

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.

Part 1 - General

Name of Department/Branch:	Manager of Culture, Sports, and Neighbourhoods, Parks, Recreation & Culture (Crystal Pool)		
PIA Drafter:	Rob Gordon, Information Access and Privacy Analyst		
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1. Description of the Initiative

Managing the personal information collected, used and disclosed by Crystal Pool staff is a complex undertaking. In 2014 staff registered 6,672 people for 1,247 programs in 2014. The Crystal Pool is the City of Victoria's largest and most important recreation facility aquatic, gym, fitness and health and wellness programs and activities. Programs and activities are offered to all age groups and to people with different fitness levels as well as people with disabilities, medical conditions and/or other barriers affecting their ability to participate. To provide excellent customer service, different payment options (e.g. online, cheque or cash) and means of communication (e.g. in person, by email or phone) are offered. And finally, to manage the programs and activities requires collecting, using and disclosing personal information for many different reasons.

Given the above environment, the purpose of this PIA is two-fold. First, and most importantly, it documents the Crystal Pool's management of personal information to confirm compliance with the *Freedom of Information and Protection of Privacy Act* (the Act). Secondly, it identifies areas where the management of the personal information can be improved to make it easier to maintain compliance with the Act.

2. Scope of this PIA

The scope of this PIA is limited to the City of Victoria's Active Living Guide programs offered and managed by the Crystal Pool and Fitness Centre. This includes day programs offered during summer and spring break.

The CLASS system and its future replacement, the LIFE Program and the employment relationship between staff and the City are not within the PIA's scope.

3. Related Privacy Impact Assessments

There is a completed PIA on the Crystal Pool's CCTV System and a PIA on the online registration and payment system.

4. Elements of Information or Data

A. Aquatics – Crystal Pool and Fitness Centre

There is about 90 total staff consisting of five regular F/T staff, 70 auxiliary staff, six contract staff and 32 service provider staff running seven program partnerships.

Program overview:

The Aquatics team is responsible for the following programs/services:

- Instruction in Swimming, First Aid, Aquatic Leadership and Aquatic Fitness Programs.
- Supervise patrons using the pools, weight rooms and cardio equipment.
- Respond and treat patron injuries.
- Respond to patron incidents in the Crystal Pool or Fitness Centre.

Personal information collected:

There are ten different programs in which Aquatics collects personal information. Aquatics primarily collect the following personal information:

- First and last name of child(ren) and parent(s)
- Contact information (e.g. email address, phone/cell number and address)
- DOB
- Description of injuries
- Evaluation/participation comments about patrons

Personal information used:

Aquatics primarily uses the following personal information for emergency contacts, certification, legislative requirement (e.g. Section 19 of the BC Pool Regulation requires all "...injuries sustained at or within the pool..." to be documented), manage programs (e.g. contact registrants, confirm eligibility to take program/course).

Personal information disclosed:

Aquatics primarily discloses the following personal information to service providers who conduct courses/programs, parents, BC Ambulance when necessary, Lifesaving Society, Red Cross, Tyee Aquatic Club, VicPD when necessary.

No personal information is disclosed to or received from other city departments.

Copies of major first aid forms are shared with BC Ambulance crews in accordance with legislation. Copies of incidents that may involve a crime are shared with the police.

Personal information management:

Consultants pick up a copy of the class list from the front desk just before the course begins. Off-site consultants and the Tyee Aquatic Club receive copies by email. Consultants do not gather additional personal information from participants. Class lists are returned and some are retained for five years while required information from the others (e.g. pass/fail) is entered into CLASS and then shredded.

The Red Cross and Canadian Lifesaving Society websites allow staff to upload information via their websites. There is a specific contact person at the Tyee Aquatic Club.

The storage of personal information on forms, class lists etc. are kept in the Lifeguard Office on the pool deck, the Aquatic Coordinator and Leader Office. Both locations can only be accessed by knowing the access codes to unlock the doors. Personal information (e.g. Class lists) staff needs immediate access to, is kept on the pool deck.

