



# Privacy Impact Assessment

Prepared by:

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## The BC Privacy Impact Assessment Guidelines<sup>1</sup>

### (I) BASIC INFORMATION

#### 1. Ministry/Public Body and Program Area.

**BC Academic Health Council**

260 - 575 West 8th Ave  
Vancouver, BC  
V5Z 1C6

#### 2. Contact Position and/or Name, Telephone Number and E-Mail Address (this should be the name of the individual most qualified to respond to questions regarding the PIA).

Theresa Roberts, Project Director  
Health Sciences Placement Network of BC (HSPnet)  
Phone (604) 925-6077  
Fax (604) 926-1357  
Email [theresa@tcroberts.com](mailto:theresa@tcroberts.com)

Or

George Eisler, CEO  
BC Academic Health Council  
Phone (604) 739-3910  
Email [geisler@bcahc.ca](mailto:geisler@bcahc.ca)

#### 3. Description of the Program/System/Legislation/Other (Initiative) being assessed. (Note here if the initiative does not collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

This assessment relates to the Health Sciences Placement Network of BC (HSPnet), a web-enabled application that supports the placement of health sciences students (from post-secondary educational institutions or *Placing Agencies*) into clinical practica or fieldwork opportunities (*placements*) in health authorities and other health service provider agencies (*Receiving Agencies*) in BC. Students to be placed are generally enrolled in schools within British Columbia, although HSPnet will allow Receiving Agencies to record the placement of students from outside of BC.

HSPnet was developed through one-time funding provided in April 2002 by the Ministry of Health Services to the BC Academic Health Council (BCAHC). The BCAHC will manage the ongoing operation and enhancement of HSPnet on behalf of its member organizations and other agencies that (1) meet the eligibility requirements of the BCAHC Policy on HSPnet eligibility, and (2) contribute to HSPnet sustainability through payment of user fees.

<sup>1</sup> The BC Privacy Impact Assessment (PIA) Guidelines are provided as a reference for compliance to the FOIPPA legislation in B.C. The PIA was developed jointly by the BC Ministry of Management Services, Corporate Privacy and Information Access Branch (CPIAB) and the Office of the Information and Privacy Commissioner (OIPC).

**Description of the Program/Initiative being assessed  
(continued)**

The BCAHC (formerly the Council of University Teaching Hospitals, or COUTH) was established under the BC Society Act through changes to the COUTH bylaws in October 2002. Members of the BCAHC society are provincial organizations and government ministries with mandates for health research, health education, and the provision of health care in BC. At a provincial systems level BCAHC has a mandate to:

- optimise effectiveness and efficiency of the relationships and interactions between researchers, educators, and practitioners and their organisations; and
- address issues and concerns in areas where responsibilities and interests are shared between members.

HSPnet is one of several interrelated strategies to address the growing shortage of skilled healthcare workers in BC. The system will streamline current processes for initiating, accepting/declining, tracking, and reporting on clinical placement opportunities and activities for health sciences students. It will contribute aggregate data on placement activities to improve planning for increased placement capacity, identification of untapped capacity, and support of initiatives to build capacity and improve the quality of placement experiences.

**(II) DESCRIPTIVE INFORMATION****1. Describe the elements of personal information that will be collected, used or disclosed and the nature and sensitivity of the personal information.**

**Student Profile:** Schools will collect information to maintain a student profile in HSPnet that contains the following information, of which all fields except Name are optional:

Student Name  
Student Number  
Student Contact Information (email, phone)  
Student Mailing Address  
Student Resume (summary of educational, work and volunteer history)

Placement requests will be sent initially from the Placing Agency to the Receiving Agency with all personal student information (including name) withheld. Once the request is accepted and confirmed, the student name will be released, but contact information (address, phone, email) and student number, if maintained in HSPnet by the Placing Agency, will not be released to the Receiving Agency.

A placement request may also include a copy of the Student Resume, prepared by the student, to assist in determining the best match for a student within a practicum environment. If a Resume accompanies a placement request, the resume will only be released in a non-identifiable format (student name withheld) until the placement is accepted by the Receiving Agency and confirmed by the Placing Agency.

