

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

PRIVACY IMPACT ASSESSMENT

I BASIC INFORMATION – Activity – Event Feedback Form

1. Ministry/Public Body and Program Area.

Department	Parks, Recreation and Culture
Division	Recreation
Program	Event Feedback

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

Name, Title	Jeff Brehaut
Branch/Section	Recreation
Phone Number	250.361.0365
E-Mail	jbrehaut@victoria.ca

2. Description of the Program/(Initiative) being assessed.

Recreation Division staff are responsible for issuing and managing permitted events in City owned parks, recreation facilities, and public venues. The division's responsibilities include receiving and responding to public feedback. The feedback received provides information to assess, improve and monitor impact and success of events. We compile and respond to the feedback, and use the compiled information to work with event organizers to:

- mitigate issues and minimize future impact
- help organizers continue improve customer experience
- minimize the impact to surrounding neighbourhoods.

Previously there has been no formal process for people to comment on past, present or future events. As a result, people sent complaints etc. to whichever city department they believed should receive their feedback. This is neither an efficient or effective method, and can take days to retrieve all the feedback received, compile it and respond to it.

This form will collect, use, but not disclose personal contact information (i.e. name and email address).

This PIA reviews the Event Feedback form for compliance with the Act's privacy provisions.

This is a new activity to help staff better plan and evaluate events using City property.

3. Purpose/Objectives of the Program (if statutory, provide citation).

The purpose of the Event Feedback form is to allow Recreation staff to more effectively gather and respond to complaints/comments/suggestions etc. from individuals regarding past, present and future events. There is no specific bylaw that provides the legislated authority for collecting the personal information that the form collects, but much of the feedback speaks to the contravention of bylaws (i.e. noise levels, advertising, fencing, parking etc.) that recreation staff are responsible to monitor for compliance. Feedback from residents is an important tool staff use in their efforts to monitor and enforce compliance.

A second, related, purpose of the form is to support the City's Civic Engagement Strategy by giving residents the ability to participate online with regard to City activities.

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

Because feedback currently is received via numerous sources and methods (i.e. emails, phone calls), it is difficult to ensure consistency and responsiveness. The new event feedback form allows for a streamlined process that provides much more control over collection of personal information. With greater control the recreation division can now maintain compliance with FIPPA.

Potential positive impacts:

- Can easily identify areas where/if impact is concentrated.
- Faster more effective service
- Better allocation of staff resources
- Improved functionality
- More information to put into reports i.e. more feedback received from a greater diversity of residents)
- Easier to collect by City and provide by individuals (i.e. online forms)
- More information to better plan and evaluate events
- People can submit their feedback directly to the people who need to receive it

Potential negative impacts:

- Retention of electronic records is typically longer than paper records
- Access to electronic records is more difficult than hard copy files
- May collect unnecessary personal information
- Without adequate procedures there is a greater risk of unauthorized access, use, and/or disclosure of personal information maintained in electronic format.

Privacy impacts:

- Personal information will be submitted directly to those who "need to know"
- Personal information will not be duplicated (i.e. copies kept by departments that receive feedback and then forward to recreation staff).
- Better capability of collecting accurate personal information (i.e. the feedback form requests specific personal information whereas there was no control over what individuals provided prior to using the form).
- More control over personal information collected (i.e. before individuals could write as much as they wanted. Now they are restricted in the amount of information they can submit which means there will be less unnecessary personal information collected).
- The feedback form will provide more useful, useable information that will allow for more complex analysis that will lead to, as an example, more efficient mitigation strategies.

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

This is a new activity. There is no existing PIA.

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

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.

The form will collect name, email address, phone number and civic address.

The form asks that the personal information of third parties not be included as it cannot be collected by staff without the permission of the third party individuals.

All the personal information is required for contact purposes to allow for different types of contact. For example, someone may request to be contacted by phone. Or, information like brochures a previous report etc. may be mailed.

The types of information collected in the comments section of the form will primarily be about:

- Noise
- Parking (i.e. neighbourhood traffic, parking , safety, machinery, maintenance/service vehicles)
- Transportation
- Customer service
- Property damage
- How rest patterns were impacted (e.g. sleep)
- Financial implications (Vehicle blocking their driveway needed to call tow truck)
- Odours (e.g. Fairs)

Personal information identifying third party individuals may be collected, but efforts will be made to prevent this from happening and the personal information will not be used to contact the third parties for their "version of events."

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

The final version of the form is attached as Appendix A.

