

PRIVACY IMPACT ASSESSMENT

I BASIC INFORMATION - New Initiative – CivicIdeas

1. Name of Organization unit.

Department	Citizen Engagement and Strategic Planning
Division	
Branch/Section	

2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Rob Gordon
Branch/Section	
Phone Number	250 361-0347
E-Mail	rgordon@victoria.ca

3. Description of the Program/System/Legislation (Initiative) being assessed.

CivicIdeas is hosted on a Granicus Inc. website.

CivicIdeas provides an online engagement platform which encourages greater community participation on important civic matters. The platform will not replace traditional forms of civic engagement but will rather complement face-to-face initiatives currently undertaken by City staff.

The introduction of an online engagement portal is a recommendation from the City's Civic Engagement Strategy. The goal of the portal is to broaden the reach of engaged stakeholders and engage the 'hard to reach' stakeholders by providing convenient ways to participate and provide feedback. The portal provides flexibility, accessibility and convenience for residents when providing feedback on important civic matters.

Not every use of CivicIdeas will require the collection of personal information. When personal information is collected, it will often be limited to such things as age and gender. The information will only be used for analysis and reporting purposes in an aggregate format.

		*Yes	No
(a)	Does this PIA involve a common or integrated program/activity (as defined in the FOIPP Act)?		X
	and		
	Is the common or integrated program/activity confirmed by the written requirements set out in the regulation?		X
(b)	Does this PIA involve a data-linking initiative (as defined in the FOIPP Act)?		X

4. Purpose/Objectives of the initiative (if statutory, provide citation).

The purpose of implementing CivicIdeas is to generate greater public participation on important civic matters. The tools available through the platform will allow the City of Victoria to:

- Collect ideas for community improvement, leverage feedback on projects underway, and prioritize key public initiatives.

- Utilize online discussions, forums and survey tools to collect feedback on specific topics.
- Provide the community with access to information such as videos, documents and presentations to help citizens make informed decisions.
- Collect electronic comments for Council agenda items using an online form tied to the upcoming meeting agenda.
- Run detailed reports and distribute them to City staff providing a deeper understanding of public opinion.

The tools utilized will be dependent on the type of project and level of engagement required. The content and tools will be project specific and tailored to the feedback required for each initiative.

5. What are the potential impacts of this proposal? (Include privacy impacts in this description).

Foreseeable impacts include greater public participation in City-led engagement initiatives and more informed feedback from citizens to the City.

The use of Survey Monkey will greatly diminish through the introduction of the survey tool offered through CivicIdeas.

Positive impacts of the introduction of CivicIdeas include the centralized location of personal data resulting in greater ease in managing personal information. Personal data will be collected through one channel and will be placed straight onto the Granicus server located in Canada.

There are no foreseeable privacy impacts as personal information obtained from the public will not be shared, but solely used in a general format for analysis and reporting purposes.

6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).

There is no previous PIA.

II DESCRIPTIVE INFORMATION

1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information. [See note above about the definition of personal information.]

For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.

CivicIdeas will not collect sensitive personal information (e.g. SIN, employment or medical history). The personal information collected will be necessary to:

- Contact participants (e.g. advising them of a new CivicIdeas forum or survey) or to respond to participant inquiries/questions
- To create a participant profile
- To provide context to participant information collected
- To identify specific types of stakeholders (e.g. where you live, age, gender)

To create a CivicIdeas profile requires an email address and user name. Your user name can be your name, some variation of it or a non-personal identifying pseudonym.

When you are signed into CivicIdeas, your IP address may be collected.

Although by themselves or together, age and gender are not, in most circumstances personal information as defined by FIPPA, they are personal information when collected by CivicIdeas

because they are linked to email addresses and/or correct names that can or do identify individuals.

Additional personal information collected (such as age and gender) will be dependent on each CivicIdeas initiative. For example, if an initiative is about evaluating the need for additional senior citizen services, participant age would be necessary to more accurately evaluate the need. Prior to collecting personal information for a specific initiative, the collection purpose will only be for those authorized by section(s) 26(c) or (e) in Part III.

Unsolicited Personal information

Individuals who use feedback forums like CivicIdeas will include personal information about third parties. The City does not have the legislated right to collect, use or disclose this personal information. CivicIdeas uses methods to minimize the receipt of third party personal information that includes:

- Prominently display a notice to participants to not provide personal information in their comments.
- Section 27(2) Notification that describes what personal information is only necessary to be collected.
- Forums and discussions will be moderated and personal information will be removed when identified.
- Personal information will be destroyed so that it cannot be retrieved.
- Participants who continue to submit personal information about other people will have their account suspended and possibly terminated.

