

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.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved.

Part 1 - General

Name of Department/Branch:	Human Resources - Learning & Development		
PIA Drafter:	Rob Gordon, Information Access and Privacy Analyst		
Email:	rgordon@victoria.ca	Phone:	250.361.0347
Program Manager:	Jennifer O'Halloran		
Email:	JOHalloran@victoria.ca	Phone:	250.361.1231

1. Description of the Initiative:

The Department of Human Resources, Learning & Development Branch is now offering a new Emotional Intelligence (EQ) service for directors, assistant directors and managers. The service is part of the City's Professional Development program.

The service consists of creating your profile, watching videos, answering questions, a workbook and debriefing to identify areas where the individual can improve their emotional intelligence and become more effective leaders in the workplace.

The Learning and Development branch are using Learning in Action Technologies product "EQ in the Workplace" which includes the online portion called "EQ in Action Profile Assessment."

2. Scope of this PIA

This PIA just reviews the EQ in Action Profile Assessment portion of the program.

3. Related Privacy Impact Assessments

There are no previous or related PIAs.

4. Elements of Information or Data

Participant's complete a "Respondent Information" form as part of their EQ in Action Profile. Only the initials of the first and last name is entered. The address provided is the address for the Human Resources office. Gender is provided as well as Industry (e.g. Government) and Position which are broad categories. (e.g. manager). Age range is required and not year of birth.

The application has been changed so that participant's do not need to provide their email address or phone numbers.

This personal information is kept separate from the information participant's provide to create their EQ Profile. Like other work of this kind in health research fields etc., the two sets of data can only be linked by a "key". In this instance, the key is a unique number assigned to each participate.

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

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.

Part 2 - Protection of Personal Information

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

5. Storage or Access outside Canada

Storage and access are outside Canada. Once participants have watched all the videos, completed the workbook etc. and their report is completed, their personal information is deleted except for some anonymized metrics the company uses for future research. A copy of reports are retained should participants wish to request another copy.

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.	HR Consultant creates accounts for participants	Collection	26(c)
2.	Participants complete their profiles	Collection	26(c)
3.	Learning in Action Technologies evaluates participants	Use	32(a) and 32(c)
4.	Learning in Action Technologies discloses report to HR Consultant	Disclosure	33.2(a), 33.2(c)
5.	HR Consultant discloses report to participant	Disclosure	33.2(a), 33.2(c)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Maintaining copies of reports	Impose a date in which copies of	Low	High

	with company too long	reports are only retained by HR Consultant in secure electronic location		
2.	Uniting personal information with profile information	Company uses industry best practices because a breach could be unrecoverable	Low	High
3.	Unauthorized access to HR Consultant's records	HR Consultant has created sufficient prevention procedures and there are sufficient physical security measures.	Low	High

10. Collection Notice

Participant's are provided with the required prescribed consent notice before participating.

Part 3 – Security of Personal Information

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

The service is managed by the HR Consultant, Learning and Development. All records are kept in her office or in her computer. The former is locked at night and the records are secure in her office. She provides participants with their reports in person.

All interaction with the Company, Learning in Action Technologies, is through the HR Consultant. This includes participants requesting additional copies of their reports through her.

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

HTTPS is used for all transmissions, computers are password protected.

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

The HR Consultant sought advice from the Information Access and privacy Analysts regarding her compliance requirements to FIPPA's privacy provisions.

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.

Only two people have access. The risk of unauthorized access is almost non-existent.

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

Only the HR consultant has access to the personal information and participants to their own personal information

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?

Applicant's provide their personal information and they have access to it to change, correct update it.

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

No

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 records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

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

- 1.) When EQ Profile is used next under the new ownership, review any changes with how the personal information is managed to confirm compliance with FIPPA's privacy provisions.

Part 7 - Program Area Signatures

Rob Gordon
Information Access and Privacy Analyst

[Signature]
Signature

Sept 15, 2015
Date

Jennifer O'Halloran
Program/Department Manager

[Signature]
Signature

Sept 10, 2015
Date

Head of Public Body, or designate

Signature

Date

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