Completing a Privacy Impact Assessment

EXERCISES

January 2015

***Please note that all of the scenarios and events portrayed in this document are fictitious.***

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| **QUIZ: Would I know when to do a PIA?** Indicate whether or not in the following circumstances if you would consider completing a PIA and briefly outline why.  |
| 1  | A public body is entering into a data matching project. |  |
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| 2  | A public body is moving its offices to a new location. |  |
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| 3 | A public body is moving from paper and implementing an electronic record management system. |  |
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| 4 | The computer operating system is being upgraded, including software and bug fixes.  |  |
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| 5 | A public body has designated new information that may be released without an access request and is planning to post them on its web-site. |  |
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| --- | --- | --- |
| 6 | All employees are going to be issued mobile phones and laptops with wireless network connections. |  |
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| 7 | A public body is hiring a new company to do general maintenance in all of its buildings. |  |
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| 8 | A public body is creating a distance learning program.  |  |
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| 9 | The social committee is planning the summer BBQ and intends to post a list on which employees can make party suggestions.  |  |
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| 10 | GPS systems are being added to all of the public body’s vehicles used by employees. |  |
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| 11 | You are creating a new position for an administrator who will have full access to client files and employee records.  |  |
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| --- | --- | --- |
| 12 | A public body is going to change its employee benefits provider. |  |
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| 13 | A public body is hiring an outside contractor to run the government website. |  |
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| 14 | A public body is planning to begin enumerating constituents online. |  |
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| 15 | You are adding surveillance cameras to the outside and inside entrances of your office buildings. |  |
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**EXERCISE 1**

You are asked to evaluate the risks involved in the following projects. What are the potential risks and how would you propose to reduce them?

1. Moving your public body’s records to a data warehouse (large database, typically housed on a cluster of servers, or a mini or mainframe computer, serving as a centralized repository of all data generated by all departments and units of an organization).
2. Developing a common (network) delivery system to allow for maximum access for use by many employees from any number of locations.
3. Adding service monitoring to measure public satisfaction and allocate resources by adding internet browser cookies and transaction logging.

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**EXERCISE 2**

Considering your public body’s personal information holdings generally, fill in the table below with the possible risks in each of the three categories, Administrative, Physical and Technical and then add the mitigation measures you would recommend.

**Privacy and Security Risks and Mitigation**

| ***Risks*** | ***Likelihood\**** | ***Harm\**** | ***Mitigation Measures*** | ***Rationale*** |
| --- | --- | --- | --- | --- |
|   |  |  |  |  |
|  |  |  |  |  |
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| ***\*Risk Levels*** | ***Likelihood***  | ***Harm***  |
| *Low* | Little possibility that the risk will occur due to mitigating factors | Compromise would likely not result in any significant harm to the privacy, safety, or economic standing of individuals or the corporation. |
| *Moderate* | A possibility that the risk will occur if no additional measures are taken. | Compromise would likely cause some harm to the privacy, safety, or economic standing of individuals or the corporation. |
| *High* | Near certainty that the risk will occur in the future if no corrective measures are taken. | Compromise would likely cause significant and immediate harm to the privacy, safety, or economic standing of individuals or the corporation. |

**EXERCISE 3**

Develop a Personal Information Flow Table for the following proposed program:

Many of your employees are required, as terms of their employment and according to various professional standards, to have certain training and certifications at the start and throughout their terms of employment in your public body.

You are implementing Continuing Professional Development standards for your employees to be managed electronically by Human Resources - Employment Services. The process will include the following:

* the collection of information about the employees’ current qualifications;
* the collection of the employees’ supporting documentation;
* undertaking and documenting an assessment of compliance;
* verification and periodic audits of compliance;
* confirmation and notification of compliance;
* notification of non-compliance and assisting employees in developing and submitting an action plan to become compliant; and
* initiation of a performance review/evaluation if the employee remains non-compliant.

Draft a Collection Notice to be used for the collection of personal information for this program.

**Answer:**

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| --- | --- | --- | --- | --- | --- |
| *Flow #*  | *Description*  | *Type of Information* | *Purpose* | *Legal Authority* | *Custody or Control* |
|  *Continuing Professional Development (CPD)* |  |
| 1 |  |  |  |  |  |
| 2 |  |  |  |  |  |
| 3 |  |  |  |  |  |
| 4 |  |  |  |  |  |
| 5 |  |  |  |  |  |
| 6 |  |  |  |  |  |

**Collection Notice:**

Your name, business contact information and accreditation and certification information are collected under the authority of the Access to Information and Protection of Privacy Act (Yukon) S. 29(c). This information will be used in the administration of the Human Resources Continuing Professional Development Program. If you have any questions about the collection of your personal information for this program, contact the World’s Most Awesome Privacy Officer, 123 Maple Street, Whitehorse, YK, wmapo@gov.yk.ca or 867.123.4567.