

Breakout Session

E5 – PIA Tools & Tips

MGS Access and Privacy Office
September 14, 2006

Toronto, Ontario

Case Study - LATER

Your Assignment (1:55 – 2:30 pm)

Preliminary privacy report

- **Data analysis – information needed and rationale**
- **Rough information flow**
- **Identify potential privacy impacts**

Privacy analysis

- **Revisit information flow, with legal authorities**
- **Analysis of privacy impacts and mitigation strategies**
- **Strategize to manage privacy challenges**

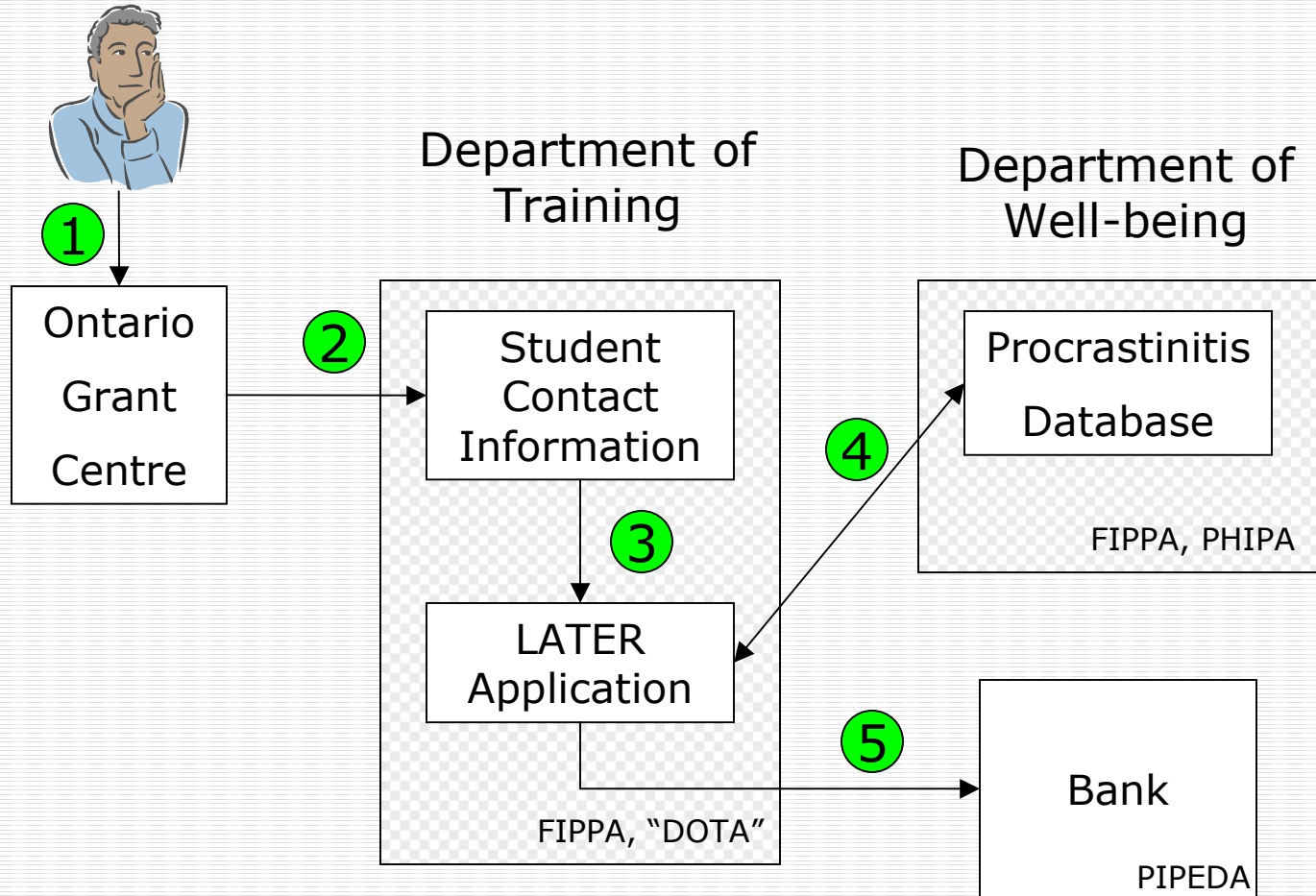
Break (2:30 – 2:45 pm)

Report to Group (2:45 – 3:15 pm)