The event feedback form will be located on the City of Victoria website, main page, "I want to..." tab, "event feedback form". Forms will be submitted directly to an email address accessible by four Community Recreation Coordinators – Jeff Brehaut, Jeff Day, Nichola Reddington and Darb Erickson, Facility and Event Coordinator. The staff member responsible for the permit/event will respond to people who submit feedback forms. Staff will either store emails with feedback forms attached in their Outlook system or their personal drive on the City of Victoria's server. In either case, the forms are password protected. They may be kept for up to 2 years before being deleted from the system. Any hard copies would be shredded and recycled – the City has a contract with Access Records and Media Management for confidential documents.

Collection

The feedback form will be available online from the City's website. You complete the form and then submit it directly to the Recreation Division. Staff with access have a "need to know" requirement. All submissions will be maintained on a computer within the Recreation Division. All computers are assigned in permanent work stations, each computer is password protected and the screen has an auto lock feature when inactive.

Use

1. Recreation staff use the submissions to gather feedback on what went well, what didn't, where improvements can be made, what changes need to be made to next year's event or upcoming events at the same place and similar in size, audience etc.
2. Reports etc. that analyse events using data from submissions will not include personal information about identifiable individuals.
3. Recreation staff will also respond to questions or requests for information in submissions.
4. Recreation staff will forward feedback forms that contain requests to repair or investigate something that another city department has responsibility for (e.g. to clean up garbage). Names and addresses won't be forwarded unless required or at the request of the person who submitted the feedback form.

Disclosure

Disclosure is for these reasons only:

- People who submit feedback forms want to be contacted by an event organizer
- There is a need to know by the other Parks and Recreation staff referenced above
- Staff in other city departments need to contact people to respond to their requests to repair or investigate something.

Access, storage, protection and retention

Hard copies may be kept in a file. The file will be in locked cabinet, desk or file room where key and/or swipe card access is required. The work area is also protected by alarm.

There will be a mailbox that limited staff can access. Email/webform submissions are retrieved from the mailbox by the limited staff with access to the mailbox. These staff members copy the submissions to their workstations and delete the copy in the mailbox. They stay on desktops until it is determined that another department is responsible, forwarded to the other dept. and then deleted. Once in the central location the data from the submissions is extracted and added to a spreadsheet or some kind of database for analysis/manipulation/creating reports. Once in a central location and data extracted the submissions are deleted from workstations and kept in the central location until no longer needed and a hard copy put in a hard file.

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			X
(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(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.

Yes	No	n/a

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

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

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.

s. 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		
Additional details as required (e.g., method of notification)			

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

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

s. 32	Yes	No	n/a
(a) 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 feedback forms collect personal contact information to address people's concerns which will often require contacting them to make sure City responses properly address the concerns.			
(b) Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)	X		
(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
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j): 22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(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)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada that authorizes or requires its disclosure		X	
	Specify name of enactment and relevant section(s)			
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i>) that authorizes or requires the information to be made public		X	
	Specify name of enactment and relevant section(s)			

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada Specify name of enactment and relevant section(s)		X	
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee, and (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary	X		
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body, and (ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary		X	
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If (i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	and			
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.			
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	if			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1) (m.1)	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	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	
(1)(p)	The disclosure			
	(i) is necessary for			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
	(A) installing, implementing, maintaining, repairing, troubleshooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	and			
	(ii) in the case of disclosure outside Canada			
	(A) is limited to temporary access and storage for the minimum time necessary for that purpose, and			
	(B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. Please identify event:		X	
(1)(r)	If the information			
	Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body,		X	
	and			
	Is disclosed for a use that is consistent with the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body.			
	Additional details as required			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	To another law enforcement agency in Canada		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.		X	
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if, (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)	X		
	Additional details as required Contact would only be the contact information provided by residents which would most often be by email.			

s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(a)	For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)	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 feedback forms collect personal contact information to address people's concerns which will often require contacting them to make sure City responses properly address the concerns.			
(b)	Repealed.			
(c)	To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister	X		

s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(d)	To an officer or employee of (i) a public body, or (ii) an agency or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed			
(e)	To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister		X	
(f)	To the auditor general or any other prescribed person or body for audit purposes		X	
(g)	To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem		X	
(h)	To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry		X	
(i)	To a public body or a law enforcement agency in Canada to assist in a specific investigation			
	(i) undertaken with a view to a law enforcement proceeding, or		X	
	(ii) from which a law enforcement proceeding is likely to result		X	
(j)	To the archives of the government of British Columbia or the archives of a public body, for archival purposes		X	
(k)	Repealed.		X	
(l)	To an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body	X		
	Additional details as required			
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)**

	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:		Information Access and Privacy Analyst		

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

Phone number:	250 361-0347
Additional details as required	
Residents who wanted to review their event feedback form submission, would contact Parks, Recreation and Culture staff who would forward residents to the Information Access and Privacy Analyst (the Analyst). The Analyst would respond to residents in accordance with section 29 of FIPPA.	