2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.

Collection:

Granicus will collect the personal information described above and will store it, provide access to it and keep it secure from unauthorized access. Granicus has created storage and access within Canada to comply with Canadian privacy laws including FIPPA.

Use

The personal information identified above will not all have the same uses. Email addresses will be used to create a profile to contact participants. Names are voluntary and if provided will be disclosed worldwide. Personal information collected specific to an initiative will not be used in a manner able to identify individuals if used in internal reports.

Disclosure

All that will be disclosed on the CivicIdeas website will be the names of people who use their real names and unsolicited personal information. Real names are not required. Personal information collected specific to an initiative will not be disclosed on the Internet, to other participants or third parties or in internal reports.

Narrative

1. Granicus provides the CivicIdeas web interface, servers and storage of all information participants provide to create their profiles and participate.
2. When participants logon to CivicIdeas, provide information or request information, they are logging on to a Granicus server which is receiving the information provided and providing access to information requested.

3. The City of Victoria will have an overall administrator of CivicIdeas and Communications Coordinators will manage their specific initiatives.
4. The Administrator will have access to all participants' profiles and the Coordinators will have access to profiles of those participants who are engaged in an initiative the Coordinator is responsible for
5. The Communications Coordinators will respond to all requests for information from participants.
6. Once an initiative ends comments can still be viewed but no more comments, submissions, etc. are accepted.
7. Reports will be developed from the content participants provide. If an initiative collected personal information, the information will be represented in aggregate form in the reports
8. Reports will be provided to required staff, City Council and electronically on the City's website. All reports etc. created from participant content will reside on the Granicus server and with the Communication Coordinator.
9. Once the City makes the decision to either adopt or discontinue an initiative, the CivicIdeas content is removed.

III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

	Yes	No	n/a
Is personal information being collected?	X		

1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		x	
	If yes, please specify the name of the Act and relevant section			
(b)	Is the personal information being collected for law enforcement purposes?		x	
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	x		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		x	
	If yes, please specify the prescribed purpose.			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?			
	and			
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?		x	

s. 26		Yes	No	n/a
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	x		
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		x	
(g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public? Please identify event:		x	
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or		x	
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		x	

2) How will the personal information be collected?

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

The information will be collected through a registration process.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	x		

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

3) Notification to collect information

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?	x		
	(b) the legal authority for collection?	x		
	(c) the contact information of the person who can answer questions regarding the collection?	x		

27(2)		Yes	No	n/a
	Additional details as required (e.g., method of notification)			
	The notification will be on the CivicIdeas website.			

IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

	Yes	No	n/a
Is personal information being used?	x		

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.) The individual will consent to the use of their personal information upon registration.	x		
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	x		
	Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.			
	The personal information will only be used for the original purpose in which it was collected. This purpose is described in Part I.			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?			x
	Specify subsection(s) being applied			

V DISCLOSURE OF PERSONAL INFORMATION
(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	x		

1) Disclosure of Personal Information

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
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s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file) See Appendix C	X		
s. 33.3	Disclosure to Public Without Request	Yes	No	n/a
(1)	Do the records fall within a category established under section 71 (1)?			X
	Additional details as required			
(2)	Do the records fall within a category established under section 71.1 (1)?			X
	Additional details as required			

2) Systematic or Repetitious Disclosure/Exchanges?

		Yes	No	n/a
i.	Do the disclosures of personal information under section 33.2 occur on a regular basis?			X
ii.	Has an Information Sharing Agreement been completed for these disclosures/exchanges?			X
iii.	Has information related to the Information Sharing Agreement(s) been entered into the Personal Information Directory ?			X

3) Research or Statistical Purposes (Section 35)

		Yes	No	n/a
	Has a researcher requested access to personal information in an identifiable form for research purposes?			X

4) Archival or Historical Purposes (Section 36)

Please check the authorization(s) for disclosure listed below.

		Yes	No	n/a
(a)	The disclosure would not be an unreasonable invasion of personal privacy under section 22			X
(b)	The disclosure is for historical research and is in accordance with section 35 (research agreements)			X
(c)	The information is about someone who has been dead for 20 or more years			X
(d)	The information is in a record that has been in existence for 100 or more years			X

VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION
(Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:			
	Contact person:	Julie Potter, Manager, Citizens Engagement		
	Phone number:	250.361.0519		
Additional details as required				

VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION
(Sections 30 and 30.1 of the FOIPP Act)

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:	These are Granicus' Policies and Procedures		
	Contact person:			
	Phone number:			
Additional details as required				
Granicus uses the Defense-in-Depth strategy which includes antivirus software, firewalls, anti-spyware programs, hierarchical passwords, intrusion detection and biometric verification.				