If contact with the student is required prior to accepting a placement request, such as when placement is contingent on a student interview with the Receiving Agency, then the student's name may be released to authorized individuals within the Receiving Agency prior to confirmation, for the sole purpose of arranging and conducting a student interview.

**2. Purpose/Objectives of the Initiative (if statutory, provide citation).**

HSPnet will introduce a province-wide system for coordinating and improving student placements for all health sciences disciplines in BC. The web-enabled application will support processes for:

- Initiating, tracking and processing (accepting or declining) placement requests among Placing Agencies and Receiving Agencies
- Reporting and analysis of placement activities (within and across programs, agencies, and disciplines) to support planning and initiatives to increase placement capacity; and
- Facilitating evaluation of placement outcomes to ensure the best educational experience for health sciences students.

**\* 3. What are the potential impacts of this proposal? (Include privacy impacts in this description)**

With current paper-based placement processes, personal information about students is already being shared via paper and faxed forms, phone and unencrypted email transactions. In addition, hard copy placement records are currently stored in multiple physical locations in a Receiving Agency (Receiving Coordinator's office, nursing unit) and could be accessed unintentionally by others with access to those physical spaces.

HSPnet will address the potential privacy risks of misdirected documents, unintentional access to personal student information, and of using unencrypted email to share placement information that may identify students. Under HSPnet, only authorized users can view records that have been identified as appropriate for their job function. For example, a Receiving Coordinator may view all records received for her agency, whereas a nursing unit manager can view only records sent to that unit, and a senior nursing manager can view only aggregate reports of non-identifiable data, and only for nursing. HSPnet business rules and implementation of user ID's within specified access levels will limit access rights according to HSPnet policy, and on a need-to-know basis only.

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

No previous assessment done.

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

Flowchart attached as Appendix 1.

**(III) PERSONAL INFORMATION COLLECTION (Sections 26 and 27 of the Freedom of Information and Protection of Privacy Act (FOIPP Act))**

**1) Authorization for Collection:**

**No personal information may be collected by or for a public body unless authorized under the FOIPP Act (as covered by numbers i, ii, or iii below).**

**Definition:** "Collect" means to bring or come together; assemble; accumulate; obtain (taxes, contributions, etc.) from a number of people; receive money.

(i). Has the collection of personal information been specifically authorized by, or under, an Act? Yes \_\_\_ No X

If Yes, please specify the name of the Act and relevant section.

(ii). Has the personal information been collected for law enforcement purposes? Yes \_\_\_ No X

**Definition:** "Law enforcement" means  
(a) policing, including criminal intelligence operations;  
(b) investigations that lead or could lead to a penalty or sanction being imposed; or,  
(c) proceedings that lead or could lead to a penalty or sanction being imposed.

\* (iii). Is the personal information directly related to, and necessary for, an operating program or activity of the public body? Yes X No \_\_\_

**If none of the above questions have been answered "Yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your Director/Manager of Information and Privacy (DMIP) for ministries or the position responsible for FOI and Privacy Coordination (FOIPP Coordinator) for other public bodies.**

**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.**

**Direct Collection**

(i). Will the personal information be collected directly from the individual that the information is about? Yes X No \_\_\_

If you are only collecting personal information directly as noted above, you will not need to do the next section on indirect collection.

**Indirect Collection**

If the personal information has not been collected directly from the individual it is about, check which of the following authorizes the indirect collection:

(i). Did the individual the information is about authorize another method of collection? \_\_\_  
(Authorization process to be in place for implementation)

(ii). Has indirect collection been authorized by the Information and Privacy Commissioner? \_\_\_

(iii). Has indirect collection been authorized by another enactment? \_\_\_\_\_

**Specify name of Act and relevant section(s).**

(iv). Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary? \_\_\_\_\_

(v). Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi judicial tribunal? \_\_\_\_\_

(vi). Is the personal information being collected for the purpose of collecting a debt or fine or making a payment? \_\_\_\_\_

(vii). Is the personal information being collected for the purpose of law enforcement? \_\_\_\_\_

\* (viii). Is a public body collecting personal information disclosed to it under sections 33 to 36 of the FOIPP Act? \_\_\_\_\_

**Specify relevant section(s) or subsections that apply.**

**Additional details as required (e.g. explanation of method of collection).**

Consistent with current practices in the industry, Student Profile information will be collected by the Placing Agency on a need-to-know basis only. For example, student date of birth will not be maintained in HSPnet.

