What is a Privacy Impact Assessment (PIA)?

A privacy impact assessment (PIA) is a process Coast Mountain College (CMTN) uses to identify, evaluate, and manage potential privacy risks related to new or changing projects, systems, and programs involving personal information.

PIAs identify deficiencies in privacy protection, assist in making informed decisions, and help avoid privacy breaches. A privacy breach occurs when personal information is used or disclosed in a way that is not in accordance with the privacy protection requirements under the *Freedom of Information and Protection of Privacy Act* (FOIPPA). PIAs are a legislative requirement under FOIPPA.

When is a PIA is required?

A PIA should be completed during the initial development of any new project, system, or program, or before any significant changes are made to an existing one. Completing a PIA early in the process ensures that privacy considerations are integrated into the design and implementation of the project, minimizing the risk of potential privacy breaches that could become significant issues.

Examples of substantial modifications that require a PIA include, but are not limited to:

new types of personal information are to be collected

significant changes are made to the way personal information is collected, used, or disclosed

personal information will be linked with information from third parties, another department, or another application

system access will be changed so that new categories or groups of individuals will have access to personal information (e.g., granting access to other units within the department, other departments, or external parties). Note: this does not include day-to-day operational changes or routines due to personnel changes

storage or access to personal information will be moved outside Canada, or to a vendor or cloud service

personal information management or security will be outsourced.

Who is responsible for completing a PIA?

The privacy officer works with the department responsible for the initiative, system, or program to draft the PIA. Technology-based initiatives may need the involvement of the IT Department.

A PIA must be completed and signed off by CMTN's privacy officer before the launch of any new project, system, or program.

Be sure to contact the privacy officer when you are contemplating a new project, system, or program or making changes to an existing one.

Questions about PIAs?

Please contact Aman Kang, the privacy officer by emailing foi@coastmountaincollege.ca.