HR Exit Survey is known by OUPA to be private information. There are no circumstances where OUPA would access this information without the knowledge/consent of HR; data security and access management is a front-of-mind concern for OUPA Surveys. In short, HR (and potentially executive leadership) will be the only users with authorized access to this survey data, and HR will determine to whom access to respondent information should be granted.



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**5.3.2** How will you know if sensitive personal information is accessed, including access by service providers? This should include a description of what information is available through logs.

Click or tap here to enter text.

**5.3.3** 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.

Click or tap here to enter text.

### **5.4 What controls does the provider have in place to prevent unauthorized access to sensitive personal information?**

Describe technical, administrative, and/or policy measures in place to protect PI. If using a cloud-based service provider, include a description of controls in each layer of the stack: software level, platform level, infrastructure level.

SurveyMonkey employs layered security controls to protect sensitive personal information. User access is managed through authentication (including SSO and MFA for enterprise clients), role-based permissions, and session timeouts. Data is encrypted in transit and at rest, with audit logs tracking access and activity. The platform is hosted on AWS, which provides physical security, network segmentation, and encrypted backups. SurveyMonkey holds SOC 2 Type II and ISO 27001 certifications and offers Canadian data residency options for enterprise clients. These measures help mitigate the risk of unauthorized access to personal information

## Part 6: Accuracy/Correction/Retention of Personal Information



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[FIPPA section 28 states](#) that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete. In this section, you will demonstrate how you intend to keep personal information on file accurate and complete.

### 6.1 How is an individual's information updated or corrected?

[FIPPA section 29](#) states that a person can ask you to correct their personal information in your custody or control. If it is not possible to update or correct (for physical, procedural or other reasons) it must be noted on the record. **Please explain how it will be updated or annotated. If personal information will be disclosed to others, how will VIU notify them of the update, correction, or annotation?**

If survey participants wish to make corrections to or delete any of their personal information they have provided in their survey response, they may provide a written request to Human Resources and the information will be corrected. Unredacted, identifying personal information will not be disclosed to VIU employees other than those authorized to use it.

### 6.2. Does your initiative use personal information to make decisions that directly affect an individual(s)?

No

#### 6.2.1.If you answered "yes" to question 6.2, do you have an information schedule in place related to personal information used to make a decision?

FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

Click or tap here to enter text.

### 6.3. Do you have a records management schedule in place?



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How long will you keep the personal information collected? Is there a plan in place for retention and deletion? Please also use this question to note how long it will be stored by the service provider (if applicable).

Click or tap here to enter text.

### Part 7 – Personal Information Banks

*A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.*

#### 7.1. Will your initiative result in a personal information bank?

No

If yes, please complete the table below:

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the Personal Information Bank

### Part 8 – Further Information

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

No. Reporting out of the information collected in the survey will only happen once the information is anonymized and aggregated – such that it will not contain personal information.

### 8.2. Will the information collected be used for research or statistical purposes?

No. There will not be any access for Research purposes. There will be use by HR for statistical purposes. For statistical reporting, responses will be combined with other responses, for reporting, in groupings of 10 or more.

## Part 9 – Summary and Proponent Responsibility

This section is for Privacy Office recommendations as well as any limitations due to privacy concerns.

Click or tap here to enter text.

## Part 10: Signatures

*This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.*

<b>Reviewed by</b>	
<b>Approved by</b>	Human Resources
<b>Date:</b>	22-July-2025