

## Privacy Impact Assessments Policy

### 1. About this document

This policy defines the processes for the development, completion and review of Privacy Impact Assessments.

### 2. Definitions

**Privacy Impact Assessments (PIAs)** are a standard tool used to identify and mitigate potential privacy risks of new or redesigned government IT systems, programs, services, or legislation, based on a standard template provided by HPW.

OIPC is the Office of the Information and Privacy Commissioner.

### 3. Application

This policy applies to all government departments as listed in GAM 2.1.

### 4. Authority

This policy is issued under GAM Policy 2.27 and was approved by the Deputy Minister of HPW on October 20, 2016.

### 5. Privacy Impact Assessments Policy Statement

- PIAs must be completed for all proposed or amended IT systems, programs, services, or legislation. Although not required at this time, PIAs are a useful tool for mitigating risks and program areas may find it useful to complete them for existing IT systems, programs, or services.
- PIAs must be completed in the template developed by the ATIPP office, unless otherwise approved by the director of Corporate Information Management.
- PIAs for all proposed new or amended IT systems, programs or services must be submitted to the ATIPP office for review and comment within a reasonable time frame prior to launch.
- PIAs must be signed in order to be considered complete.
- If a PIA is submitted to the OIPC, a representative from the ATIPP office should be present when a department meets with the OIPC to receive comments on a submitted PIA, unless approved by the director of Corporate Information Management.

## 6. Roles and Responsibilities

Deputy Heads will:

- Ensure necessary project resources (i.e. financial, technical, staff, etc.) are available to complete a PIA.
- Support their privacy officers in implementing this policy.
- Approve completed PIAs, or designate a director or assistant deputy minister to approve them.

Privacy Officers will:

- Ensure this policy is communicated to department staff.
- Support the ATIPP office in implementing this policy, including notifying the ATIPP office of new PIAs coming forward for review.

The ATIPP Office will:

- In coordination with the department's privacy officer, determine the scale/scope of a PIA appropriate to the circumstances.
- At the request of the department's privacy officer, assist program managers, or a delegate, with drafting and completing PIAs.
- Maintain and update templates and guidance documents.
- Maintain a central repository of all completed PIAs that is accessible within government to encourage knowledge sharing between departments.
- Review and comment on PIAs prior to their approval.

Program Managers will:

- Notify their privacy officer when a new program, service, information system, or legislation is proposed and a PIA is required.
- Complete PIAs using templates provided by the ATIPP office or alternatives approved by the director of Corporate Information Management.
- Work in partnership with their privacy officer and the ATIPP office to complete the PIA.
- Ensure the PIA is signed by all required parties prior to the launch of any new IT system, program or service, or legislation coming into force.
- Ensure completed and signed PIAs have been provided to the ATIPP office for the central repository.