4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information? There is no requirement to add or change personal information as it is all provided by individuals and is mostly opinion, comments, suggestions, etc. Personal information deleted is because it belongs to third parties and cannot be collected, used or disclosed.			X
6.	Does your system security include an ongoing audit process that can track use of the system (e.g., when and who accessed and updated the system)?	X		
	Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances Audit abilities are described below under additional details			
7.	Does the audit identify inappropriate accesses to the system?	X		
	Additional details Granicus uses the LogMeIn application which uses: <ul style="list-style-type: none"> • The OpenSSL communications protocol is used by LogMeIn which is the standard for web-based commerce or online banking • lockout mechanisms only allow a few incorrect logins before locking the account or the offending IP address. • audit messages will notify users via email when an important change (such as adding a new computer) or a suspicious event (such as an incorrect login) occurs. • The host keeps a detailed event log specific to LogMeIn. It also writes major events (such as a remote access session starting or ending) into the operating system event logs Further information is available at: https://secure.logmein.com/products/pro/security.aspx			

		Yes	No	n/a
	Will the information be stored or accessed only in Canada? Granicus is a US company that stores it's customer information on servers in Canada and backs up the information on servers in Canada.	X		
		Yes	No	n/a
(a)	Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?			X
	Please explain			
(b)	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?			X

	Please explain		
(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?		X
	Please explain		

VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use? The data is kept indefinitely. The schedule number is 1201.	X		

Recommendations:

- 1.) Include privacy language in next contract when updated or renewed
- 2.) Include a moderation policy to manage CivicIdeas
- 3.) Use the Privacy Policy (Appendix A) for CivicIdeas

X SIGNATURES

PUBLIC BODY APPROVAL:

Julie Potter
Employee responsible for CivicIdeas

Julie Potter
Signature

Sept. 8 2014
Date

Rob Gordon
Information Access and Privacy Analyst

Rob Gordon
Signature

August 27, 2014
Date

Katie Hamilton
Director, Citizen Engagement and Strategic Planning

Katie Hamilton
Signature

Sept 8 2014
Date

Julie Luckevich
Director or Manager, Archives and Records Management

Julie Luckevich
Signature

Sept. 17, 2014
Date

APPENDIX A

PRIVACY POLICY

This Privacy Policy substitutes for Granicus' CivicIdeas Privacy Policy.

CivicIdeas complies with the privacy provisions in the Freedom of Information and Protection of Privacy Act (FIPPA). To confirm compliance a Privacy Impact Assessment was completed. CivicIdeas will be managed in accordance with the Privacy Impact Assessment.

No language in the CivicIdeas contract with Granicus, Granicus' Terms and Conditions or Privacy Policy pertaining to personal information is applicable if the language contravenes FIPPA's privacy provisions. Additionally, Granicus will not contact you directly to collect personal information for any use or disclosure reasons exclusive to Granicus' purposes.

Consent

Before accepting your completed profile, you must confirm that you have read the Terms and Conditions and this Privacy Policy before your profile is accepted allowing your CivicIdeas participation. Once you submit your profile for acceptance consent to collect your personal information for the uses described below is presumed to have been received. You may however, decline at any time to provide personal information requested by a forum, discussion group or survey.

Collection, use and disclosure

You do not need to disclose your identity to other CivicIdeas participants. When creating your profile you will need to choose a user name, but you are able to choose a user name that does not identify you. Further, any your personal information CivicIdeas collects will not be shared with other participants.

The personal information CivicIdeas collects will be used for one of these two purposes:

- It will relate directly to and be necessary for a program or activity (Section 26(c) of FIPPA) or;
- Be necessary for the purposes of planning or evaluating a program or activity (Section 26(e) of FIPPA)

We collect your email address in order to communicate with you regarding CivicIdeas or to respond to your questions you may have regarding CivicIdeas or specific forums, discussions or surveys. At times a forum, discussion or survey will ask for personal information such as your age or gender. This information is necessary because it will better evaluate a service or more accurately prioritize new programs. For example, evaluating a service for senior citizens would be more comprehensive if the City organized participant submissions by age category.

Personal information collected will not be used or disclosed to City staff or Council in such a way that will identify individuals. Personal information collected for a specific purpose will be used or disclosed in aggregate or statistical formats that will not identify individuals.

