

# Appendix A: Checklist and Confirmation Page for a Blogger Blog

Name of Blog (as it will appear on the site):

Ministry and Program Area:

Ministry Blog Administrator:

Email:  Phone:

Go-Live Date:

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Please check the appropriate answers to the following questions:

### **Purpose**

Does the program area require a blog that will potentially collect personal information (in relation to a program or activity of the Ministry) because it is necessary to:

- |  |                       |                       |
|--|-----------------------|-----------------------|
| ♦ Provide a forum for citizen engagement and/or discussion;                  | Yes                   | No                    |
| ♦ Hear users' thoughts and/or opinions on a subject;                         | <input type="radio"/> | <input type="radio"/> |
| ♦ Facilitate discussion between users;                                       |                       |                       |
| ♦ Notify users of further opportunities for discussion; or,                  |                       |                       |
| ♦ Provide users with updates on the progress of the matter under discussion? |                       |                       |

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### **Collection and Notification**

Has a "Collection Notice" (as per Appendix B) been posted on the Ministry's blog, or has a link to the "Collection Notice" been provided? Yes  No

Will all posts/comments be frequently monitored by the Ministry's blog moderator?

Name of Moderator:

Will comments that fall outside of the scope of the Ministry's blog or that share third party information (such as pictures of individuals other than the commenter submitting them) be deleted by the moderator and the group reminded of good privacy practices?  Yes  No

Do users need only to identify themselves with their profile username?  Yes  No

**Use and Disclosure**

Will the Ministry only use and/or disclose personal information submitted by users for the same purpose it was collected or in a way that is consistent with the original purpose of the collection as identified above (except as required by law)?  Yes  No

Will the Ministry only disclose personal information about individuals on the blog that has been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q)?  Yes  No

**Records Management**

Has a records retention and disposition schedule been created?  Yes  No

If the blog is no longer regularly moderated, will it be removed from the Web and all records kept for the requisite amount of time (see records retention and disposition schedule)?  Yes  No

**I understand the information and analysis in this PIA is limited to the interaction between Blogger and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Blogger's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by Blogger's Terms of Use.**  Yes  No

***If you have answered "No" to any of the above questions a separate PIA will need to be completed before your blog can be launched.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***

## Appendix B: Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s. 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government.

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact  (business title, business address, business telephone) .

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - Blog

### 1. Ministry/Public Body and Program Area.

Ministry	Ministry of Labour, Citizens' Services and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Initiative Title	<b>General Blogger Blog PIA</b>

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250-386-0378
E-Mail	Jeannette.VanDenBulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

This General Blogger Blog Privacy Impact Assessment (PIA) as a guide to assist ministries in the development and administration of a public facing blog and to ensure that the information collected, used, and disclosed on a blog is done in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

Based on this General Blogger Blog PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if a blog falls under this General Blogger Blog PIA. See Appendix A. If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their blog. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to the blog being launched, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirements of a privacy impact assessment under section 69(5) of FOIPPA.

**Note: It will be the responsibility of each ministry to ensure that it has appropriate authority under FOIPPA to collect, use and disclose any personal information that is included on the blog.**

**A separate PIA must be completed for blogs where the collection, use, and disclosure of individuals' personal information does not meet the criteria specified in the checklist and this PIA.**

***\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using Blogger in the manner described in Appendix A. The program area using Blogger is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Blogger's Terms of Use.\****

## Background

Blogger is one of the most popular and widely used blogging platforms and therefore of high interest to government initiatives involving online engagement and social media.

Individuals do not need to register with Blogger for some activities, but must register for others (commenting, creating their own blogs, etc). Once registered, a user can create their own blog, comment on other blogs using their profile, and "follow" other blogs in order to be kept up to date with their content.

Attached to this PIA:

- Appendix A – checklist/Signoff Page for a ministry blog
- Appendix B – Sample Collection Notice

## General Blog: Outline

This PIA outlines a standard blog in which ministries are interacting with citizens (readers, commenters). This means that the blog is used to share information with citizens, and to answer questions, solicit feedback, and collect non-sensitive personal information. The use of a blog will inevitably involve the collection of some personal information due to its design and the fact that government may be soliciting opinions. However, ministries should not be soliciting other personal information (e.g. home addresses, medical history) without a separate PIA being completed. A government blog should NOT include personal information about third parties (this includes pictures that have a third party in them – i.e. someone other than the blog user with whom the ministry is communicating). Under FOIPPA, specific legislative authority is required for government to collect, use, and disclose personal information. Please see the discussion on collection, use and disclosure below.

## Direct Collection

The FOIPPA covers information under the "custody and control" of a public body. Any personal information that the ministry collects will be in the custody and control of that ministry.

Collection occurs in two ways: first, when a ministry asks for users to provide it with information. For example, when a moderator posts a question asking users to respond in the comment section, any comments posted that answers the question will be considered collected. Secondly, unsolicited comments can also be collected when action is taken on them; this means something other than just reading them and deleting them. Some examples of action taken could be: replying to a posted comment, using the comment to inform a government policy, or conducting further research on information provided by a user. (See section 27.1 of FOIPPA "When Personal Information is not Collected").

Personal information in the form of usernames, comments, and opinions of commenters on the blog site may be collected under s.26(c), if the personal information is directly related to and is necessary for a program or activity of the ministry.

Blogs are a very open forum where comments and opinions can be shared with ease. In most cases, anyone with an account with the blogging platform can post a comment and that content may appear on the site instantly (depending on the settings). Therefore, ministries' blogs may easily generate unsolicited personal and non-personal information. To keep extraneous information to a minimum, all government blogs must be moderated. The most up-to-date moderation policy can be obtained from the Citizen Engagement team ([citizenengagement@gov.bc.ca](mailto:citizenengagement@gov.bc.ca)). If a moderator can no longer be appointed to administer a ministry blog, the account should be promptly deleted.

For use with this PIA, personal information will be directly collected by a blog under s.27(1) of FOIPPA; therefore ministries must not solicit personal information about third parties, nor collect

third party personal information. It will be the responsibility of the moderator to delete comments containing third party personal information and pictures of third parties and remind users of privacy practices.

**A blog that intentionally solicits personal information other than usernames and opinions or collects personal information about anyone other than the individual posting does not fall within this general PIA and will require a separate PIA to determine if legislative authority to collect, use and disclose the personal information exists.**

### Notification

The FOIPPA requires a collection notification whenever personal information is collected. The notice must provide the purpose for collection (to engage the public in discussion regarding the public body's program, policy, etc.) the legal authority under which they are collecting the information (section 26(c) of FOIPPA or other statutory provisions), and the title, business address and business telephone number for a ministry employee who can answer questions about the collection. The ministry will need to post a collection notification on the blog in a conspicuous place to comply with FOIPPA. See Appendix B for suggested wording.

### Use

Use of personal information is authorized under section 32(a), where personal information is used for its original purpose or for a use that is consistent with the original purpose of the collection. Consistent use is defined in s.34 of FOIPPA. (For the purpose of this General PIA, ministries must not use posted information for any reason other than stated in the collection notice or otherwise required by law.)

For the purpose of this General PIA – the use of any comments collected from individuals must be for enabling the ministry to engage individuals in public discussions or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the ministry or respecting legislation relating to the ministry.

### Disclosure

The personal information a ministry discloses on its blog must be authorized by a provision in s. 33.1 of FOIPPA.

- *Posted comments by individuals*

A blog user's personal information is considered disclosed by government when the user posts to the ministry's site. This type of disclosure is authorized by Ministerial Order 030 (pursuant to FOIPPA section 33.1(3)) which allows for disclosure on social media sites for the purpose of public consultation/engagement.

- *Posted images and text by ministries*

There are two options for posting (disclosure) of personal information by ministries covered by this General Blog PIA.

The first option is that a ministry may post (disclose) photos or videos of identifiable individuals that are collected by observation at a presentation, ceremony, performance, sports meet or similar event if the individual voluntarily appeared and the event was open to the public (pursuant to section 33.1(1)(q)).

Example: The Ministry of Transportation has a celebration for an opening of a new bridge on a major BC Highway – the public is invited to a ribbon cutting ceremony and photographs are taken that include members of the public.

The second option requires the ministry to have written consent of an individual whose personal information (text or image) is being disclosed on the blog (pursuant to section 33.1(1)(b)). Consent must be in writing and specify to whom the personal information may be

disclosed (in this case it would be to the public through a ministry sponsored blog), how the personal information may be used (for example the promotion of XYZ program), and that it will be disclosed outside of Canada.

Example: The Ministry of Community, Sport and Cultural Development wants to post pictures to its new blog of its minister presenting at a members-only gala awards night for a local sports organization. Because this event is not open to the public the ministry will require the written consent of individuals who appear in photos as well as consent to post the names of the award winners.

**If the proposed blog will disclose personal information using a statutory authority other than section 33.1(1)(b), 33.1(1)(q) or 33.1(3) a separate PIA is required to ensure compliance with the FOIPPA.**

#### **Storage and Access**

Storage and access is authorized by section 30.1(b) of FOIPPA, which permits storage and access for the purpose of a disclosure allowed under the FOIPPA (in the case of comments posted by users the disclosure provision is 33.1(3)).

*Remember:* If information is requested by the ministry from users, when a relevant response is provided by them, it is considered collected and the information comes under the control of the ministry. You must only solicit from users the minimum amount of information necessary to the program or activity. In addition, for the purposes of this PIA, the ministry must have an individual's written consent to post any material not received via social media that contains personal information about the individual to the site – unless it is images taken at a public event voluntarily attended by the individual.

#### **4. Purpose/Objectives of the initiative (if statutory, provide citation).**

Blog use by ministries promotes a collaborative environment that can enhance citizen engagement and dialogue with the Province of British Columbia. Blog use is seen as part of government's drive to transform the delivery of services to improve outcomes for its citizens, as outlined in *Citizens @ the centre: B.C. Government 2.0*

The purpose of this PIA is to outline a standard template for use of a Blogger blog, whereby any ministry or program area using Blogger within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use a different blog platform or use Blogger in ways not described here, they will be required to complete a separate PIA.

#### **5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Blogs have the potential to enable government to share information about its programs and services. It is a way of making information available immediately and at a low cost, and reaching large groups of people. Potential impacts include:

- Information dissemination about current government bodies, programs or public figures in a popular online environment.
- Increased knowledge, awareness and interest of users about the B.C. Government, its agencies or functions.

There are some potential privacy impacts associated with the use of blogs, including:

- Privacy concerns related to the appropriate disclosure of personal information (e.g. through pictures containing personal information of individuals).

- Privacy concerns regarding the collection of personal information of blog users (e.g. text comments from individuals).
- Privacy concerns regarding the collection of third-party information from blog users in comments and photos or videos.

The use of moderators will mitigate these potential negative impacts.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

N/A



## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

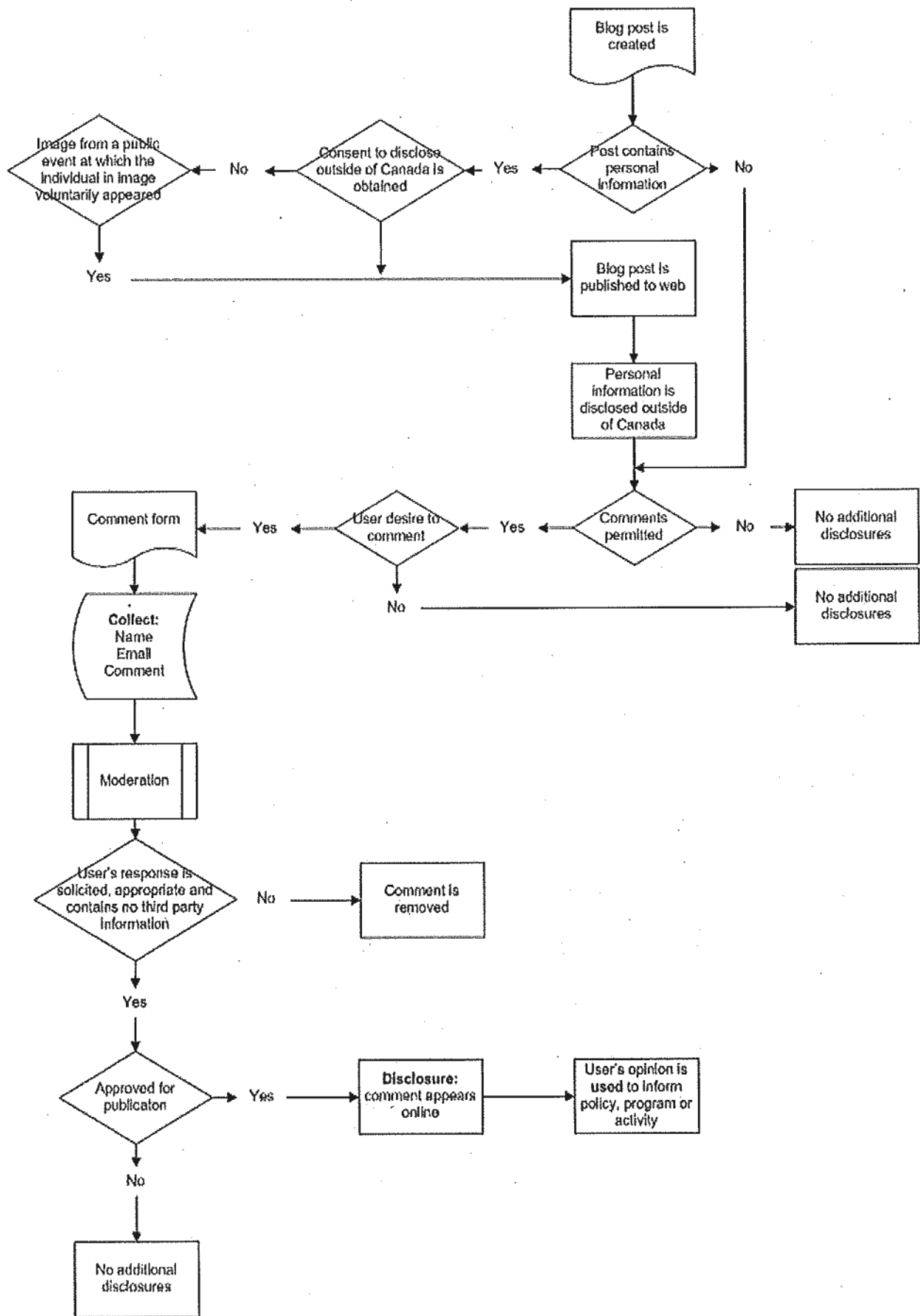
- Name of user posting text comments
- Time of posting of an individual's comment (e.g. "Post 2 hours ago." "Post 5 days ago.").
- Photos depicting individuals (e.g. attached to profile as part of a posted comment).
- An individual's personal opinion about a subject in a posted text comments.
- Images of individuals in photographs or videos posted by the ministry.

Usernames and profile pictures are disclosed by the commenter when registering their profile and engaging with other blogs. This falls under the purview of Ministerial Order 030.

A user's ideas, opinions and comments are their own personal information and will be treated as such. A moderator will regularly ensure that third-party information is deleted from the site.

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

See information flow chart below.



III

**PERSONAL INFORMATION COLLECTION**

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?	X		

**1) Authorization for Collection:**

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
	<b>If yes, please specify the name of the Act and relevant section</b>			
(b)	Is the personal information being collected for law enforcement purposes?		X	
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
	<b>If yes, please specify the prescribed purpose.</b>			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?		X	
	<b>and</b>			
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	X		
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?		X	
	<b>Please identify event:</b>			
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2,		X	
	or			

s. 26		Yes	No	n/a
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	X		

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)	Yes	No	n/a
Has the individual from whom personal information is being collected, been informed of:			
(a) the purpose for collection?	X		
(b) the legal authority for collection?	X		
(c) the contact information of the person who can answer questions regarding the collection?	X		
<b>Additional details as required (e.g., method of notification)</b> <b>See Discussion of Notification</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?	X		

*Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>Personal information collected will only be used for the purpose of enabling the public body to engage individuals inside and outside of British Columbia in public discussion and promotion respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body or consistent with these purposes.</p>			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		X	
	<b>Specify subsection(s) being applied</b>			

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

**1) Disclosure of Personal Information**

Sections 33; 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j): 22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	
	<b>Specify name of enactment and relevant section(s)</b>			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that  (i) authorizes or requires its disclosure, and  (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if  (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
<b>and</b>  (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
<b>If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if  (i) the information is necessary for the performance of the duties of the individual in relation to the public body,		X	
<b>and</b>  (ii) in relation to disclosure outside Canada,  (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and  (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary.</b>				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	

(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<b>and</b>			
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that		X	
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.		X	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	



(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b> (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. <b>Please identify event:</b>	X		
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, <b>and</b>		X	
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			

(2)(a)	To another law enforcement agency in Canada		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.	X		
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,  (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and  (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		X	
<p><b>Additional details as required</b></p> <p>Ministerial Order 030 to section 33.1(3) allows for disclosure of personal information outside of Canada through social media sites if the personal information was previously disclosed on a social media site by the individual who is the subject of the personal information and the personal information was obtained for the purposes of enabling the public body to engage individuals.</p> <p><b>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</b></p>				

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
 (Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:	Blog moderator		
	Phone number:			
<b>Additional details as required</b>				
Individuals will be able to edit or delete their own comments. If the ministry re-posts information provided in a comment and a user feels that their personal information (as it appears in the post) needs to be corrected or annotated they can contact the blog moderator/administrator, who will administer the request. Any corrections or annotations will be added to the blog post in question.				

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
(Sections 30 and 30.1 of the FOIPP Act)

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	Policy No. 33 Use of Social Media in the BC Public Service		
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?		X	
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X
<b>Additional details</b>				
<p>In assessing the "reasonableness" of the security arrangements, consideration must be given to the nature of the personal information involved and the seriousness of the consequences of its unauthorized disclosure.</p> <p>Every comment submitted to Blogger is intended by the individual to be for public use and is for the purpose of citizen engagement on public programs and initiatives; sensitive personal information should not be involved.</p> <p>Any risk of third party information being disclosed is reasonably mitigated by moderating the postings and putting up warnings not to post third party information on the site. Also ensuring the site is taken down when it is no longer being moderated ensures no future unauthorized collection, use or disclosure of personal information.</p>				

VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION  
cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?		X	

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	X		
<p><b>Please explain</b></p> <p>If any pictures or text posted to the Blog by the ministry contain personal information, the program area will secure forms consenting to the disclosure of personal information outside of Canada, with the exception of those that are collected by observation at a presentation, ceremony, performance, sports meet, or similar event at which individuals appear voluntarily and that are open to the public.</p>			
(b) Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	X		
<p><b>Please explain</b></p> <p>The personal information will be stored in or accessed from foreign servers in order to allow for their disclosure, as authorized by section 33.1(3)/MO030 of FOIPPA for posted comments, and as authorized by section 33.1(1)(b) and 33.1(1)(q) for photos/information posted by the ministry.</p>			
(c) Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
<p><b>Please explain</b></p>			


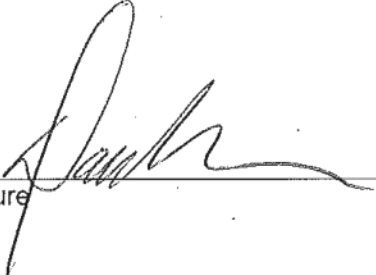
**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?  No personal information will be collected that will be used to make a decision that directly affects an individual.		X	

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**

X SIGNATURES

PUBLIC BODY APPROVAL:

_____ Program Manager	_____ Signature	_____ Date
_____ Ministry Contact Responsible for Systems Maintenance and Security	_____ Signature	_____ Date
_____ Jeannette Van Den Bulk Knowledge and Information Services Office of the Chief Information Officer Ministry of Labour, Citizens Services, and Open Government	 _____ Signature	February 10, 2012 _____ Date
_____ Dave Nikolejsin (Chief Information Officer) Assistant Deputy Minister or Equivalent	 _____ Signature	Feb 10/2012 _____ Date

## Appendix A

### Checklist and Confirmation Page for a Blogger Blog

Name of Blog (as it will appear on site) \_\_\_\_\_

Ministry and Program Area \_\_\_\_\_ Blog Go-Live Date \_\_\_\_\_

Ministry Blog Administrator \_\_\_\_\_ email \_\_\_\_\_

This checklist is to be completed to determine if a separate PIA is needed to address the program area's needs around the collection, use, and disclosure of personal information when administering a Blogger blog.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<p><b>Purpose</b> The program area needs to have a blog that potentially collects personal information because in relation to a program or activity of the ministry it is necessary to:</p> <ul style="list-style-type: none"> <li>• Provide a forum for citizen engagement and discussion;</li> <li>• Hear users' thoughts and opinions on a subject;</li> <li>• Facilitate discussion between users;</li> <li>• Notify users of further opportunities for discussion; or,</li> <li>• Provide users with updates on the progress of the matter under discussion</li> </ul> <p>Please provide a description of the purpose:</p>		
<p><b>Collection and Notification</b> A "Collection Notice" (as per Appendix B) has been posted on the ministry's blog or a link is provided.</p>		
<p>All posts will be frequently monitored by the ministry's blog moderator Moderator's name: _____</p>		
<p>Comments that fall outside of the scope of the Ministry's blog or that share third party information (such as pictures of individuals other than the commenter submitting them) will be deleted by the moderator and the group will be reminded of good privacy practices</p>		
<p>Users do not need to further identify themselves other than with their profile username</p>		
<p><b>Use and Disclosure</b> The Ministry will not use or disclose personal information submitted by users other than for its original purpose or in a way that is consistent with the original purpose of the collection as identified above (except as required by law).</p>		
<p>The Ministry will not disclose personal information about individuals on the blog that has not been authorized for disclosure by FOIPPA under section 33.1(1)(b), or 33.1(1)(q).</p>		
<p><b>Records Management</b> A records retention and disposition schedule has been created.</p>		



	Yes	No
If the blog is no longer regularly moderated it will be removed from the web and all records will be kept for the requisite amount of time (see records retention and disposition schedule).		
I understand the information and analysis in this PIA is limited to the interaction between Blogger and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Blogger's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Blogger's Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your blog can be launched.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## Appendix B

### Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s.26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact (business title, name, telephone, email).

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - Facebook

### 1. Ministry/Public Body and Program Area.

Ministry	Labour, Citizens' Services and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Initiative Title	<b>General Facebook PIA</b>

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250-356-0378
E-Mail	Jeannette.vandenbulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

This General Facebook Privacy Impact Assessment (PIA) is intended as a guide to assist ministries in the development and administration of a Facebook Page and to ensure that the information collected, used, and disclosed on Facebook is done in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

Based on this General Facebook PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if a Facebook Page falls under this general Facebook PIA. See [Appendix A](#). If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their Facebook Page. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to the Facebook page being launched, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirements of a privacy impact assessment under section 69(5) of FOIPPA.

**NOTE: It will be the responsibility of each ministry to ensure that it has appropriate authority under the FOIPP Act to collect, use and disclose any personal information that is included on the Facebook Page.**

**A. separate PIA must be completed for Facebook Pages where the collection, use, and disclosure of citizens' personal information does not meet the criteria specified in the checklist and this PIA.**

***\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using Facebook in the manner described in Appendix A. The program area using Facebook is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Facebook's Terms of Use.\****

## **Background**

Facebook is a social networking service whose website was launched in February 2004. As of January 2011, Facebook had over 600 million users worldwide, with 16 million users in Canada. It continues to be the most widely used social media site and therefore of high interest to open government initiatives such as *Citizens @ the Centre: B.C. Government 2.0*.

Individuals must register on Facebook before being allowed to use its features. Once registered, users may create a personal profile, add other users as friends, exchange messages (including instant updates when they change their profile), and join common interest sites known as "Pages".

This PIA is intended for Pages as public bodies should not be setting up personal profile pages (Profiles). Profiles are intended for individual personal use while Pages are designed for organizations, businesses, and high-profile individuals wanting to interact with fans. Public bodies wanting to create a Page will need to link it to an individual e-mail and password. Pages are intended for organizations to share information, while also soliciting information and feedback from those Facebook users who "like" their site. Facebook can also be used in connection with various other forms of social media such as Twitter, Hootsuite, Youtube, and Blogger.

Attached to this PIA:

- [Appendix A](#) – Checklist/Signoff Page for a ministry Facebook Site
- [Appendix B](#) – Sample Collection Notice

## **General Facebook Page: Outline**

This PIA outlines a standard Facebook Page in which ministries are interacting with citizens (Facebook users) on a "shallow" level. This means that the Facebook Page is only used to share information with citizens, and to answer questions, solicit feedback, and collect non-sensitive personal information. The use of Facebook will inevitably involve the collection of some personal information due to its design and the fact that government may be soliciting opinions. However ministries should not be soliciting other personal information (e.g. home addresses, medical history) without a separate PIA being completed. A government Facebook site should NOT include personal information about third parties (this includes pictures that have a third party in them - i.e. someone other than the Facebook user with whom the ministry is communicating.). Under FOIPPA, specific legislative authority is required for government to collect, use, and disclose personal information. Please see the more detailed discussion on collection, use and disclosure below.

## **Direct Collection**

The FOIPP Act covers information under the "custody and control" of a public body, but Facebook sites pose a unique environment for what constitutes "collection".

Collection occurs in two ways; firstly, when a ministry asks for users to provide it with information. For example, when the site monitor posts a question asking users to respond on the Facebook Wall, any comments posted that answers the question will be considered collected. Secondly, unsolicited comments can also be collected when action is taken on them. This means something other than just reading them and deleting them. Some examples of action taken could be: replying to a posted comment, using the comment to inform a government policy, or conducting further research on information provided by a user. (See section 27.1 of FOIPP Act "When Personal Information is not Collected").

