



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands] PIA#[will be assigned by PCT]AGRI28-2019

## Why do I need to do a PIA?

Section 69 (5) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a ministry to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Section 69 (5.1) requires the head to submit the PIA to the minister responsible for FOIPPA for review, during the development of any new system, project, program or activity, or proposed enactment, or when making changes to an existing one. The Privacy, Compliance and Training Branch (PCT) is the representative of the Minister for these purposes. Ministries must submit PIAs to PCT at for review and comment prior to implementation of any initiative. If you have any questions, please call the Privacy and Access Helpline (250 356-1851) for a privacy advisor. Please see our PIA Guidelines for question-specific guidance on completing a PIA.

## What if my initiative does not include personal information?

Ministries still need to complete Part 1 of the PIA and submit it, along with the signatures pages, to PCT even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

## Part 1 – General

Name of Ministry:	Agriculture		
PIA Drafter:	Corrine Roesler		
Email:	Corrine.Roesler@gov.bc.ca	Phone:	604 556 3110
Program Manager:	Willow Minaker		
Email:	Willow.Minaker@gov.bc.ca	Phone:	778 974-3846

*In the following questions, delete the descriptive text and replace it with your own.*

### 1. Description of the Initiative

~~A joint pilot project between the Ministry of Agriculture and is pursuing a joint pilot project with the Provincial Agricultural Land Commission (ALC) to determine if radar satellite-based change detection has the potential to assist with monitoring and regulatory oversight of the Agricultural Land Reserve (ALR).~~

~~This project is an exploration of new technology and it's potential application and not a new system, project, program or activity, or a change to an existing one.~~

The project will attempt to detect anthropogenic changes within three overlapping areas of Southern BC. The exact locations will depend on availability of radar satellite imagery but will be no larger than 90x50 km in size as dictated by the size of a radar satellite image frame. Southern

Commented [GA11]: Corrine can you explain why this area was selected?



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands] PIA#[will be assigned by PCT]AGRI28-2019

BC was chosen as the availability of high-resolution optical imagery is greater than in Northern BC. A lower mainland location will be given preference due to proximity to the ALC offices and travel time for staff to verify results.

The Radar satellite images from different time periods (1 year, 24 days, 12 hours) will be compared in an attempt analysed to detect new land fill, infrastructure (buildings, roads, etc.) and large commercial vehicle parking within the ALR Agricultural Land Reserve.

The resolution of these radar satellite images will be ~~could be~~ 3m (Radarsat 2's Wide Ultra-Fine beam mode). At this resolution, large commercial vehicles may be distinguishable from passenger vehicles, but the type of vehicle (sedan versus pickup truck), licence plates, or the presence of passengers will not be distinguishable. At this resolution, the approximate footprint of infrastructure may be distinguishable, but the type and use of infrastructure (house versus garage versus shop) will not be distinguishable.

Sample data is available to the public;

<https://mdacorporation.com/geospatial/international/satellites/RADARSAT-2/sample-data>

The Any A sample of the detected changes would then be verified by traditional methods, such as aerial photography, high resolution optical satellite imagery, or windshield survey from a public road.— The Ministry will support the ALC as needed to verify if detected changesatellite images accurately represents the detected change to the land base. No compliance activities are included in this verification, the goal of verification is to confirm if the detected change is accurate.

Results of the verification will used to refine the change detection process using an iterative approach.

## 2. Scope of this PIA

This PIA does not cover assess compliance and enforcementany activities of the ALC.

This PIA covers only the role of the BC Ministry of Agriculture in this pilot project, which is to provide technical and funding support and to gain an understanding of the capabilities of radar-based satellite systems.

This PIA covers the exploration of new technology and potential applications.

## 4.3. Related Privacy Impact Assessments

The ALC has legislative authority for regulatory oversight in the ALR and may have submitted a PIA related to the activities being explored under this pilot project.—The activities of the ALC in this pilot project have been assessed in a separate PIA.

**Commented [GA12]:** Corrine can you expand on what would be visible at this resolution? Could you make out types of vehicles (ie; truck, car or van)? Is there an example image we could include as an appendix to the PIA for reference?



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands] PIA#[will be assigned by PCT]AGRI28-2019

## 5.4. Elements of Information or Data

~~Radar~~ The only data involved is satellite imagery (both archive and current) for the selected ALR lands.