Security, Storage and Access

Granicus' security and storage and access of personal information is provided by Granicus as part of its contract with the City of Victoria to use CivicIdeas. One purpose of the Privacy Impact Assessment is to evaluate whether the security, storage and access of personal information meets FIPPA's requirements. Granicus' security, storage and access provisions for CivicIdeas were found to be sufficient.

Granicus is a US based company with Canadian government clients in British Columbia, Alberta, Ontario and Nova Scotia. To comply with Canadian privacy laws Granicus' servers that protect, store and access CivicIdeas data, including personal information, are located in Canada.

IP Addresses and Cookies

If you just browse the CivicIdeas website and don't participate, your presence will be anonymous. If you participate in CivicIdeas or use the site's services, your IP address may be collected. A session cookie will be placed on your computer which will disappear when you leave CivicIdeas. A persistent cookie may also be placed on your computer and will stay on your computer. The session cookies allows Granicus' systems to uniquely identify you while you are logged into the Website in order to process your online transactions and requests, and to verify your identity, after you have logged in, as you move through our Website. Persistent cookies track aggregate and statistical information about user activity.

Correction, removal of personal information.

Participants are able to update their profile information at any time. If a particular CivicIdeas forum, discussion or survey requests personal information you may correct or delete it before the forum, discussion or survey closes. After that, you will only be able to delete it by requesting the moderator to do so on your behalf.

Contact

For more information about this privacy statement or CivicIdeas collection and use of personal information, please contact the Information Access and Privacy Analyst by email rgordon@victoria.ca.

APPENDIX B

MODERATION POLICY

CivicIdeas is an important component in the City of Victoria's Civic Engagement efforts. Through CivicIdeas the City will provide important information on the work it does regarding "priority setting, decision-making, program development, service delivery" and revenue allocation. In return, CivicIdeas will make it possible for more residents to participate in city governance, in larger numbers, and at a more informed and meaningful level.

The purpose of this moderation policy is to maintain the focus of CivicIdeas on the above goals. To achieve this purpose, participant discourse is expected to be civil, polite and desirous of making a meaningful contribution. Submissions that are abusive, offensive, obscene, defamatory, etc., or promote personal agendas are unacceptable.

The rules:

In addition to Granicus' Terms and Conditions, CivicIdeas will be moderated. Moderators will be City of Victoria staff managing specific CivicIdeas initiatives (i.e., forums, discussions or surveys). Moderators can answer questions specific to the initiative he/she is managing and will be the contact if you believe a participant's submission is inappropriate. The moderator will determine whether or not to remove submissions. For clarity the following are additional types of unacceptable submissions:

- Unproven or unsupported accusations against individuals or organizations
- Spam or promoting services or products
- Invading anyone's personal privacy
- Identifying any publicly-elected representative or candidate regardless of their political affiliation, whether those comments are supportive or critical
- Are contrary to the principles of the Canadian Charter of Rights and Freedoms

Participants who continue to submit inappropriate submissions may be suspended from CivicIdeas or permanently removed from participating.

Personal information:

CivicIdeas complies with the privacy provisions in the *Freedom of Information and Protection of Privacy Act*. To confirm compliance, a Privacy Impact Assessment was completed. The City of Victoria has also created a privacy policy specific to CivicIdeas. It is necessary to collect some personal information to complete your profile. Some personal information will also be collected when necessary for a specific survey, forum or discussion. However, unless specifically requested, please do not provide personal information that identifies you or other individuals when submitting content to CivicIdeas. Personal information that is not requested will be deleted and will not be considered in the evaluation of new initiatives.

Unsubscribing:

You can unsubscribe from CivicIdeas at any time. To unsubscribe, email civicideas@granicus.com and request that your account be deactivated.

APPENDIX C

SECTION 27(2) NOTIFICATION

The personal information collected by CivicIdeas, including forums, surveys, discussions, will be used to inform the City's decision making process on new initiatives, programs, service, spending allocations etc. The City only collects your email address and personal information necessary for specific initiatives posted on CivicIdeas. Sections 26(c) and (e) of the Freedom of Information and Protection of Privacy Act are the legislated authorities for the collection of personal information. If you require further information regarding the collection of personal information by CivicIdeas, please contact the Information Access and Privacy Analyst at 250.361.0347, rgordon@victoria.ca or by mail at: Information Access and Privacy Analyst, Legislative and Regulatory Services Department, #1 Centennial Square, Victoria BC, V8W 1P5.

Unless requested, please do not include personal information that identifies you or other individuals when submitting content to CivicIdeas. Personal information that is not requested will be deleted and not considered in the evaluation of new initiatives etc.