



City of Victoria - Privacy Impact Assessment

HR ONLINE RECRUITMENT APPLICATION

PIA-2016-004

Part 1 – General

Name of Department/Branch:	Human Resources		
PIA Drafter:	Rob Gordon		
Email:	rgordon@victoria.ca	Phone:	250.361.0347
Program Manager:			
Email:		Phone:	

1. Description of the Initiative

The City's existing hiring system no longer achieved required business processes and it included manual processes that were inefficient including:

- Providing information over the phone instead of a dedicated site for applicants and/or other people interested in working for the city
- Allowing individuals to create profiles and upload their resumes
- Create a better online environment for applicants to apply for job postings
- No ability to screen or filter applicants' qualifications

The Human Resources needed a new online system that possessed all the functionality to manage the hiring process in an online environment. ICIMS' "Recruit" software application provides this functionality that includes:

- Communication with applicants
- Provides applicants access to the recruitment process information
- Allows the hiring manager to view applications in real time
- Allows recruiters to sort through candidate applications
- Can tailor postings (e.g. job specific questions) so that applicants can determine if they are qualified for posted positions

This version of recruit has the minimum functionality. It is considered a "Skinny System."

2. Scope of this PIA

This PIA looks at all aspects of Recruit with regard to its use by HR. The purpose of the review is to determine whether the use of Recruit complies with the privacy provisions in the *Freedom of Information and Protection of Privacy Act*.

3. Related Privacy Impact Assessments

There is a previous PIA on the Department of Human Resources previous hiring process that was not an online process.



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4. Elements of Information or Data

Applicant profile collects:

- First and last name
- Email address (work or personal)
- Phone number (work, home or cell)
- Address (work or home), street address, street name, city, province/state and country
- Resume
- IP address

Application process collects:

- Cover letter
- Responses to screening questions that determine whether you can apply for positions with the City (e.g. are you 16 or older, are you able to work in Canada) or job related questions regarding qualifications

There is no additional personal information collected from applicants who are screened in on a job posting.

Recruit does not collect personal information via:

- social media (this component of system is not enabled)
- Reference checks
- Friend referrals
- Interview notes of applicants screened
- Any additional testing of screened in applicants
- Personal information using cookies, third party cookies, web beacons or other tracking technologies
- Recruit does not provide third parties with applicant information to tailor applicants' Internet browsing experience (e.g. targeted advertising).

Components of Recruit:

- Library: Contains no personal information. It stores pre-screening questions or job related questions that HR staff can use.
- Attachments: HR scans and attaches the resumes and cover letters of individuals who submit hard copies. Also, the attachment function is used when applicants submit copies of degrees, certifications or other documentation to demonstrate their qualifications.
- Reports: Do not collect personal information. Reports are aggregate data.
- Search function: searches stored resumes and only HR staff have access

Access to Recruit

- HR Staff have complete access to the job competitions they are managing.
- HR staff can also access other competitions to fill in for co-workers when necessary



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- Hiring managers are those who create competitions to fill positions in their program areas. They review all applications and identify a shortlist of qualified applicants to proceed further in the competition.
- After competitions are complete, all applications are moved to a closed job folder. Hiring managers have access to their own competition closed job folders. They have access so they can review applications from previous competitions that required the same qualifications as a new competition.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

The personal information is stored and accessed on/from a server outside of Toronto Ontario. The data centre owner is IT Weapons. It provides back-up services to Canadian sites and maintenance is done within Canada. No synchronization occurs to the data. The data is not moved from data centre to data centre for cost savings such as cooling costs (e.g. the “Follow the Sun” strategy).

IT weapons staff have limited access. DBA's and Production IT staff undergo background checks and receive ongoing training as required by their duties

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.	



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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);	yes
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.	Competition applications received	collection	26(c)
2.	Applicants receive application confirmation notification	use	32(a)
3.	Applications are reviewed for qualifications (HR & Hiring Mgrs)	use	32(a)
4.	Applications are reviewed for qualifications (Hiring Mgrs)	disclosure	33.2(a)(c)
5.	Correspondence to/from applicants (provide further personal information)	collection	26(c)
6.	Correspondence to/from applicants (provide clarification of competition)	use	32(a)
7.	Short-listed applicants called for interviews	use	32(a)
8.	Potential successful applicant(s) references called	use	32(a)