Existing (and available) aerial photography and optical ~~aerial~~ satellite imagery of the selected ALR lands ~~parcels~~.

Location of detected change in a shapefile format. Depending on the success of the pilot, this data may include an initial estimate of type, such as land fill, infrastructure, or large vehicle parking.

Existing public datasets (accessed via the BC Geographic Warehouse or address BC) may be used to verify change detection results. Information utilized in these data sets may include

Civic address

Imagery of land base (including Lidar, scanned maps, land classification maps and digital elevation models)

Information ~~may also~~ will be collected in the process of verifying change detection results. This includes notes taken during windshield surveys. Survey staff are trained to not include personal information in notes, ensuring that they are technical in nature and refer only to the land base.

**Within the scope of the Ministry's role, no personal identifiers will be included in the analysis of the land base. Images of the land base, and change verification results (ie: if change detected by the satellite ~~satellite~~ was accurate or inaccurate) will be retained by the Ministry to supplement existing data sets of ALR land, and inform future policy or programming. ~~In the course of verifying the change detection results, datasets which are accessible through the BC Geographic Warehouse may be referenced in a GIS system and civic address (AddressBC) may be used to help orient the windshield survey.~~**

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If **no** personal information is involved, please submit Parts 1, 6, and 7 unsigned to PCT at [pia.intake@gov.bc.ca](mailto:pia.intake@gov.bc.ca). A privacy advisor will be assigned to your file and will guide you through the completion of your PIA.



# Privacy Impact Assessment for *{Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands}*

PIA#*{will be assigned by PCT}*AGRI28-2019

## Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own:

Storage or Access outside Canada

Change detection results will not be accessible from outside Canada.

Data-linking Initiative\*

~~FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.~~

~~Personal information from one database is linked or combined with personal information from another database;~~

~~The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;~~

~~The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.~~

~~If you have answered "yes" to all three questions, please contact a PCT Privacy Advisor to discuss the requirements of a data-linking initiative.~~

**Commented [GA13]:** Addressing that MDS is American owned and managed. Corrine can we say here that schedules E and G will be included in the contact.

**Commented [RCA4]:** Can we add 'If necessary', or 'If personal information, will include E and G....'. If the pilot itself does not include any personal information, these two schedules are not required.

Common or Integrated Program or Activity\*



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands]

PIA#[will be assigned by PCT]AGRI28-2019

FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

<u>Does the initiative involve a program or activity that provides a service (or services)?</u>	<u>Yes/No</u>
<u>Are the services provided through:</u> <u>- a public body and at least one other public body or agency working collaboratively to provide that service; or</u> <u>- one public body working on behalf of one or more other public bodies or agencies;</u>	<u>Yes/No</u>
<u>Is the common or integrated program/activity confirmed by written documentation that meets the requirements set out in the FOIPPA regulation.</u>	<u>Yes/No</u>
<u>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</u>	

\* Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). PCT will facilitate the consultation with the OIPC.

For future reference, ministries are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. PCT will help facilitate this notification.

Personal Information Flow Diagram and/or Personal Information Flow Table



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands]

PIA#[will be assigned by PCT]AGRI28-2019

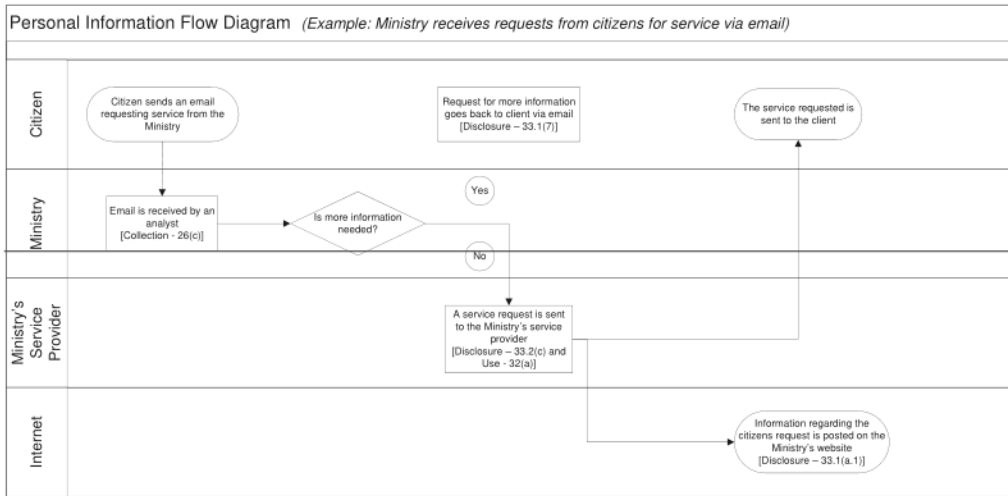
Please provide a diagram and/or table that shows how your initiative will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged.

Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.

For ease of reference, the collection, use, and disclosure authorities in FOIPPA can be found in the appendices. If you do not know what the relevant authorities are, please contact a PCT privacy advisor.

Depending on the complexity of your initiative, you may choose to provide one general diagram for the initiative, and more specific diagrams for particular components. If multiple organizations will collect, use, or disclose personal information, the diagram should identify how each organization is involved in the initiative.

## Example:



Examples can be removed and additional lines added as needed.

For PCT Use Only:  
Version 1.0



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands]

PIA#[will be assigned by PCT]AGRI28-2019

Personal Information Flow Table

Description/Purpose	Process	PIPA Authority
Mail received from client requesting service	Collection	(c)
Mail client back requesting more information	Disclosure	1(7)
Service request transferred to service provider contracted by Ministry	Disclosure & Retention	2(c) and (a)

Risk Mitigation Table

**Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.**

Examples can be removed and additional lines added as needed.

Risk Mitigation Table

Risk	Mitigation Strategy	Likelihood	Impact
Employees could access personal information and use or disclose it for personal purposes	Limit of Employment	Low	High
Request may not actually come from client (i.e. their mail address may be being used by someone else)	Implementation of identification verification procedures	Low	High
Client's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure line	Low	High

For PCT Use Only:  
Version 1.0



# Privacy Impact Assessment for *{Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands}*

PIA#*{will be assigned by PCT}*AGRI28-2019

<u>erent risks in sending rsonal information to a ent via email</u>	<u>licy developed to inform ents of risk and ask if they ould like the information a different medium, such through the mail</u>	<u>edium</u>	<u>edium</u>
---	--	--------------	--------------

## Collection Notice

If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:

The purpose for which the information is being collected

The legal authority for collecting it, and

The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

Please include your proposed wording for a collection notice and where it will be located for individuals to read before collection takes place. You can also attach a screen shot or a copy of your form where the collection notice would be located. For further help with collection notices please see the "Collection Notice Tip Sheet" located on the CIO's website.

## Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your Ministry Information Security Officer (MISO) when filling out this section. Your MISO will also be able to tell you whether you will need to complete a separate assessment called a Security Threat and Risk Assessment (STRA) for this initiative.

Please describe the physical security measures related to the initiative (if applicable):

For example: locked cabinets, securely stored laptops, or key card access to the building.

Please describe the technical security measures related to the initiative (if applicable):

For example: use of government firewalls, document encryption, or user access profiles assigned on a need-to-know basis.

Does your branch rely on security policies other than the Information Security Policy?





# Privacy Impact Assessment for *{Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands}*

PIA#*{will be assigned by PCT}*AGRI28-2019

**Please describe any specific policies and procedures and provide contact details for someone who could answer further questions regarding these policies and procedures.**

Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

**For example: role-based access.**

Please describe how you track who has access to the personal information.

**For example: audit trails or physical sign-in and sign-out of files.**

## **Part 4 – Accuracy/Correction/Retention of Personal Information**

How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the ministry notify them of the update, correction or annotation?

**For example: users have access to update their own information or, notes will be made on a government case file.**

Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

**For example: check to see that the information was obtained from a reputable source such as another government agency.**

If you answered "yes" to question 17, do you have approved records retention and disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

**If you do not have a schedule, please document how these records will be kept until a schedule is in place. Please describe retention schedules that apply where retention exceeds the one year requirement of the FOIPPA. Please contact your Ministry Records Officer if you need assistance.**



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands]

PIA#[will be assigned by PCT]AGRI28-2019

## Part 5 – Further Information

Does the initiative involve systematic disclosures of personal information? If yes, please explain:

**For example: your ministry has a regular exchange of personal information (both collection and disclosure) with the federal government in order to provide services to your ministry's clients. Under section 69 (2), this information is required to be published in the Personal Information Directory (PID), which is maintained and published by PCT.**

Please check this box if the related Information Sharing Agreement (ISA) has been prepared. If you have general questions about preparing an ISA, please contact the Privacy and Access Helpline.