Personal information in the form of usernames, comments, and opinions of participants on the Facebook site may be collected under s. 26(c), if the personal information is directly related to and is necessary for a program or activity of the ministry.

Facebook sites are a very open forum where comments and opinions can be shared with ease. Anyone who has a Facebook account and has "liked" a ministry's Facebook Page can post a comment and that content appears on the site instantly. Therefore, ministries' Facebook sites may generate unsolicited personal and non-personal information. To keep extraneous information to a minimum, all government Facebook sites must be monitored. The most up-to-date moderation policy can be obtained from Citizen Engagement ([citizenengagement@gov.bc.ca](mailto:citizenengagement@gov.bc.ca)), part of the Ministry of Labour, Citizens' Services and Open Government. If a monitor can no longer be appointed to administer a ministry Flickr page, the account should be promptly deleted.

On Facebook, personal information will be directly collected under s.27(1) of FOIPPA; therefore ministries must not solicit personal information about third parties, nor collect third party personal information. It will be the responsibility of the monitor to delete comments containing third party personal information and pictures of third parties and remind users of privacy practices.

**A Facebook Page that intentionally solicits personal information other than usernames and opinions or collects personal information about anyone other than the individual posting does not fall within this general PIA and will require a separate PIA to determine if legislative authority to collect, use and disclose the personal information exists.**

### Notification

Facebook's Terms of Use requires notification if collection of information is occurring.

Facebook has its own Statement of Rights and Responsibilities which include section 5: Protecting Other People's Rights. Subsection 5.7 states: If you collect information from users, you will: **obtain their consent, make it clear you (and not Facebook) are the one collecting their information, and post a privacy policy explaining what information you collect and how you will use it.** (Facebook, 2011: <http://www.facebook.com/terms.php>)

In addition, the FOIPP Act requires a collection notification whenever personal information is collected. The notice must provide the reason for collection (to engage the public in discussion regarding the public body's program, policy, etc.), the authority under which they are collecting the information (section 26(c) of FOIPPA), and the contact information for a ministry employee who can answer questions about the collection.

The ministry will need to post a collection notification on the information tab of its Facebook page to comply with both the FOIPPA and with Facebook Terms of Use. See Appendix B for suggested wording

### Use

Use of personal information is authorized under section 32(a), where personal information is used for its original purpose or for a use that is consistent with the original purpose of the collection. Consistent use is defined in s. 34 of FOIPPA. (For the purpose of this general PIA, ministries must not use posted information for any reason other than stated in the collection notice, or otherwise required by law.)

For the purpose of this General PIA – the use of any comments collected from individuals must be for enabling the ministry to engage individuals in public discussions or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the ministry or respecting legislation relating to the ministry.

## Disclosure

The personal information a ministry discloses on its Facebook Page must be authorized by a provision in s.33.1 of FOIPPA.

- *Posted comments by individuals*

On a Facebook site users may disclose their personal information by posting to the site. This type of disclosure is authorized by s. 33.1(1)(r), which allows for disclosure on social media sites for the purpose of public consultation/engagement.

- *Posted images by ministries*

There are two options for posting (disclosure) of personal information by ministries covered by this general Facebook PIA.

The first option is that a ministry may post (disclose) photos or videos of identifiable individuals that are collected by observation at a presentation, ceremony, performance, sports meet or similar event if the individual voluntarily appeared and the event was open to the public (pursuant to section 33.1(1)(q)).

Example: The Ministry of Transportation has a celebration for an opening of a new bridge on a major BC Highway – the public is invited to a ribbon cutting ceremony and photographs are taken that include members of the public.

The second option requires the ministry to have written consent of an individual whose personal information or image is being disclosed on the Facebook site (pursuant to section 33.1(1)(b)). Consent must be in writing and specify to whom the personal information may be disclosed (in this case it would be to the public through a ministry sponsored Facebook site), how the personal information may be used (for example the promotion of XYZ program), and that it will be disclosed outside of Canada.

Example: The Ministry of Community, Sport and Cultural Development wants to post pictures to its new Facebook site of its minister presenting at a members-only gala awards night for a local sports organization. Because this event is not open to the public the ministry will require the written consent of individuals who appear in photos as well as consent to post the names of the award winners.

**If the proposed Facebook site will disclose personal information using a statutory authority other than section 33.1 (1)(b), 33.1(1)(q) or 33.1(1)(r) a separate PIA is required to ensure compliance with the FOIPP Act.**

## Storage and Access

Storage and access is authorized by section 30.1 (b) of FOIPPA, which permits storage and access for the purpose of a disclosure allowed under the Act (in the case of comments posted by users the disclosure provision is 33.1(1)(r)).

Remember: If information is requested by the ministry from users, when a relevant response is provided by them, it is considered collected and the information comes under the control of the ministry. You must only solicit from users the minimum amount of information necessary to the program or activity. In addition, for the purposes of this PIA, the ministry must have an individual's written consent to post any material not received via social media that contains personal information about the individual to the site – unless it is images taken at a public event voluntarily attended by the individual.

**4. Purpose/Objectives of the initiative (if statutory, provide citation).**

Facebook use by ministries promotes a collaborative environment that can enhance citizen engagement and dialogue with the Province of British Columbia. Facebook use is seen as part of government's drive to transform the delivery of services to improve outcomes for its citizens, as outlined in *Citizens @ the Centre: B.C. Government 2.0*.

The purpose of this PIA is to outline a standard template for use of Facebook, whereby any ministry or program area using this site within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use Facebook in ways not described here, they will be required to complete a separate PIA.

**5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Facebook has the potential to enable government to share information about its programs and services. It is a way of making information available immediately and at a low cost, and reaching large groups of people. Potential impacts include:

- Information dissemination about current government bodies, programs or public figures in a popular online environment.
- Increased knowledge, awareness and interest of users about the B.C. government, its agencies or functions.

There are some potential privacy impacts associated with the use of Facebook, including:

- Privacy concerns related to the appropriate disclosure of personal information (e.g. through pictures containing personal information of individuals).
- Privacy concerns regarding the collection of personal information of Facebook users (e.g. text comments from individuals).
- Privacy concerns regarding the collection of third-party information from Facebook users in comments and photos or videos.

The use of monitors will mitigate these potential negative impacts.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

N/A

## II DESCRIPTIVE INFORMATION

### 1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information..

- Name of user posting text comments
- Time of posting of an individual's comment (e.g. "Post 2 hours ago." "Post 5 days ago.").
- Photos depicting individuals (e.g. attached to profile as part of a posted comment).
- An individual's personal opinion about a subject in a posted text comment.
- Images of individuals in photographs or videos posted by the government.

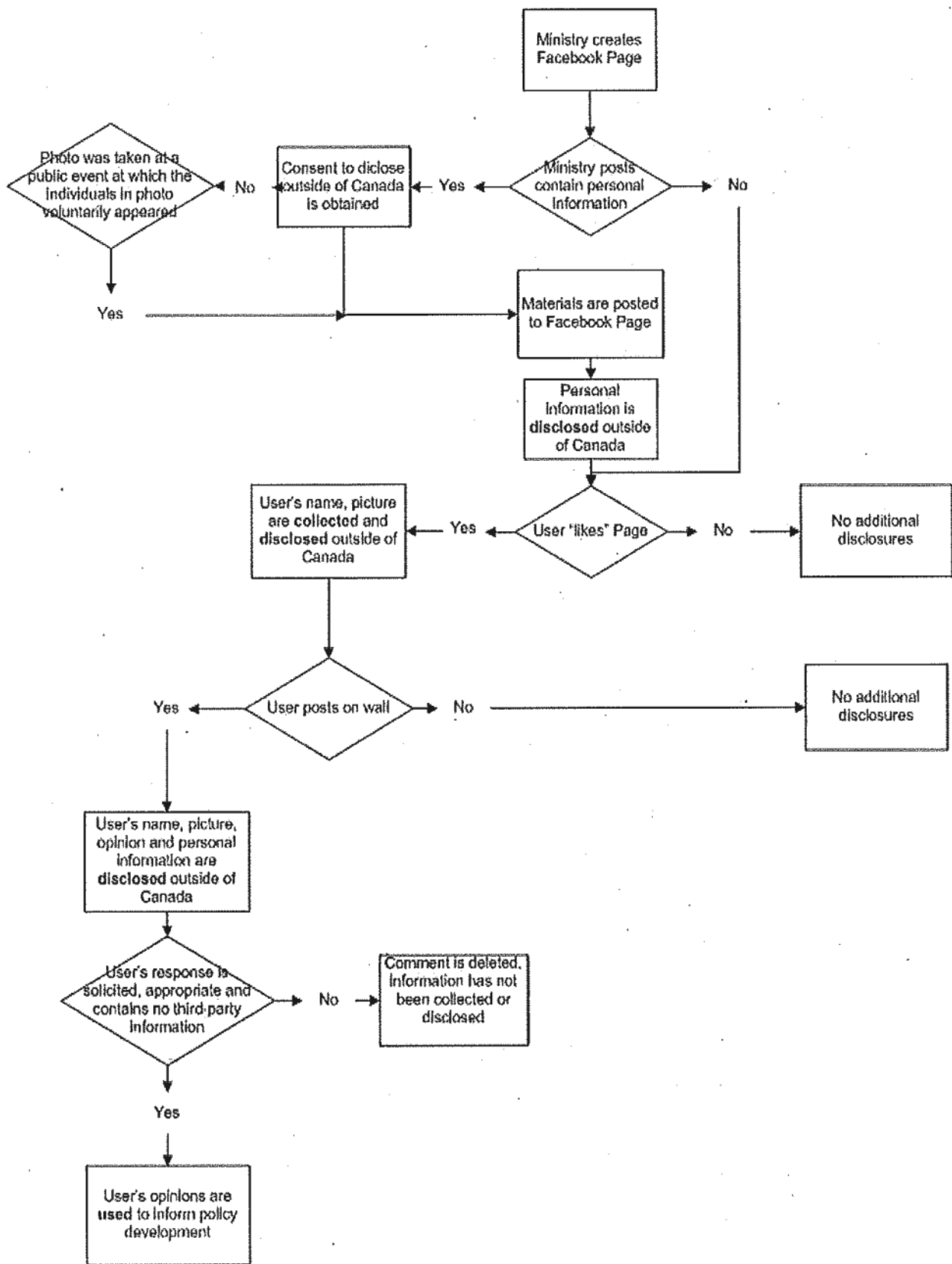
Usernames and profile pictures are disclosed by the Facebook user when signing up with their profile and engaging in the use of Facebook. This falls under the purview of the 33.1(1)(r).

A users ideas, opinions and comments are their own personal information and will be treated as such. A monitor will ensure that third-party information is deleted from the site.

### 2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.

See information flow chart below.





**III PERSONAL INFORMATION COLLECTION**

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?	X		

**1) Authorization for Collection:**

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
	<b>If yes, please specify the name of the Act and relevant section</b>			
(b)	Is the personal information being collected for law enforcement purposes?		X	
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
	<b>If yes, please specify the prescribed purpose.</b>			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection? <b>and</b>		X	
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	X		
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g)	Is the personal information being collected at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?		X	
(h)	Is personal identity information being collected by:			

s. 26		Yes	No	n/a
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or		X	
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	X		

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?	X		
	(b) the legal authority for collection?	X		
	(c) the contact information of the person who can answer questions regarding the collection?	X		
	<b>Additional details as required (e.g., method of notification)</b> <b>See Discussion of Notification</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?	X		

*Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>Personal information collected will only be used for the purpose of enabling the public body to engage individuals inside and outside of British Columbia in public discussion and promotion respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body or consistent with these purposes.</p>			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		X	
	<b>Specify subsection(s) being applied</b>			

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

*A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.*

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):  22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	
	<b>Specify name of enactment and relevant section(s)</b>			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
	<b>and</b> (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada			
<b>If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body,		X	
	<b>and</b> (ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada			
<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister.		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	

(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	and		X	
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.		X	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	

(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b> (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i>.</b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public.	X		
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, <b>and</b>	X		
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	To another law enforcement agency in Canada		X	



(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.		X	
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if, (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)	X		
<b>Additional details as required</b> <b>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</b>				

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
 (Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:	Facebook Monitor		
	Phone number:			
<b>Additional details as required</b> Individuals will be able to edit or delete their own comments. If the ministry re-posts information provided in a comment and a user feels that their personal information (as it appears in the post) needs to be corrected or annotated they can contact the Facebook monitor, who will administer the request. Any corrections or annotations will be added to the blog post in question.				

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
 (Sections 30 and 30.1 of the FOIPP Act)

**Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.**

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	<b>Policy No. 33 Use of Social Media in the BC Public Service</b>		
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?		X	
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X

	<p><b>Additional details</b></p> <p>The Facebook account login information will only be available to those that need to operate the account.</p> <p>In assessing the "reasonableness" of the security arrangements, consideration must be given to the nature of the personal information involved and the seriousness of the consequences of its unauthorized disclosure.</p> <p>Every comment submitted to Facebook is intended by the individual to be for public use and is for the purpose of citizen engagement on public programs and initiatives; sensitive personal information should not be involved.</p> <p>Any risk of third party information being disclosed is reasonably mitigated by moderating the postings and putting up warnings not to post third party information on the site. Also ensuring the site is taken down when it is no longer being moderated ensures no future unauthorized collection, use or disclosure of personal information.</p>
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**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION**  
cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?		X	

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	X		
<p><b>Please explain</b></p> <p>If any pictures or text posted to the Facebook page by the ministry contain personal information, the program area will secure forms consenting to the disclosure of personal information outside of Canada, with the exception of those that are collected by observation at a presentation, ceremony, performance, sports meet, or similar event at which individuals appear voluntarily and that are open to the public.</p>			
(b) Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	X		
<p><b>Please explain</b></p> <p>The personal information will be stored in or accessed from foreign servers in order to allow for their disclosure, as authorized by section 33.1(1)(r) of FOIPPA for posted comments, and as authorized by section 33.1(1)(b) and 33.1(1)(q) for photos/information posted by the ministry.</p>			

(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
	<b>Please explain</b>			


VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?  No personal information will be collected that will be used to make a decision that directly affects an individual.		X	

**Note:** Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.

**X SIGNATURES**

**PUBLIC BODY APPROVAL:**

_____ Program Manager	_____ Signature	_____ Date
_____ Ministry Contact Responsible for Systems Maintenance and Security	_____ Signature	_____ Date
_____ Jeannette Van Den Bulk Knowledge and Information Services Office of the Chief Information Officer Ministry of Labour, Citizens Services, and Open Government	 _____ Signature	_____ February 10, 2012 Date
_____ Dave Nikolejsin (Chief Information Officer) Assistant Deputy Minister or Equivalent	 _____ Signature	_____ Feb 10/2012 Date

## Appendix A Checklist and Confirmation Page for Facebook Site

Name of Facebook Site (as it will appear on site) \_\_\_\_\_

Ministry and Program Area \_\_\_\_\_ Go-Live Date: \_\_\_\_\_

Ministry Facebook Site Administrator \_\_\_\_\_ email \_\_\_\_\_

This checklist is to be completed to determine if a separate PIA is needed to address the program area's needs around the collection, use, and disclosure of personal information when administering a Facebook "Like" page.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<p><b>Purpose</b> The program area needs to have a Facebook site that potentially collects personal information because it is necessary to:</p> <ul style="list-style-type: none"> <li>• Provide a forum for citizen engagement and discussion;</li> <li>• Hear users' thoughts and opinions on a subject;</li> <li>• Facilitate discussion between users;</li> <li>• Notify users of further opportunities for discussion; or,</li> <li>• Provide users with updates on the progress of the matter under discussion</li> </ul> <p>Please provide a description of the purpose:</p>		
<p><b>Collection and Notification</b> A "Collection Notice" has been posted on the information tab of the ministry's Facebook page (as per Appendix B).</p>		
<p>All posts will be monitored by the ministry's Facebook monitor Monitor's name: _____</p>		
<p>Comments that fall outside of the scope of the Ministry's Facebook Page or that share third party information (such as pictures of individuals other than the Facebook user submitting them) will be deleted by the monitor and the group will be reminded of good privacy practices</p>		
<p>Users do not need to further identify themselves other than with their Facebook username</p>		
<p><b>Use and Disclosure</b> The ministry will not use or disclose personal information submitted by users other than for its original purpose (as identified above) or in a way that is consistent with the original purpose of the collection as identified above (except as required by law).</p>		
<p>The Ministry will not post personal information about individuals that has not been authorized for disclosure by FOIPPA under section 33.1(1)(b), or 33.1(1)(q).</p>		



	Yes	No
<b>Records Management</b> A records retention and disposition schedule has been created.		
I understand the information and analysis in this PIA is limited to the interaction between Facebook and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Facebook's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Facebook's Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your Facebook page can be launched.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## Appendix B

### Collection Notice

Facebook requires us (pursuant to section 5.7 of their Statement of Rights and Responsibilities) to notify you that by posting comments on this site you are consenting to the collection of the information you provide.

Ministry of \_\_\_\_\_ will collect information that relates directly to and is necessary for an operating program or activity of this Ministry. Personal information that is collected is done so under the authority of s.26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others, including pictures.

If you have any questions about the collection of your personal information, please contact (business title, name, telephone, email).

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION – Flickr

### 1. Ministry/Public Body and Program Area.

Ministry	Labour, Citizens' Services and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Program	<b>General Flickr PIA</b>

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250-356-0378
E-Mail	Jeannette.VanDenBulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

This General Flickr Privacy Impact Assessment (PIA) is intended as a guide to assist ministries in the development and administration of Flickr and to ensure that the information collected, used, and disclosed on Flickr is done in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

Based on this General Flickr PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if their use of Flickr falls under this general Flickr PIA. See [Appendix A](#). If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their use of Flickr. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to use of Flickr, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirements of a privacy impact assessment under section 69(5) of FOIPPA.

**NOTE: It will be the responsibility of each ministry to ensure that it has appropriate authority under the FOIPP Act to collect, use and disclose any personal information that is included on Flickr.**

**A separate PIA must be completed for Flickr use where the collection, use, and disclosure of citizens' personal information does not meet the criteria specified in the checklist and this PIA.**

*\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using Flickr in the manner described in Appendix A. The program area using Flickr is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Flickr's Terms of Use.\**

## Background

There is an interest by government and by the broader public sector to make use of online photo sharing websites. Such services are increasingly viewed as a powerful tool to provide information about government programs and services over the internet.

Wikipedia describes Flickr and photosharing services as follows:

**Photo sharing** is the publishing or transfer of a user's digital photos online, this enabling the user to share them with others (whether publicly or privately). This functionality is provided through both websites and applications that facilitate the upload and display of images. The term can also be loosely applied to the use of online photo galleries that are setup and managed by individual users, including photoblogs.

**Flickr** is a photo sharing website, web service suite and an online community platform. In addition to being a popular website for users to share personal photographs, the service is widely used by bloggers as a photo repository. Its popularity has been fuelled by its organizational tools that allow photos to be tagged and browsed by user-created categories. It hosts more than two billion images.

Attached to this PIA:

- Appendix A – Checklist/Signoff Page for a ministry Flickr Page
- Appendix B – Sample Collection Notice
- Appendix C – Parameters of a ministry Flickr Page
- Appendix D - Parameters of a ministry Flickr Page Screen Capture

### **General Flickr Page: Outline**

A ministry may institute a Flickr page in two different ways that may be combined, dependent on the purposes of the program or initiative. The first is to allow for the input from individuals on the pictures being posted by the public body. This would involve the ministry posting pictures that invite discussion or dialogue and then engaging individuals in matters respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body. The second is not to allow for the input of individuals on the photos posted by the public body. This would be more ideally suited for those looking strictly to inform the public of what is happening in the program or initiative in question.

If a program does not wish to permit comments on photos, they must select the account/photostream option that disables the commenting function (as a default) on all photos uploaded. In this case, no collection notice would be required, as no personal information would be collected from users (see discussion below "Notification").

If a public body wishes to combine these two approaches they must ensure that all photos that invite dialogue are accompanied by a collection notice, and that all photos that do not have a collection notice have commenting disabled.

### **Direct Collection**

The FOIPP Act covers information under the "custody and control" of a public body, but these media sharing sites pose a unique environment for what constitutes "collection".

Collection occurs in two ways; firstly, when a Ministry asks for users to provide it with information. For example, when the site monitor posts a photo inviting users to respond in the comments section, any comments that come in that answer/address the question will be considered collected. Secondly, unsolicited comments can also be collected when action is taken on them. This means something other than just reading them and then deleting them. Some examples of action taken could be: replying to a posted comment, using the comment to inform a government

policy, or conducting further research on information provided by a user. (See section 27.1 of FOIPP Act "When Personal Information is not Collected").

Personal information in the form of usernames, comments, and opinions of participants on these media sharing sites may be collected under s. 26(c), if the personal information is directly related to and is necessary for a program or activity of the ministry.

Media sharing social network sites constitute open forums where comments and opinions can be shared with ease. Anyone who has a Flickr account and can post a comment will have that content appear on the site instantly. Therefore, a ministry's Flickr site may generate unsolicited personal and non-personal information. To keep extraneous information to a minimum, all ministry Flickr sites must be monitored. The most up-to-date moderation policy can be obtained from Citizen Engagement (citizenengagement@gov.bc.ca), part of the Ministry of Labour, Citizens' Services and Open Government. If a monitor can no longer be appointed to administer a ministry Flickr page, the account should be promptly deleted.

On Flickr, personal information will be directly collected under s.27(1) of FOIPPA, therefore ministries must not solicit personal information about third parties, nor collect third party personal information. It will be the responsibility of the monitor to delete comments containing third party personal information and remind users of privacy practices.

**A Flickr Page that intentionally solicits personal information other than usernames and opinions or collects personal information of third parties does not fall within this General PIA and will require a separate PIA to determine if legislative authority to collect, use and disclose the personal information exists.**

#### **Notification**

If a program wishes to engage the public in discussion, they must provide a collection notice that provides the reason for collection (to engage the public in discussion regarding the public body's program, policy, etc.), the authority under which they are collecting the information (section 26(c) of FOIPPA), and the contact information for a ministry employee who can answer questions about the collection.

On Flickr, there are limited areas where this information can appear such that an individual can see it before their information is collected. Thus, this information must appear in the text box below each photo which is open for comments in order to comply with the FOIPPA. See Appendix B for suggested wording.

#### **Use**

Use of personal information is authorized under section 32(a), where personal information is used for its original purpose or for a use that is consistent with the original purpose of the collection. Consistent use is defined in s. 34 of FOIPPA. (Ministries must not use posted information for any reason other than stated in the collection notice.)

For the purpose of this General Flickr PIA – the use of any comments collected from individuals must be for discussions or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the ministry or respecting legislation relating to the ministry.

#### **Disclosure**

The personal information a ministry discloses on its Flickr Page must be authorized by a provision in s.33.1of FOIPPA.

##### ***• Posted comments by individuals***

On a Flickr site users may disclose their personal information by posting their comments to the site. This type of disclosure is authorized by Ministerial Order 030 (pursuant to FOIPP Act

section 33.1(3)) which allows for disclosure on social media sites for the purpose of public consultation/engagement.

• *Photos posted by ministries*

There are two options for posting (disclosure) of personal information by ministries covered by this General Flickr PIA.

The first option is that a ministry may post (disclose) photos of identifiable individuals that are collected by observation at a presentation, ceremony, performance, sports meet or similar event if the individual voluntarily appeared and the event was open to the public (pursuant to section 33.1(1)(q)).

Example: The Ministry of Transportation has a celebration for an opening of a new bridge on a major BC Highway – the public is invited to a ribbon cutting ceremony and photographs are taken that include members of the public.

The second option requires the ministry to have written consent of an individual whose personal information or image is being disclosed on the Flickr page (pursuant to section 33.1(1)(b)). Consent must be in writing and specify to whom the personal information may be disclosed (in this case it would be to the public through a ministry sponsored Flickr page), how the personal information may be used (for example the promotion of XYZ program), and that it will be disclosed outside of Canada.

Example: The Ministry of Community, Sport and Cultural Development wants to post pictures to its new Flickr site of its minister presenting at a members-only gala awards night for a local sports organization. Because this event is not open to the public the ministry will require the written consent of individuals who appear in photos as well as consent to post the names of the award winners.

For all photos that include an identifiable individual regardless of whether they are open for comments, the public body must have a signed consent form on file that authorizes the public body (in the prescribed manner) to disclose that information outside of Canada with the exception of those photos that are taken at a presentation, ceremony, performance, sports meet, or a similar event open to the public and the individuals who appear in the photo voluntarily appeared.

**If the proposed Flickr page will disclose personal information using a statutory authority other than section 33.1(1)(b), 33.1(1)(q) or the 33.1(3) a separate PIA is required to ensure compliance with the FOIPP Act.**

**Storage and Access**

Storage and access is authorized by section 30.1 (b) of FOIPPA, which permits storage and access for the purpose of a disclosure allowed under the Act (in the case of comments posted by users the disclosure provision is Ministerial Order 030 pursuant to section 33.1(3)).

*Remember:* If information is requested by the ministry from users, when a relevant response is provided by them, it is considered collected and the information comes under the control of the ministry. You must only solicit from users the minimum amount of information necessary to the program or activity. In addition, for the purposes of this PIA, the ministry must have an individual's written consent to post any material not received via social media that contains personal information about the individual to the site – unless it is images taken at a public event voluntarily attended by the individual.