The longest any records are kept by Aquatic staff is five years. These records are maintained in hard copy. They reside for one year in the Aquatic Coordinator and Leader Office and are then transferred to a locked storage room.

B. Child & Youth Recreation Services

Program overview:

This program employs approximately 15-20 auxiliary staff with varied hours (mainly during summer months of July/August) and approximately 5 contracted staff with varied hours. They provide the following services:

- Recreational classes for kids/youth – dance, music, arts, etc.
- Recreational events for kids/youth – Skateboard competition, Wipe-Out Pool event
- Childcare for kids – Pro D-Day, Spring Break Camps, Winter Break Camp, Summer Camps
- Youth drop-in/leadership – Friday Night Teen Swim; Step-Up Youth Crew (Leadership)

Personal information collected:

Child and Youth Recreation Services primarily collect the following personal information:

- First and last name of child(ren) and parent(s)
- Contact information (e.g. email address, phone/cell number and address)
- DOB of children
- Medical information
- List of people with pickup and no pickup privileges

Registration forms are emailed or handed out in person when registration opens for Summer Camp. The completed forms are returned on the first day of the Summer Camp program.

The teen swim list is printed in hard copy each week to track attendance and update information (e.g. teen progress).

Personal information used:

The personal information is used to manage the services, specifically:

- Emergency contacts in case which parents need to be contacted.
- To confirm parental consent for their children to participate
- For child safety with regard to who can and cannot pick them up.
- To evaluate children/teens ability to participate in physical activity such as their swimming ability or medical issues that would limit their participation.
- Teen Swim: To contact youth/parents about behavioral issues and track attendance

Personal information disclosed:

Child and Youth Recreation Services does not disclose personal or collect personal from third parties or other City departments. Personal information is not shared with other city departments.

Consultants receive names and phone numbers and they have their own waiver form that participants must complete. The waiver form is not shared with Child and Youth Recreation staff. Consultants receive a printed class list from the front desk just prior to the course starting. At the end of courses, consultants will either return or destroy the list. Class lists are shredded the day of, or the day after, they are returned.

Staff disclose course roster sheets via email with the Red Cross. A generic email address is used (myrcsupport@redcross) and the Red Cross confirms receipt of the roster.

Personal information management:

Records are kept with staff during programs for the uses stated above. Personal information is kept in these three places when not needed: the summer camp office, the programmer's office or the storage room. All three locations are locked. Summer camp forms are kept in hard copy because CLASS does not have the ability to store all the information. Teen swim paper forms are kept for a year so that staff can total attendance for the year and then shredded. Contracted consultants return the forms to the front desk at the end of each class.

Day Camp Procedures:

Day camp staff keep the class lists in the camp binder along with attendance lists and registration forms for each child in their program. At the end of each program, the Day camp staff file all the registration forms into a master binder. At the beginning of each week, the Day camp staff take registration forms for any repeat participants from the master binder and file them in their camp binder for the length of program (1 day to 1 week). The Camp binder is kept with the Day camp Leaders at all times and usually stored in their backpack. The only times documents are visible to the public is during sign-in/sign-out times. Out of program time the camp binders are locked in the Summer Camp office.

Summer camp forms are kept for seven years. Parents are asked to fill out a new registration form at the start of every year to be sure no important information has changed. In the small chance that we don't have a current registration form for a child we use last year's form. Forms are shredded when no longer used.

Protection of Personal Information

The teen Swim Binder is kept on the Summer Day Camp Coordinator's desk for easy access and the camp registration forms are kept on the Camp office desk also for easy access. After a year, they are moved to the storage room. The Coordinator takes the binders to the storage room. There's usually 2 binders per year.

C. Facility and Event Coordinator – Sport, Arena and Arts & Culture

Program overview:

The Facility and Event Coordinator is responsible for a diverse range of programs. Approximately 10 contractors deliver the services.