If an ISA has been prepared as part of your initiative, please complete the fields in the table below by deleting the descriptive text in the right hand column and replacing it with your own:

Information Sharing Agreement – Required Information	
description	<b><u>regular exchange of personal information between the Ministry of Administration (ADMIN) and the University of Life in order to provide scholarships to eligible residents of BC.</u></b>
primary ministry/government agency involved	<b><u>ADMIN</u></b>
other ministries/government agencies and public bodies involved	<b><u>University of Life</u></b>
business contact title	<b><u>Manager, Administration Services</u></b>
business contact telephone number	<b><u>0-555-5555</u></b>

For PCT Use Only:  
Version 1.0



# Privacy Impact Assessment for [Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands]

PIA#[will be assigned by PCT]AGRI28-2019

Indication of whether or not personal information is involved	Yes
Start date	1-Apr-14
End date (if applicable)	1-Apr-15

Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain:

**For example: you will be disclosing information to PhD students so they can conduct research.**

Please check this box if the related Research Agreement (RA) is attached.  
You require assistance completing an RA please contact a PCT advisor.

Will a personal information bank (PIB) result from this initiative?

**A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual. Under section 69 (2) of FOIPPA, this information is required to be published in the PID, which is maintained and published by PCT.**

If yes, please complete the fields in the table below by deleting the descriptive text in the right hand column and replacing it with your own.

Personal Information Bank – Required Information	
Description	Personal contact information of branch staff in case of emergency
Primary ministry/government agency involved	ADMIN
Other ministries/government agencies and public bodies involved	None
Business contact title	Office Manager, Administration Services
Business contact telephone number	0-555-5555

For PCT Use Only:  
Version 1.0



# Privacy Impact Assessment for *{Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands}*

PIA#~~{will be assigned by PCT}~~AGRI28-2019

~~use ensure Parts 6 and 7 are attached unsigned to your submitted PIA.~~

## **Part 6 – PCT Comments and Signatures**

*This PIA is based on a review of the material provided to PCT as of the date below. If, in future any substantive changes are made to the scope of this PIA, the ministry will have to complete a PIA Update and submit it to PCT.*

\_\_\_\_\_  
Privacy Advisor  
Privacy, Compliance and Training  
Branch  
Ministry of Finance

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Director or Manager  
Privacy, Compliance and Training  
Branch  
Corporate Information and  
Records Management Office  
Ministry of Finance **(if Personal  
Information is involved in this  
initiative)**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

For PCT Use Only:  
Version 1.0



# Privacy Impact Assessment for *{Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands}* PIA#~~{will be assigned by PCT}~~AGRI28-2019

## Part 7 – Program Area Comments and Signatures

Corrine Roesler

Program Manager

Signature

November 14,  
2019  
Date

Eileen Padgett or Nick Corcoran

Ministry Contact Responsible for  
Security (Signature not required  
unless MISO has been involved.)

Signature

Date

Assistant Deputy Minister or  
Designate (if Personal Information  
is involved in this initiative)

Signature

Date

Executive Director or equivalent (if  
no Personal Information is involved  
in this initiative)

Signature

Date

A final copy of this PIA (with all applicable signatures and attachments) must be provided to PCT for its records to complete the process. PCT is the designated office of primary responsibility for PIAs under ARCS 293-60.



## Privacy Impact Assessment for *{Pilot - Satellite Based Change Detection for Monitoring of Agricultural Lands}*

PIA#~~{will be assigned by PCT}~~AGRI28-2019

*PCT will publish the ministry name, business contact details and a brief summary of the PIA to the Personal Information Directory (PID) as required by section 69(2) of FOIPPA. If you have any questions, please contact your privacy advisor at PCT or call the Privacy and Access Helpline at 250 356-1851.*