This document is used by the Privacy Management Division (PMD) to determine whether a Privacy Impact Assessment or any other privacy compliance analysis is required for a program or activity.

**SECTION I**

**IMPORTANT:** Fill out section I and attach supporting documentation on the program/activity being considered in the checklist (e.g.: business case, framework, planning document, Security Assessment and Authorization (SA&A), scenarios, storyboard, journey map, etc…). Referring to the list of definitions (see Annex A), please provide the required information to the best of your knowledge. Do not hesitate to consult with PMD for assistance.

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| **GENERAL INFORMATION** | | | | | |
| **Date: YYYY/MM/DD** | | | | | |
| **Lead Branch, Division, and Unit** (*if this is a jointly delivered activity, please provide all responsible branches, directorates or divisions)* |  | | | | |
| **Title of Program or Activity** *(for Treasury Board Submissions or Memorandum to Cabinet, please add the title of the submission)* |  | | | | |
| **Contact person (Name, title, email, and phone number)** |  | | | | |
| **Is the activity considered a major, minor, or small project under** [**ESDC’s Investment Management Process**](http://iservice.prv/eng/finance/ipprocess/topics/project_identification.shtml)**?** | Major | Minor | Small | N/A | TBD |

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| **PROGRAM OR ACTIVITY DESCRIPTION** | | | | | |
| **Please provide background information and a description of the program or activity, and indicate if this is a new initiative or a modification of an existing one.** | | | | | |
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| Will the program or activity involve any of the following **personal information** elements**[[1]](#footnote-2)**? | Name (e.g.: surname, given names, maiden name, nicknames, aliases etc…)  Contact information (e.g.: work and/or home information, including postal and email addresses, telephone, fax, cell phone numbers, etc..)  Date of birth and/or date of death  Gender  Medical information (e.g.: psychological assessments, physical abilities, medical conditions, etc.)  Biometric information (e.g. blood type, eye or facial scan, DNA, fingerprints, etc.)  Physical attributes (e.g. height, weight, hair and eye colour, etc.)  Biographical Information (e.g. work history, curriculum vitae, family information, hobbies, interest, etc.)  Client information (e.g. benefit type, start date, end date, amount, etc.)  Employee personnel information (e.g. records of attendance and leave, official languages qualifications, exact salary, level of security clearance, etc.)  Employee equity information (e.g. information about aboriginal peoples, members of visible minorities, persons with disabilities, and women)  Financial information (e.g. income, investments, mortgages, loans, financial institution information, etc.)  Language (e.g. mother tongue, official and other languages, etc.)  Personal identifying number (e.g. Personal Record Identifier (PRI), SIN, unique identifier, etc.)  Views and/or opinions  Photos and/or videos  Citizenship status (e.g. citizen, landed immigrant, etc.)  Other, please specify: | | | | |
| Were any privacy assessments (e.g. review of privacy notices or information sharing agreement, privacy impact assessment, threshold assessment) completed on any part of your program or activity since April 2010? | |  | YES |  | NO |
| If **YES**, please note any assessment(s) below, the date they were completed (month and year), and where applicable, the PMD file number. | | | | | |

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| **USE OF PERSONAL INFORMATION** | | | | | |
| **Please explain** why the personal information is required and how it will be used: | | | | | |
| Will the activity involve contracting out or transferring of a part of the program or activity to another level of government or a third party (e.g. private sector, provincial government)? | |  | YES |  | NO |
| **Please explain:** | | | | | |
| Does the program or activity involve any of the following activities? (Select all that apply) | Policy Analysis, Research, and Evaluation Activities  Statistical Analysis (including data linkage)  Public Opinion Research, Consultations, or Surveys (both internal and external to ESDC)  User/usability testing | | | | |