**4. Purpose/Objectives of the initiative (if statutory, provide citation).**

The use of photo-sharing sites by ministries promotes a collaborative environment that can enhance citizen engagement and dialogue with the Province of British Columbia. Flickr use is seen as part of government's drive to transform the delivery of services to improve outcomes for its citizens, as outlined in *Citizens @ the Centre: B.C. Government 2.0*

The purpose of this PIA is to outline a standard template for use of Flickr, whereby any ministry or program area using this site within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use Flickr in ways not described here, they will be required to complete a separate PIA.

**5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Flickr has the potential to enable government to share information about its programs and services. It is a way of making information available immediately and at a low cost, and reaching large groups of people. Potential impacts include:

- Information dissemination about current government bodies, programs or public figures in a popular online environment.
- Increased knowledge, awareness and interest of users about the B.C. government, its agencies or functions.

There are some potential privacy impacts associated with the use of Flickr, including:

- Privacy concerns related to the appropriate disclosure of personal information (e.g. through pictures containing personal information of individuals).
- Privacy concerns regarding the collection of personal information of Flickr users (e.g. text comments from individuals).
- Privacy concerns regarding the collection of third-party information from Flickr users in comments.

The use of monitors will mitigate these potential negative impacts.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

N/A

## II DESCRIPTIVE INFORMATION

1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.

Personal information that can potentially be collected/disclosed through a Flickr page includes:

- Name of user posting text comments
- Time of posting of an individual's comment (e.g. "Post 2 hours ago." "Post 5 days ago.")
- Photos depicting individuals (attached to profile as part of a posted comment).
- An individual's personal opinion about a subject in a posted text comment.
- Images of individuals in photographs posted by the government.

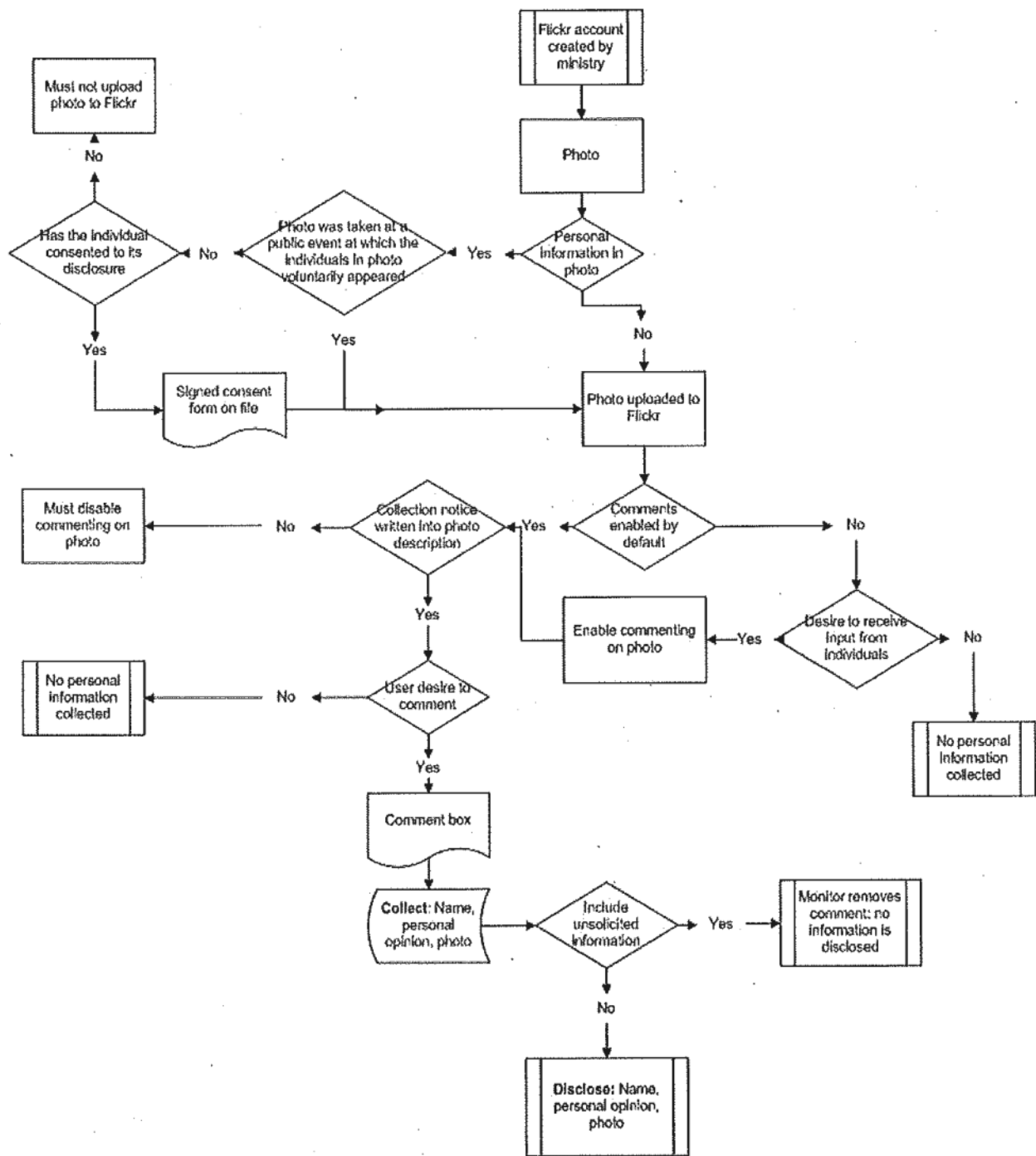
Usernames and profile pictures are disclosed by the Flickr user when signing up with their profile and engaging in the use of Flickr. This falls under the purview of Ministerial Order 030.

A users ideas, opinions and comments are their own personal information and will be treated as such. A monitor will ensure that third-party information is deleted from the site.

2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.

See information flow chart below





**III PERSONAL INFORMATION COLLECTION**  
 (Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?	X		

**1) Authorization for Collection:**

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
	<b>If yes, please specify the name of the Act and relevant section</b>			
(b)	Is the personal information being collected for law enforcement purposes?		X	
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
	<b>If yes, please specify the prescribed purpose.</b>			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection? <b>and</b>		X	
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	X		
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g)	Is the personal information being collected at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?		X	
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or		X	

s. 26		Yes	No	n/a
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	X		

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?	X		
	(b) the legal authority for collection?	X		
	(c) the contact information of the person who can answer questions regarding the collection?	X		
	<b>Additional details as required (e.g., method of notification)</b> <b>See Discussion of Notification</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?	X		

*Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>Personal information collected will only be used for the purpose of enabling the public body to engage individuals inside and outside of British Columbia in public discussion and promotion respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body or consistent with these purposes.</p>			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		X	
	<b>Specify subsection(s) being applied</b>			

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

*A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.*

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):  22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	
	<b>Specify name of enactment and relevant section(s)</b>			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that  (i) authorizes or requires its disclosure, and  (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if  (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
<b>and</b>				
(ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
<b>If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if  (i) the information is necessary for the performance of the duties of the individual in relation to the public body,			
<b>and</b>				
(ii) in relation to disclosure outside Canada,  (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and  (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	

(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<b>and</b>		X	
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.		X	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	

(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b> (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public.	X		
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, <b>and</b>		X	
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	To another law enforcement agency in Canada		X	



(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.	X		
(4)	<p>In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,</p> <p>(a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and</p> <p>(b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.</p>		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		X	
<p><b>Additional details as required</b></p> <p>Ministerial Order 030 to section 33.1(3) allows for disclosure of personal information outside of Canada through social media sites if the personal information was previously disclosed on a social media site by the individual who is the subject of the personal information and the personal information was obtained for the purposes of enabling the public body to engage individuals.</p> <p><b>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</b></p>				

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
 (Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?			X
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?			X
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?			X
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:	Flickr Monitor		
	Phone number:			
<b>Additional details as required</b>				
Individuals will be able to edit or delete their own comments. If the ministry re-posts information provided in a comment and a user feels that their personal information (as it appears in the post) needs to be corrected or annotated they can contact the Flickr monitor/administrator, who will administer the request. Any corrections or annotations will be added to the blog post in question.				

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
 (Sections 30 and 30.1 of the FOIPP Act)

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	<b>Policy No. 33 Use of Social Media in the BC Public Service</b>		
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?		X	
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X

	<p><b>Additional details</b></p> <p>The Flickr account login information will only be available to those that need to operate the account.</p> <p>In assessing the “reasonableness” of the security arrangements, consideration must be given to the nature of the personal information involved and the seriousness of the consequences of its unauthorized disclosure.</p> <p>Every comment submitted to Flickr is intended by the individual to be for public use and is for the purpose of citizen engagement on public programs and initiatives; sensitive personal information should not be involved.</p> <p>Any risk of third party information being disclosed is reasonably mitigated by moderating the postings and putting up warnings not to post third party information on the site. Also ensuring the site is taken down when it is no longer being moderated ensures no future unauthorized collection, use or disclosure of personal information.</p>
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**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION**  
cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

		Yes	No	n/a
	Will the information be stored or accessed only in Canada?		X	

**Personal information in a public body’s custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

		Yes	No	n/a
(a)	Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	X		
	<p><b>Please explain</b></p> <p>If any pictures or text posted to the Flickr page by the ministry contain personal information, the program area will secure forms consenting to the disclosure of personal information outside of Canada, with the exception of those that are collected by observation at a presentation, ceremony, performance, sports meet, or similar event at which individuals appear voluntarily and that are open to the public.</p>			
(b)	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	X		
	<p><b>Please explain</b></p> <p>The personal information will be stored in or accessed from foreign servers in order to allow for their disclosure, as authorized by section 33.1(3)/MO030 of FOIPPA for posted comments, and as authorized by section 33.1(1)(b) and 33.1(1)(q) for photos/information posted by the ministry.</p>			

(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
	<b>Please explain</b>			

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?  No personal information will be collected that will be used to make a decision that directly affects an individual.		X	

**Note:** Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.

X SIGNATURES

PUBLIC BODY APPROVAL:

\_\_\_\_\_  
Program Manager

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Ministry Contact Responsible for  
Systems Maintenance and Security

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Jeannette Van Den Bulk  
Knowledge and Information Services  
Office of the Chief Information Officer  
Ministry of Labour, Citizens Services,  
and Open Government

\_\_\_\_\_  
Signature

\_\_\_\_\_  
February 10, 2012  
Date

\_\_\_\_\_  
Dave Nikolejsin (Chief Information  
Officer)  
Assistant Deputy Minister or Equivalent

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Feb 10/2012  
Date

## Appendix A

### Checklist and Confirmation Page for Flickr Site

Name of Flickr Site (as it will appear on site) \_\_\_\_\_

Ministry and Program Area \_\_\_\_\_ Go-Live Date: \_\_\_\_\_

Ministry Flickr Site Administrator \_\_\_\_\_ email \_\_\_\_\_

This checklist is to be completed to determine if a separate PIA is needed to address the program area's needs around the collection, use, and disclosure of personal information when administering a Flickr account.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<p><b>Purpose</b> The program area needs to have a Flickr site that potentially collects personal information because it is necessary to:</p> <ul style="list-style-type: none"> <li>• Provide a forum for citizen engagement and discussion;</li> <li>• Hear users' thoughts and opinions on a subject;</li> <li>• Facilitate discussion between users;</li> <li>• Notify users of further opportunities for discussion; or,</li> <li>• Provide users with updates on the progress of the matter under discussion</li> </ul> <p>Please provide a description of the purpose:</p>		
<p><b>Collection and Notification</b> A "Collection Notice" (as per Appendix B) has been posted in the description pane of all photos that have commenting enabled.</p>		
<p>All posts will be monitored by the ministry's Flickr monitor Monitor's name: _____</p>		
<p>Comments that fall outside of the scope of the Ministry's Flickr or that share third party information (such as pictures of individuals other than the commenter submitting them) will be deleted by the monitor and the group will be reminded of good privacy practices</p>		
<p>Users do not need to further identify themselves other than with their Flickr username</p>		
<p><b>Use and Disclosure</b> The ministry will not use or disclose personal information submitted by users other than for its original purpose or in a way that is consistent with the original purpose of the collection as identified above (except as required by law).</p>		
<p>The Ministry will not post personal information about individuals that has not been authorized for disclosure by FOIPPA under section 33.1(1)(b), or 33.1(1)(g).</p>		



	Yes	No
The required settings from the Parameters of a Ministry Flickr Page are met (as per Appendix C)		
<b>Records Management</b> A records retention and disposition schedule has been created.		
I understand the information and analysis in this PIA is limited to the interaction between Flickr and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Flickr's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Flickr's Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your Flickr page can be launched.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## Appendix B

### Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s.26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact (business title, name, telephone, email).

## Appendix C Parameters of a Ministry Flickr Page

When the Flickr account is created, there are a number of default settings that should be selected.

Setting Category	Recommended Setting * = required	Reason
<b>Global Settings</b>		
Access to your original files and other sizes	No one	This is the only available option for free accounts. If the public body subscribes to a paid account, the same option is recommended.
Allow others to share your stuff	*No	This disables the ability of users to share the public body's photos via Facebook, or Twitter, etc. This would enable unauthorized disclosure of personal information.
Who can add you to a photo	Only you	This disables the ability of users to mark the public body as appearing in a photo. There is no evident use to this ability and may lead to unwanted markings.
Who can print your photos	Only you	This disables the ability of a user to request prints of the public body's photos which may result in unwanted distribution of photos.
Allow your stuff to be added to a gallery	*No	This disables the possibility that a public body's photo may be added to a gallery, which would likely be an unauthorized use of any personal information.
Hide your EXIF data	Yes	This disables the ability of Flickr to display the make of camera that took the photos. It is not necessary to hide this information, but as it is unnecessary, it is recommended that it remains hidden.
Show which application you used for uploading	No	This disables the ability of Flickr to display the application used to upload the photos. It is not necessary to hide this information, but as it is unnecessary, it is recommended that it remains hidden.
Hide your stuff from public searches	*Yes, on flickr.com and 3 <sup>rd</sup> party websites	This disables the ability of public body photos from appearing in searches such as Yahoo! Image Search. Given the purpose of the Flickr account is to engage the public and not primarily to provide images, this function must be disabled.
Hide your profile from public searches	No	This allows people searching for the public body to find their Flickr profile.
Who can see what on your profile	<b>Email address:</b> Anyone <b>IM Names:</b> Anyone <b>Real Name:</b> Anyone <b>Current city:</b> Anyone	Users should be able to see an email address for the account so that they may contact someone if they have questions regarding the collection of their information. The other information revealed is not necessary but may be beneficial to engagement efforts.
Make your photos eligible for invitation by Getty Images?	No thanks, I don't want to license my photos through Getty Images	Allowing Getty Images to license public body images would likely fall outside the original use of any photos containing personal information.
<b>Defaults for new</b>		

<b>Uploads</b>		
Who will be able to see, comment on, add notes, or add people	<b>See:</b> Anyone <b>Comment on:</b> Only you <b>Add notes, tags, people:</b> *Only you	These settings allow for anyone to see a photo that is uploaded, and does not allow commenting automatically. Photos the public body wishes to receive comments on, should have the commenting abilities added manually, and must also ensure that a collection notice is added into the photo's description field. There is no evident need for users to add tags, notes or people. If a program would like to involve a more "folksonomic" tagging aspect, it will be required to fill out a separate PIA.
What license will your content have	All rights reserved.	The public body must seek to limit the unauthorized use of photos that they upload to Flickr
Who will be able to see your stuff on a map	Only you	If the public body wishes to add geotags to photos that contain personal information, they will be required to complete a separate PIA.
Import EXIF location data	No	It is unnecessary to disclose the GPS coordinates of a photo. If the public body would like to disclose the GPS coordinates of a photo with personal information in it they will have to complete a separate PIA.
Auto-rotate your photos	Yes	This is not a mandatory setting; however, it is a beneficial one.
What Safety Level and Content Type will your photostream have	Safety level: Safe Content type: photos	If the Safety Level of the public body's photos are not considered "Safe" (suitable for a global public audience), they are not to be uploaded to Flickr. If a program area wants to upload Moderate or Restricted photos, they must complete a separate PIA.
<b>Content Filters</b>		
Search settings	*SafeSearch: On Content type: Photos/Videos	This setting relates to the administrator's use of the site, and should be set to SafeSearch in order to remain within the Appropriate Use Standards of government's Core Policy.
Autoplay videos	Yes	This is not a mandatory setting; however, it is a beneficial one.

# APPENDIX D

## Parameters of a Ministry Flickr Page Screen Capture



Signed in as [redacted] (f new) Help Sign Out

Home You Organize & Create Contacts Groups Explore Upload

Search

### Your account

Your Getty Images preference has been saved.


[Personal Information](#) [Privacy & Permissions](#) [Emails & Notifications](#) [Sharing & Extending](#)

#### Global settings

<b>Who can access your original image files?</b>	No one <i>(because you have a free account).</i>	<a href="#">edit</a>
<b>Allow others to share your stuff</b>	No	<a href="#">edit</a>
<b>Who can add you to a photo?</b>	Only you	<a href="#">edit</a>
<b>Printing</b>	<ul style="list-style-type: none"> <li>• Who can print your photos: Only you</li> <li>• Where to ship your prints: Canada</li> </ul>	<a href="#">edit</a>
<b>Allow your stuff to be added to a gallery [?]</b>	No	<a href="#">edit</a>
<b>Hide your EXIF data [?]</b>	No	<a href="#">edit</a>
<b>Show which application you used for uploading</b>	No	<a href="#">edit</a>
<b>Hide your stuff from public searches [?]</b>	Yes, on flickr.com and 3rd-party sites	<a href="#">edit</a>
<b>Hide your profile from public searches</b>	No	<a href="#">edit</a>
<b>Who can see what on your profile</b>	<ul style="list-style-type: none"> <li>• Email address: Anyone ([redacted]@yahoo.com)</li> <li>• IM names: Anyone (n/a)</li> <li>• Real name: Anyone (n/a)</li> <li>• Current city: Anyone (n/a)</li> </ul> <p><a href="#">Edit your IM names, real name, or current city</a></p>	<a href="#">edit</a>
<b>Make your photos eligible for invitation by Getty Images?</b>	No thanks, I don't want to license my photos through Getty Images	<a href="#">edit</a>

(con't next page)

## Defaults for new uploads

Who will be able to see, comment on, add notes, or add people	<ul style="list-style-type: none"><li>• See: Anyone</li><li>• Comment on: Only you</li><li>• Add notes, tags, and people: Only you</li></ul>	<a href="#">edit</a>
What license will your content have	All rights reserved 	<a href="#">edit</a>
Who will be able to see your stuff on a map	Only you	<a href="#">edit</a>
Import EXIF location data [?]	No	<a href="#">edit</a>
Auto-rotate your photos [?]	Yes	<a href="#">edit</a>
What Safety Level and Content Type will your photosstream have	<ul style="list-style-type: none"><li>• Safety level: Safe</li><li>• Content type: Photos</li></ul>	<a href="#">edit</a>

## Content filters

Search settings	<ul style="list-style-type: none"><li>• SafeSearch: On</li><li>• Content type: Photos / Videos</li></ul>	<a href="#">edit</a>
Autoplay videos	Yes	<a href="#">edit</a>

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - SurveyMonkey

### 1. Ministry/Public Body and Program Area.

Ministry	Labour, Citizens' Services, and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Initiative Title	General SurveyMonkey PIA

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address. (This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250 356 0378
E-Mail	Jeannette.vandenbulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed. (Please note here if the initiative does not collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

This General SurveyMonkey Privacy Impact Assessment (PIA) is intended as a guide to assist ministries in the use of SurveyMonkey as an online survey tool and to ensure that any personal information is collected, used, and disclosed in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

Based on this General SurveyMonkey PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if their survey falls under this General PIA. See [Appendix A](#). If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their use of SurveyMonkey. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to their survey going live, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirement for a privacy impact assessment under section 69(5) of FOIPPA.

**A separate PIA must be completed for SurveyMonkey surveys where there is potential for collection, use, and disclosure of personal information.**

***\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using SurveyMonkey in the manner described in Appendix A. The program area using SurveyMonkey is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, SurveyMonkey's Terms of Use.\****

## Background

SurveyMonkey is a web-based tool that enables users to create their own web-based surveys while also managing and analyzing data. The company offers a number of paid-for services however, the main draw and focus of this General PIA is their free-service that allows small, simple surveys to be put together easily with no cost.

SurveyMonkey is an American company with all information collected and stored on servers located in the United States. Despite having a robust security and privacy policy, ministries should not use SurveyMonkey to collect personal information because of section 30.1 of the FOIPP Act, which requires personal information be stored and accessed inside Canada (with limited, generally inapplicable exceptions).

A government body may choose to use SurveyMonkey if they are **not collecting personal information**. For example, the survey does not collect names, addresses, or multiple demographic data points that could through the mosaic effect identify an individual. Surveys may collect data that is aggregated and cannot be traced back to an identifiable individual.

As well a note, like the one below (and in Appendix B), must be visible to all participants, either as part of an email or on the webpage that contains the link to the survey:

*"The Government of BC will not collect, use, or disclose personal information using SurveyMonkey. Please be aware however that IP addresses are collected by SurveyMonkey itself, and these IP addresses and other information collected will be stored on SurveyMonkey's servers located outside of Canada. This survey is voluntary and a response is encouraged, not required."*

Attached to this PIA:

- [Appendix A](#) – Checklist/Signoff Page for a ministry SurveyMonkey survey
- [Appendix B](#) – Required notification

#### 4. Purpose/Objectives of the Initiative (If statutory, provide citation).

The purpose of this PIA is to outline a standard way to use SurveyMonkey, whereby any ministry or program area using this site within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use SurveyMonkey in ways not described here, they will be required to complete a separate PIA.

#### 5. What are the potential impacts of this proposal? (Include privacy impacts in this description).

SurveyMonkey can be a useful internal tool for gaining feedback from colleagues and employees. It can also be a useful external tool to gain simple, quick feedback from citizens and clients. It is not a replacement for in-depth surveying and analysis or for any surveys that collect personal information.

Ministries must ensure their surveys do not collect personal information in order to use the SurveyMonkey tool.

#### 6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).



No General PIA has previously been completed for SurveyMonkey. A General Fluidsurvey PIA is also available from Knowledge and Information Services.

## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the definition of personal information.]  
*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

No personal information should be collected by the ministry as part of the survey.

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

No personal information will be collected by government. However, IP addresses will be collected by SurveyMonkey, and survey participants will be informed of this before taking the survey.

III

**PERSONAL INFORMATION COLLECTION**

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected? No personal information will be collected by a ministry. *However, IP addresses are collected by SurveyMonkey and survey participants will be informed of this before they take the survey. A ministry will not have custody or control of IP addresses.	X*	X	

**1) Authorization for Collection:**

A public body may collect personal information as authorized by one of the following provisions:

s. 26	Yes	No	n/a
(a) Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?			X
If yes, please specify the name of the Act and relevant section			
(b) Is the personal information being collected for law enforcement purposes?			X
(c) Is the personal information directly related to, and necessary for, a program or activity of the public body?			X
(d) Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?			X
If yes, please specify the prescribed purpose.			
(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection? and			X
(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e) Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?			X
(f) Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?			X
(g) Is the personal information being collected at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?			X
(h) Is personal identity information being collected by:			

s. 26	Yes	No	n/a
A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or			X
A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.			X

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?			X

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

s. 27(1)	Yes	No	n/a
(a)(i) Did the individual the information is about authorize another method of collection?			X
(a)(ii) Has indirect collection been authorized by the Information and Privacy Commissioner?			X
(a)(iii) Has indirect collection been authorized by another enactment?			X
<b>If yes, please specify the name of the Act and relevant section(s)</b>			
(a.1)(i) Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?			X
(a.1)(ii) Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?			X
(b) Is the public body collecting personal information disclosed to it by another public body under an authority within sections 33 to 36 of the FOIPP Act?			X
<b>Specify relevant section(s) or subsections that apply.</b>			
(c)(i) Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?			X

s. 27(1)		Yes	No	n/a
(c)(ii)	Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?			X
(c)(iii)	Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?			X
(c)(iv)	Is the personal information being collected for the purpose of law enforcement?			X
(c)(v)	Is the personal information being collected to reduce the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?			X
(d)	Is the personal information being transferred to the public body from another public body in accordance with section 27.1?			X
(e)	Is the personal information being collected necessary for delivering a common or integrated program or activity?			X
(f)	Is the personal information about an employee, other than a service provider, and the collection of the information is necessary for the purposes of managing or terminating an employment relationship between a public body and the employee?			X
(g)	Is the information personal identity information that is collected by the designated provincial identity information service that is necessary to provide services under section 69.2?			X
	<b>Additional details as required (e.g., explanation of method of collection)</b>			

***If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.***

### 3) Notification to collect information

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?			X
	(b) the legal authority for collection?			X
	(c) the contact information of the person who can answer questions regarding the collection?			X
	<b>Additional details as required (e.g., method of notification)</b>			

**Notification is not required if the answer is "yes" to any of the following:**

27(3)		Yes	No	n/a
(a)	Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?			X
(b)	Has the Minister responsible for the FOIPP Act excused your public body from complying because it would			
	(a) result in the collection of inaccurate information?			X
	or (b) defeat the purpose or prejudice the use for which the personal information is collected?			X
(c)	The information (a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, and (b) is not collected directly from the individual the information is about			X
(d)	Is the information collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appears and that is open to the public.			X
27 (4)	Is it reasonable to expect that notifying an employee of collection under subsection 27 (1) (f) would compromise (a) the availability or accuracy of the information, or (b) an investigation or a proceeding related to the employment of the employee?			X
	Additional details as required			

*If you have not provided the required notification as outlined above, please contact Knowledge and Information Services.*

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?		X	

**IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO V. DISCLOSURE OF PERSONAL INFORMATION**

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?		X	

**IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION**

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**

(Section 28 and section 29 of the FOIPP Act)

**If an individual's personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.**

	Yes	No	n/a
1. Are there procedures in place to enable an individual to request/review a copy of their own personal information?			X
2. Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?			X
3. If personal information is corrected, are there procedures in place to notify other holders of this information?			X
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>			
Policy/procedure:			
Contact person:			
Phone number:			
<b>Additional details as required</b>			

If any of the questions above have been answered "no", please contact Knowledge and Information Services for further clarification.