- Outdoor sports camps
- Outdoor sport programs
- Arena programming – skating lessons, public skating and special events
- Arts and Culture programming – music programming at the Cameron Bandshell
- Special events - Sport and Arts & Culture

Personal information collected:

The Facility and Event Coordinator uses the same application that Child and Youth Recreation Services uses.

- First and last name of child(ren) and parent(s)
- Contact information (e.g. email address, phone/cell number and address)
- DOB of children

Personal information used:

The personal information is used for these purposes:

- To contact parents/family in case of an emergency (e.g. medical)
- To know who is authorized to pick up children
- For consent to participate in activities
- For safety concerns (e.g. ability to swim, allergies, diabetes etc.)
- To allow contractors to contact parents regarding their children's participation

Personal information disclosed:

Contractors receive names and phone numbers for class lists and medical forms. Photo release forms and photos are taken during music programming at the Cameron Bandshell. The forms and photos are shared with Citizen Engagement and Strategic Planning for

promotional purposes. Special event prize draw entries collect name and phone number or email address. Non-winning tickets are securely shredded and winning tickets are securely shredded after winners are contacted.

Sport Camp registration forms are emailed or handed out in person when registration opens. The completed forms are returned on the first day of the Summer Camp program.

When a summer camp program ends, the contractor gives the forms to the Summer Camp Coordinator and they are filed in a binder and kept in the summer camp office. Off-site summer camps (soccer camps) collect and store forms in their office.

The Front Desk sends out/hands out registration forms, registers clients and receives calls from clients for the Facility and Events Coordinator. The skate shop is responsible for skating registrations and selling skating passes. Parents submit completed registration forms for all outdoor programs to instructors or the Camp Coordinator for on-site outdoor sports camps.

If there is a medical emergency at the arena, arena staff complete the incident accident form which is not disclosed to third parties. They are maintained in a binder at SOFMC, the Facility and Events Coordinator retrieves them and keeps them in her office at the Crystal Pool.

Personal information management:

Private lesson forms are kept as a record of who has taken private lessons and the instructors who taught the lessons. The lesson skill cards are bundled together and kept in a drawer in the SOFMC skate shop. Uncompleted lesson cards are kept from one season to the next (e.g. the end of one season to the beginning of the next). They are kept for at least one season because people can pay for a number of lessons and participate on a drop in basis which means they may participate over multiple seasons.

Off-site instructors do not return class lists, but on-site instructors do return them and they are then shredded.

D. Adult Health & Fitness Programs & Services

Program overview:

The adult health and fitness programs and services registers people for health & wellness programs including Yoga, Pilates, Boot Camps as well as drop-in group fitness programs including aerobics, step and spin classes. Staff also provide weight room supervision, personal training services and rehab and massage services.

There is one regular full-time staff. There are 20 to 25 contractors who deliver all the programs and services.

Personal information collected:

The personal information collected comes from the Personal Training – Client Background form that collects:

- Gender and age (not DOB)
- Contact information
- Occupation
- Emergency contact information
- Physical fitness history and fitness goals
- Medical history as it pertains to determining the appropriate fitness program.
- Names of family doctor, Chiropractor, Physiotherapist, Massage Therapist, other medical professional

Contractors do not collect client personal information on behalf of Adult Health and Fitness.

Personal information used:

The personal information collected is used for health screening purposes to determine a client's eligibility for personal training.

Personal Information disclosed:

Front Desk staff print and provide instructors with class lists. Contractors receive a copy of the client background form and class lists. Both are returned at the completion of programs. However, there is no formal, written policy or procedure.

Personal Information Management:

Class lists are used for the first day and there is no procedure to retrieve them. Contractors do not collect any personal information from clients that they disclose to Crystal Pool staff.

Contractors do receive the Client Background form and keep it until they have completed their work with a client. They then return the forms. Client background forms are kept in a filing cabinet in the locked office. There is no policy on how long the forms are kept.

The Front Desk handles most of administration work.