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| **SYSTEMS MODIFICATIONS *(if applicable)*** | |
| Will the activity involve any of the following modifications to information technology (IT) legacy system(s)? (Select all that apply) | Upgrading an existing system  Performing systems migration  Developing a new system  Use of Cloud Technology |
| **Please specify which IT systems are involved and list any Security Assessment and Authorization (SA&A) performed on the systems for the program or activity:**  If you have any questions on SA&A please use the following email:  [NC-ITSRM-STIGR-GD@HRSDC-RHDCC.GC.CA](mailto:NC-ITSRM-STIGR-GD@HRSDC-RHDCC.GC.CA) | |

**SECTION II**

*To be completed by the Privacy Management Division – assessment to be provided and recommendation on whether a Privacy Impact Assessment is required as per TBS policy.*

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| Will the personal information associated with the proposed program or activity be used for **an administrative purpose** (see annex a) that directly affects the individual to whom the information relates?  (e.g. receipt of a benefit, user authentication or registration, eligibility for a program) |  | YES |  | NO |
| **Assessment:** | | | | |
| Will the program or activity involve the use of personal information for **non-administrative** activities? | |  |  |  |  | | --- | --- | --- | --- | |  | YES |  | NO | | | | |
| Will the activity result in a **substantial modification** (as per the [Directive on Privacy Impact Assessments](http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=18308#appA))to the privacy practices and/or to the handling of personal information of a proposed program or activity where personal information is used for an administrative purpose that directly affects the individual to whom the information relates?  (e.g. collecting information from another source, collecting new personal information, automating a process, changes to IT infrastructure that result in changes to the handling, protection, or processing of personal information) |  | YES |  | NO |
| **Assessment**: | | | | |
| Is any personal information of a **sensitive nature** involved (e.g. Social Insurance Number, medical information, financial information, biometric information, enforcement or investigation-related information, information about youth or a vulnerable group)? | |  |  |  |  | | --- | --- | --- | --- | |  | YES |  | NO | | | | |
| **Assessment**: | | | | |

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| **CONCLUSION** |
| Type of privacy analysis required (check one)   |  |  |  |  | | --- | --- | --- | --- | |  | Privacy Protocol |  | Privacy Impact Assessment | |  | Ad Hoc Privacy Analysis |  | High Level Privacy Analysis for IT Solutions | |  | None |  |  |   **Rationale**:  **Privacy Contact: (NAME OF ANALYST)** |

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| As the executive responsible for this program/activity/initiative, I agree to implement the above recommendation and to assign the necessary resources requested to adavnce the work. | |
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| **Name of OPI** |  |
| **Title, Division**  **Branch** |  |
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| **Scott MacKay**  **Director, Privacy Management Division** |  |
| **Corporate Secretariat** |  |
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**Annex A: Supporting material**

1. **Definitions**

**Administrative Purpose**

Section 3 of the *Privacy Act* defines administrative purpose as the use of personal information about an individual "in a decision making process that directly affects that individual." This includes all uses of personal information for confirming identity, for example, for authentication and verification purposes, and for determining eligibility of individuals for government programs.

**Non-administrative Purpose**

A non-administrative purpose refers to the use of personal information for a purpose that is not related to any decision-making process that directly affects the individual. This includes the use of personal information for research, statistical, audit and evaluation purposes.

**Personal information** means information about an identifiable individual that is recorded in any form.

**Substantial modification**

Refers to a change or an amendment to the privacy practices related to a particular program or activity, which is reflected in a personal information bank description. This includes any change or amendment to the privacy practices related to activities that use automated or technological means to identify, create, analyze, compare, extract, cull, match or define personal information.

1. **Reference tools:**

Privacy Act: <http://laws-lois.justice.gc.ca/eng/acts/p-21/page-1.html#h-3>

Policy on Privacy Protection: <https://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=12510>

Directive on Privacy Impact Assessment: <http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=18308#appA>

Directive on Privacy Practices: <https://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=18309>

Directive on Social Insurance Numbers: <https://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=13342>

1. See section 3 of the [*Privacy Act*](http://laws-lois.justice.gc.ca/eng/acts/p-21/page-1.html#h-3)for the full definition of personal information. [↑](#footnote-ref-2)