Schools will collect and maintain information from students at the time of their enrolment into the educational program. Upon receipt of updated information (e.g. name change, updated resume) from a student, the school would update the HSPnet student profile.

**If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. Please contact your DMIP or FOIPP Coordinator.**

### 3) Notification to collect information

**A public body must not collect personal information from an individual without notifying them of the collection as outlined below.**

(i). Has the individual whose personal information is being collected, been informed of: (informed consent process to be in place in time for HSPnet implementation)

- (a) the purpose for collection? Yes  No
- (b) the legal authority for collecting it? Yes  No
- (c) the contact information of the person who can answer questions regarding the collection? Yes  No

Notification is not required if the answer is “yes” to either of the following:

- (ii). Is the personal information about law Enforcement or anything referred to in Section 15(1) or (2) of the FOIPP Act? Yes  No
- (iii). Has the minister responsible for the FOIPP Act excused your public body from complying because it would:
  - (a) result in the collection of inaccurate information, or
  - (b) defeat the purpose or prejudice the use for which the personal information is collected? Yes  No

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

Prior to adding a student's identifiable information to HSPnet, the school Instructor will provide the student with a copy of the “Identified Purposes and Handling of Personal Information in HSPnet” document, plus a blank consent form. The “Identified Purposes” document also directs students to the HSPnet website where they will find the HSPnet Privacy and Security policies and contact information for the BCAHC Privacy Officer.

**If you have not provided the required notification as outlined in Section (i) above, please contact your DMIP or FOIPP Coordinator.**

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

**Under the FOIPP Act, personal information held by public bodies may only be used for certain specified purposes as outlined below.**

***Definition:** “use” of personal information means employing it to accomplish the public body's objectives; for example, to administer a program or activity, to provide a service or to determine someone's eligibility for a benefit or suitability for a job.*

***Definition:** “consistent” means for the purposes for which the information was obtained or compiled if the use (a) has a reasonable and direct connection to that purpose, and (b) is necessary for performing the statutory duties of, or for operating a legally authorized program of, the public body that uses or discloses the information.*

The public body must check one or more of the authorities listed below.

- 1) Has the individual the personal information is about consented to the use?  Yes

Note: Supporting documentation must be on file.

- 2) Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purpose?  Yes

**Please provide details of the original purpose for which the personal information was obtained or compiled. Please also provide, if applicable, details of the consistent/secondary use.**

The original purpose is to support:

- Identification and confirmation of suitable placement opportunities for a student;
- Processes that ensure the necessary paperwork and other arrangements are in place for an effective and safe placement (such as documentation for prerequisite training, agency liability insurance, patient consent forms, instructions for parking);
- Tracking the placement throughout its duration for purposes of locating and/or contacting the student within the receiving agency (in case of emergency or to alert the student of job action or facility problems), or contacting the supervisor to discuss placement status, progress against learning objectives, etc.

At this time, there is no new/secondary use envisioned that would involve identifiable personal information.

- \* 3) If the personal information was disclosed to the public body under sections 33 to 36, is the information being used for that same purpose? \_\_\_\_\_

**Specify subsection(s) that are being applied.**

**If you have not checked one of the above, you do not have the authority to use the information. Please contact your DMIP or FOIPP Coordinator.**

**(V) DISCLOSURE OF PERSONAL INFORMATION (Sections 33, 35, 36 of the FOIPP Act)**

**A public body may disclose personal information only as authorized under the FOIPP Act (as noted below). It should be noted that section 33 of the FOIPP Act also authorizes the disclosure of personal information in responding to FOI requests.**

***Definition:** "Disclose/disclosure" means to reveal, show, expose, provide copies of, sell, give or tell (personal or non-personal information or records).*

**1) Disclosure of Personal Information (Section 33)**

Section 33 of the FOIPP Act provides the legislative authority to disclose personal information; i.e., personal information cannot be disclosed unless authorized by section 33.