E. Outdoor Recreation and Parks Program

Program overview:

Develop outdoor recreation and parks programs for the all ages including adult/seniors day trips and some new programs for seniors. There is one full-time staff person with occasional help from staff for in-house programs. The majority of the programs are run by contract staff.

Personal information collected:

Personal information is collected in person, over the phone and the Internet.

The personal information collected comes from the Informed Consent form that collects:

- Participant's name and parents if participant under 19
- Emergency contact information
- Medical information (e.g. allergies, medications, physical limitations)
- Photo (optional)

Personal information used:

The personal information is used for attendance, evaluate participants and confirm completion of courses. Some of the programs are a higher risk (e.g. kayaking) so a sense of the overall health of the client is required. Seniors medical information is necessary in case the information is needed should a medical emergency occur during a field trip.

Personal information disclosed:

No personal information is disclosed to or collected from other City departments.

Class lists and medical forms are shared with the consultants. Contractors have participants complete a waiver form, but this information is not shared with Rec & Parks staff.

Contractors pick up the class list from either my office or the front desk (occasionally in an envelope in the "pick up" drawer. For one contractor, I will occasionally email the class list. The class list would only have the clients name and phone number on it. Two of the main (major) contractors I deal with never see a class list as I register our clients on their registration software and include only the clients name and phone number during the registration process. The Programmer, Outdoor Recreation Services, requests contractors to return their class lists and they are shredded. Contractors do not provide personal information regarding participants after their courses end.

Managing personal information:

The Programmer, Outdoor Recreation Services does not distribute, collect or manage the registration forms.

Personal information is not provided over the phone. If personal information is discovered to be wrong, an alert is put on a client's account in CLASS. When the individual calls to register the next time, she will be asked to provide current information. Occasionally individuals are called and asked to update their contact information.

During bus trips, the Informed Consent forms are attached to the class list and given to the driver and returned after the trip. The Consent forms are then re-filed in the Programmers filing cabinet. Informed consent forms are not sent to any other contractor as they have their own that they require participants to sign.

The current year class lists and consent forms are kept in a locked cabinet in the Programmer's office for a year and all others are sent to the storage room.

If participants agree to disclose their photo on the Informed consent form, only two years' of signed copies are retained. Medical emergencies are managed the same way they are by all program areas.

F. Front Desk

Program Overview:

The Front Desk supports all the program areas and is the main contact point for all users. The Front Desk staff process registrants' enrollment into classes etc., process all applications for passes and memberships (silver and gold annual passes, regional and corporate memberships) and sell merchandise (merchandise sales only require cash/Visa/debit card transactions that do not require the collection of personal information). There are 3 regular Front Desk staff and 13 auxiliaries. They are usually the first point of contact for patrons.

Personal information collected:

The Front Desk collects personal information on behalf of all program areas. It also collects:

- Bank account, chequing account or credit card information to process membership payments
- Name, address and contact information for memberships and all passes

Personal information used:

The personal information is used only to manage the programs and activities.

Personal information disclosed:

There is no disclosure of personal information to other departments and none is received. The Crystal Pool is a location whereby people can purchase dog licences. Completed dog licence forms are retrieved by Bylaw staff approximately every two weeks. The information is not retained by Front Desk staff. Consultants pick up their class lists from the front desk usually just before their course/program starts.

The Front Desk receives the calls from clients of the other program areas.

Memberships:

- The front desk staff set up monthly payments for memberships. A 12 month payment schedule is created in CLASS and it encrypts the credit card number so staff can only view the last 4 digits.
- On the 15th of each month the Supervisor processes membership payments.
- Members who don't make membership payments have their passes revoked. Municipalities share this information so that lapsed members cannot use any facilities.
- Corporate Passes are paid in full by the employer and the names of the employees eligible for a pass are submitted by the employer.

Managing personal information:

Front desk staff enter personal information into Class as it is received from patrons.