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:			
	Contact person:			
	Phone number:			
	Additional details as required			
	The PIA recommends creating procedures for managing event feedback form submissions from receipt to extraction of data to a spreadsheet and/or has been actioned.			
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?			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			
7.	Does the audit identify inappropriate accesses to the system?			X

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

Additional details				
The Event feedback forms will not be collected, used or disclosed by a system. A system will also not store the personal information. The personal information collected will be maintained in workstations and hard files. Both locations have "reasonable security arrangements" required by FIPPA.				
		Yes	No	n/a
	Will the information be stored or accessed only in Canada?	X		

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

		Yes	No	n/a
1.	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			
2.	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			
3.	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)

If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.

		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?		X	

Part IX Recommendations

1. Request from Archives and Records Management staff a retention schedule for the Event Feedback Form.
2. Create a procedure that lists who personal information can be disclosed to and why it would be disclosed. (e.g. other city departments, people such as the Mayor the resident asked the form to be sent to, event organizers and, in addition to resident consent, only disclose personal information if required to resolve purpose resident submitted form).
3. Create a procedure that explains how forms will be managed from receipt to inclusion in a spreadsheet (i.e. so that copies are not created and lost or put somewhere that can be accessed by anyone).
4. Seek the advice of the Information Access and Privacy Analyst before changing the collection, use or disclosure of personal information the Event Feedback form collects.
5. Provide the Information Access and Privacy Analyst a copy of the initial reports created from the feedback form data.
6. Provide a final version of the feedback form to the Information Access and Privacy Analyst to be appended to this PIA.

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

SIGNATURES

Jeff Brehaut		18 July 2014
Program area PIA drafter	Signature 	Date 18 July 2014
Information Access and Privacy Analyst Rob Gordon	Signature 	Date July 21, 2014
Manager, Archives and Records Management	Signature 	Date July 31/14
Director, Legislative and Regulatory Services Department	Signature	Date

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

Event Feedback Form

Event Feedback Form

The Event Feedback Form offers the public the opportunity to comment on events they have attended, plan to attend, are held near their home, or for any other reason that may assist City of Victoria staff evaluate events. Your feedback will be considered as we work with event organizers to support and improve future events.

*Indicates required field.

Part I – Contact Information

*First Name:

*Last Name:

Address:

City:

Province:

Postal Code:

Phone:

*Email Address:

*Email Address Again:

Part 2 – Event Details

Proximity to Event

Live beside

1-2 blocks away

3-4 blocks away

Further than 4 blocks

*Event Name:

*Event Date/Time of Experience:

*Event Location:

*Event Feedback:

*Would you like to receive a response? Yes No

PIA #: 2014-003	Date: 06/11/2014	Privacy Analyst: Rob Gordon
Re: Event Feedback Form		

Do you want to be contacted by the event organizer to discuss your feedback? Yes _____ No _____

If your feedback pertains to another City department's responsibilities, your feedback will be forwarded to the department for response.

Attach a Document or Photo?
_____ (Browse)

Please note that we are unable to accept attachments larger than 10MB by email. If your attachment is larger than this, please submit it in person, Monday to Friday from 8 a.m. – 4:30 p.m. at #121 – 1925 Blanshard Street, Victoria, BC V8T4J2, or mail it to: #121 – 1925 Blanshard Street, Victoria, BC V8T4J2.

Please do not submit the personal information of third parties including family members. Examples of personal information include photos and describing a person's activities that could identify the person and opinions about others.

Section 27(2) Notification

The personal information the feedback form collects will be used and/or disclosed only for the purposes described above. Section 26(c) and 26(e) of the *Freedom of Information and Protection of Privacy Act* are the legislated authorities for the City of Victoria to collect, use and disclose your personal information. For more information on the collection of your personal information, please contact: Rob Gordon, Information Access and Privacy Analyst - Legislative and Regulatory Services #1 Centennial Square, Victoria BC V8W 1P6

T 250.361.0347
rgordon@victoria.ca

*I certify that the information provided is correct to the best of my knowledge.

If you have requested a response, please allow up to five business days for us to get back to you.

Thank you.

(Submit Button)

(Automatic Response Screen)

Event Feedback Form

Thank you for your submission. We appreciate your time and feedback.

If you have requested a response, please allow up to five business days for us to get back to you.

Thank you for your interest in events held in the city of Victoria.