

Privacy Impact Assessment Procedures & Storing Personal Information Outside of Canada

Public bodies such as UVic are now required to complete a Privacy Impact Assessment (PIA) for new or significantly changed initiatives involving the handling of personal information.

General Information:

- [British Columbia's Freedom of Information and Protection of Privacy Act \(FIPPA\)](#) was amended in 2021 to require public bodies such as UVic to complete a PIA for all new or significantly modified initiatives. An "initiative" refers to any system, process, program or activity that supports university business. This tip sheet will guide learners on what is needed to begin a PIA, and how to complete one.
- FIPPA no longer includes a data residency requirement for all personal information to be stored within Canada. Instead, public bodies must complete a privacy risk assessment for storage outside of Canada.

What is Personal Information?

Personal information is any recorded information about an identifiable individual that is not business contact information. Examples include: student name, personal address, medical information, personal opinions, and video/audio recordings.

What is the purpose of a PIA?

A PIA is a step-by-step review process to make sure you protect the personal information you collect, use, disclose or store in your initiative. You'll work with the Privacy Office to identify, evaluate and manage privacy risks.

Who is responsible for completing the PIA?

The Administrative Authority (as defined in [Policy GV0235](#)) responsible for the initiative will work with the Privacy Office to complete the PIA. If the initiative will store personal information outside of Canada then both the [Privacy Office](#) and [Information Security Office](#) will have to sign off on the project.

Required steps for PIA procedure:

- 1** If your initiative involves procurement of services subject to [Purchasing Policy FM5105](#), please start by engaging Purchasing Services to inform them of your initiative. Find the Purchasing Officer assigned to your unit at [Find Purchasing Officer](#) or contact Purchasing Services at purchase@uvic.ca. Once you receive the go ahead from Purchasing, please proceed with the steps listed below to complete a PIA with the Privacy Office.

- 2** If a PIA is required, you may [download the template](#) form from the [Privacy and Access webpage](#).

- 3** Fill out the form and submit it to privacyinfo@uvic.ca.
Some things to consider:
 - a) There will be questions that you may not have the answers to yet or that you may not understand. The privacy team will be able to help fill in the blanks once you submit it to the office.
 - b) It is important to provide as much detail as possible in Part 1: “**General Information**” so that the privacy team can use that information to fill out any parts that were left blank.
 - c) There will most likely be some clarification questions and communications between your group and the Privacy Office. It is best to have one point of contact for these discussions. This is usually the Administrative Authority (which will be listed on page 1).

- 4** Depending on whether personal information is stored inside or outside of Canada, completion of the PIA can happen in one of two ways:
 - a) *Information stored **inside of Canada*** - when all parties are comfortable with the PIA then the document goes off to the Administrative Authority for review and sign-off.
 - b) *Information stored **outside of Canada*** – a completed PIA will be reviewed by the Chief Privacy Officer for their signature and then it will be sent to the Administrative Authority. Your initiative may require a risk assessment by University Systems and may require their approval.

For further information:



[Privacy and Access to Information Office](#)



privacyinfo@uvic.ca