- When patrons provide new information, it also goes into CLASS immediately and staff can confirm the correctness of patrons' personal information not being updated.
- When staff identify incorrect information, a note in the CLASS "Alert Text" field is added to request the correct information (e.g. "Need new phone number") with their initials and the date the note was entered.
- CLASS has mandatory fields which helps maintain the correctness of data entry.
- When people request their registration (in person or by phone), they must provide their street address or phone number.
- Front Desk staff provide consultants with class lists and receive and shred lists the consultants return. There are no application forms for memberships or passes for staff to hand out and collect.
- Payroll records are transferred at the end of the calendar year to the storage locker.
- Most of the records kept at the Front Desk, like the Monthly Payment Authorization, are shredded when they expire.
- The POS has a dividing glass between the patrons and the computer and could not be easily accessed by the public.
- The PC monitors at the Front Desk cannot be easily viewed by the public as they are both angled away from the customer's position at the counter. There are two back computers at the Front Desk, one about 15 feet from the counter, and one 20-25 feet from the counter, so common computer text (in Outlook or Class for example) is not readable by the public.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

Part 2 - Protection of Personal Information

5. Storage or Access outside Canada

There is no storage or access of personal information outside of Canada.

6. Data-linking Initiative*

If you answer “yes” to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.	
1. Personal information from one database is linked or combined with personal information from another database;	no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
If you have answered “yes” to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	

7. Common or Integrated Program or Activity*

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.	
1. This initiative involves a program or activity that provides a service (or services);	no
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Patrons submit registration forms in person/phone/email	Collection	26(c)
2.	Patrons update their personal information by phone/in person/email	Collection	26(c)
3.	Manage certification courses for third parties (e.g. Red Cross, Lifesaving Society). Collection is from the third parties.	Collection	26(c)
4.	Respond to medical situations or incidents	Collection	26(b), 26(c)
5.	For patron safety (e.g. who can pick up kids, allergies etc.)	Collection & use	26(c), 32(a)
6.	Manage programs/courses/activities etc.	Use	32(a)
7.	Evaluate patrons (e.g. swimming lessons)	Use and disclosure	32(a), 33.2(a), 33.1(7)
8.	Evaluate patron physical/medical fitness to participate in programs/courses	Use & disclosure	32(a), 33.1(1)(b), 33.2(a)
9.	For the provision of medical care (e.g. major accident involving BC Ambulance and hospital care) or for law enforcement	Use & disclosure	32(a), 32(b), 33.2(b), 33.1(1)(c), 33.2(i)(i)
10.	Disclosure back to patrons who own the personal information	Use & Disclosure	32(a), 33.1(7)
11.	Manage courses for certification from third parties (e.g. Red Cross, Lifesaving Society)	Use & Disclosure	32(a), 33.1(1)(e), 33.2(a)
12.	Disclosure to consultants/contractors to manage classes/activities/programs etc.	Use and disclosure	32(a), 32(b), 33.1(1)(b), 33.1(1)(e.1)
	Disclosure to Citizen Engagement and Strategic Planning for promotional purposes	Use and disclosure	32(a), 32(b), 33.2(a), 33.2(c), 33.1(1)(b)
13.	Disclosed to Citizen Engagement and Strategic Planning for promotional purposes	Use and disclosure	32(a), 32(b), 33.2(a), 33.2(c)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized disclosure during programs and activities	Adopt the PIA recommendations. Staff require basic privacy awareness and understanding that they are responsible under FIPPA for protecting personal information	Low	med
2.	Unauthorized use and/or disclosure by consultants/contractors	Include privacy requirements in contracts. Require contractors etc. to have basic privacy awareness.	med	med
3.	Unauthorized disclosure to patrons	Rules regarding confirming individuals identity	low	Low/med
4.	Collection of personal information without legislated authority	Review purposes for collecting personal information including personal information consultants collect to confirm compliance with one of FIPPA's collection purposes	low	Low/med
5.	Unnecessary long retention of personal information	Review whether personal information needs to be kept as long as it is	low	Low/med
6.	Insufficient protection of personal	Implement formal practices to track the number of class lists and their location so they can be accounted for at the end of programs.	low	Low/med

10. Collection Notice

All the forms used by Crystal Pool staff have been reviewed and are in the process of being updated for compliance with FIPPA's privacy provisions including section 27(2) notifications.

