



Procedures for Privacy Impact Assessments

Link to Parent Policy:	Privacy Policy		
Procedure Reference:	PRPR03_2211N_AD/PRE		
Procedure Sponsor:	President		
Procedure Contact:	Privacy Officer		
Stakeholders:	All members of the OC Community including: Employees, Students, the Board of Governors, Contractors and Visitors		
Approved by:	Executive Team		
Effective Date:	March 23, 2023		
Last reviewed:	December 2022	Scheduled review date:	December 2027

1. Purpose

Okanagan College is responsible for ensuring that it protects the personal information within its custody and control, including by complying with the provisions of the *Freedom of Information and Protection of Privacy Act* ("FIPPA"). FIPPA requires that Okanagan College conduct a Privacy Impact Assessment ("PIA") to ensure that all collection, use, disclosure, protection and processing of personal information is compliant with FIPPA.

A Privacy Impact Assessment (PIA) is an in-depth review of any new or significantly revised initiative, project, activity or program to ensure that it is compliance with the provisions of FIPPA, to identify and mitigates risks arising from the initiative and to ensure that the initiative appropriately protects the privacy of individuals.

The purpose of this Procedure is to set out Okanagan College's process for conducting PIAs in accordance with the provisions of FIPPA.

2. Scope & Responsibility

This Procedural applies to all new and significantly revised initiatives of the College. An "initiative" includes an enactment, system, project, program or activity of the College.

All Employees of the Okanagan College are expected to be aware of and follow this Procedure in the event that they are involved in a new or significantly revised initiative.

Departments and management Employees are responsible to plan and implement new or significantly revised Initiatives in accordance with the requirements of this Procedure.

3. Responsibility of the Head

The administration of this Procedure is the responsibility of the President, who is the “head” of the College for all purposes under FIPPA (the “Head”). The Head may delegate any of their powers under this Procedure or FIPPA to other College Personnel by written delegation.

4. Responsibilities of All Employees

- 4.1 Any Employees responsible for developing or introducing a new or significantly revised Initiatives that involve or may involve the collection, use, disclosure or processing of Personal Information by the College must report that Initiative to the Privacy Officer at an early stage in its development.
- 4.2 All Employees involved in a new or significantly revised Initiative will cooperate with the Privacy Officer and provide all requested information needed to complete the PIA.
- 4.3 All Employees will, cooperate with any other PIA that the Privacy Officer decides to perform or directs the responsible manager to perform.

5. The Role of the Responsible Employee

- 5.1 The Responsible Employee is the Department Head or other designated Employee who is responsible for overseeing an initiative, and in the event of doubt, means the Employee designated in the PIA as the Responsible Employee. The Responsible Employee is responsible for:
 - a) ensuring that new and significantly revised Initiatives for which they are the responsible are referred to the Privacy Officer for completion of a PIA;
 - b) supporting all required work necessary for the completion and approval of the PIA;
 - c) being familiar with and ensuring that the initiative is carried out in compliance with the PIA; and
 - d) requesting that the Privacy Officer make amendments to the PIA when needed.

6. Initiatives involving the Storage of Personal Information outside of Canada

- 6.1 Employees may not engage in any new or significantly revised initiative that involves the storage of Personal Information outside of Canada until the Privacy Officer has completed and the Head has approved a PIA and any required Supplemental Review.
- 6.2 The Responsible Employee or Department should not enter into a binding commitment to participate in any initiative without a completed and approved PIA. They may also be required to complete a Supplemental Review before an initiative can move forward.
- 6.3 The Head is responsible for reviewing and, if appropriate, approving all Supplemental Reviews and in doing so must consider risk factors including:
 - a) the likelihood that the Initiative will give rise to an unauthorized, collection, use, disclosure or storage of Personal Information;
 - b) the impact to an individual of an unauthorized collection, use, disclosure or storage of Personal Information;
 - c) whether the Personal Information is stored by a service provider;
 - d) where the Personal Information is stored;
 - e) whether the Supplemental Review sets out mitigation strategies proportionate to the level of risk posted by the Initiative.
- 6.4 Approval of a Supplemental Review shall be documented in writing.

7. Contact Information

Questions or comments about this Policy may be addressed to the Privacy Officer at privacy@okanagan.bc.ca.

8. Related Acts and Regulations

College and Institute Act
Freedom of Information and Protection of Privacy Act (FIPPA)

9. Supporting References, Policies, Procedures and Forms

Procedures for Responding to Privacy Critical Incidents and Breaches
Procedures for Responding to Freedom of Information Access Requests
Procedures for Privacy Impact Assessments
Procedures for Website Privacy

History / Revisions

Date	Action
2022-11-09	New Procedure approved by OC Executive Team: <i>Procedures for Privacy Impact Assessments</i>