Please check the main authorization(s) for disclosure below.

- (i). If the individual the information is about has identified the information and consented to its disclosure,

\_\_X\_\_

(Note: Supporting documentation must be on file)

(ii). 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. Please also provide, if applicable, details of the consistent/secondary use.**

The original purpose is to support:

- Identification and confirmation of suitable placement opportunities for a student;
- Processes that ensure the necessary paperwork and other arrangements are in place for an effective and safe placement (such as documentation for prerequisite training, liability insurance, patient consent forms, instructions for parking);
- Tracking the placement throughout its duration for purposes of locating and/or contacting the student within the receiving agency (in case of emergency or to alert the student of job action or facility problems), or contacting the supervisor to discuss placement status, progress against learning objectives, etc.

There is no new/secondary use envisioned at this time that would involve identifiable personal information.

(iii). For the purpose of complying with an enactment of, or with a treaty, arrangement or agreement made under an enactment of, British Columbia or Canada,

      

**Specify name of Act and relevant section(s).**

(iv). For the purpose of complying with a subpoena, warrant or order issued or made by a court, person or body with jurisdiction to compel the production of information,

      

(v). 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, or for the protection of the health or safety of, the officer, employee or minister,

      

(vi). To the Attorney General for use in civil proceedings involving the government,

      

(vii). To the Attorney General or a person referred to in section 36 of the *Coroners Act*, for the purposes of that Act,

      

(viii). For the purpose of collecting a debt or fine owing by an individual to the government of British Columbia or to a public body, or making a payment owing by the government

of British Columbia or by a public body to an individual, \_\_\_\_\_

(ix). To the auditor general or any other prescribed person or body for audit purposes, \_\_\_\_\_

(x). To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem, \_\_\_\_\_

(xi). 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, \_\_\_\_\_

(xii). To the British Columbia Archives and Records Service, or the archives of a public body, for archival purposes, \_\_\_\_\_

(xiii). To a public body or a law enforcement agency in Canada to assist in an investigation (i) undertaken with a view to a law enforcement proceeding, or (ii) from which a law enforcement proceeding is likely to result, \_\_\_\_\_

(xiv). If the public body is a law enforcement agency and the information is disclosed (i) to another law enforcement agency in Canada, or (ii) to a law enforcement agency in a foreign country under an arrangement, written agreement, treaty or legislative authority, \_\_\_\_\_

(xv). If the head of the public body determines that compelling circumstances exist that affect anyone's health or safety and if notice of disclosure is mailed to the last known address of the individual the information is about, \_\_\_\_\_

(xvi). So that the next of kin or a friend of an injured, ill or deceased individual may be contacted. \_\_\_\_\_

**Additional details as required.**

**If you have not checked any of the above authorizations for disclosure or require clarification, you should contact your DMIP or FOIPP Coordinator.**

**2) Systematic or Repetitious Disclosures/Exchanges**

(i). Do the disclosures of personal information under section 33 occur on a regular basis? Yes X No

Although disclosure may occur on a regular basis, each disclosure is related to a specific placement request and is directed only to authorized individual(s) at the requested destination. Each student consents to disclosure of their personal information for the duration of their educational program and for all courses that require a placement experience. Of course, a student may withdraw their consent at any time as outlined in the Privacy and Security Policies and in the "Identified Purposes and Handling of Personal Information in HSPnet" document that is provided to each student.

(  
 ii) Has an Information Sharing Agreement been Completed for these disclosures/exchanges? Yes \_\_\_ No X

(iii). Has information related to the Information Sharing Agreements(s) been entered into the Personal Information Directory? Yes \_\_\_ No X

**Personal information exchanges within a public body do not normally require an ISA if they are for a consistent purpose as defined under section 33(c) of the Act or are necessary for the performance of an employee of the public body under section 33(f). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.**

**3) Research or Statistical Purposes (under Section 35 of the FOIPP Act)**

(i). Has a researcher requested access to personal information in an identifiable form for research purposes? Yes\_\_\_ No X

**If "yes", a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact your DMIP or FOIPP Coordinator for assistance. Please note: research using personal information may only be conducted if it meets all of the terms of section 35.**

**4) Archival or Research Purposes (under Section 36 of the FOIPP Act)**

The British Columbia Archives, or the archives of a public body, may disclose personal information for archival or historical purposes as authorized by Section 36.