Part 3 - Security of Personal Information

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

Aquatics:

- Lifesaving Society and Red Cross rosters are kept in a locked storage locker.
- Five minor first aid record books are kept at specified locations around the pool deck. Incidents transferred to electronic tracking document.
- Major first aid records are entered into an electronic tracking document. Completed forms are first kept in the Lifeguard station which is locked and then transferred to a binder and kept in the Aquatic Coordinator's office which is also locked.

Child & Youth Recreation Services:

- Summer Camp forms are kept downstairs in the locked storage room because all the information cannot be entered into CLASS.
- Teen Swim forms are kept in a binder in Child/Youth Programmers locked office. Kept for statistical purposes to track attendance at end of year.

Facility and Event Coordinator – Sport, Arena and Arts & Culture:

- Summer Camp forms are kept downstairs in the locked storage room because all the information cannot be entered into CLASS.
- The Facility and Event Coordinator's office is locked and also contains a lockable file cabinet.

Adult Health & Fitness Programs & Services:

- Client background forms are kept on file for liability purposes.

Outdoor Recreation and Parks Program:

- For day trips, bus drivers receive the class lists and keep them in their possession.

Front Desk:

- Access to the front desk area behind the counter is protected with a high counter and passcode protected entrance. There is also at least one staff member at all times staffing the front desk. Additionally, the front desk supervisor's office is adjoined to the front desk area.

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

Computers at the Front desk are password protected.

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

There are no security policies.

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.

Changes to personal information are done at the request of individuals registering for courses/programs/classes. All front desk staff and staff managing the different programs

(described in Part 1 above) have the ability to enter and update individuals' registration information.

There is insufficient front desk staff to limit and/or restrict staff ability to make changes to individuals' registration information without negatively impacting customer service (e.g. waiting for a staff member to become available to update an individual's registration information).

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

The CLASS system has audit capabilities, but is in the process of being replaced. Therefore, a separate PIA will be done on the system that replaces CLASS.

There are no formal policies or procedures that track access.

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?

Information is provided by individual's which is then added directly into CLASS. When individuals have new information (e.g. a new phone number or email address), they provide the information and staff immediately enter it into CLASS. If staff attempt to contact an individual and the contact information is wrong, a note is added to CLASS stating what contact information needs to be updated, the staff person's initials and the date the wrong contact information was discovered.

Personal information provided by third parties (e.g. the Red Cross) would need to be updated by the Red Cross and then the Crystal Pool notified because the information is collected by the third parties and disclosed to staff.

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

No. The programs/lessons/courses etc. the Crystal Pool offers do not require the need to make decisions or judgements or involve information that must be evaluated, analyzed or investigated. Requirements to enrol in courses etc. are based on space availability, sometimes completion of prerequisites or are age based. All of the requirements are objective and easily determined.

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.

N/A

19. If you answered “yes” to question 17, do you have a disposition schedule that keeps personal information for at least 1 year after using it to make a decision directly affecting an individual?

N/A

Part 5 - Further Information

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

No

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No

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

Part 6 - Information Access and Privacy Analyst's Recommendations

PLEASE SEE APPENDIX C FOR THE RECOMMENDATIONS



City of Victoria - Privacy Impact Assessment
Crystal Pool & Fitness Centre Administration
PIA-2014-007

Part 7 - Program Area Signatures

Rob Gordon
Privacy Officer/Privacy Office
Representative

Rob Gordon
Signature

June 9/15
Date

T. ASKHAM
Program/Department Manager

T. Askham
Signature

JUNE 5, 2015
Date

N/A
Contact Responsible for Systems
Maintenance and/or Security
(Signature not required unless they
have been involved in this PIA.)