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
(Sections 30 and 30.1 of the FOIPP Act)

**Note:** For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the Signatures section.

For PIAs that do not involve systems initiatives, this section should be completed by the program area completing the PIA. In this case, the signature of the systems representative is not required.

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?			X
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?			X
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?			X
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?			X
5.	Do controls and procedures exist for the authority to add, change or delete personal information?			X
6.	Does your system security include an ongoing audit process that can track use of the system (e.g., when and who accessed and updated the system)?			X
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X
<b>Additional details</b>				

*If any of the questions above have been answered "no", please contact your Ministry's Security Officer. If you have any questions or require clarification please contact Knowledge and Information Services.*

**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION**  
cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?			X

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?			
Please explain			
(b) Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the Freedom of Information and Protection of Privacy Act?			
Please explain			
(c) Will the personal information be disclosed under section 33.1(1)(1.1)?			
Please explain			

*If you have not answered "yes" to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact Knowledge and Information Services.*

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

If a public body uses an individual's personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.



		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?			X
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?			X

***If you answered "no" to the above questions, your procedures may need to be revised. Please contact your Records Officer.***

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**



## Appendix A: Checklist and Confirmation Page for SurveyMonkey Survey

Name of Survey:			
Ministry and Program Area:			
Ministry Survey Administrator:		Phone:	
Email:			
Go- Live Date:			

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<b>Purpose</b> The program area needs to use SurveyMonkey to hear users' thoughts and opinions on a subject. Please provide a description of the purpose:		
<b>Notification</b> The Notification (See Appendix B) has been included in all requests for participation in the survey. Example, by email or on the webpage a link to the survey is posted on. Describe where notification will be:		
No personal information is being collected through the Ministry's survey. This includes: <ul style="list-style-type: none"> <li>• No names of survey participants or third parties</li> <li>• No addresses</li> <li>• No demographic information that could be used if put together to identify an individual</li> <li>• No names or information about other people</li> </ul>		
SurveyMonkey is voluntary, participants are not required to take the survey.		
A copy of survey questions are attached to this checklist.		
I understand the information and analysis in this PIA is limited to the interaction between SurveyMonkey and the requirements set out in the FOIPPA. It is the responsibility of our program area to review SurveyMonkey's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, SurveyMonkey's Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before you can use SurveyMonkey.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## **Appendix B**

### **Notification**

The Government of BC will not collect, use, or disclose personal information using SurveyMonkey. Please be aware however that IP addresses are collected by SurveyMonkey itself, and these IP addresses and other information collected will be stored on SurveyMonkey's servers located outside of Canada. This survey is voluntary and a response is encouraged, not required.

**Please do not provide any third-party information (i.e. talk about others) in your responses to the survey.**

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - Blog

### 1. Ministry/Public Body and Program Area.

Ministry	Ministry of Labour, Citizens' Services and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Initiative Title	<b>General Tumblr Blog</b>

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250-386-0378
E-Mail	Jeannette.VanDenBulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

This General Tumblr Blog Privacy Impact Assessment (PIA) is intended as a guide to assist ministries in the development and administration of a public facing blog and to ensure that the information collected, used, and disclosed on a blog is done in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

Based on this General Tumblr Blog PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if a blog falls under this General Tumblr Blog PIA. See Appendix A. If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their blog. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to the blog being launched, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirements of a privacy impact assessment under section 69(5) of FOIPPA.

**Note: It will be the responsibility of each ministry to ensure that it has appropriate authority under FOIPPA to collect, use and disclose any personal information that is included on the blog.**

**A separate PIA must be completed for blogs where the collection, use, and disclosure of individuals' personal information does not meet the criteria specified in the checklist and this PIA.**

***\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using Tumblr in the manner described in Appendix A. The program area using Tumblr is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Tumblr's Terms of Use.\****

## Background

Tumblr is one of the most popular and widely used blogging platforms and therefore of high interest to government initiatives involving online engagement and social media.

Individuals do not need to register with Tumblr for some activities, but must register for others (commenting, creating their own blogs, etc). Once registered, a user can create their own blog, comment on other blogs using their profile, and "follow" other blogs in order to be kept up to date with their content.

Attached to this PIA:

- Appendix A – checklist/Signoff Page for a ministry blog
- Appendix B – Sample Collection Notice

## General Blog: Outline

This PIA outlines a standard blog in which ministries are interacting with citizens (readers, commenters). This means that the blog is used to share information with citizens, and to answer questions, solicit feedback, and collect non-sensitive personal information. The use of a blog will inevitably involve the collection of some personal information due to its design and the fact that government may be soliciting opinions. However, ministries should not be soliciting other personal information (e.g. home addresses, medical history) without a separate PIA being completed. A government blog should NOT include personal information about third parties (this includes pictures that have a third party in them – i.e. someone other than the blog user with whom the ministry is communicating). Under FOIPPA, specific legislative authority is required for government to collect, use, and disclose personal information. Please see the discussion on collection, use and disclosure below.

## Direct Collection

The FOIPPA covers information under the "custody and control" of a public body. Any personal information that the ministry collects will be in the custody and control of that ministry.

Collection occurs in two ways: first, when a ministry asks for users to provide it with information. For example, when a moderator posts a question asking users to respond in the comment section, any comments posted that answers the question will be considered collected. Secondly, unsolicited comments can also be collected when action is taken on them; this means something other than just reading them and deleting them. Some examples of action taken could be: replying to a posted comment, using the comment to inform a government policy, or conducting further research on information provided by a user. (See section 27.1 of FOIPPA "When Personal Information is not Collected").

Personal information in the form of usernames, comments, and opinions of commenters on the blog site may be collected under s.26(c), if the personal information is directly related to and is necessary for a program or activity of the ministry.

Blogs are a very open forum where comments and opinions can be shared with ease. In most cases, anyone with an account with the blogging platform can post a comment and that content may appear on the site instantly (depending on the settings). Therefore, ministries' blogs may easily generate unsolicited personal and non-personal information. To keep extraneous information to a minimum, all government blogs must be moderated. The most up-to-date moderation policy can be obtained from the Citizen Engagement team ([citizenengagement@gov.bc.ca](mailto:citizenengagement@gov.bc.ca)). If a moderator can no longer be appointed to administer a ministry blog, the account should be promptly deleted.

For use with this PIA, personal information will be directly collected by a blog under s.27(1) of FOIPPA; therefore ministries must not solicit personal information about third parties, nor collect

third party personal information. It will be the responsibility of the moderator to delete comments containing third party personal information and pictures of third parties and remind users of privacy practices.

**A blog that intentionally solicits personal information other than usernames and opinions or collects personal information about anyone other than the individual posting does not fall within this general PIA and will require a separate PIA to determine if legislative authority to collect, use and disclose the personal information exists.**

### Notification

The FOIPPA requires a collection notification whenever personal information is collected. The notice must provide the purpose for collection (to engage the public in discussion regarding the public body's program, policy, etc.) the legal authority under which they are collecting the information (section 26(c) of FOIPPA or other statutory provisions), and the title, business address and business telephone number for a ministry employee who can answer questions about the collection. The ministry will need to post a collection notification on the blog in a conspicuous place to comply with FOIPPA. See Appendix B for suggested wording.

### Use

Use of personal information is authorized under section 32(a), where personal information is used for its original purpose or for a use that is consistent with the original purpose of the collection. Consistent use is defined in s.34 of FOIPPA. (For the purpose of this General PIA, ministries must not use posted information for any reason other than stated in the collection notice or otherwise required by law.)

For the purpose of this General PIA – the use of any comments collected from individuals must be for enabling the ministry to engage individuals in public discussions or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the ministry or respecting legislation relating to the ministry.

### Disclosure

The personal information a ministry discloses on its blog must be authorized by a provision in s. 33.1 of FOIPPA.

- *Posted comments by individuals*

A blog user's personal information is considered disclosed by government when the user posts to the ministry's site. This type of disclosure is authorized by Ministerial Order 030 (pursuant to FOIPPA section 33.1(3)) which allows for disclosure on social media sites for the purpose of public consultation/engagement.

- *Posted images and text by ministries*

There are two options for posting (disclosure) of personal information by ministries covered by this General Blog PIA.

The first option is that a ministry may post (disclose) photos or videos of identifiable individuals that are collected by observation at a presentation, ceremony, performance, sports meet or similar event if the individual voluntarily appeared and the event was open to the public (pursuant to section 33.1(1)(q)).

Example: The Ministry of Transportation has a celebration for an opening of a new bridge on a major BC Highway – the public is invited to a ribbon cutting ceremony and photographs are taken that include members of the public.

The second option requires the ministry to have written consent of an individual whose personal information (text or image) is being disclosed on the blog (pursuant to section 33.1(1)(b)). Consent must be in writing and specify to whom the personal information may be

disclosed (in this case it would be to the public through a ministry sponsored blog), how the personal information may be used (for example the promotion of XYZ program), and that it will be disclosed outside of Canada.

Example: The Ministry of Community, Sport and Cultural Development wants to post pictures to its new blog of its minister presenting at a members-only gala awards night for a local sports organization. Because this event is not open to the public the ministry will require the written consent of individuals who appear in photos as well as consent to post the names of the award winners.

**If the proposed blog will disclose personal information using a statutory authority other than section 33.1(1)(b), 33.1(1)(q) or 33.1(3) a separate PIA is required to ensure compliance with the FOIPPA.**

#### **Storage and Access**

Storage and access is authorized by section 30.1(b) of FOIPPA, which permits storage and access for the purpose of a disclosure allowed under the FOIPPA (in the case of comments posted by users the disclosure provision is 33.1(3)).

*Remember:* If information is requested by the ministry from users, when a relevant response is provided by them, it is considered collected and the information comes under the control of the ministry. You must only solicit from users the minimum amount of information necessary to the program or activity. In addition, for the purposes of this PIA, the ministry must have an individual's written consent to post any material not received via social media that contains personal information about the individual to the site – unless it is images taken at a public event voluntarily attended by the individual.

#### **4. Purpose/Objectives of the initiative (if statutory, provide citation).**

Blog use by ministries promotes a collaborative environment that can enhance citizen engagement and dialogue with the Province of British Columbia. Blog use is seen as part of government's drive to transform the delivery of services to improve outcomes for its citizens, as outlined in *Citizens @ the centre: B.C. Government 2.0*

The purpose of this PIA is to outline a standard template for use of a Tumblr blog, whereby any ministry or program area using Tumblr within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use a different blog platform or use Tumblr in ways not described here, they will be required to complete a separate PIA.

#### **5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Blogs have the potential to enable government to share information about its programs and services. It is a way of making information available immediately and at a low cost, and reaching large groups of people. Potential impacts include:

- Information dissemination about current government bodies, programs or public figures in a popular online environment.
- Increased knowledge, awareness and interest of users about the B.C. Government, its agencies or functions.

There are some potential privacy impacts associated with the use of blogs, including:

- Privacy concerns related to the appropriate disclosure of personal information (e.g. through pictures containing personal information of individuals).



- Privacy concerns regarding the collection of personal information of blog users (e.g. text comments from individuals).
- Privacy concerns regarding the collection of third-party information from blog users in comments and photos or videos.

The use of moderators will mitigate these potential negative impacts.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

N/A

## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

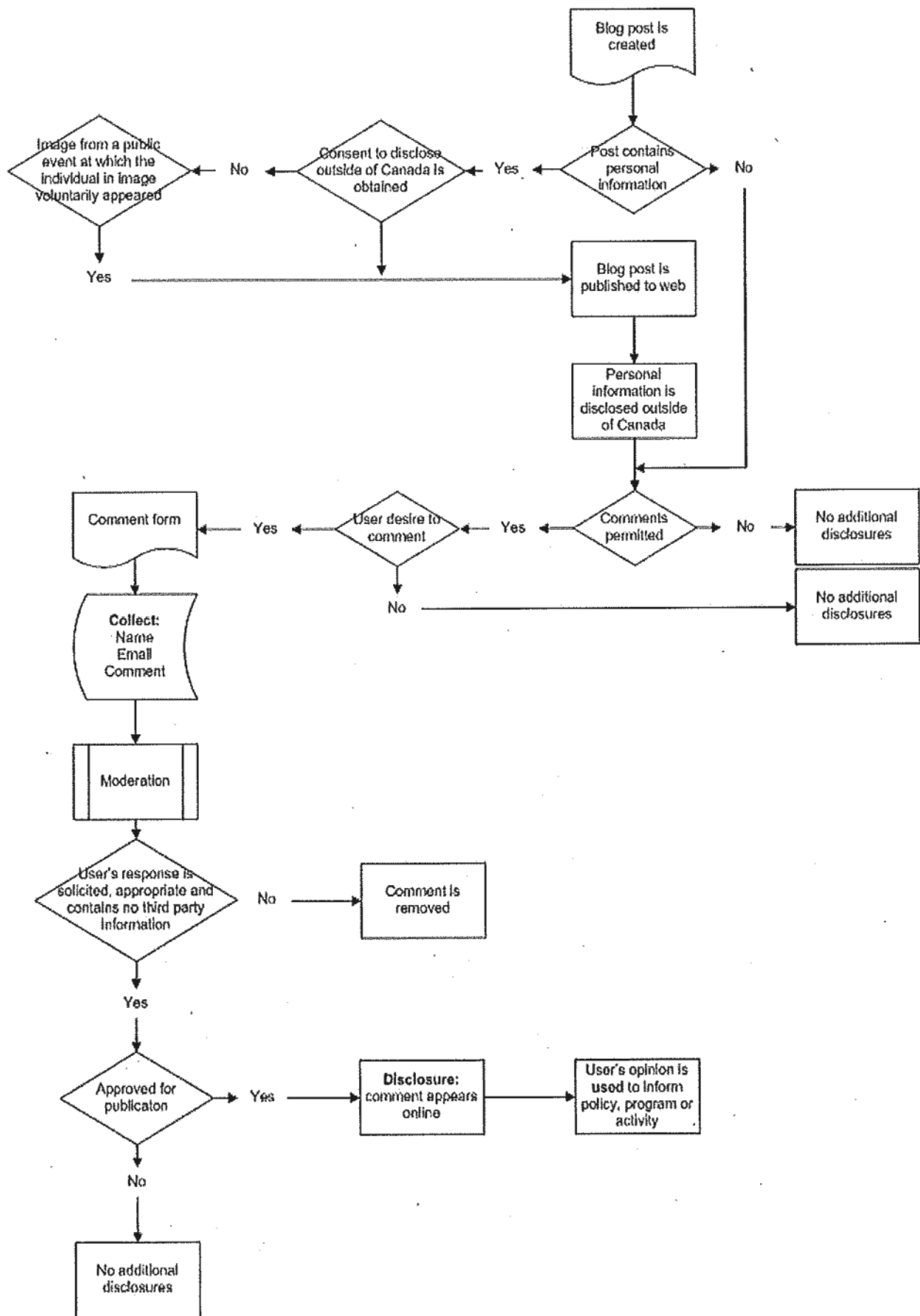
- Name of user posting text comments
- Time of posting of an individual's comment (e.g. "Post 2 hours ago." "Post 5 days ago.").
- Photos depicting individuals (e.g. attached to profile as part of a posted comment).
- An individual's personal opinion about a subject in a posted text comments.
- Images of individuals in photographs or videos posted by the ministry.

Username and profile pictures are disclosed by the commenter when registering their profile and engaging with other blogs. This falls under the purview of Ministerial Order 030.

A user's ideas, opinions and comments are their own personal information and will be treated as such. A moderator will regularly ensure that third-party information is deleted from the site.

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

See information flow chart below.



### III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?	X		

#### 1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
	<b>If yes, please specify the name of the Act and relevant section</b>			
(b)	Is the personal information being collected for law enforcement purposes?		X	
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
	<b>If yes, please specify the prescribed purpose.</b>			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?		X	
	<b>and</b>			
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	X		
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?		X	
	<b>Please identify event:</b>			
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2,		X	
	or			

s. 26		Yes	No	n/a
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	X		

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)	Yes	No	n/a
Has the individual from whom personal information is being collected, been informed of:			
(a) the purpose for collection?	X		
(b) the legal authority for collection?	X		
(c) the contact information of the person who can answer questions regarding the collection?	X		
<b>Additional details as required (e.g., method of notification)</b> <b>See Discussion of Notification</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?	X		

*Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>Personal information collected will only be used for the purpose of enabling the public body to engage individuals inside and outside of British Columbia in public discussion and promotion respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body or consistent with these purposes.</p>			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		X	
	<b>Specify subsection(s) being applied:</b>			

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j): 22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	
	<b>Specify name of enactment and relevant section(s)</b>			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that  (i) authorizes or requires its disclosure, and  (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if  (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
<b>and</b>				
(ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
<b>If paragraph (1)(e)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if  (i) the information is necessary for the performance of the duties of the individual in relation to the public body,		X	
<b>and</b>				
(ii) in relation to disclosure outside Canada,  (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and  (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is <i>temporary</i> and why disclosure outside Canada is <i>necessary</i></b>				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	



(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<b>and</b>		X	
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.		X	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	

(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b> (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. <b>Please identify event:</b>	X		
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, <b>and</b>		X	
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			

(2)(a)	To another law enforcement agency in Canada		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.	X		
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,  (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and  (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		X	
<p><b>Additional details as required</b></p> <p>Ministerial Order 030 to section 33.1(3) allows for disclosure of personal information outside of Canada through social media sites if the personal information was previously disclosed on a social media site by the individual who is the subject of the personal information and the personal information was obtained for the purposes of enabling the public body to engage individuals.</p> <p><b>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</b></p>				

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
 (Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:	Blog moderator		
	Phone number:			
<b>Additional details as required</b>				
Individuals will be able to edit or delete their own comments. If the ministry re-posts information provided in a comment and a user feels that their personal information (as it appears in the post) needs to be corrected or annotated they can contact the blog moderator/administrator, who will administer the request. Any corrections or annotations will be added to the blog post in question.				

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
 (Sections 30 and 30.1 of the FOIPP Act)

**Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.**

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	<b>Policy No. 33 Use of Social Media in the BC Public Service</b>		
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?		X	
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X
<b>Additional details</b>				
<p>In assessing the "reasonableness" of the security arrangements, consideration must be given to the nature of the personal information involved and the seriousness of the consequences of its unauthorized disclosure.</p> <p>Every comment submitted to Tumblr is intended by the individual to be for public use and is for the purpose of citizen engagement on public programs and initiatives; sensitive personal information should not be involved.</p> <p>Any risk of third party information being disclosed is reasonably mitigated by moderating the postings and putting up warnings not to post third party information on the site. Also ensuring the site is taken down when it is no longer being moderated ensures no future unauthorized collection, use or disclosure of personal information.</p>				

**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION**  
 cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?		X	

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	X		
<p><b>Please explain</b></p> <p>If any pictures or text posted to the Blog by the ministry contain personal information, the program area will secure forms consenting to the disclosure of personal information outside of Canada, with the exception of those that are collected by observation at a presentation, ceremony, performance, sports meet, or similar event at which individuals appear voluntarily and that are open to the public.</p>			
(b) Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	X		
<p><b>Please explain</b></p> <p>The personal information will be stored in or accessed from foreign servers in order to allow for their disclosure, as authorized by section 33.1(3)/MO030 of FOIPPA for posted comments, and as authorized by section 33.1(1)(b) and 33.1(1)(q) for photos/information posted by the ministry.</p>			
(c) Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
<p><b>Please explain</b></p>			



**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?  No personal information will be collected that will be used to make a decision that directly affects an individual.		X	

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**

X SIGNATURES

PUBLIC BODY APPROVAL:

_____ Program Manager	_____ Signature	_____ Date
_____ Ministry Contact Responsible for Systems Maintenance and Security	_____ Signature	_____ Date
_____ Jeannette Van Den Bulk Knowledge and Information Services Office of the Chief Information Officer Ministry of Labour, Citizens Services, and Open Government	_____ Signature 	_____ Date February 10, 2012
_____ Dave Nikolejsin (Chief Information Officer) Assistant Deputy Minister or Equivalent	_____ Signature 	_____ Date Feb. 10/2012



## Appendix A

### Checklist and Confirmation Page for a Tumblr Blog

Name of Blog (as it will appear on site) \_\_\_\_\_

Ministry and Program Area \_\_\_\_\_ Blog Go-Live Date \_\_\_\_\_

Ministry Blog Administrator \_\_\_\_\_ email \_\_\_\_\_

This checklist is to be completed to determine if a separate PIA is needed to address the program area's needs around the collection, use, and disclosure of personal information when administering a Tumblr blog.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<p><b>Purpose</b> The program area needs to have a blog that potentially collects personal information because in relation to a program or activity of the ministry it is necessary to:</p> <ul style="list-style-type: none"> <li>• Provide a forum for citizen engagement and discussion;</li> <li>• Hear users' thoughts and opinions on a subject;</li> <li>• Facilitate discussion between users;</li> <li>• Notify users of further opportunities for discussion; or,</li> <li>• Provide users with updates on the progress of the matter under discussion</li> </ul> <p>Please provide a description of the purpose:</p>		
<p><b>Collection and Notification</b> A "Collection Notice" (as per Appendix B) has been posted on the ministry's blog or a link is provided.</p>		
<p>All posts will be frequently monitored by the ministry's blog moderator Moderator's name: _____</p>		
<p>Comments that fall outside of the scope of the Ministry's blog or that share third party information (such as pictures of individuals other than the commenter submitting them) will be deleted by the moderator and the group will be reminded of good privacy practices</p>		
<p>Users do not need to further identify themselves other than with their profile username</p>		
<p><b>Use and Disclosure</b> The Ministry will not use or disclose personal information submitted by users other than for its original purpose or in a way that is consistent with the original purpose of the collection as identified above (except as required by law).</p>		
<p>The Ministry will not disclose personal information about individuals on the blog that has not been authorized for disclosure by FOIPPA under section 33.1(1)(b), or 33.1(1)(q).</p>		
<p><b>Records Management</b> A records retention and disposition schedule has been created.</p>		

	Yes	No
If the blog is no longer regularly moderated it will be removed from the web and all records will be kept for the requisite amount of time (see records retention and disposition schedule).		
I understand the information and analysis in this PIA is limited to the interaction between Tumblr and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Tumblr's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Tumblr's Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your blog can be launched.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## Appendix B

### Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s.26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact (business title, name, telephone, email).

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - Twitter

### 1. Ministry/Public Body and Program Area.

Ministry	Labour, Citizens' Services and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Program	<b>General Government Twitter Use</b>

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250-356-0378
E-Mail	Jeannette.vandenbulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

This General Twitter Privacy Impact Assessment (PIA) is intended as a guide to assist ministries in the development and administration of Twitter accounts and to ensure that the information collected, used, and disclosed on Twitter is done in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

Based on this General Twitter PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if their use of Twitter falls under this general Twitter PIA. See [Appendix A](#). If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their use of Twitter. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to use of Twitter, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirements of a privacy impact assessment under section 69(5) of FOIPPA.

**NOTE:** It will be the responsibility of each ministry to ensure that it has appropriate authority under the FOIPPA to collect, use and disclose any personal information that is included on Twitter.

A separate PIA must be completed for Twitter use where the collection, use, and disclosure of citizens' personal information does not meet the criteria specified in the checklist and this PIA.

*\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using Twitter in the manner described in Appendix A. The program area using Twitter is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Twitter's Terms of Use.\**

## Background

There is an interest by government and by the broader public sector to make use of online microblogging websites. Such services are increasingly viewed as a powerful tool to provide information about government programs and services over the internet.

**Microblogging** is a broadcast medium that is limited in size (either actual, or file size) that allows users to exchange and communicate small bits of content, like short ideas, links, or sometimes, images.

**Twitter** limits each "tweet" or entry to 140 characters. Tweets are published in real-time to the site. A Twitter profile is comprised of a few essential elements: the feeds<sup>1</sup>, a profile picture, a background image and a list of those "following and followed"<sup>2</sup> by the user.

Attached to this PIA:

- Appendix A – checklist/Sign-off Page for a ministry Twitter Account
- Appendix B – Sample Collection Notice
- Appendix C – Definitions

### General Twitter Account: Outline

This PIA outlines a standard Twitter account in which ministries are interacting with citizens. This means that the Twitter account is only used to share information with citizens, and to answer questions, solicit feedback, and collect non-sensitive personal information. The use of Twitter will inevitably involve the collection of some personal information due to its design and the fact that government may be soliciting opinions. However ministries should not be soliciting other personal information (e.g. home addresses, medical history) without a separate PIA being completed. A government Twitter account should NOT include personal information about third parties (this includes pictures that have a third party in them – i.e. someone other than the Twitter user with whom the ministry is communicating). Under FOIPPA, specific legislative authority is required to collect, use, and disclose personal information. Please see the more detailed discussion on collection, use and disclosure below.

### Direct Collection

FOIPPA covers information under the "custody and control" of a public body, but Twitter accounts post a unique environment for what constitutes "collection".

