



# Privacy

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## CHECK LIST

### PRIVACY IMPACT ASSESSMENT (PIA)

To be completed by the project leader and submitted to the Access to Information and Privacy (ATIP) Office

#### Objective

The Privacy Impact Assessment (PIA) is a process used to ascertain that all new or substantially new activities requiring the collection, retention, use or disclosure of personal information are conducted in accordance with the *Privacy Act* and to establish methods for ensuring that personal information is kept confidential. This Check List does not apply to personal information collected, used or disclosed exclusively for journalistic, artistic or literary purposes. To determine whether a PIA is required, this Check List must be completed whenever the Corporation plans to adopt new technologies or information systems, undertake new projects/initiatives, or make major changes to existing programs.

#### Check List

**Name of Project/Program/Initiative** (hereafter the “Project”)

**Project Description**

**Does the Project involve the collection, retention, use or disclosure of personal information?**  
(See Appendix A)

- Yes: Complete the Check List.
- No: A Privacy Impact Assessment is not required. You can stop filling out the questionnaire at this point and send it to the ATIP Office.

**Describe the personal information that will be collected, retained, used or disclosed as part of the Project.**

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The following questionnaire will be used to determine whether the Project poses a risk for privacy protection or privacy breach that warrants more thorough analysis via a PIA. The risk level is based on two factors: 1) the probability that a harmful event will occur; 2) the potential impact such an event could have on the people involved and CBC/Radio-Canada.

You are asked to provide us with all relevant information in the **Comments** section.

<b>Question</b>	<b>Background</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
1. Is the personal information of a sensitive nature?	The inherent privacy risk is proportional to the sensitivity of the information. The same is true for the potential impact on the affected people and the Corporation should a privacy breach occur. This means the risk level will be lower for general information (address, telephone number), but grows substantially for personal information dealing for example with health, behaviour or financials.	<input type="checkbox"/>	<input type="checkbox"/>	

<b>Question</b>	<b>Background</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
2. Will the personal information be collected, used or retained for an extended period of time?	The longer the collection, use or retention period, the higher the risk of a privacy breach.	<input type="checkbox"/>	<input type="checkbox"/>	

<b>Question</b>	<b>Background</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
3. Will the personal information collected be used to make decisions that directly affect individuals?	The use of personal information for an administrative purpose means the use of that information in a decision-making process that directly affects individuals. The <i>Privacy Act</i> contains specific requirements when the information is collected for an administrative purpose, including a mandatory retention period. These strict requirements heighten the risk of a privacy breach.	<input type="checkbox"/>	<input type="checkbox"/>	

Question	Background	Yes	No	Comments
4. Does the personal information collected, used, retained or disclosed affect a large number of people?	The risk of a privacy breach increases in proportion to the number of individuals whose personal information is being collected, used, retained or disclosed.	<input type="checkbox"/>	<input type="checkbox"/>	

Question	Background	Yes	No	Comments
5. Will the personal information be disclosed or shared internally or externally?	Disclosing personal information, especially outside the organization, increases the risk of a privacy breach. In some cases, additional control measures may be required, particularly surrounding the disclosure process and the actions taken by third parties to protect personal information.	<input type="checkbox"/>	<input type="checkbox"/>	

Question	Background	Yes	No	Comments
6. Will the Project use a personal identifier already used by one or more platforms, or create a new personal identifier?	The more often a personal identifier is used on different platforms, the greater the risk of a privacy breach, given the potential for cross-referencing of personal information.	<input type="checkbox"/>	<input type="checkbox"/>	

Question	Background	Yes	No	Comments
7. Is the Project likely to trigger negative reactions among staff or the public?	Some activities may be perceived negatively, even if they don't actually violate the <i>Privacy Act</i> . Whenever personal information is collected, used or disclosed without the consent of the individuals concerned even when authorized by the law, there is a heightened risk of damaging CBC/Radio-Canada's reputation (following negative media coverage, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	

Question	Background	Yes	No	Comments
8. Does the Project include the use of an external service provider?	Use of an external service provider increases the risk of a privacy breach, as CBC/Radio-Canada could be held responsible in some cases for how the provider handles and protects personal information.	<input type="checkbox"/>	<input type="checkbox"/>	

Check List completed by:

Name:

Date:

Title:

**Determining the need for a PIA**

The more “Yes” answers there are to the above questions, the greater the likelihood that a PIA is required. The specific nature of the Project may also be an influencing factor. The need to conduct a full assessment must be discussed with ATIP Office staff, the final decision resting with the ATIP Coordinator. The recommendations resulting from a PIA will be used to mitigate any risks identified.

**Does the Project require a Privacy Impact Assessment?**

Yes

No

ATIP Office comments

Name:

Date:

## APPENDIX A

### DEFINITION OF PERSONAL INFORMATION

Personal information as defined in the federal *Privacy Act*:

“Personal information” means information about an identifiable individual that is recorded in any form including, without restricting the generality of the foregoing:

- (a) information relating to the race, national or ethnic origin, colour, religion, age or marital status of the individual;
- (b) information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
- (c) any identifying number, symbol or other particular assigned to the individual;
- (d) the address, fingerprints or blood type of the individual;
- (e) the personal opinions or views of the individual except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual by a government institution or a part of a government institution specified in the regulations;
- (f) correspondence sent to a government institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to such correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the individual;
- (h) the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual by an institution or a part of an institution referred to in paragraph (e), but excluding the name of the other individual where it appears with the views or opinions of the other individual; and
- (i) the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual.

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