Signature

Date

ROBERT G. WOODLAND
Corporate Administrator
City of Victoria
#1 Centennial Square
Victoria BC V8W 1P6

Head of Public Body, or designate

Robert G. Woodland
Signature

06/11/2015
Date

A final copy of this PIA (with all signatures) must be kept on record.

APPENDIX 1 – QUESTIONS ON COLLECTION, USE AND DISCLOSURE

Below are questions regarding the collection, use and disclosure of personal information. Once I compile and add the information to the PIA, we will move on to the next stage of the PIA.

1. Description of your program area and the services you provide to the public
2. How many staff work in your area
3. Whether the public can access staff areas or are their locked doors, counters, etc. that prevent access to the public.
4. A list of the personal information you collect. Please also provide copies of your application forms.
5. Explain the primary reasons for collecting (e.g. eligibility for a program/activity, to process payments/refunds, to contact people about cancellations etc., for supervisors to confirm attendance, evaluation, completing course etc.).
6. Describe how it is collected (e.g. in person, over the phone, the Internet).
7. Do you share personal information with other City depts.? If yes, what personal information do you share and why do you share it?
8. Do other City depts. share personal information with you? If yes, what personal information do they share and why do they share it?
9. Other than the people who provide their personal information or for purposes of the LIFE Program, do you disclose personal to other public bodies, third parties, non-profits etc? If yes, what personal information is shared and for what purpose?
10. Are completed application forms retained even after the information is entered into the CLASS system? If yes, why are the forms kept?

Appendix 2 – Questions regarding consultants and other third parties

1. Disclosure of personal information to consultants:

- Are there written procedures with disclosure?
- When do consultants receive class lists (e.g. before the day the class begins, the day of or just before the class)?
- How do they receive class lists (e.g. email, pick up at front desk)?
- Do they return class lists when the program or activity concludes?
- What do we do with class lists when program/activities conclude?
 - i. Are they entered into CLASS and then destroyed
 - ii. If destroyed, how quickly are they destroyed and how are they destroyed?
 - iii. If retained, for how long?
- Do consultants provide any personal information on participant's that they gather as part of their requirements to deliver programs?
- If the answer is yes to the above question, what personal information is received and how is it received.
- Please provide any other relevant information.

2. Collection/Disclosure to third parties (e.g. The Red Cross). This question does not apply to everyone.

- Do you disclose by any other method than email? if yes, please explain.
- Do you disclose to a specific person or a generic organization email address (e.g. RedCrosssubmissions@Redcross.org)?
- Is there a confirmation process to confirm personal information was received by the appropriate person or department?
- Do you have a written information sharing agreement?
- Please provide any other relevant information.

3. Describe the process of entering hard copy application forms, and/or personal information gathered by other means (e.g. over the phone, verbally in person), into CLASS

- Is there dedicated staff who enter people's personal information into Class, or is it entered depending on who is available to do the work?
- Once in CLASS is the personal information checked for correctness and completeness?
- Is personal information entered into CLASS as it is received, once a specific number have been received or at scheduled times?
- Once entered into CLASS what happens to application forms (e.g. how long do they stay in your working area, do they go directly to secure, on-site storage)?
- If application forms are kept in your working area after being entered into CLASS:
 - i. Are they kept in a secure location?
 - ii. Who has access to them?
 - iii. What is the purpose for keeping them in the working area?

- iv. When are they sent to secure, on-site, storage?
- When people provide, or request, their personal information over the phone or verbally in person:
 - i. How is their identity confirmed?
 - ii. If we collect, or update, their personal information, is it entered into CLASS immediately?
 - iii. What happens when we find out we have someone's wrong home or cell phone number , or email address?
- Please provide any other relevant information.