Collection of personal information can occur in four ways; first when a ministry @mentions<sup>3</sup> anyone where the user is an individual and not an organization, the user's name and image (and possibly other personal information) will be considered collected. Second, when a ministry retweets<sup>4</sup> anything that is either originally tweeted by an individual, or contains personal information in it, that information will be considered collected. Third, if government asks for users to provide it directly with information. For example, when the government Twitter account poses a question asking users to respond, any comments sent via direct message<sup>5</sup> or @mention that answers the questions will be considered collected. Finally, if government uses, records, or

<sup>1</sup> The feed is a constantly-moving roll of tweets. One feed consists of tweets solely published by the user and the other consists of tweets published by the people the user follows.

<sup>2</sup> Users "follow" other users in order to have their tweets automatically populate their feed.

<sup>3</sup> A "mention" or "@mention" is when one Twitter user adds another user's handle (@user) into the body of the tweet, effectively directing that tweet to that user's attention.

<sup>4</sup> A retweet is a tweet that someone else has chosen to post themselves. It is normally accredited to the original tweet-er. A retweet appears as a "RT" followed by the handle of the original tweeter. Modified retweets ("MRT" or "MT") are when the original tweet is altered slightly in order to accommodate additional comments, or the added characters required to denote a retweet.

<sup>5</sup> A direct message is a private message between users. It cannot be seen by others and does not show up in the feed. Direct messages can only be sent to people that the user follows.

discloses either a tweet by an individual, or a tweet that contains personal information on another social media site, that information will be considered collected. For example, if tweets are used as an example of public opinion on a policy issue, the identity of the tweeter, their profile picture, and their opinion will be considered collected.

Personal information in the form of usernames, comments and opinions of participants on these media sharing sites may be collected under s. 26(c), if the personal information is directly related to and is necessary for a program or activity of the ministry

Media sharing social network sites constitute open forums where comments and opinions can be shared with ease. Anyone who has a Twitter account and can post a comment will have that content appear in the ministry's direct message inbox instantly. Therefore, a ministry's Twitter site may generate unsolicited personal and non-personal information. To keep extraneous information to a minimum, all government Twitter direct message inboxes must be monitored. The most up-to-date moderation policy can be obtained from Citizen Engagement (citizenengagement@gov.bc.ca), part of the Ministry of Labour, Citizens' Services and Open Government. If a monitor can no longer be appointed to administer a ministry Twitter account, the account should be promptly deleted.

On Twitter, personal information will be directly collected under s.27(1) of FOIPPA, therefore ministries must not solicit personal information about third parties, nor collect third party personal information. It is important not to solicit third party information because any third party information received would be considered collected without authority. It will be the responsibility of the monitor to delete direct messages containing third party personal information (such as names, activities, or opinions of someone other than the commenter) and remind users of privacy practices.

**A Twitter account that intentionally solicits personal information other than usernames and opinions or collects personal information of third parties does not fall within this General PIA and will require a separate PIA to determine if legislative authority to collect, use and disclose the personal information exists.**

### Notification

If a program wishes to engage the public in discussion, they must provide a collection notice that outlines the reason for collection (to engage the public in discussion regarding the public body's program, policy, etc.), the authority under which they are collecting the information (section 26(c) of FOIPPA or some other enactment as applicable), and the title, business address and business telephone for a ministry employee who can answer questions about the collection (contact info must not be the Twitter account). On Twitter, there are limited areas where this information can appear such that an individual can see it. The preferred method for accomplishing this is by using the bio section of the profile to provide a link, or to direct individuals to the Web link section of the profile, which would link to a collection notice. Alternatively, a collection notice can also be written into the bio section. See [Appendix B](#) for suggested wording.

### Use

Use of personal information is authorized under section 32(a), where personal information is used for its original purpose or for a use that is consistent with the original purpose of the collection. Consistent use is defined in s. 34 of FOIPPA. (For the purpose of this general PIA, ministries must not use posted information for any reason other than stated in the collection notice, or otherwise required by law.)

For the purpose of this General PIA – the use of any comments collected from individuals must be for enabling the ministry to engage individuals in public discussions or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the ministry or respecting legislation relating to the ministry.

## Disclosure

The disclosure of personal information by a ministry on its Twitter account must be authorized by a provision in s.33.1 of the FOIPPA.

- *Tweeted comments by individuals*

A Twitter user's personal information may be disclosed by a ministry if a tweet is retweeted. Tweets directed at the ministry via @mention that are not considered relevant or appropriate must not be retweeted. If any action is taken on the tweet (i.e. responding to the user, retweeting their tweet, or using their tweet in any way) it will be considered collected.

- *Tweets by ministries*

There are three options for tweeting (disclosure) of personal information by ministries covered by this general Twitter PIA.

The first option is that a ministry may retweet an individual's tweet that is directed to them via an @mention, but only if the tweet is relevant to the purpose of their collection as stated in their collection notice (pursuant to section 33.1(1)(r) of FOIPPA).

Example: The Ministry of Environment is using a Twitter account to engage individuals in ways to improve BC's "green policies". Twitter user @greenBCresident tweets "**@MinistryTwitterAccount BC needs an XYZ program to help the env't**", and the government Twitter account retweets this tweet before addressing it.

The second option is that a ministry may tweet (disclose) photos of identifiable individuals that are collected by observation at a presentation, ceremony, performance, sports meet or similar event if the individual voluntarily appeared and the event was open to the public (pursuant to section 33.1(1)(q) of FOIPPA).

Example: The Ministry of Transportation has a celebration for an opening of a new bridge on a major BC Highway – the public is invited to a ribbon cutting ceremony and photographs are taken that include members of the public.

The third option requires the ministry to have written consent of an individual whose personal information or image is being disclosed on Twitter (pursuant to section 33.1(1)(b) of FOIPPA). Consent must be in writing and specify to whom the personal information may be disclosed (in this case it would be to the public through a ministry sponsored Twitter account), how the personal information may be used (for example the promotion of XYZ program), and that it will be disclosed outside of Canada.

Example: The Ministry of Community, Sport and Cultural Development wants to post pictures to Twitter feed of its minister presenting at a members-only gala awards night for a local sports organization. Because this event is not open to the public the ministry will require the written consent of individuals who appear in photos as well as consent to post the names of the award winners.

**If the proposed Twitter account will disclose personal information using a statutory authority other than section 33.1(1)(b), 33.1(1)(q) or 33.1(1)(r) a separate PIA is required to ensure compliance with the FOIPPA.**

## Storage and Access

Storage and access is authorized by section 30.1 (b) of FOIPPA, which permits storage and access for the purpose of a disclosure allowed under the Act (in the case of retweets of tweets posted by users the disclosure provision is 33.1(1)(r)).

Remember: If information is requested by the ministry from users, when a relevant response is provided by them, it is considered collected and the information comes under the control of the

ministry. You must only solicit from users the minimum amount of information necessary to the program or activity. In addition, for the purposes of this PIA, the ministry must have an individual's written consent to post any material not received via social media that contains personal information about the individual to the site – unless it is images taken at a public event voluntarily attended by the individual.

**4. Purpose/Objectives of the initiative (if statutory, provide citation).**

The use of microblogging sites by ministries promotes a collaborative environment that can enhance citizen engagement and dialogue with the Province of British Columbia. Twitter use is seen as part of government's drive to transform the delivery of services to improve outcomes for its citizens, as outlined in *Citizens @ the Centre: B.C. Government 2.0*.

The purpose of this General Twitter PIA is to outline a standard template for use of Twitter, whereby any ministry or program area using this site within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use Twitter in ways not described here, they will be required to complete a separate PIA.

**5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Twitter has the potential to enable government to share information about its programs and services. It is a way of making information available immediately and at a low cost, and reaching large groups of people. Potential impacts include:

- Information dissemination about current government bodies, programs, or public figures in a popular online environment.

- Increased knowledge, awareness and interest of users about the B.C. government, its agencies or functions.

There are some possible privacy impacts associated with the use of Twitter, including:

- Privacy concerns related to the appropriate disclosure of personal information (e.g. through tweets or tweeted pictures containing personal information of individuals).

- Privacy concerns regarding the collection of personal information of Twitter users (e.g. tweets directed at the government account, direct messages)

- Privacy concerns regarding the collection of third-party information from Twitter users.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

N/A



## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the amended definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

**Personal information that can potentially be collected/disclosed through a Twitter account includes:**

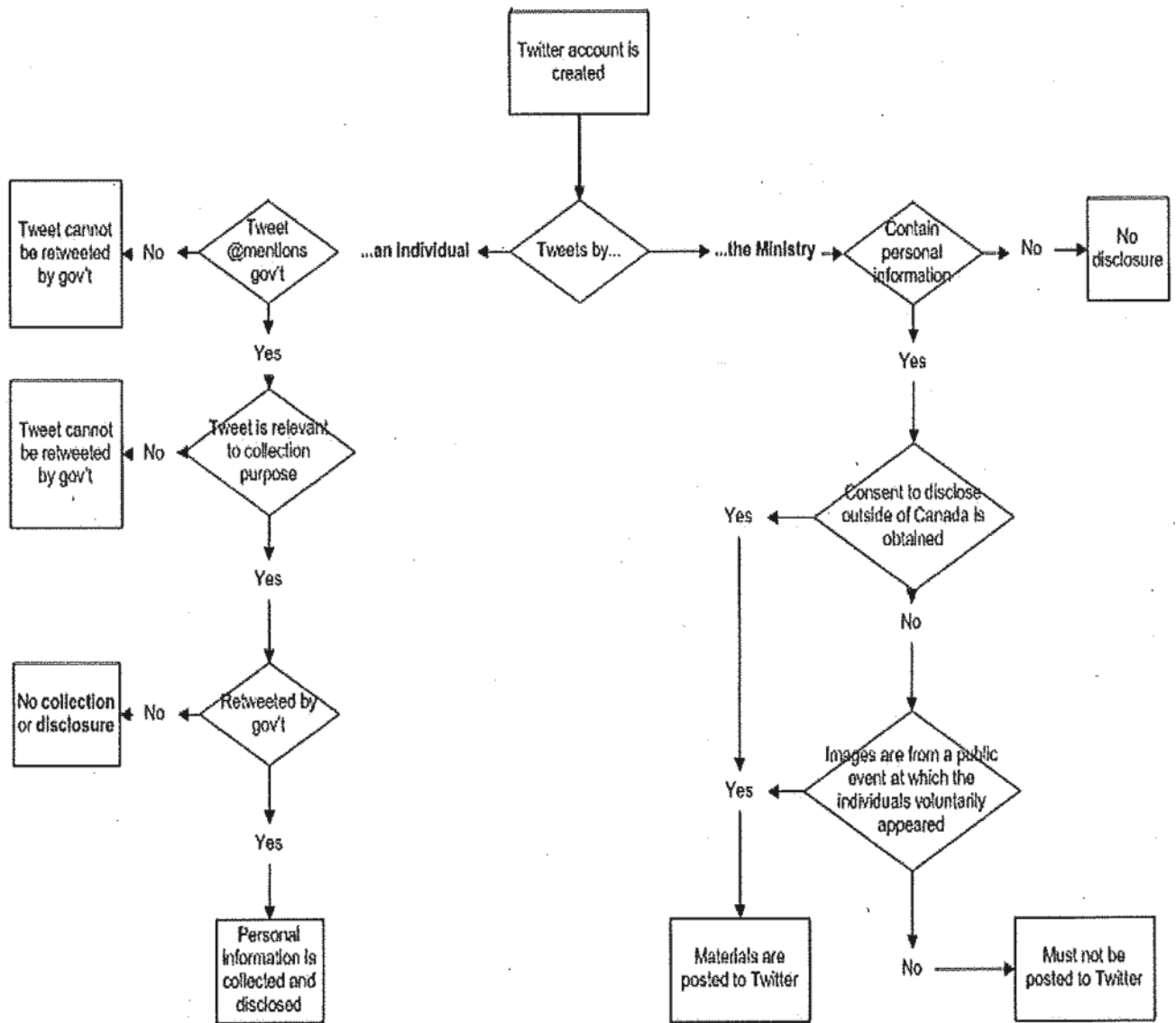
- Name of user posting text comments
- Time or date of posting of an individual's tweet (e.g. "2 hours ago." "Dec 13.").
- Images of individuals (in tweeted or retweeted photos or as part of a tweeter's profile picture).
- An individual's personal opinion about a subject in a tweet.

Username and profile pictures are disclosed by the Twitter user when signing up with their profile and engaging in the use of Twitter. This falls under the purview of section 33.1(1)(r).

A user's ideas, opinions and comments are their own personal information and will be treated as such. A monitor will ensure that third-party information is deleted from the government's Twitter account (direct message inbox).

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

See information flow chart below.



### III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?	X		

#### 1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26	Yes	No	n/a
(a) Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
<b>If yes, please specify the name of the Act and relevant section</b>			
(b) Is the personal information being collected for law enforcement purposes?		X	
(c) Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d) Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
<b>If yes, please specify the prescribed purpose.</b>			
(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?		X	
<b>and</b>			
(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e) Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	X		
(f) Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g) Is the personal information being collected at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?		X	
(h) Is personal identity information being collected by:			
A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2,		X	
or			

s. 26		Yes	No	n/a
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	X		

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?	X		
	(b) the legal authority for collection?	X		
	(c) the contact information of the person who can answer questions regarding the collection?	X		
	<b>Additional details as required (e.g., method of notification)</b> <b>See discussion of Notification</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?	X		

*Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>Personal information collected will only be used for the purpose of enabling the public body to engage individuals inside and outside of British Columbia in public discussion and promotion respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body or consistent with these purposes.</p>			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		X	
	<b>Specify subsection(s) being applied</b>			

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

*A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.*

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please choose the main authorization(s) for disclosure below. All authorities that may apply do not need to be checked, only the main authorizations for the initiative.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):  22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
<b>Specify name of enactment and relevant section(s)</b>				
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that  (i) authorizes or requires its disclosure, and  (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if  (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
	<b>and</b>  (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada			
<b>If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if  (i) the information is necessary for the performance of the duties of the individual in relation to the public body,		X	
	<b>and</b>  (ii) in relation to disclosure outside Canada,  (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and  (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada			
<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	

(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<b>and</b>		X	
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.		X	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1) (m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	



(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	
(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b> (ii) in the case of disclosure outside Canada  (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and  (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public.	X		
(1)(r)	If the information  Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body,  <b>and</b>	X		
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	

(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	To another law enforcement agency in Canada		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.		X	
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,  (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and  (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		X	
	<b>Additional details as required</b>  <b>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</b>			

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
 (Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:	Twitter Monitor		
	Phone number:			
<b>Additional details as required</b>				
Individuals will be able to delete their own comments. If the Twitter monitor re-tweets information provided in a comment and a user feels that their personal information (as it appears in the tweet) needs to be corrected or annotated they can contact the Twitter monitor, who will administer the request. Any corrections or annotations will be re-tweeted.				

**VII. SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
(Sections 30 and 30.1 of the FOIPP Act)

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	<b>Policy No. 33 Use of Social Media in the BC Public Service</b>		
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?		X	
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X

	<p><b>Additional details</b></p> <p>The Twitter account login information will only be available to those that need to operate the account.</p> <p>In assessing the “reasonableness” of the security arrangements, consideration must be given to the nature of the personal information involved and the seriousness of the consequences of its unauthorized disclosure.</p> <p>Every comment submitted to Twitter is intended by the individual to be for public use and is for the purpose of citizen engagement on public programs and initiatives; sensitive personal information should not be involved.</p> <p>Any risk of third party information being disclosed is reasonably mitigated by moderating the postings and putting up warnings not to post third party information on the site. Also ensuring the site is taken down when it is no longer being moderated ensures no future unauthorized collection, use or disclosure of personal information.</p>
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**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION**  
cont'd

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

	Yes	No	n/a
Will the information be stored or accessed only in Canada?		X	

**Personal information in a public body’s custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

	Yes	No	n/a
<b>(a)</b> Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	X		
<p><b>Please explain</b></p> <p>If any pictures or text posted to Twitter by the ministry contain personal information, the program area will secure forms consenting to the disclosure of personal information outside of Canada, with the exception of those that are collected by observation at a presentation, ceremony, performance, sports meet, or similar event at which individuals appear voluntarily and that are open to the public.</p>			
<b>(b)</b> Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	X		

	<p><b>Please explain</b></p> <p>The personal information will be stored in or accessed from foreign servers in order to allow for their disclosure, as authorized by section 33.1(1)(r) of FOIPPA for posted comments, and as authorized by section 33.1(1)(b) and 33.1(1)(q) for photos/information posted by the ministry.</p>		
(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?		X
	<p><b>Please explain</b></p>		


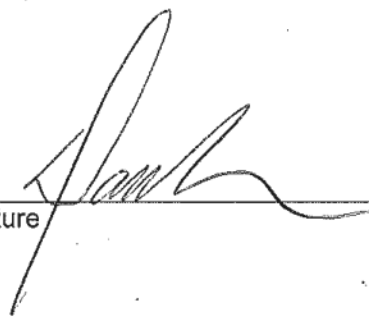
**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?  No personal information will be collected that will be used to make a decision that directly affects an individual.		X	

**Note:** Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.

**X SIGNATURES**

**PUBLIC BODY APPROVAL:**

Program Manager	Signature	Date
Ministry Contact Responsible for Systems Maintenance and Security	Signature	Date
		February 10, 2012
Jeannette Van Den Bulk Knowledge and Information Services Office of the Chief Information Officer Ministry of Labour, Citizens Services, and Open Government	Signature	Date
		Feb 10/2012
Dave Nikolejsin Chief Information Officer Assistant Deputy Minister or Equivalent	Signature	Date



## Appendix A

### Checklist and Confirmation Page for Twitter Account

Name of Twitter Account \_\_\_\_\_

Ministry and Program Area \_\_\_\_\_ Twitter Go-Live Date \_\_\_\_\_

Ministry Twitter Administrator \_\_\_\_\_ email \_\_\_\_\_

This checklist is to be completed to determine if a separate PIA is needed to address the program area's needs around the collection, use, and disclosure of personal information when administering a Twitter account.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<p><b>Purpose</b> The program area needs to have a Twitter account that potentially collects personal information because it is necessary to:</p> <ul style="list-style-type: none"> <li>• Provide a forum for citizen engagement and discussion;</li> <li>• Hear users' thoughts and opinions on a subject;</li> <li>• Facilitate discussion between users;</li> <li>• Notify users of further opportunities for discussion; or,</li> <li>• Provide users with updates on the progress of the matter under discussion</li> </ul> <p>Please provide a description of the purpose:</p>		
<p><b>Collection and Notification</b> A "Collection Notice" (as per Appendix B) has been posted somewhere on the profile or a link to one is provided.</p>		
<p>All tweets directed at the government via @mentions will be monitored by the ministry's Twitter monitor Monitor's name: _____</p>		
<p>Direct messages that fall outside of the scope of the Ministry's twitter or that share third party information (such as pictures of individuals other than the commenter submitting them) will be deleted by the monitor and the group will be reminded of good privacy practices</p>		
<p>Users do not need to further identify themselves other than with their Twitter handle</p>		
<p><b>Use and Disclosure</b> The ministry will not use or disclose personal information submitted by users other than for its original purpose or in a way that is consistent with the original purpose of the collection as identified above (except as required by law).</p>		
<p>The Ministry will not post personal information about individuals that has not been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q).</p>		

	Yes	No
The program will only retweet individuals' tweets if they are on topic @mentions		
<b>Records Management</b> A records retention and disposition schedule has been created.		
I understand the information and analysis in this PIA is limited to the interaction between Twitter and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Twitter's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Twitter's Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your Twitter account can be launched.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## Appendix B

### Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s.26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact (business title, name, telephone, email).

## Appendix C

### Definitions:

**@Mentions:** A "mention" or "@mention" is when one Twitter user adds another user's handle (@user) into the body of the tweet, effectively directing that tweet to that user's attention. These tweets show up in a separate feed labelled "@mentions". Any user can @mention any other user.

**Background:** The background is the picture, or pattern that back-drops a user's profile for when they are looking at their feed, or for when others are looking at their profile.

**Direct Messages:** A direct message is a private message between users. It cannot be seen by others and does not show up in the feed. Direct messages can only be sent to people that the user follows.

**Feed:** The feed is a constantly-moving roll of tweets published by the people the user follows.

**Following:** Users "follow" other users in order to have their tweets automatically populate their feed.

**Handle:** A Twitter handle is their username, preceded by the @ symbol.

**Hashtags:** A hashtag (#) denotes a word or a phrase (with no spaces) that allows tweets to be easily searched or aggregated. An example of this is during the Stanley Cup finals, the hashtag #StanleyCup would follow or precede someone's comments on the game, the series or something else similarly related.

**List of followed:** This list is of those users whose tweets make up the feed.

**List of followers:** This list is of those whose feeds your tweets appear in.

**Profile picture:** Each user has a picture that appears beside each of their tweets. For those that do not upload a picture, there is a default picture provided by Twitter.

**Retweet:** A retweet is a tweet that someone else has chosen to post themselves. It is normally accredited to the original tweet-er. A retweet appears as a "RT" followed by the handle of the original tweeter. Modified retweets ("MRT" or "MT") are when the original tweet is altered slightly in order to accommodate additional comments, or the added characters required to denote a retweet.

**Tweet:** A tweet is a post or a status on Twitter. It is limited to 140 characters in length.

**Twit-pic:** A twit-pic is a picture that has been uploaded and attached to a tweet.

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION - Blog

### 1. Ministry/Public Body and Program Area.

Ministry	Ministry of Labour, Citizens' Services and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Initiative Title	<b>General Wordpress Blog PIA</b>

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250-386-0378
E-Mail	Jeannette.VanDenBulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

This General Wordpress Blog Privacy Impact Assessment (PIA) is intended as a guide to assist ministries in the development and administration of a public facing Wordpress blog and to ensure that the information collected, used, and disclosed on Wordpress is done in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act (FOIPPA)*.

Based on this General Wordpress Blog PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if a blog falls under this General Wordpress Blog PIA. See Appendix A. If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their blog. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to the blog being launched, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirements of a privacy impact assessment under section 69(5) of FOIPPA.

**Note: It will be the responsibility of each ministry to ensure that it has appropriate authority under FOIPPA to collect, use and disclose any personal information that is included on the blog.**

**A separate PIA must be completed for blogs where the collection, use, and disclosure of individuals' personal information does not meet the criteria specified in the checklist and this PIA.**

*\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using Wordpress in the manner described in Appendix A. The program area using Wordpress is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Wordpress' Terms of Use.\**

## Background

Wordpress is one of the most popular and widely used blogging platforms and therefore of high interest to government initiatives involving online engagement and social media.

Individuals do not need to register with Wordpress for some activities, but must register for others (commenting, creating their own blogs, etc). Once registered, a user can create their own blog, comment on other blogs using their profile, and "follow" other blogs in order to be kept up to date with their content.

Attached to this PIA:

- [Appendix A](#) – checklist/Signoff Page for a ministry blog
- [Appendix B](#) – Sample Collection Notice

## General Wordpress Blog: Outline

This PIA outlines a standard blog in which ministries are interacting with citizens (readers, commenters). This means that the blog is used to share information with citizens, and to answer questions, solicit feedback, and collect non-sensitive personal information. The use of a blog will inevitably involve the collection of some personal information due to its design and the fact that government may be soliciting opinions. However, ministries should not be soliciting other personal information (e.g. home addresses, medical history) without a separate PIA being completed. A government blog should NOT include personal information about third parties (this includes pictures that have a third party in them – i.e. someone other than the blog user with whom the ministry is communicating). Under FOIPPA, specific legislative authority is required for government to collect, use, and disclose personal information. Please see the discussion on collection, use and disclosure below.

## Direct Collection

The FOIPPA covers information under the "custody and control" of a public body. Any personal information that the ministry collects will be in the custody and control of that ministry.

Collection occurs in two ways: first, when a ministry asks for users to provide it with information. For example, when a moderator posts a question asking users to respond in the comment section, any comments posted that answers the question will be considered collected. Secondly, unsolicited comments can also be collected when action is taken on them; this means something other than just reading them and deleting them. Some examples of action taken could be: replying to a posted comment, using the comment to inform a government policy, or conducting further research on information provided by a user. (See section 27.1 of FOIPPA "When Personal Information is not Collected").

Personal information in the form of usernames, comments, and opinions of commenters on the blog site may be collected under s.26(c), if the personal information is directly related to and is necessary for a program or activity of the ministry.

Blogs are a very open forum where comments and opinions can be shared with ease. In most cases, anyone with an account with the blogging platform can post a comment and that content may appear on the site instantly (depending on the settings). Therefore, ministries' blogs may easily generate unsolicited personal and non-personal information. To keep extraneous information to a minimum, all government blogs must be moderated. The most up-to-date moderation policy can be obtained from the Citizen Engagement team ([citizenengagement@gov.bc.ca](mailto:citizenengagement@gov.bc.ca)). If a moderator can no longer be appointed to administer a ministry blog, the account should be promptly deleted.

For use with this PIA, personal information will be directly collected by a blog under s.27(1) of FOIPPA; therefore ministries must not solicit personal information about third parties, nor collect

third party personal information. It will be the responsibility of the moderator to delete comments containing third party personal information and pictures of third parties and remind users of privacy practices.

**A blog that intentionally solicits personal information other than usernames and opinions or collects personal information about anyone other than the individual posting does not fall within this general PIA and will require a separate PIA to determine if legislative authority to collect, use and disclose the personal information exists.**

### Notification

The FOIPPA requires a collection notification whenever personal information is collected. The notice must provide the purpose for collection (to engage the public in discussion regarding the public body's program, policy, etc.) the legal authority under which they are collecting the information (section 26(c) of FOIPPA or other statutory provisions), and the title, business address and business telephone number for a ministry employee who can answer questions about the collection. The ministry will need to post a collection notification on the blog in a conspicuous place to comply with FOIPPA. See Appendix B for suggested wording.