Please check the authorization(s) for disclosure listed below.

- \* (i). the disclosure would not be an unreasonable invasion of personal privacy under Section 22. \_\_\_\_\_
- (ii). the disclosure is for historical research and is in accordance with section 35 (research agreements) \_\_\_\_\_
- (iii). the information is about someone who has been dead for 20 or more years. \_\_\_\_\_
- (iv). the information is in a record that has been in existence for 100 or more years. \_\_\_\_\_

**Additional details as required.**

No disclosure for archival or historical purposes is envisioned at this time.

**If you have not checked any of the above authorizations for disclosure or require clarification, you should contact your DMIP or FOIPP Coordinator.**

**(VI) ACCURACY AND CORRECTION OF PERSONAL INFORMATION (Sections 28 and 29 of the FOIPP Act)**

**If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access to, or have corrected or annotated their personal information or a period of one year after a decision has been made based upon the personal information.**

(i). Are there procedures in place to enable an individual to request/review a copy of their own personal information?      Yes   X        No   

(ii). Are there procedures in place to correct or annotate an individual's personal information if requested including what source was used to up-date the file?      Yes   X        No   

(iii). If personal information is corrected, are there procedures in place to notify other holders of this information?      Yes   X        No   

**If yes, please provide the name of the policy and/or procedures, a contact person and phone number.**

**Additional details as required.**

Policy No. 3.4 specifically addresses requirements to enable an individual to request/review a copy of their own personal information and to correct or annotate that information if requested. If the information is corrected/annotated, all authorized viewers will have access to the corrected/annotated information when they next view the electronic record. When such changes/annotations are made, the Privacy Officer and student's Educational institution will discuss whether there is a need to notify specific individuals and/or HSPnet users of the change, and who should make the notification (the BCAHC Privacy Officer or student's Educational institution).

Contact:  
Theresa Roberts, HSPnet Director  
604-925-6077

or

George Eisler, BCAHC Privacy Officer  
604-739-3910

**If any of the questions above have been answered "No", please contact your DMIP or FOIPP Coordinator for further clarification.**

**(VII) SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION (Section 30 of the FOIPP Act)**

**Note:** For PIAs related to new or existing systems, this section should be completed by the branch of the ministry responsible for systems maintenance and security and signed off, by this branch, in the Signatures section.

For PIAs that do not involve systems initiatives, this section should be completed by the Branch or DMIP/FOI Coordinator completing the PIA. In this case, the signature of the systems representative is not required.

**A public body must protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal. GMOP Section 8.4.5 requires public bodies to conduct a Security Threat Risk Assessment for information systems.**

*Definition: "Reasonable security arrangements" are those which a fair, rational person would think were appropriate to the sensitivity of the information and to the medium in which it is stored, transmitted, handled, or transferred. A sliding scale of security arrangements is appropriate, depending on the sensitivity of the personal information that a public body handles.*

1) Is there reasonable technical security in place to protect against unauthorized access or disclosure? Yes  No

Please explain.

The central HSPnet server is managed by the BC Institute of Technology (BCIT) under an extensive Service Legal Agreement (SLA) that has been signed by both parties. The SLA outlines all of the minimum acceptable requirements for software, firewall functionality, and user access protection by both BCIT and HSPnet. BCIT reserves the right to remove HSPnet from their network upon any signs of technical security breach including, at BCIT's sole discretion, if it is believed that the HSPnet server has been compromised and/or that it has compromised any services or infrastructure within the BCIT Domain.

The SLA also requires HSPnet to maintain complex password rules at all times in order to prevent both HSPnet and other BCIT systems from unauthorized access or attack.

HSPnet provides multiple levels of security as appropriate given a user's role in placing students. Complex passwords are required, and these passwords expire automatically every 90 days.