Appendix 3 - Overview of Crystal Pool's Personal Information Management with Recommendations

The Crystal Pool and Fitness Centre has five program areas providing the programs and activities listed in the Active Living Guide, which is published twice a year. The front desk area provides most of the administrative services (e.g. answering patron questions, disseminating and receiving application forms and keeping the CLASS system updated) for the five program areas. Each of the areas has a small full-time permanent staff, in some instances just one person, responsible for overall management of their programs and activities. In addition to the full-time staff there are approximately 100 auxiliary staff mostly in the Aquatics (lifeguards) and Child and Youth recreation Services (to staff summer camps). Approximately another 100 service providers, consultants, trainers etc. delivery many of the programs and activities.

Programs and activities are offered year round at a number of venues (e.g. Save-on-Foods Memorial Centre, the Crystal Pool and Fitness Centre, community centres and parks). Further, the programs and activities occur seven days a week from early morning to late evening for all ages (pre-school, youth, adults and seniors). People can participate by attending one session (e.g. public skate or family swim); a specific program lasting a couple of months (e.g. swimming or skating lessons) or they can buy a silver or gold pass (i.e. based on restricted access times to the facilities) for a month or a year.

Included in the managing of the programs and activities is the collection, use and disclosure of personal information. For the most part the personal information collected, used and disclosed is the same (e.g. name, DOB, contact and emergency contact information, medical history). However, for the more strenuous fitness programs more sensitive personal is collected. Personal information is collected from the same people, for many reasons, is only needed for relatively short periods (e.g. two years), and is then often collected again from the same people who take, as an example, a higher-level swimming course.

The personal information is, of course, used to manage the programs and activities. Examples include, contacting a family member if a son or daughter gets injured; advising registered patrons if a program is canceled or the time or place is changed; or, determining whether an individual is qualified or approved to take a particular program or course (e.g. lifeguard training, age requirements). Finally, disclosure involves front desk staff, program staff, consultants, service providers, family members or other emergency contacts and third parties (e.g. family doctor).

It became apparent, as the PIA completed, that records containing personal information travelled to many different locations. A typical record path is:

1. Clients drop off an application at the front desk
2. The application is forwarded to the program area manager
3. It is stored in the manager's office until a program starts
4. When the program starts, the application is disclosed to the consultant running the program
5. After the program completes, the consultant returns the applications to by program or front desk staff
6. The applications are storage in an office for a few months

7. About one year later, the applications are moved to a storage locker that all program areas use to store records. Depending on the program area, the movement of records can be much more complex. For example, they can move back and forth from offices to the Crystal Pool's pool deck, travel for day trips or summer camps.

The recommendations below are based on the particular circumstances of managing the personal information by the Crystal Pool and Fitness Centre staff. Specifically, the recommendations identify where the personal information is most vulnerable to possible non-compliance with the privacy provisions.

Recommendations:

1. Obtain a security shredding bin to dispose of all records containing personal information (the Information Access and Privacy Analyst is responsible for this recommendation).
2. Use one secure storage area for all program area records and limit access to staff that need access.
3. Develop a formal policy for off-siting records to prevent boxed records from remaining on-site longer than necessary.
4. Determine how long records need to be retained for (e.g. when the operational need expires) and have a formal policy to ensure they are then destroyed.
5. Create a written requirement for all consultants, service providers etc. to destroy personal information they receive after the program or activity ends.
6. Review what personal information contractors/consultants etc. collect to confirm that it "*...relates directly to and is necessary for a program or activity*" (section 26(c) of FIPPA – Purpose for which personal information may be collected).
7. Advise Pool staff that class lists, the first aid and incident records contain personal information and must be protected as much as reasonably possible from access by patrons.
8. Keep personal information in a locked drawer or cabinet when stored in offices.
9. Create a policy that identifies minimal requirements to protect personal information during field trips, summer camps etc.
10. Review the S Drive for records with personal information that can be removed.
11. Implement the recommendations to the forms for them to be compliant with FIPPA.
12. Contracts with third party consultants, service providers etc. need privacy language to help ensure that the third parties understand their responsibility to maintain compliance with FIPPA's privacy provisions.