### Use

Use of personal information is authorized under section 32(a), where personal information is used for its original purpose or for a use that is consistent with the original purpose of the collection. Consistent use is defined in s.34 of FOIPPA. (For the purpose of this General PIA, ministries must not use posted information for any reason other than stated in the collection notice or otherwise required by law.)

For the purpose of this General PIA – the use of any comments collected from individuals must be for enabling the ministry to engage individuals in public discussions or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the ministry or respecting legislation relating to the ministry.

### Disclosure

The personal information a ministry discloses on its blog must be authorized by a provision in s. 33.1 of FOIPPA.

- *Posted comments by individuals*

A blog user's personal information is considered disclosed by government when the user posts to the ministry's site. This type of disclosure is authorized by Ministerial Order 030 (pursuant to FOIPPA section 33.1(3)) which allows for disclosure on social media sites for the purpose of public consultation/engagement.

- *Posted images and text by ministries*

There are two options for posting (disclosure) of personal information by ministries covered by this General Blog PIA.

The first option is that a ministry may post (disclose) photos or videos of identifiable individuals that are collected by observation at a presentation, ceremony, performance, sports meet or similar event if the individual voluntarily appeared and the event was open to the public (pursuant to section 33.1(1)(q)).

Example: The Ministry of Transportation has a celebration for an opening of a new bridge on a major BC Highway – the public is invited to a ribbon cutting ceremony and photographs are taken that include members of the public.

The second option requires the ministry to have written consent of an individual whose personal information (text or image) is being disclosed on the blog (pursuant to section 33.1(1)(b)). Consent must be in writing and specify to whom the personal information may be

disclosed (in this case it would be to the public through a ministry sponsored blog), how the personal information may be used (for example the promotion of XYZ program), and that it will be disclosed outside of Canada.

Example: The Ministry of Community, Sport and Cultural Development wants to post pictures to its new blog of its minister presenting at a members-only gala awards night for a local sports organization. Because this event is not open to the public the ministry will require the written consent of individuals who appear in photos as well as consent to post the names of the award winners.

**If the proposed blog will disclose personal information using a statutory authority other than section 33.1(1)(b), 33.1(1)(q) or 33.1(3) a separate PIA is required to ensure compliance with the FOIPPA.**

#### **Storage and Access**

Storage and access is authorized by section 30.1(b) of FOIPPA, which permits storage and access for the purpose of a disclosure allowed under the FOIPPA (in the case of comments posted by users the disclosure provision is 33.1(3)).

*Remember:* If information is requested by the ministry from users, when a relevant response is provided by them, it is considered collected and the information comes under the control of the ministry. You must only solicit from users the minimum amount of information necessary to the program or activity. In addition, for the purposes of this PIA, the ministry must have an individual's written consent to post any material not received via social media that contains personal information about the individual to the site – unless it is images taken at a public event voluntarily attended by the individual.

#### **4. Purpose/Objectives of the initiative (if statutory, provide citation).**

Blog use by ministries promotes a collaborative environment that can enhance citizen engagement and dialogue with the Province of British Columbia. Blog use is seen as part of government's drive to transform the delivery of services to improve outcomes for its citizens, as outlined in *Citizens @ the centre: B.C. Government 2.0*

The purpose of this PIA is to outline a standard template for use of a Wordpress blog, whereby any ministry or program area using Wordpress within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use a different blog platform or use Wordpress in ways not described here, they will be required to complete a separate PIA.

#### **5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

Blogs have the potential to enable government to share information about its programs and services. It is a way of making information available immediately and at a low cost, and reaching large groups of people. Potential impacts include:

- Information dissemination about current government bodies, programs or public figures in a popular online environment.
- Increased knowledge, awareness and interest of users about the B.C. Government, its agencies or functions.

There are some potential privacy impacts associated with the use of blogs, including:

- Privacy concerns related to the appropriate disclosure of personal information (e.g. through pictures containing personal information of individuals).



- Privacy concerns regarding the collection of personal information of blog users (e.g. text comments from individuals).
- Privacy concerns regarding the collection of third-party information from blog users in comments and photos or videos.

The use of moderators will mitigate these potential negative impacts.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

N/A

## II DESCRIPTIVE INFORMATION

1. **Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.** [See note above about the definition of personal information.]

*For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.*

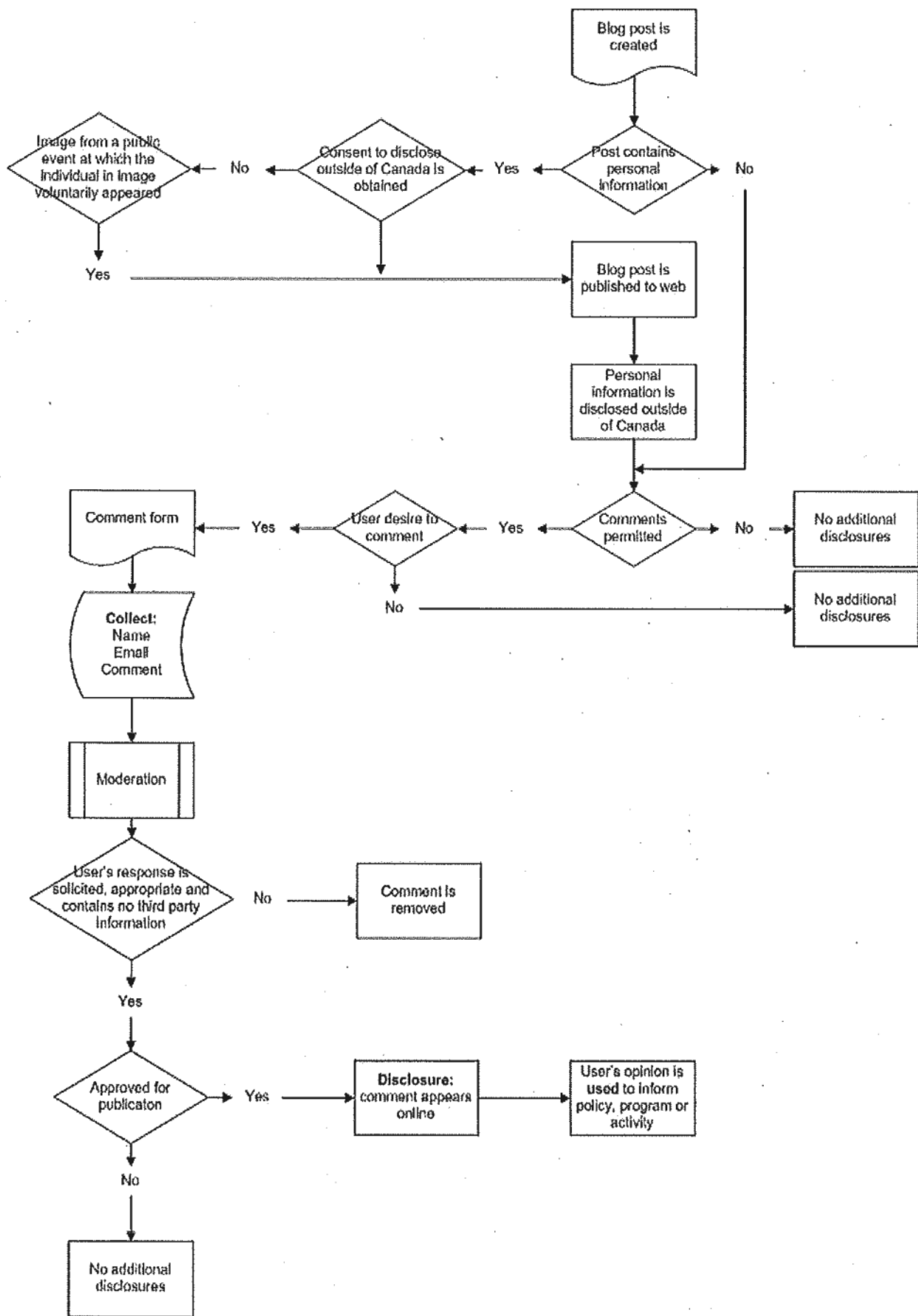
- Name of user posting text comments
- Time of posting of an individual's comment (e.g. "Post 2 hours ago." "Post 5 days ago.").
- Photos depicting individuals (e.g. attached to profile as part of a posted comment).
- An individual's personal opinion about a subject in a posted text comments.
- Images of individuals in photographs or videos posted by the ministry.

Usernames and profile pictures are disclosed by the commenter when registering their profile and engaging with other blogs. This falls under the purview of Ministerial Order 030.

A user's ideas, opinions and comments are their own personal information and will be treated as such. A moderator will regularly ensure that third-party information is deleted from the site.

2. **Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

See information flow chart below.



**III PERSONAL INFORMATION COLLECTION**  
 (Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?	X		

**1) Authorization for Collection:**

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
	<b>If yes, please specify the name of the Act and relevant section</b>			
(b)	Is the personal information being collected for law enforcement purposes?		X	
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
	<b>If yes, please specify the prescribed purpose.</b>			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?		X	
	<b>and</b>			
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	X		
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public? <b>Please identify event:</b>		X	
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or		X	

s. 26		Yes	No	n/a
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	X		

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?	X		
	(b) the legal authority for collection?	X		
	(c) the contact information of the person who can answer questions regarding the collection?	X		
	<b>Additional details as required (e.g., method of notification)</b> <b>See Discussion of Notification</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?	X		

*Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>Personal information collected will only be used for the purpose of enabling the public body to engage individuals inside and outside of British Columbia in public discussion and promotion respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body or consistent with these purposes.</p>			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		X	
	<b>Specify subsection(s) being applied</b>			

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):  22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	
	<b>Specify name of enactment and relevant section(s)</b>			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee, <b>and</b> (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada		X	
<b>If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body, <b>and</b> (ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada		X	
<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	



(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<b>and</b>		X	
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.		X	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	

(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b> (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. <b>Please identify event:</b>	X		
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, <b>and</b>		X	
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			

(2)(a)	To another law enforcement agency in Canada		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.	X		
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,  (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and  (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		X	
<p><b>Additional details as required</b></p> <p>Ministerial Order 030 to section 33.1(3) allows for disclosure of personal information outside of Canada through social media sites if the personal information was previously disclosed on a social media site by the individual who is the subject of the personal information and the personal information was obtained for the purposes of enabling the public body to engage individuals.</p> <p><b>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</b></p>				

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
 (Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:	Blog moderator		
	Phone number:			
<b>Additional details as required</b> Individuals will be able to edit or delete their own comments. If the ministry re-posts information provided in a comment and a user feels that their personal information (as it appears in the post) needs to be corrected or annotated they can contact the blog moderator/administrator, who will administer the request. Any corrections or annotations will be added to the blog post in question.				

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
(Sections 30 and 30.1 of the FOIPP Act)

**Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.**

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	Policy No. 33 Use of Social Media in the BC Public Service		
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?		X	
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X
<b>Additional details</b>				
<p>In assessing the "reasonableness" of the security arrangements, consideration must be given to the nature of the personal information involved and the seriousness of the consequences of its unauthorized disclosure.</p> <p>Every comment submitted to Wordpress is intended by the individual to be for public use and is for the purpose of citizen engagement on public programs and initiatives; sensitive personal information should not be involved.</p> <p>Any risk of third party information being disclosed is reasonably mitigated by moderating the postings and putting up warnings not to post third party information on the site. Also ensuring the site is taken down when it is no longer being moderated ensures no future unauthorized collection, use or disclosure of personal information.</p>				

VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION  
cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?		X	

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	X		
<p><b>Please explain</b></p> <p>If any pictures or text posted to the Blog by the ministry contain personal information, the program area will secure forms consenting to the disclosure of personal information outside of Canada, with the exception of those that are collected by observation at a presentation, ceremony, performance, sports meet, or similar event at which individuals appear voluntarily and that are open to the public.</p>			
(b) Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	X		
<p><b>Please explain</b></p> <p>The personal information will be stored in or accessed from foreign servers in order to allow for their disclosure, as authorized by section 33.1(3)/MO030 of FOIPPA for posted comments, and as authorized by section 33.1(1)(b) and 33.1(1)(q) for photos/information posted by the ministry.</p>			
(c) Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
<p><b>Please explain</b></p>			

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?  No personal information will be collected that will be used to make a decision that directly affects an individual.		X	

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**

**X SIGNATURES**

**PUBLIC BODY APPROVAL:**

\_\_\_\_\_  
Program Manager

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Ministry Contact Responsible for  
Systems Maintenance and Security

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Jeannette Van Den Bulk  
Knowledge and Information Services  
Office of the Chief Information Officer  
Ministry of Labour, Citizens Services,  
and Open Government

\_\_\_\_\_  
Signature

*J. Van Den Bulk*  
\_\_\_\_\_  
February 10, 2012  
Date

\_\_\_\_\_  
Dave Nikolejsin (Chief Information  
Officer)  
Assistant Deputy Minister or Equivalent

\_\_\_\_\_  
Signature

*[Signature]*  
\_\_\_\_\_  
Feb 10/2012  
Date



## Appendix A

### Checklist and Confirmation Page for a Wordpress Blog

Name of Blog (as it will appear on site) \_\_\_\_\_

Ministry and Program Area \_\_\_\_\_ Blog Go-Live Date \_\_\_\_\_

Ministry Blog Administrator \_\_\_\_\_ email \_\_\_\_\_

This checklist is to be completed to determine if a separate PIA is needed to address the program area's needs around the collection, use, and disclosure of personal information when administering a Wordpress blog.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<p><b>Purpose</b> The program area needs to have a blog that potentially collects personal information because in relation to a program or activity of the ministry it is necessary to:</p> <ul style="list-style-type: none"> <li>• Provide a forum for citizen engagement and discussion;</li> <li>• Hear users' thoughts and opinions on a subject;</li> <li>• Facilitate discussion between users;</li> <li>• Notify users of further opportunities for discussion; or,</li> <li>• Provide users with updates on the progress of the matter under discussion</li> </ul> <p>Please provide a description of the purpose:</p>		
<p><b>Collection and Notification</b> A "Collection Notice" (as per Appendix B) has been posted on the ministry's blog or a link is provided.</p>		
<p>All posts will be frequently monitored by the ministry's blog moderator Moderator's name: _____</p>		
<p>Comments that fall outside of the scope of the Ministry's blog or that share third party information (such as pictures of individuals other than the commenter submitting them) will be deleted by the moderator and the group will be reminded of good privacy practices</p>		
<p>Users do not need to further identify themselves other than with their profile username</p>		
<p><b>Use and Disclosure</b> The Ministry will not use or disclose personal information submitted by users other than for its original purpose or in a way that is consistent with the original purpose of the collection as identified above (except as required by law).</p>		
<p>The Ministry will not disclose personal information about individuals on the blog that has not been authorized for disclosure by FOIPPA under section 33.1(1)(b), or 33.1(1)(q).</p>		
<p><b>Records Management</b> A records retention and disposition schedule has been created.</p>		

	Yes	No
If the blog is no longer regularly moderated it will be removed from the web and all records will be kept for the requisite amount of time (see records retention and disposition schedule).		
I understand the information and analysis in this PIA is limited to the interaction between Wordpress and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Wordpress' Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Wordpress' Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your blog can be launched.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## Appendix B

### Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s.26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact (business title, name, telephone, email).

# PRIVACY IMPACT ASSESSMENT

## I BASIC INFORMATION – YouTube

### 1. Ministry/Public Body and Program Area.

Ministry	Labour, Citizens' Services and Open Government
Division	Office of the Chief Information Officer
Branch/Section	Knowledge and Information Services
Program	<b>General YouTube PIA</b>

### 2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jeannette Van Den Bulk
Branch/Section	Knowledge and Information Services
Phone Number	250-356-0378
E-Mail	Jeannette.VanDenBulk@gov.bc.ca

### 3. Description of the Program/System/Legislation (Initiative) being assessed.

This General YouTube Privacy Impact Assessment (PIA) is intended as a guide to assist ministries in the development and administration of YouTube channels and to ensure that the information collected, used, and disclosed on YouTube is done in a way consistent with the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIPPA).

Based on this General YouTube PIA, a checklist has been created that will serve as a quick and efficient means for ministries to determine if their use of YouTube falls under this general YouTube PIA. See [Appendix A](#). If the site meets all of the requirements in the checklist a new PIA will not be required. Conversely, if it does not meet the requirements in the checklist, a new PIA must be completed.

Ministries should complete the checklist before moving forward with their use of YouTube. Knowledge and Information Services Branch (KIS) will require a copy of the signed checklist prior to use of YouTube, as per section 69(5.1) of FOIPPA. The ministry should retain a copy of the signed checklist to satisfy the requirements of a privacy impact assessment under section 69(5) of FOIPPA.

**NOTE: It will be the responsibility of each ministry to ensure that it has appropriate authority under the FOIPP Act to collect, use and disclose any personal information that is included on YouTube.**

**A separate PIA must be completed for YouTube use where the collection, use, and disclosure of citizens' personal information does not meet the criteria specified in the checklist and this PIA.**

*\*This Privacy Impact Assessment addresses Freedom of Information and Protection of Privacy Act requirements while using Youtube in the manner described in Appendix A. The program area using Youtube is responsible for ensuring they have reviewed and complied with all obligations created by provincial legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Youtube's Terms of Use.\**

## Background

There is an interest by government and by the broader public sector to make use of online video sharing websites. Such services are increasingly viewed as a powerful tool to provide information about government programs and services over the internet.

Wikipedia describes YouTube and videosharing services as follows:

**Video sharing** allows individuals to upload video clips to an internet website. The video host will then store the video on its server, and show the individual different types of code to allow others to view that video. Because many users do not have personal web space, either as a paid service, or through an ISP offering, video hosting services are becoming increasingly popular, especially with the explosion in popularity of blogs, forums and other interactive pages.

**YouTube**, a subsidiary of Google, is a video sharing website where users can upload, view and share video clips. It uses Adobe Flash technology to display a wide variety of user-generated video content, including movie clips, TV clips and music videos, as well as amateur content such as videoblogging and short original videos. Unregistered users can watch most videos on the site, while registered users are permitted to upload an unlimited number of videos. Related videos, determined by title and tags, appear onscreen to the right of a given video. In YouTube's second year, functions were added to enhance user ability to post video 'responses' and subscribe to content feeds.

Attached to this PIA:

- Appendix A – Checklist/Signoff Page for a ministry YouTube Page
- Appendix B – Sample Collection Notice
- Appendix C – Parameters of a ministry YouTube Page
- Appendix D - Parameters of a ministry Youtube Page Screen Capture

### **General YouTube Page: Outline**

A ministry may institute a YouTube page in two different ways. The first is to allow for the input from individuals on the videos being posted by the public body. This would involve the ministry posting videos that invite discussion or dialogue and then engaging individuals in matters respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body. The second is not to allow for the input of individuals on the videos posted by the public body. This would be more ideally suited for those looking strictly to inform the public of what is happening in the program or initiative in question.

If a program wishes to invite comments they are required to put a collection notice where it can easily be seen by those wishing to comment. An ideal place for this collection notice is in the channel's description section. This field can be edited by selecting "Edit Channel" box found on the main channel page, clicking on the "Info and Settings" tab, and then writing in a collection notice in the "Description" field. Sample wording for the collection notice can be found in Appendix B.

If a program does not wish to permit comments on videos, they must select the account/channel option that disables the commenting function (as a default) on all videos uploaded. In this case, no collection notice would be required, as no personal information would be collected from users (see discussion below "Notification").

### **Direct Collection**

The FOIPP Act covers information under the "custody and control" of a public body, but these media sharing sites pose a unique environment for what constitutes "collection".

Collection occurs in two ways; firstly, when a Ministry asks for users to provide it with information. For example, when an administrator posts a video inviting users to respond in the comments section, any comments that come in that answer/address the question will be considered collected. Secondly, unsolicited comments can also be collected when action is taken on them. This means something other than just reading them and then deleting them. Some examples of action taken could be: replying to a posted comment, using the comment to inform a government policy, or conducting further research on information provided by a user. (See section 27.1 of FOIPP Act "When Personal Information is not Collected").

Personal information in the form of usernames, comments, and opinions of participants on these media sharing sites may be collected under s. 26(c), if the personal information is directly related to and is necessary for a program or activity of the ministry.

Media sharing social network sites constitute open forums where comments and opinions can be shared with ease. Anyone who has a YouTube account and can post a comment will have that content appear on the site instantly. Therefore, a ministry's YouTube site may generate unsolicited personal and non-personal information. To keep extraneous information to a minimum, all government YouTube sites must be monitored. The most up-to-date moderation policy can be obtained from Citizen Engagement ([citizenengagement@gov.bc.ca](mailto:citizenengagement@gov.bc.ca)), part of the Ministry of Labour, Citizens' Services and Open Government. If a monitor can no longer be appointed to administer a ministry YouTube page, the account should be promptly deleted.

On YouTube, personal information will be directly collected under s.27(1) of FOIPPA, therefore ministries must not solicit personal information about third parties, nor collect third party personal information. It will be the responsibility of the monitor to delete comments containing third party personal information and remind users of privacy practices.

**A YouTube channel that intentionally solicits personal information other than usernames and opinions or collects personal information of third parties does not fall within this General PIA and will require a separate PIA to determine if legislative authority to collect, use and disclose the personal information exists.**

#### Notification

If a program wishes to engage the public in discussion, they must provide a collection notice that provides the reason for collection (to engage the public in discussion regarding the public body's program, policy, etc.), the authority under which they are collecting the information (section 26(c) of FOIPPA), and the contact information for a ministry employee who can answer questions about the collection.

On YouTube, there are limited areas where this information can appear such that an individual can see it. Thus, this information should appear in the free text field in the profile. The collection notice must appear in channel profiles or another conspicuous place in order to comply with the FOIPPA. See [Appendix B](#) for suggested wording.

#### Use

Use of personal information is authorized under section 32(a), where personal information is used for its original purpose or for a use that is consistent with the original purpose of the collection. Consistent use is defined in s.34 of FOIPPA. (For the purpose of this General PIA, ministries must not use posted information for any reason other than stated in the collection notice or otherwise required by law.)

For the purpose of this General PIA – the use of any comments collected from individuals must be for enabling the ministry to engage individuals in public discussions or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the ministry or respecting legislation relating to the ministry.

## Disclosure

The personal information a ministry discloses on its YouTube Page must be authorized by a provision in s.33.1 of the FOIPPA.

- *Posted comments by individuals*

On a YouTube site users may disclose their personal information by posting their comments to the site. This type of disclosure is authorized by section 33.1(1)(r) of the FOIPPA which allows for disclosure on social media sites for the purpose of public consultation/engagement.

- *Videos posted by ministries*

There are two options for posting (disclosure) of personal information by ministries covered by this General YouTube PIA.

The first option is that a ministry may post (disclose) videos of identifiable individuals that are collected by observation at a presentation, ceremony, performance, sports meet or similar event if the individual voluntarily appeared and the event was open to the public (pursuant to section 33.1(1)(q)).

Example: The Ministry of Transportation has a celebration for an opening of a new bridge on a major BC Highway – the public is invited to a ribbon cutting ceremony and videos are taken that include members of the public.

The second option requires the ministry to have written consent of an individual whose personal information or image is being disclosed on the YouTube channel (pursuant to section 33.1(1)(b)). Consent must be in writing and specify to whom the personal information may be disclosed (in this case it would be to the public through a ministry sponsored YouTube channel), how the personal information may be used (for example the promotion of XYZ program), and that it will be disclosed outside of Canada.

Example: The Ministry of Community, Sport and Cultural Development wants to post videos to its new YouTube channel of its minister presenting at a members-only gala awards night for a local sports organization. Because this event is not open to the public the ministry will require the written consent of individuals who appear in videos as well as consent to post the names of the award winners.

For all videos that include an identifiable individual regardless of whether they are open for comments, the public body must have a signed consent form on file that authorizes the public body (in the prescribed manner) to disclose that information outside of Canada with the exception of those videos that are taken at a presentation, ceremony, performance, sports meet, or a similar event open to the public and the individuals who appear in the video voluntarily appeared.

**If the proposed YouTube channel will disclose personal information using a statutory authority other than section 33.1(1)(b), 33.1(1)(q) or 33.1(1)(r) a separate PIA is required to ensure compliance with the FOIPP Act.**

## Storage and Access

Storage and access is authorized by section 30.1 (b) of FOIPPA, which permits storage and access for the purpose of a disclosure allowed under the Act (in the case of comments posted by users the disclosure provision is section 33.1(1)(r)).

Remember: If information is requested by the ministry from users, when a relevant response is provided by them, it is considered collected and the information comes under the control of the ministry. You must only solicit from users the minimum amount of information necessary to the program or activity. In addition, for the purposes of this PIA, the ministry must have an individual's written consent to post any material not received via social media that contains personal information about the individual to the site – unless it is images taken at a public event voluntarily attended by the individual.

**4. Purpose/Objectives of the initiative (if statutory, provide citation).**

The use of video-sharing sites by ministries promotes a collaborative environment that can enhance citizen engagement and dialogue with the Province of British Columbia. YouTube use is seen as part of government's drive to transform the delivery of services to improve outcomes for its citizens, as outlined in *Citizens @ the Centre: B.C. Government 2.0*

The purpose of this PIA is to outline a standard template for use of YouTube, whereby any ministry or program area using this site within the prescribed parameters will not be required to fill out an additional PIA. However, if ministries decide to use YouTube in ways not described here, they will be required to complete a separate PIA.