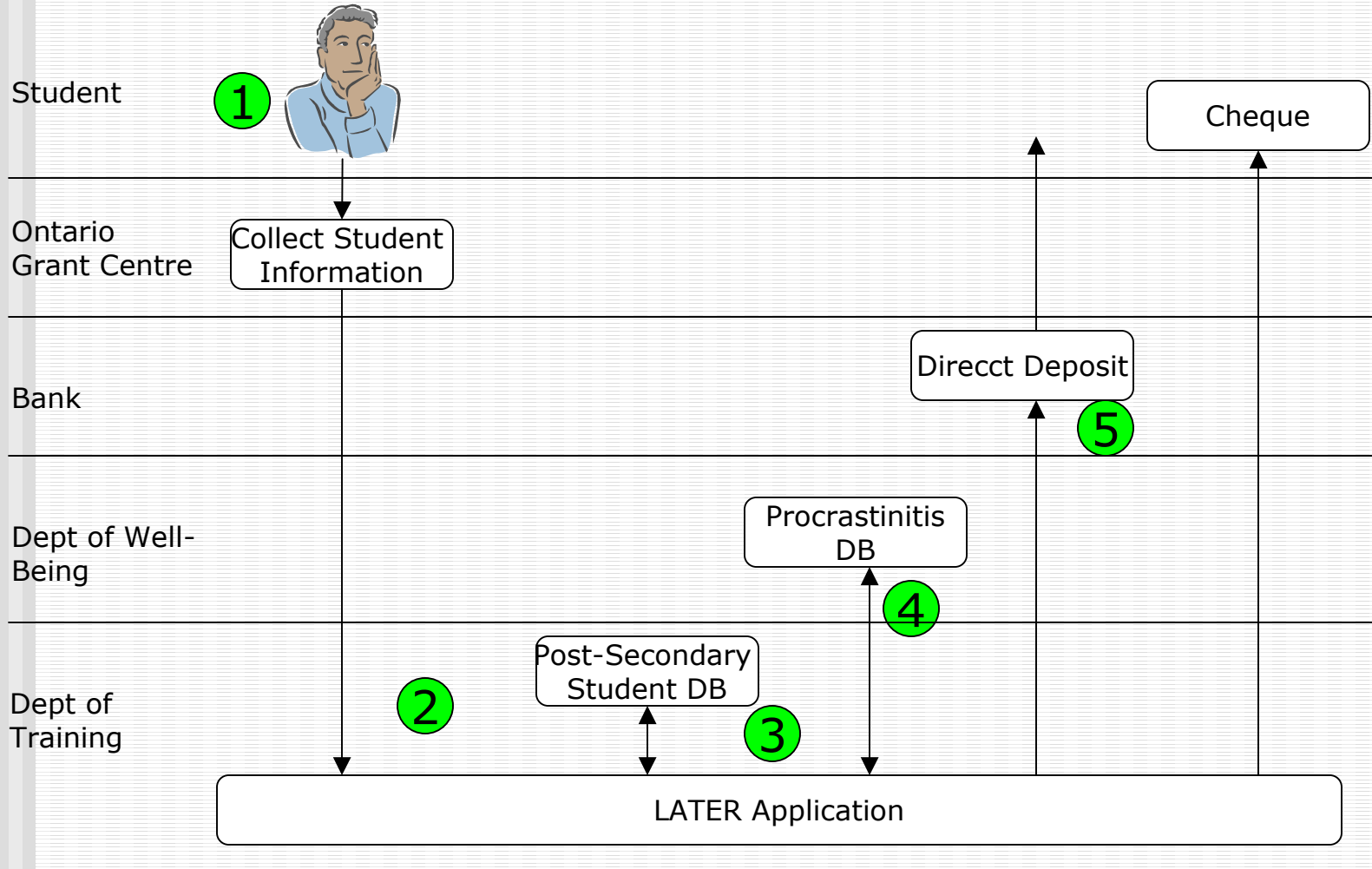
Data Analysis

- Look at each data element
- Determine whether collection, use and disclosure is justified under FIPPA/PHIPA/PIPEDA or privacy principles
- Propose rationale for collection, use, disclosure (full/limited/no)

Example information flow



Example information flow



Privacy Analysis

FIPPA	PHIPA	Protection of Privacy
s.2	s.2,3,4,5	Definitions
s.38	s.29-36	Collection
s.39	s.18-28	Manner of collection
s.40	s.13-14	Retention
s.41	s.37	Use
s.42	s.38-50	Disclosure
s.47	s.52, 55	Access and Correction
Part 2	s.53, 54	Freedom of Information requests
s. 44, 45, 46	s.15, 16, 17	Accountability and Openness
Reg. 460 s.3, 4	s.12	Security

Privacy Challenge Questions

1. Project manager asks, “why do we have to jump through one more bureaucratic hoop?”
2. IT Manager says, “No need to worry about privacy, we have all the latest security measures in place.”
3. Project Leader asks, “What can we do to get around all of these barriers in the Act?”
4. Project Leader says, “Thanks for letting us know about the PIA – let us know when you’re done.”
5. There’s no documentation. The program is based on a meeting decision back in 1973.

Privacy Challenge Questions

6. At initial PIA meeting you are told, “The system goes live next week”
7. In sign-off phase, the system owner says to you, the reviewer, “Will you sign the PIA?”
8. We just got a new supercomputer! We now have the capacity to collect and store more data!”
9. My Director says that under FIPPA/PHIPA we don’t have to do a PIA.
10. You just finished drafting the PIA and the project scope changes.