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9.	Potential successful applicant(s) references called	disclosure	33.2(a)(c)
10.	Successful applicant chosen and contacted for additional information (e.g. proof of D/L classification, education certificate, diplomas etc.)	collection	26(c)
11.	Successful applicant chosen and contacted for additional information (e.g. proof of D/L classification, education certificate, diplomas etc.)	use	32(a)
12.	Successful applicant notified and offered position	use	32(a)
13.	Unsuccessful applicants notified	disclosure	33.2(a)
14.	Selected applicant hired	use	32(a)
15.	Unsuccessful applicants request feedback	use	32(a)
16.	Unsuccessful applicants request feedback	disclosure	33.2(a)
17.	Unsuccessful internal applicant(s) submit grievance	disclosure	33.2(a)(h)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Incorrect personal information	Request individuals to review update their resumes at least every year	medium	medium
2.	Unauthorized access	Fewer password attempts and shorter lockout	low	low
3.	Unnecessary review of resumes	Privacy training, Audit ability, Policy	medium	medium
4.	Unauthorized disclosure	Policy, Privacy training	low	low
5.	Unnecessarily long retention	Policy, System configuration	medium	medium
6.	Possible insufficient protection	System configuration	low	low

10. Collection Notice

A draft notice has been written



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Part 3 – Security of Personal Information

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

Physical security at the data centre:

- 24x7x365 monitoring and security guards
- Secure bullet-resistant entrances
- Video surveillance and image capture systems with archived footage
- Physically secure enclosures for cabinets and cages with biometric access controls
- Heavy gauge wire mesh in all data center walls

Physical security at the City:

- Employee computers are not easily accessible by the public
- There is a staffed front counter that monitors access to HR by the public
- HR is an almost stand-alone department with just one hallway connecting it to Bylaw Services work area

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

Technical security to the application:

- 10 character passwords (upper, lower case, number characters)
- 10 attempts before being locked out
- 2 hour expiry for inactivity

Technical security at the server site:

- Access cards and biometric controls for facility entry
- Network Operations Center staff on site 24x7
- Fully redundant monitoring of firewalls
- Anti-virus perimeter defense devices

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

No. See recommendation to create a written security policy.

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.

There are five HR staff with access to Recruit (the four advisors and the Human Resources Clerk). They all have administrative privileges and can access every posting.



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

The system does maintain a log of who accessed it and what changes additions or deletions they made.
Recruit can be remotely accessed, for example from home, but only with an authorized user name and active password.

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?

Factual information would be updated by individuals or staff if requested by individuals the personal information was about. Information would be annotated in the job posting file if required

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

Yes. Individuals' resumes are used to determine if they have the qualifications to apply for the position(s) they apply for.

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.

Individuals submit their own personal information and can access it online at any time. Staff will also seek clarification regarding the accuracy of personal information if there is a discrepancy or reason to believe the personal information is not correct.

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?

Yes. HR retains all records from individuals who apply for positions for a year and specific information for more than a year. This was instituted when the previous PIA was completed.



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Part 5 – Further Information

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

Recruit will send confirmation emails when applicants apply for a position, reminders to applicants to complete the job application they started and other customized automatic notifications can be sent

There are no systematic disclosures to anyone other than applicants (e.g. do hiring managers receive any)

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

No



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Part 6 – Information Access and Privacy Analyst’s Recommendations

1. 5 attempts maximum then locked out
2. 1 hour lock out for inactivity when it becomes available
3. Do not keep resumes longer than a year unless without the consent of individuals and their confirmation that their personal information is accurate and up to date.
4. Delete resumes of applicants who cannot apply for positions with the City because they are either not 16 or are unable to work in Canada
5. Employment history is considered to be sensitive personal information and access to it is typically based on the “Least Privilege Principle [e.g. system users should operate using the least set of privileges necessary to complete the job]” Please review access to determine if it is possible to reduce the current privileges of staff.
6. The privacy notification needs to be placed where applicants can read it before applying or right after applying.
7. Create a security policy for question 13 so that a written document is available for reference for new staff, to ensure consistent application and as a reminder that personal information has to be managed in accordance with FoIPPA

Section 27(2) Privacy Notification:

This section states that:

A public body must ensure that an individual from whom it collects personal information is told

- (a) the purpose for collecting it,
- (b) the legal authority for collecting it, and
- (c) the title, business address and business telephone number of an officer or employee of the public body who can answer the individual's questions about the collection.

Draft statement

The City of Victoria’s Human Resources Department collects your resume, cover letter and other necessary personal information to manage the competition you have applied for including determining your qualifications for the position. Human Resources is legislated authority to collect your personal information for these purposes is section 26(c) of the *Freedom of Information and Protection of Privacy Act*. If you require further information regarding the collection, use or disclosure of your personal information, please contact Human Resource Clerk, 627 Pandora street ,Victoria BC, v8w 1n8, 250 361 0232 sloo@victoria.ca



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HR ONLINE RECRUITMENT SYSTEM

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Part 7 - Program Area Signatures

Rob Gordon
Privacy Officer / Privacy Office Representative

Rob Gordon
Signature

Oct 12/16
Date

Sherry Olak
Program / Department Manager

Sherry Olak
Signature

Sept 27/16
Date

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

L.A. Presta
Signature

Oct 20/16
Date

N/A Designate is
Head of Public Body, or designate

Rob Gordon
Signature

Oct 20/16
Date

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

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