**5. What are the potential impacts of this proposal? (Include privacy impacts in this description).**

YouTube has the potential to enable government to share information about its programs and services. It is a way of making information available immediately and at a low cost, and reaching large groups of people. Potential impacts include:

- Information dissemination about current government bodies, programs or public figures in a popular online environment.
- Increased knowledge, awareness and interest of users about the B.C. government, its agencies or functions.

There are some potential privacy impacts associated with the use of YouTube, including:

- Privacy concerns related to the appropriate disclosure of personal information (e.g. through videos containing personal information of individuals).
- Privacy concerns regarding the collection of personal information of YouTube users (e.g. text comments from individuals).
- Privacy concerns regarding the collection of third-party information from YouTube users in comments.

The use of monitors will mitigate these potential negative impacts.

**6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).**

N/A.



## **II DESCRIPTIVE INFORMATION**

- 1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information.**

**Personal information that can potentially be collected/disclosed through a YouTube page includes:**

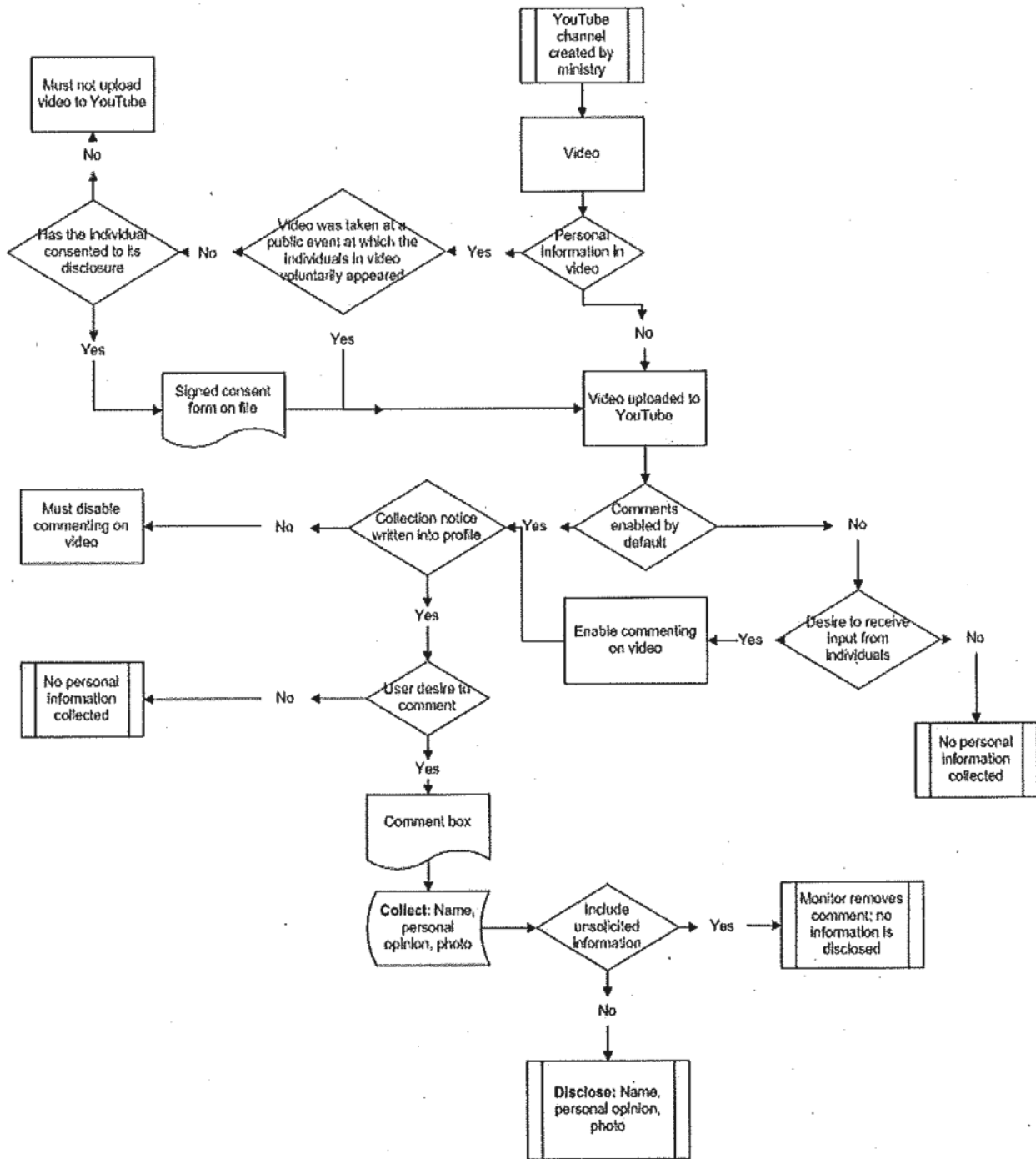
- Name of user posting text comments
- Time of posting of an individual's comment (e.g. "Post 2 hours ago." "Post 5 days ago.").
- Images of individuals (in posted videos or as part of a commenter's profile picture).
- An individual's personal opinion about a subject in a posted text comment.

Usernames and profile pictures are disclosed by the YouTube user when signing up with their profile and engaging in the use of YouTube. This falls under the purview of section 33.1(1)(r).

A users ideas, opinions and comments are their own personal information and will be treated as such. A monitor will ensure that third-party information is deleted from the site.

- 2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.**

See information flow chart below



**III PERSONAL INFORMATION COLLECTION**  
 (Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

**\*\*IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact Knowledge and Information Services for further details.

	Yes	No	n/a
Is personal information being collected?	X		

**1) Authorization for Collection:**

A public body may collect personal information as authorized by one of the following provisions:

s. 26	Yes	No	n/a
(a) Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?		X	
<b>If yes, please specify the name of the Act and relevant section</b>			
(b) Is the personal information being collected for law enforcement purposes?		X	
(c) Is the personal information directly related to, and necessary for, a program or activity of the public body?	X		
(d) Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?		X	
<b>If yes, please specify the prescribed purpose.</b>			
(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?		X	
<b>and</b>			
(ii) Would a reasonable person consider that collection appropriate in the circumstances?			
(e) Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	X		
(f) Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?		X	
(g) Is the personal information being collected at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?		X	
(h) Is personal identity information being collected by:			
A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2,		X	
or			

s. 26		Yes	No	n/a
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.		X	

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact Knowledge and Information Services.

**2) How will the personal information be collected?**

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	X		

**3) Notification to collect information**

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)		Yes	No	n/a
	Has the individual from whom personal information is being collected, been informed of:			
	(a) the purpose for collection?	X		
	(b) the legal authority for collection?	X		
	(c) the contact information of the person who can answer questions regarding the collection?	X		
	<b>Additional details as required (e.g., method of notification)</b> <b>See Discussion of Notification</b>			

**IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)**

	Yes	No	n/a
Is personal information being used?	X		

*Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.*

The public body **must** check one or more of the authorities listed below:

s.32		Yes	No	n/a
(a)	Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)		X	
(b)	Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	X		
	<p><b>Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.</b></p> <p>Personal information collected will only be used for the purpose of enabling the public body to engage individuals inside and outside of British Columbia in public discussion and promotion respecting proposed or existing initiatives, policies, proposals, programs and legislation of the public body or consistent with these purposes.</p>			
(c)	If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?		X	
	<b>Specify subsection(s) being applied</b>			

**V DISCLOSURE OF PERSONAL INFORMATION**

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	X		

*A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.*

**1) Disclosure of Personal Information**

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please choose the main authorization(s) for disclosure below. All authorities that may apply do not need to be checked, only the main authorizations for the initiative.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)		X	
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):  22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,		X	
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,		X	
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,		X	
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or		X	
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).		X	
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	X		
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada that authorizes or requires its disclosure		X	

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
<b>Specify name of enactment and relevant section(s)</b>				
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) that authorizes or requires the information to be made public		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that  (i) authorizes or requires its disclosure, and  (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i> ) or Canada		X	
<b>Specify name of enactment and relevant section(s)</b>				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if  (i) the information is necessary for the performance of the duties of the minister, officer or employee,		X	
<b>and</b>  (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
<b>If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if  (i) the information is necessary for the performance of the duties of the individual in relation to the public body,			
<b>and</b>  (ii) in relation to disclosure outside Canada,  (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and  (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada			X	
<b>If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary</b>				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister		X	

(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body		X	
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act		X	
(1)(i)	If			
	(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by			
	a. an individual, or			
	b. corporation of which the individual the information is about is or was a director or officer,			
	<b>and</b>		X	
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that			
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or			
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction			
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,		X	
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or		X	
	(iii) resolving an issue regarding such a payment		X	
(1)(j)	(i) Repealed.		X	
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or		X	
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences		X	
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations		X	
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and			
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety		X	
(1)(m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur		X	
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted		X	



(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)		X	
(1)(p)	The disclosure (i) is necessary for			
	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or			
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body		X	
	<b>and</b> (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred			
	<b>If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i></b>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public.	X		
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about,			
	Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, <b>and</b>	X		
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	<b>Additional details as required</b>			
(1)(s)	In accordance with section 35 (disclosure for research or statistical purposes).		X	
(1)(t)	To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information		X	

(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			
(2)(a)	To another law enforcement agency in Canada		X	
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.		X	
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.		X	
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if,  (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and  (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.		X	
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)		X	
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)		X	
<p><b>Additional details as required</b></p> <p><b>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</b></p>				

**VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION**  
 (Section 28 and section 29 of the FOIPP Act)

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	X		
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	X		
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:			
	Contact person:	Youtube Monitor		
	Phone number:			
<b>Additional details as required</b>				
Individuals will be able to edit or delete their own comments. If the ministry re-posts information provided in a comment and a user feels that their personal information (as it appears in the post) needs to be corrected or annotated they can contact the Youtube monitor/administrator, who will administer the request. Any corrections or annotations will be added to the blog post in question.				

**VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION**  
 (Sections 30 and 30.1 of the FOIPP Act)

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	X		
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	X		
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	X		
<b>If yes, please provide the name of the policy and/or procedures, a contact person and phone number.</b>				
	Policy/procedure:	Policy No. 33 Use of Social Media in the BC Public Service		
	Contact person:			
	Phone number:			
<b>Additional details as required</b>				
4.	Have user access profiles been assigned on a need-to-know basis?	X		
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	X		
6.	Does your system security include an <b>ongoing</b> audit process that can track use of the system (e.g., when and who accessed and updated the system)?		X	
<b>Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances</b>				
7.	Does the audit identify inappropriate accesses to the system?			X

	<p><b>Additional details</b></p> <p>The YouTube account login information will only be available to those that need to operate the account.</p> <p>In assessing the “reasonableness” of the security arrangements, consideration must be given to the nature of the personal information involved and the seriousness of the consequences of its unauthorized disclosure.</p> <p>Every comment submitted to Youtube is intended by the individual to be for public use and is for the purpose of citizen engagement on public programs and initiatives; sensitive personal information should not be involved.</p> <p>Any risk of third party information being disclosed is reasonably mitigated by moderating the postings and putting up warnings not to post third party information on the site. Also ensuring the site is taken down when it is no longer being moderated ensures no future unauthorized collection, use or disclosure of personal information.</p>
--	---

**VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION**  
cont'd

**Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.**

	Yes	No	n/a
Will the information be stored or accessed only in Canada?		X	

**Personal information in a public body’s custody or under its control must be stored and accessed only in Canada, unless one of the following applies:**

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?		X	
<p><b>Please explain</b></p> <p>If any pictures or text posted to Youtube by the ministry contain personal information, the program area will secure forms consenting to the disclosure of personal information outside of Canada, with the exception of those that are collected by observation at a presentation, ceremony, performance, sports meet, or similar event at which individuals appear voluntarily and that are open to the public.</p>			
(b) Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	X		
<p><b>Please explain</b></p> <p>The personal information will be stored in or accessed from foreign servers in order to allow for their disclosure, as authorized by section 33.1(1)(r) of FOIPPA for posted comments, and as authorized by section 33.1(1)(b) and 33.1(1)(q) for videos/information posted by the ministry.</p>			

(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?		X	
	<b>Please explain</b>			

**VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)**

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	X		
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?  No personal information will be collected that will be used to make a decision that directly affects an individual.		X	

**Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.**

X SIGNATURES

PUBLIC BODY APPROVAL:

_____ Program Manager	_____ Signature	_____ Date
_____ Ministry Contact Responsible for Systems Maintenance and Security	_____ Signature	_____ Date
_____ Jeannette Van Den Bulk Knowledge and Information Services Office of the Chief Information Officer Ministry of Labour, Citizens Services, and Open Government	<i>J. Van Den Bulk</i> _____ Signature	February 10, 2012 _____ Date
_____ Dave Nikolejsin (Chief Information Officer) Assistant Deputy Minister or Equivalent	<i>[Signature]</i> _____ Signature	Feb 10/2012 _____ Date



## Appendix A Checklist and Confirmation Page for YouTube Channel

Name of Youtube Channel (as it will appear on site) \_\_\_\_\_

Ministry and Program Area \_\_\_\_\_ Youtube Go-Live date \_\_\_\_\_

Ministry Youtube Administrator \_\_\_\_\_ email \_\_\_\_\_

This checklist is to be completed to determine if a separate PIA is needed to address the program area's needs around the collection, use, and disclosure of personal information when administering a YouTube account.

Please enter an "X" under the appropriate answer to the following questions:

	Yes	No
<p><b>Purpose</b> The program area needs to have a YouTube channel that potentially collects personal information because it is necessary to:</p> <ul style="list-style-type: none"> <li>• Provide a forum for citizen engagement and discussion;</li> <li>• Hear users' thoughts and opinions on a subject;</li> <li>• Facilitate discussion between users;</li> <li>• Notify users of further opportunities for discussion; or,</li> <li>• Provide users with updates on the progress of the matter under discussion</li> </ul> <p>Please provide a description of the purpose:</p>		
<p><b>Collection and Notification</b> A "Collection Notice" (as per Appendix B) has been posted somewhere on the channel.</p>		
<p>All posts will be moderated by the ministry's YouTube monitor Monitor's name: _____</p>		
<p>Comments that fall outside of the scope of the Ministry's Youtube or that share third party information (such as pictures of individuals other than the commenter submitting them) will be deleted by the monitor and the group will be reminded of good privacy practices</p>		
<p>Users do not need to further identify themselves other than with their YouTube username</p>		
<p><b>Use and Disclosure</b> The ministry will not use or disclose personal information submitted by users other than for its original purpose or in a way that is consistent with the original purpose of the collection as identified above (except as required by law or for law enforcement).</p>		
<p>The Ministry will not post personal information about individuals that has not been authorized for disclosure by FOIPPA under section 33.1(1)(b), or 33.1(1)(q).</p>		
<p>The required settings from the Parameters of a Government YouTube Channel are met (as per Appendix C)</p>		

	Yes	No
<b>Records Management</b> A records retention and disposition schedule has been created.		
I understand the information and analysis in this PIA is limited to the interaction between Youtube and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Youtube's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy, including but not limited to Legal Services Branch review of, and Risk Management Branch approvals for indemnities created by, Youtube's Terms of Use."		

**If you have answered 'No' to any of the above questions a separate PIA will need to be completed before your YouTube page can be launched.**

Checklist Completed By \_\_\_\_\_ Signature \_\_\_\_\_

Program Manager Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Signature \_\_\_\_\_ Date \_\_\_\_\_

KIS Comments:

## Appendix B

### Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s.26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact (business title, name, telephone, email).

## Appendix C

### Parameters of a Government YouTube Page

When the YouTube account and channel are created, there are a number of default settings that should be selected.

Setting Category	Recommended Setting * = required	Reason
<b>Account Settings</b>		
<u>Sharing (On YouTube)</u>		
Upload a video	✓ *	This is a mandatory default setting. Private videos are never shared.
Favourite a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Like a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Comment on a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Subscribe to a channel	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
<u>Sharing (On connected accounts)</u>		
Upload a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Favourite a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Like a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Comment on a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
<u>Connect your accounts</u>		
Facebook	[unconnected] *	Connecting accounts may result in the unintentional disclosure of the personal information of users that interact with the BC Government's other social media channels.
Twitter	[unconnected] *	Connecting accounts may result in the unintentional disclosure of the personal information of users that interact with the BC Government's other social media channels.
orkut	[unconnected] *	Connecting accounts may result in the unintentional disclosure of the personal information of users that interact with the BC Government's other social media channels.
<b>My Channel Settings</b>		
Activity Settings	Allow channel comments but don't display until approved or Disable channel comments	This allows comments to be moderated to ensure that they do not contain unsolicited or obscene information.

# APPENDIX D

## Parameters of a Ministry YouTube Channel Screen Capture

This screenshot shows the 'Sharing and Connected Accounts' section of a YouTube account settings page. The left sidebar contains navigation links: Overview, Profile Setup, Playback Setup, Email Options, Sharing (highlighted), Privacy, Mobile Setup, and Manage Account. The main content area is titled 'Sharing and Connected Accounts' and includes the following information:

- Text: "You can choose to automatically share YouTube activity on YouTube and your favorite sites. Don't worry, we'll never share information about activity on private videos."
- On YouTube** (checkboxes):
  - Upload a video\*
  - Favorite a video
  - Like a video
  - Comment on a video
  - Subscribe to a channel
- On connected accounts** (checkboxes):
  - Upload a video
  - Favorite a video
  - Like a video
  - Comment on a video
- Connect your accounts** (checkboxes):
  - Facebook - Connect
  - Twitter - Connect
  - orkut - Connect

\* Public video uploads are always shared on YouTube

A 'Save Changes' button is located at the bottom of the settings area.

The footer contains links for Help, About, Press & Blogs, Copyright, Creators & Partners, Advertising, Developers, Terms, Privacy, Safety, Report a bug, and Try something new. It also shows language (English) and location (Canada) settings.

This screenshot shows a YouTube channel page for a user. The channel name is partially obscured by a redaction box. The page layout includes:

- Channel header: Channel name, subscriber count (0), video count (0), and an 'Edit Channel' button.
- Navigation: 'Feed' and 'Videos' tabs, and a 'Search Channel' search bar.
- Activity Section: A 'Post to feed' text area, a 'Settings' button, and a 'view' dropdown menu.
- Activity Settings Modal: A dark overlay with three radio button options:
  - Allow channel comments
  - Allow channel comments but don't display until approved
  - Disable channel commentsButtons for 'Cancel' and 'Apply' are also present.
- Channel Info: 'About [redacted]'s channel' section with an 'Edit' button, 'Section 25' notice, 'Post a channel comment' text area, and a 'Post' button.
- Channel Details: 'Created by' (redacted), 'Latest Activity' (Dec 20, 2011), and 'Date Joined' (Dec 20, 2011).
- Footer: 'Other Channels' section with a 'more v' link.

# Appendix A: Checklist and Confirmation Page for a Facebook Page

Name of Facebook page (as it will appear on the site):

Ministry and Program Area:

Ministry Facebook page Administrator:

Email:  Phone:

Go-Live Date:

---

Please check the appropriate answers to the following questions:

### Purpose

Does the program area require a Facebook page that will potentially collect personal information (in relation to a program or activity of the Ministry) because it is necessary to:

- |  |                       |                       |
|--|-----------------------|-----------------------|
| ♦ Provide a forum for citizen engagement and/or discussion;                  | Yes                   | No                    |
| ♦ Hear users' thoughts and/or opinions on a subject;                         | <input type="radio"/> | <input type="radio"/> |
| ♦ Facilitate discussion between users;                                       |                       |                       |
| ♦ Notify users of further opportunities for discussion; or,                  |                       |                       |
| ♦ Provide users with updates on the progress of the matter under discussion? |                       |                       |

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### Collection and Notification

Has a "Collection Notice" (as per Appendix B) been posted on the information tab of the Ministry's Facebook page? Yes  No

Will all posts/comments be monitored by the Ministry's Facebook monitor?

Name of Monitor:

Will comments that fall outside of the scope of the Ministry's Facebook page or that share third party information (such as pictures of individuals other than the commenter submitting them) be deleted by the monitor and the group reminded of good privacy practices?  Yes  No

Do users need only to identify themselves with their Facebook username?  Yes  No

**Use and Disclosure**

Will the Ministry only use and/or disclose personal information submitted by users for the same purpose for which it was collected or in a way that is consistent with the original purpose of the collection as identified above (except as required by law)?  Yes  No

Will the Ministry only disclose personal information about individuals on the Facebook page that has been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q)?  Yes  No

**Records Management**

Has a records retention and disposition schedule been created?  Yes  No

If the Facebook page is no longer regularly monitored, will it be removed from the Web and all records kept for the requisite amount of time (see records retention and disposition schedule)?  Yes  No

**I understand the information and analysis in this PIA is limited to the interaction between Facebook and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Facebook's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by Facebook's Terms of Use.**  Yes  No

***If you have answered "No" to any of the above questions a separate PIA will need to be completed before your Facebook page can be launched.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***

## Appendix B: Collection Notice

Facebook requires us (pursuant to section 5.7 of their Statement of Rights and Responsibilities) to notify you that by posting comments on this site you are consenting to the collection of the information you provide. The Ministry of \_\_\_\_\_ will collect information that relates directly to and is necessary for an operating program or activity of this Ministry. Personal information that is collected is done so under the authority of s. 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the Government of BC.

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others, including pictures.

If you have any questions about the collection of your personal information, please contact \_\_(business title, name, telephone number, email address)\_\_\_.



# Appendix A: Checklist and Confirmation Page for a Flickr Site

Name of Flickr site (as it will appear on the site):

Ministry and Program Area:

Ministry Flickr site Administrator:

Email:  Phone:

Go-Live Date:

---

Please check the appropriate answers to the following questions:

### Purpose

Does the program area require a Flickr site that will potentially collect personal information (in relation to a program or activity of the Ministry) because it is necessary to:

- ◆ Provide a forum for citizen engagement and/or discussion; Yes  No
- ◆ Hear users' thoughts and/or opinions on a subject;
- ◆ Facilitate discussion between users;
- ◆ Notify users of further opportunities for discussion; or,
- ◆ Provide users with updates on the progress of the matter under discussion?

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### Collection and Notification

Has a "Collection Notice" (as per Appendix B) been posted in the description pane of all photos that have commenting enabled? Yes  No

Will all posts/comments be monitored by the Ministry's Flickr monitor?

Name of Monitor:

Will comments that fall outside of the scope of the Ministry's Flickr or that share third party information (such as pictures of individuals other than the commenter submitting them) be deleted by the monitor and the group reminded of good privacy practices?  Yes  No

Do users need only to identify themselves with their Flickr username?  Yes  No

**Use and Disclosure**

Will the Ministry only use and/or disclose personal information submitted by users for the same purpose for it was collected or in a way that is consistent with the original purpose of the collection as identified above (except as required by law)?  Yes  No

Will the Ministry only disclose personal information about individuals that has been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q)?  Yes  No

Have the required settings from the "Parameters of a Ministry Flickr Page" been met (as per Appendix C)?  Yes  No

**Records Management**

Has a records retention and disposition schedule been created?  Yes  No

**I understand the information and analysis in this PIA is limited to the interaction between Flickr and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Flickr's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by Flickr's Terms of Use.**  Yes  No

***If you have answered "No" to any of the above questions a separate PIA will need to be completed before your Flickr page can be launched.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***

## Appendix B: Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s. 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government.

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others, including pictures.

If you have any questions about the collection of your personal information, please contact \_\_\_\_(business title, name, telephone number, email address)\_\_\_\_\_.

## Appendix C: Parameters of a Ministry Flickr Page

When the Flickr account is created, there are a number of default settings that should be selected.

Setting Category	Recommended Setting * = required	Reason
<b>Global Settings</b>		
Access to your original files and other sizes	No one	This is the only available option for free accounts. If the public body subscribes to a paid account, the same option is recommended.
Allow others to share your stuff	*No	This disables the ability of users to share the public body's photos via Facebook, or Twitter, etc. This would enable unauthorized disclosure of personal information.
Who can add you to a photo	Only you	This disables the ability of users to mark the public body as appearing in a photo. There is no evident use to this ability and may lead to unwanted markings.
Who can print your photos	Only you	This disables the ability of a user to request prints of the public body's photos which may result in unwanted distribution of photos.
Allow your stuff to be added to a gallery	*No	This disables the possibility that a public body's photo may be added to a gallery, which would likely be an unauthorized use of any personal information.
Hide your EXIF data	Yes	This disables the ability of Flickr to display the make of camera that took the photos. It is not necessary to hide this information, but as it is unnecessary, it is recommended that it remains hidden.
Show which application you used for uploading	No	This disables the ability of Flickr to display the application used to upload the photos. It is not necessary to hide this information, but as it is unnecessary, it is recommended that it remains hidden.
Hide your stuff from public searches	*Yes, on flickr.com and 3 <sup>rd</sup> party websites	This disables the ability of public body photos from appearing in searches such as Yahoo! Image Search. Given the purpose of the Flickr account is to engage the public and not primarily to provide images, this function must be disabled.
Hide your profile from public searches	No	This allows people searching for the public body to find their Flickr profile.
Who can see what on your profile	<b>Email address:</b> Anyone <b>IM Names:</b> Anyone <b>Real Name:</b> Anyone <b>Current city:</b> Anyone	Users should be able to see an email address for the account so that they may contact someone if they have questions regarding the collection of their information. The other information revealed is not necessary but may be beneficial to engagement efforts.
Make your photos eligible for invitation by Getty Images?	No thanks, I don't want to license my photos through Getty Images	Allowing Getty Images to license public body images would likely fall outside the original use of any photos containing personal information.
<b>Defaults for new</b>		

<b>Uploads</b>		
Who will be able to see, comment on, add notes, or add people	<b>See:</b> Anyone <b>Comment on:</b> Only you <b>Add notes, tags, people:</b> *Only you	These settings allow for anyone to see a photo that is uploaded, and does not allow commenting automatically. Photos the public body wishes to receive comments on, should have the commenting abilities added manually, and must also ensure that a collection notice is added into the photo's description field. There is no evident need for users to add tags, notes or people. If a program would like to involve a more "folksonomic" tagging aspect, it will be required to fill out a separate PIA.
What license will your content have	All rights reserved.	The public body must seek to limit the unauthorized use of photos that they upload to Flickr
Who will be able to see your stuff on a map	Only you	If the public body wishes to add geotags to photos that contain personal information, they will be required to complete a separate PIA.
Import EXIF location data	No	It is unnecessary to disclose the GPS coordinates of a photo. If the public body would like to disclose the GPS coordinates of a photo with personal information in it they will have to complete a separate PIA.
Auto-rotate your photos	Yes	This is not a mandatory setting; however, it is a beneficial one.
What Safety Level and Content Type will your photostream have	Safety level: Safe Content type: photos	If the Safety Level of the public body's photos are not considered "Safe" (suitable for a global public audience), they are not to be uploaded to Flickr. If a program area wants to upload Moderate or Restricted photos, they must complete a separate PIA.
<b>Content Filters</b>		
Search settings	*SafeSearch: On Content type: Photos/Videos	This setting relates to the administrator's use of the site, and should be set to SafeSearch in order to remain within the Appropriate Use Standards of government's Core Policy.
Autoplay videos	Yes	This is not a mandatory setting; however, it is a beneficial one.