Student information is not available for "browsing" by unauthorized users (i.e. only Placement Coordinators will have access to information on students within their agency, and will have access to placement information only for students in Educational Programs under their responsibility).

2) Is there reasonable physical security in place to protect against unauthorized access or disclosure? Yes  No

Please explain.

The central HSPnet equipment is maintained within a physically secured area of a secured building that maintains BCIT's other critical hardware systems. BCIT maintains strict entry and access procedures for staff and contractors.

3) Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information? Yes X No    

**If yes, please provide the name of the policy and/or procedures, a contact person and phone number.**

The following policies direct the use, collection and disclosure of information in HSPnet. Copies of the policies are appended to this Assessment.

BCAHC Policy Manual Section 3 – Privacy and Security of Personal Information  
 Policy 3.0           General  
 Policy 3.1           Accountability  
 Policy 3.2           Identified Purposes and Ensuring Consent  
 Policy 3.3           Accuracy  
 Policy 3.4           Safeguards  
 Policy 3.5           Openness, Individual Access, and Challenging Compliance

Contact:  
 Theresa Roberts, Project Director - HSPnet  
 Phone: 604-925-6077  
 Or  
 George Eisler – BCAHC Privacy Officer  
 Phone: 604-739-3910

4) Have user access profiles been assigned on a need to know basis? Yes X No    

5) Do controls and procedures exist for the authority to add, change, or delete personal information? Yes X No    

6) Does your system security include an **on-going** audit process that can track use of the system (e.g., when and who accessed and updated the system)? Yes X No    

**Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances.**

Security roles and passwords ensure that only authorized individuals are permitted access to student's placement records. Some roles permit view-only access, while other roles permit a user to edit a record.

Key changes to records are recorded in History tables for the purposes of (1) providing an online transaction history and (2) to support periodic audits to identify potential problems with the user interface or training (as indicated by frequent and/or repeated albeit authorized edits), or to investigate reported or suspected security problems, or to detect unreported or unknown security problems. Policy no. 3.3 requires the HSPnet user group and technical support to identify planned, specific audits (to be undertaken a minimum quarterly basis) and to maintain a mechanism for responding to reported breaches or suspected breaches of confidentiality.

Does the audit identify inappropriate accesses to the system? Yes  No

**Additional details as required.**

No group or generic user ID's will be granted and each individual user's access will be tracked in HSPnet, both their dates/times of login and any records edited. A user's view of HSPnet information will be limited such that no areas of the system they are permitted to access would be considered "inappropriate access." As well, the HSPnet Privacy Officer will coordinate a bi-annual process, through Agency HSPnet Administrators, to review all user ID's, last login, frequency of login (and need for continued use), security roles, access rights, and number/types of records edited. This review will be undertaken to detect potential problems with security role definitions, agency setup of programs and destinations, training and user interface issues, and individual problems with inappropriate access.

**If any of the questions above have been answered "No", please contact your DMIP or FOIPP Coordinator.**

**(VIII) RETENTION OF PERSONAL INFORMATION (SECTION 31)**

**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.**

1) Do you have an approved records retention and disposition schedule? Yes  No

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? Yes  No

If you answered "No" to the above questions, your procedures may need to be revised. Please contact your DMIP or Records Officer.

Note: Records of provincial public bodies and specifically designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with a Records Officer to initiate the records scheduling process.

**(IX) DIRECTOR/MANAGER OF INFORMATION AND PRIVACY (DMIP) OR FOIPP COORDINATOR REVIEW**

1) Have you contacted the individual responsible for the completion of the PIA to discuss the information submitted, in particular those questions identified by an Asterisk? Yes  No

2) Does the Initiative meet the requirements of the FOIPP Act?

Yes \_\_\_\_ No \_\_\_\_

3) Is there a mechanism in place to review this PIA as appropriate to ensure the information remains current?

Yes \_\_\_\_ No \_\_\_\_

Are you satisfied that the policies/procedures for correction and/or annotation are adequate?

**If there is additional information that would support the intended collection, use or disclosure of the personal information, please either insert in the appropriate text box or append to the PIA.**

**Comments**