# Appendix D: Parameters of a Ministry Flickr Page Screen Capture

## Your account

Your Getty Images preference has been saved.

- [Personal Information](#)
[Privacy & Permissions](#)
[Emails & Notifications](#)
[Sharing & Extending](#)

### Global settings

Who can access your original image files?	No one (because you have a free account).	<a href="#">edit</a>
Allow others to share your stuff	No	<a href="#">edit</a>
Who can add you to a photo?	Only you	<a href="#">edit</a>
Printing	<ul style="list-style-type: none"> <li>Who can print your photos: Only you</li> <li>Where to ship your prints: Canada</li> </ul>	<a href="#">edit</a>
Allow your stuff to be added to a gallery [?]	No	<a href="#">edit</a>
Hide your EXIF data [?]	No	<a href="#">edit</a>
Show which application you used for uploading	No	<a href="#">edit</a>
Hide your stuff from public searches [?]	Yes, on flickr.com and 3rd-party sites	<a href="#">edit</a>
Hide your profile from public searches	No	<a href="#">edit</a>
Who can see what on your profile	<ul style="list-style-type: none"> <li>Email address: Anyone ([redacted]@yahoo.com)</li> <li>IM names: Anyone (n/a)</li> <li>Real name: Anyone (n/a)</li> <li>Current city: Anyone (n/a)</li> </ul> <a href="#">Edit your IM names, real name, or current city</a>	<a href="#">edit</a>
Make your photos eligible for invitation by Getty Images?	No thanks, I don't want to license my photos through Getty Images	<a href="#">edit</a>

### Defaults for new uploads

Who will be able to see, comment on, add notes, or add people	<ul style="list-style-type: none"> <li>See: Anyone</li> <li>Comment on: Only you</li> <li>Add notes, tags, and people: Only you</li> </ul>	<a href="#">edit</a>
What license will your content have	All rights reserved ©	<a href="#">edit</a>
Who will be able to see your stuff on a map	Only you	<a href="#">edit</a>
Import EXIF location data [?]	No	<a href="#">edit</a>
Auto-rotate your photos [?]	Yes	<a href="#">edit</a>
What Safety Level and Content Type will your photostream have	<ul style="list-style-type: none"> <li>Safety level: Safe</li> <li>Content type: Photos</li> </ul>	<a href="#">edit</a>

### Content filters

Search settings	<ul style="list-style-type: none"> <li>SafeSearch: On</li> <li>Content type: Photos / Videos</li> </ul>	<a href="#">edit</a>
Autoplay videos	Yes	<a href="#">edit</a>

# Appendix A: Checklist and Confirmation Page for a SurveyMonkey Survey

Name of Survey:

Ministry and Program Area:

Ministry Survey Administrator:

Email:  Phone:

Go-Live Date:

---

Please check the appropriate answers to the following questions:

### **Purpose**

Does the program area require the use of SurveyMonkey to:

- ◆ Hear users' thoughts and opinions on a subject; OR
- ◆ Collect feedback from employees, colleagues, or citizens on a given topic?

Yes

No

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### **Notification**

Has the "Notification" (see Appendix B) been included in all requests for participation in the survey?  
For example, by email or on the web page where a link to the survey is posted.

Yes

No

*Describe where the notification will be located:*

**Collection**

Will the program area ensure that personal information is **not** being collected through the Ministry's survey?

This includes:

- ♦ Names of survey participants or third parties
- ♦ Addresses
- ♦ Demographic information that if combined could identify an individual
- ♦ Names or information about other people

Yes  No

Is the survey voluntary; i.e. participants will not be required to take the survey?

Have you disabled the collection of IP addresses on your survey (see Appendix C)?

**Has a copy of the survey questions been attached to this checklist?**

**I understand the information and analysis in this PIA is limited to the interaction between SurveyMonkey and the requirements set out in the FOIPPA. It is the responsibility of our program area to review SurveyMonkey's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by SurveyMonkey's Terms of Use.**

***If you have answered "No" to any of the above questions a separate PIA will need to be completed before you can use SurveyMonkey.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***




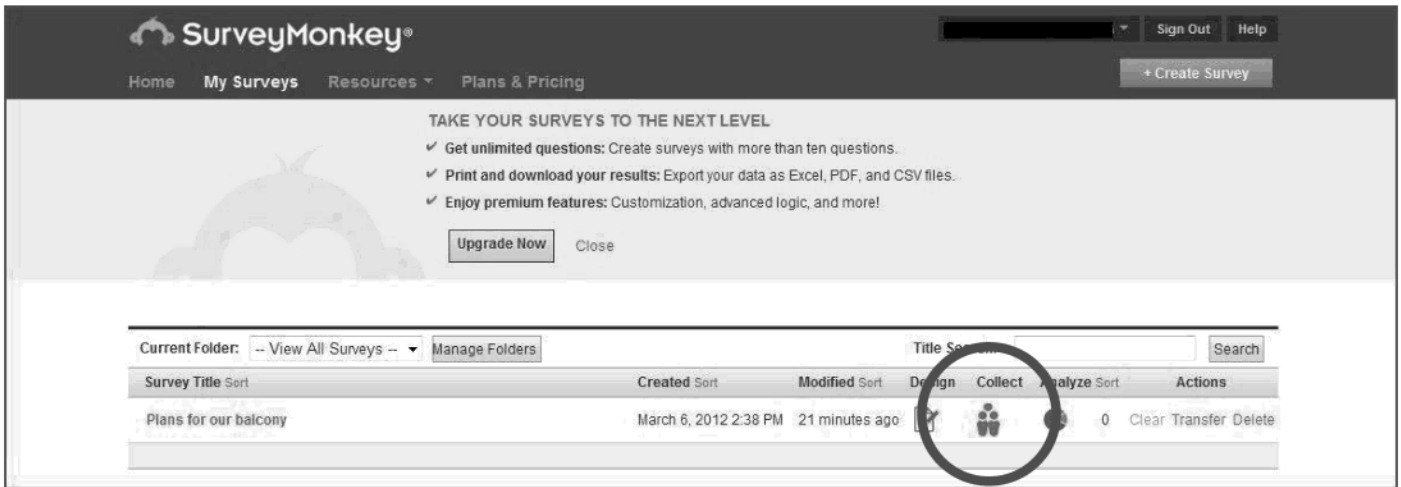
## **Appendix B: Notification**

The Government of BC will not collect, use, or disclose personal information using SurveyMonkey. Please be aware however that IP addresses are collected by SurveyMonkey itself, and these IP addresses and other information collected will be stored on SurveyMonkey's servers located outside of Canada. This survey is voluntary and a response is encouraged, not required.

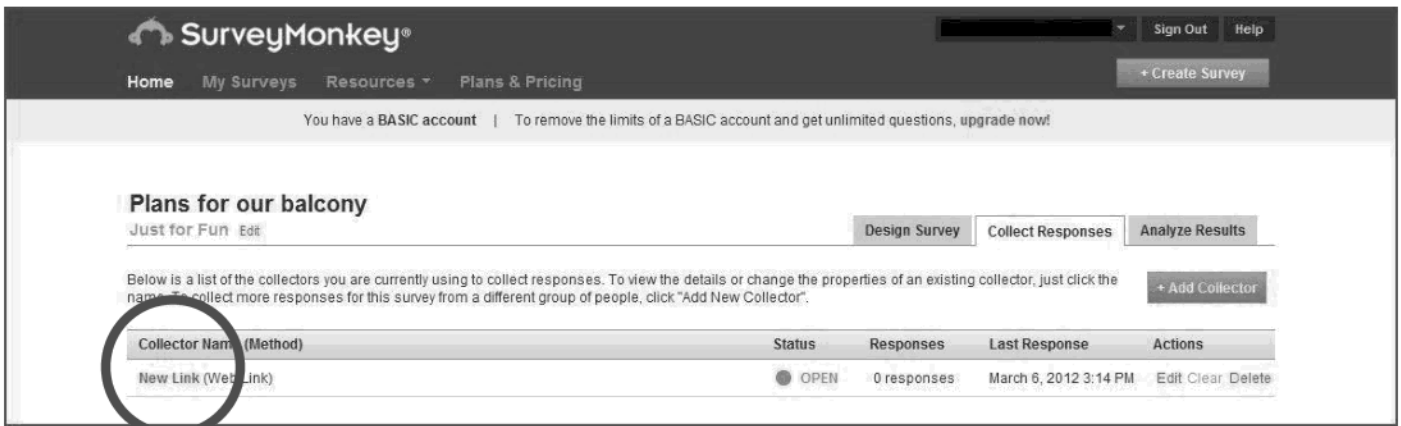
Please do not provide any third-party information (i.e. talk about others) in your responses to the survey.

# Appendix C: How to Disable the Collection of IP Addresses

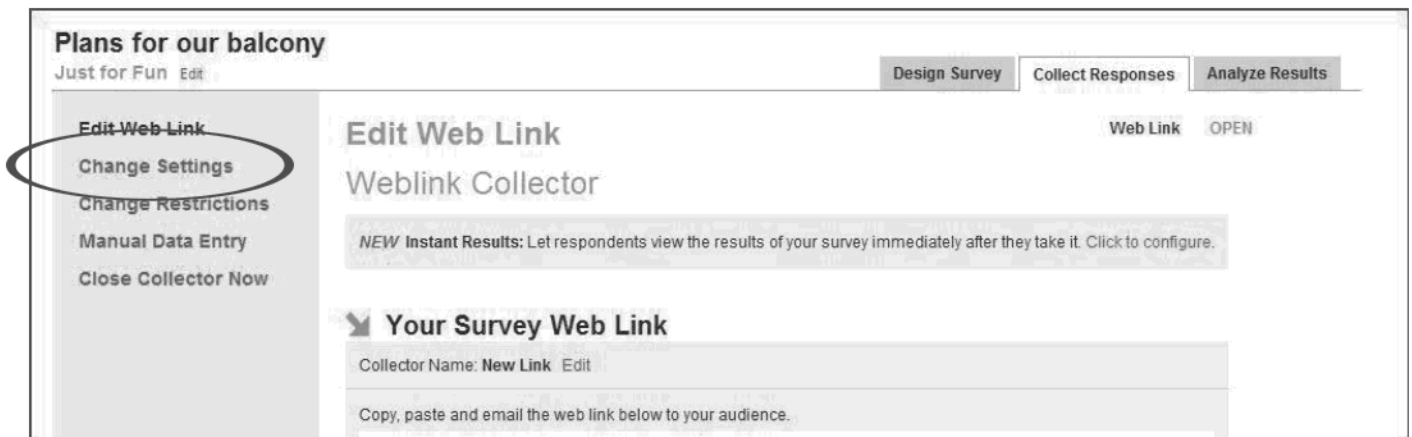
1. Click on the "collect" icon  next to the survey title on the "My Surveys" page.



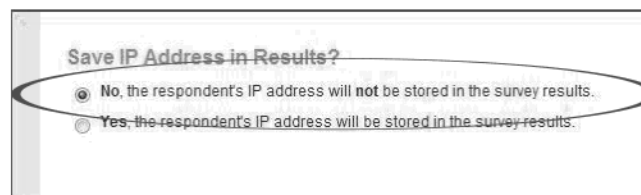
2. Click on the title of a current collector to access the current settings.



3. Click the "change settings" button on the left hand side-bar.



4. Scroll down to "Save IP Address in Results?" and choose **No**. Remember to click "save settings" when you are finished.



# Appendix A: Checklist and Confirmation Page for a Tumblr Blog

Name of Blog (as it will appear on the site):

Ministry and Program Area:

Ministry Blog Administrator:

Email:  Phone:

Go-Live Date:

---

Please check the appropriate answers to the following questions:

### **Purpose**

Does the program area require a blog that will potentially collect personal information (in relation to a program or activity of the Ministry) because it is necessary to:

- ♦ Provide a forum for citizen engagement and/or discussion; Yes  No
- ♦ Hear users' thoughts and/or opinions on a subject;
- ♦ Facilitate discussion between users;
- ♦ Notify users of further opportunities for discussion; or,
- ♦ Provide users with updates on the progress of the matter under discussion?

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### **Collection and Notification**

Has a "Collection Notice" (as per Appendix B) been posted on the Ministry's blog, or has a link to the "Collection Notice" been provided? Yes  No

Will all posts/comments be frequently monitored by the Ministry's blog moderator?

Name of Moderator:

Will comments that fall outside of the scope of the Ministry's blog or that share third party information (such as pictures of individuals other than the commenter submitting them) be deleted by the moderator and the group reminded of good privacy practices?  Yes  No

Do users need only to identify themselves with their profile username?  Yes  No

**Use and Disclosure**

Will the Ministry only use and/or disclose personal information submitted by users for the same purpose it was collected or in a way that is consistent with the original purpose of the collection as identified above (except as required by law)?  Yes  No

Will the Ministry only disclose personal information about individuals on the blog that has been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q)?  Yes  No

**Records Management**

Has a records retention and disposition schedule been created?  Yes  No

If the blog is no longer regularly moderated, will it be removed from the Web and all records kept for the requisite amount of time (see records retention and disposition schedule)?  Yes  No

**I understand the information and analysis in this PIA is limited to the interaction between Tumblr and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Tumblr's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by Tumblr's Terms of Use.**  Yes  No

***If you have answered "No" to any of the above questions a separate PIA will need to be completed before your blog can be launched.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***

## Appendix B: Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s. 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government.

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact \_\_\_\_(business title, business address, business telephone)\_\_\_\_.

# Appendix A: Checklist and Confirmation Page for a Twitter Account

Name of Twitter account:

Ministry and Program Area:

Ministry Twitter Administrator:

Email:  Phone:

Twitter Go-Live Date:

---

Please check the appropriate answers to the following questions:

### **Purpose**

Does the program area require a Twitter account that will potentially collect personal information (in relation to a program or activity of the Ministry) because it is necessary to:

- |  |                       |                       |
|--|-----------------------|-----------------------|
| ♦ Provide a forum for citizen engagement and/or discussion;                  | Yes                   | No                    |
| ♦ Hear users' thoughts and/or opinions on a subject;                         | <input type="radio"/> | <input type="radio"/> |
| ♦ Facilitate discussion between users;                                       |                       |                       |
| ♦ Notify users of further opportunities for discussion; or,                  |                       |                       |
| ♦ Provide users with updates on the progress of the matter under discussion? |                       |                       |

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### **Collection and Notification**

Has a "Collection Notice" (as per Appendix B) been posted somewhere on the profile or a link to one been provided? Yes  No

Will all tweets directed at the government via @mentions be monitored by the Ministry's Twitter monitor?

Name of Monitor:

Will direct messages that fall outside of the scope of the Ministry's twitter or that share third party information (such as pictures of individuals other than the commenter submitting them) be deleted by the monitor and the group reminded of good privacy practices?  Yes  No

Do users need only to identify themselves with their Twitter handle?  Yes  No

**Use and Disclosure**

Will the Ministry only use and/or disclose personal information submitted by users for the same purpose for which it was collected or in a way that is consistent with the original purpose of the collection as identified above (except as required by law)?  Yes  No

Will the Ministry only disclose personal information about individuals that has been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q)?  Yes  No

Will the program only retweet individuals' tweets if they are on topic @mentions?  Yes  No

**Records Management**

Has a records retention and disposition schedule been created?  Yes  No

**I understand the information and analysis in this PIA is limited to the interaction between Twitter and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Twitter's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by Twitter's Terms of Use.**  Yes  No

***If you have answered "No" to any of the above questions a separate PIA will need to be completed before your Twitter account can be launched.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***

## Appendix B: Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s. 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government.

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others, including pictures.

If you have any questions about the collection of your personal information, please contact \_\_\_\_(business title, name, telephone number, email address)\_\_\_\_\_.



## Appendix C: Definitions

**@Mentions:** A “mention” or “@mention” is when one Twitter user adds another user's handle (@user) into the body of the tweet, effectively directing that tweet to that user's attention. These tweets show up in a separate feed labelled “@mentions”. Any user can @mention any other user.

**Background:** The background is the picture, or pattern that back-drops a user's profile for when they are looking at their feed, or for when others are looking at their profile.

**Direct Messages:** A direct message is a private message between users. It cannot be seen by others and does not show up in the feed. Direct messages can only be sent to people that the user follows.

**Feed:** The feed is a constantly-moving roll of tweets published by the people the user follows.

**Following:** Users “follow” other users in order to have their tweets automatically populate their feed.

**Handle:** A Twitter handle is their username, preceded by the @ symbol.

**Hashtags:** A hashtag (#) denotes a word or a phrase (with no spaces) that allows tweets to be easily searched or aggregated. An example of this is during the Stanley Cup finals, the hashtag #StanleyCup would follow or precede someone's comments on the game, the series or something else similarly related.

**List of followed:** This list is of those users whose tweets make up the feed.

**List of followers:** This list is of those whose feeds your tweets appear in.

**Profile picture:** Each user has a picture that appears beside each of their tweets. For those that do not upload a picture, there is a default picture provided by Twitter.

**Retweet:** A retweet is a tweet that someone else has chosen to post themselves. It is normally accredited to the original tweet-er. A retweet appears as a “RT” followed by the handle of the original tweeter. Modified retweets (“MRT” or “MT”) are when the original tweet is altered slightly in order to accommodate additional comments, or the added characters required to denote a retweet.

**Tweet:** A tweet is a post or a status on Twitter. It is limited to 140 characters in length.

**Twit-pic:** A twit-pic is a picture that has been uploaded and attached to a tweet.

# Appendix A: Checklist and Confirmation Page for a Wordpress Blog

Name of Blog (as it will appear on the site):

Ministry and Program Area:

Ministry Blog Administrator:

Email:  Phone:

Go-Live Date:

---

Please check the appropriate answers to the following questions:

### **Purpose**

Does the program area require a blog that will potentially collect personal information (in relation to a program or activity of the Ministry) because it is necessary to:

- ◆ Provide a forum for citizen engagement and/or discussion; Yes  No
- ◆ Hear users' thoughts and/or opinions on a subject;
- ◆ Facilitate discussion between users;
- ◆ Notify users of further opportunities for discussion; or,
- ◆ Provide users with updates on the progress of the matter under discussion?

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### **Collection and Notification**

Has a "Collection Notice" (as per Appendix B) been posted on the Ministry's blog, or has a link to the "Collection Notice" been provided? Yes  No

Will all posts/comments be frequently monitored by the Ministry's blog moderator?

Name of Moderator:

Will comments that fall outside of the scope of the Ministry's blog or that share third party information (such as pictures of individuals other than the commenter submitting them) be deleted by the moderator and the group reminded of good privacy practices?  Yes  No

Do users need only to identify themselves with their profile username?  Yes  No

**Use and Disclosure**

Will the Ministry only use and/or disclose personal information submitted by users for the same purpose it was collected or in a way that is consistent with the original purpose of the collection as identified above (except as required by law)?  Yes  No

Will the Ministry only disclose personal information about individuals on the blog that has been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q)?  Yes  No

**Records Management**

Has a records retention and disposition schedule been created?  Yes  No

If the blog is no longer regularly moderated, will it be removed from the Web and all records kept for the requisite amount of time (see records retention and disposition schedule)?  Yes  No

**I understand the information and analysis in this PIA is limited to the interaction between Wordpress and the requirements set out in the FOIPPA. It is the responsibility of our program area to review Wordpress' Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by Wordpress' Terms of Use.**  Yes  No

***If you have answered "No" to any of the above questions a separate PIA will need to be completed before your blog can be launched.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***

## Appendix B: Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s. 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government.

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others.

If you have any questions about the collection of your personal information, please contact \_\_\_\_(business title, business address, business telephone)\_\_\_\_.

# Appendix A: Checklist and Confirmation Page for a YouTube Channel

Name of YouTube Channel (as it will appear on site):

Ministry and Program Area:

Ministry YouTube Administrator:

Email:  Phone:

YouTube Go-Live Date:

---

Please check the appropriate answers to the following questions:

### **Purpose**

Does the program area require a YouTube Channel that will potentially collect personal information (in relation to a program or activity of the Ministry) because it is necessary to:

- ♦ Provide a forum for citizen engagement and/or discussion; Yes  No
- ♦ Hear users' thoughts and/or opinions on a subject;
- ♦ Facilitate discussion between users;
- ♦ Notify users of further opportunities for discussion; or,
- ♦ Provide users with updates on the progress of the matter under discussion?

*Please provide a description of the original purpose and any proposed consistent/secondary purpose(s).*

### **Collection and Notification**

Has a "Collection Notice" (as per Appendix B) been posted somewhere on the channel? Yes  No

Will all posts be monitored by the Ministry's YouTube monitor?

Name of Monitor:

Will direct messages that fall outside of the scope of the Ministry's YouTube channel or that share third party information (such as pictures of individuals other than the commenter submitting them) be deleted by the monitor and the group reminded of good privacy practices?  Yes  No

Do users need only to identify themselves with their YouTube username?  Yes  No

**Use and Disclosure**

Will the Ministry only use and/or disclose personal information submitted by users for the same purpose for which it was collected or in a way that is consistent with the original purpose of the collection as identified above (except as required by law)?  Yes  No

Will the Ministry only disclose personal information about individuals that has been authorized for disclosure by FOIPPA under section 33.1(1)(b) or 33.1(1)(q)?  Yes  No

Have the required settings from the "Parameters of a Government YouTube Channel" been met (as per Appendix C)?  Yes  No

**Records Management**

Has a records retention and disposition schedule been created?  Yes  No

**I understand the information and analysis in this PIA is limited to the interaction between YouTube and the requirements set out in the FOIPPA. It is the responsibility of our program area to review YouTube's Terms of Use. We have reviewed and complied with all obligations created by other legislation and policy including, but not limited to, Legal Services Branch review of, and Risk Management Branch approvals for, indemnities created by YouTube's Terms of Use.**  Yes  No

***If you have answered "No" to any of the above questions please contact a Privacy Advisor at Knowledge and Information Services.***

Signatures:

Program Manager (name)

\_\_\_\_\_  
Signature

Date

Knowledge and Information Services

\_\_\_\_\_  
Signature

Date

***Knowledge and Information Services' comments:***

## Appendix B: Collection Notice

The personal information you post may be collected by the Ministry of \_\_\_\_\_ under s. 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of engaging and consulting with the public. Please be aware that any information collected may be stored and/or accessed outside of Canada on servers not belonging to the government.

To protect your own privacy and the privacy of others, please do not include any personal information including phone numbers and email addresses in the body of your comment. Please do not share personal information about others, including pictures.

If you have any questions about the collection of your personal information, please contact \_\_\_\_(business title, name, telephone number, email address)\_\_\_\_\_.

## Appendix C: Parameters of a Ministry YouTube Channel

Setting Category	Recommended Setting * = required	Reason
<b>Account Settings</b>		
<u>Sharing (On YouTube)</u>		
Upload a video	✓ *	This is a mandatory default setting. Private videos are never shared.
Favourite a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Like a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Comment on a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Subscribe to a channel	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
<u>Sharing (On connected accounts)</u>		
Upload a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Favourite a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Like a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
Comment on a video	[unchecked] *	This setting, if checked, could unintentionally disclose the personal information of another user.
<u>Connect your accounts</u>		
Facebook	[unconnected] *	Connecting accounts may result in the unintentional disclosure of the personal information of users that interact with the BC Government's other social media channels.
Twitter	[unconnected] *	Connecting accounts may result in the unintentional disclosure of the personal information of users that interact with the BC Government's other social media channels.
orkut	[unconnected] *	Connecting accounts may result in the unintentional disclosure of the personal information of users that interact with the BC Government's other social media channels.
<b>My Channel Settings</b>		
Activity Settings	Allow channel comments but don't display until approved or Disable channel comments	This allows comments to be moderated to ensure that they do not contain unsolicited or obscene information.



# Appendix D: Parameters of a Ministry YouTube Channel Screen Capture

