



Privacy Impact Assessment for Data Analysis Branch

PIA#FIN20037

Why do I need to do a PIA?

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

What if my initiative does not include personal information?

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

Part 1 – General

Name of Ministry:	Finance		
PIA Drafter:	Jonathan Baron		
Email:	[REDACTED]	Phone:	[REDACTED]
Program Manager:	Jonathan Baron		
Email:	[REDACTED]	Phone:	[REDACTED]

1. Description of the Initiative

The initiative is a new branch called the Data Analysis Branch, which is part of the new Finance Real Estate and Data Analysis (FREDA) group within the Policy and Legislation Division (PLD). The Branch will be using Ministry data holdings, and other sources of data, to conduct research and analysis in support of policy development. The Data Analysis Branch will build the capacity of the division to perform data analysis in support of policy development. The purpose of the Branch is to build the capacity to use data for analysis internally, not to share data outside the Ministry or provide any service to the public

2. Scope of this PIA

This PIA covers all activities of the new Data Analysis Branch.

3. Related Privacy Impact Assessments

There are no previous PIAs for this initiative or existing PIAs that cover parts of the initiative.



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4. Elements of Information or Data

The new branch will be acquiring data from a variety of sources to conduct statistical analysis, primarily using information collected under statutes that the Ministry of Finance is responsible for. Some is acquired from tax collection, such as Income Tax, Speculation and Vacancy Tax, and Property Transfer Tax. Other sources of data collection include the LTSA Land Title Register, and the BC Assessment Roll.

Personal information is present in many of these data sources.

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

If **no** personal information is involved, please submit Parts 1, 6, and 7 unsigned to PCT at [REDACTED]. A privacy advisor will be assigned to your file and will guide you through the completion of your PIA.



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Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

The data cannot be accessed outside of Canada.

6. Data-linking Initiative*

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

1. Personal information from one database is linked or combined with personal information from another database;	yes
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
If you have answered "yes" to all three questions, please contact a PCT Privacy Advisor to discuss the requirements of a data-linking initiative.	



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7. Common or Integrated Program or Activity*

<p>In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
1. This initiative involves a program or activity that provides a service (or services);	no
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

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

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

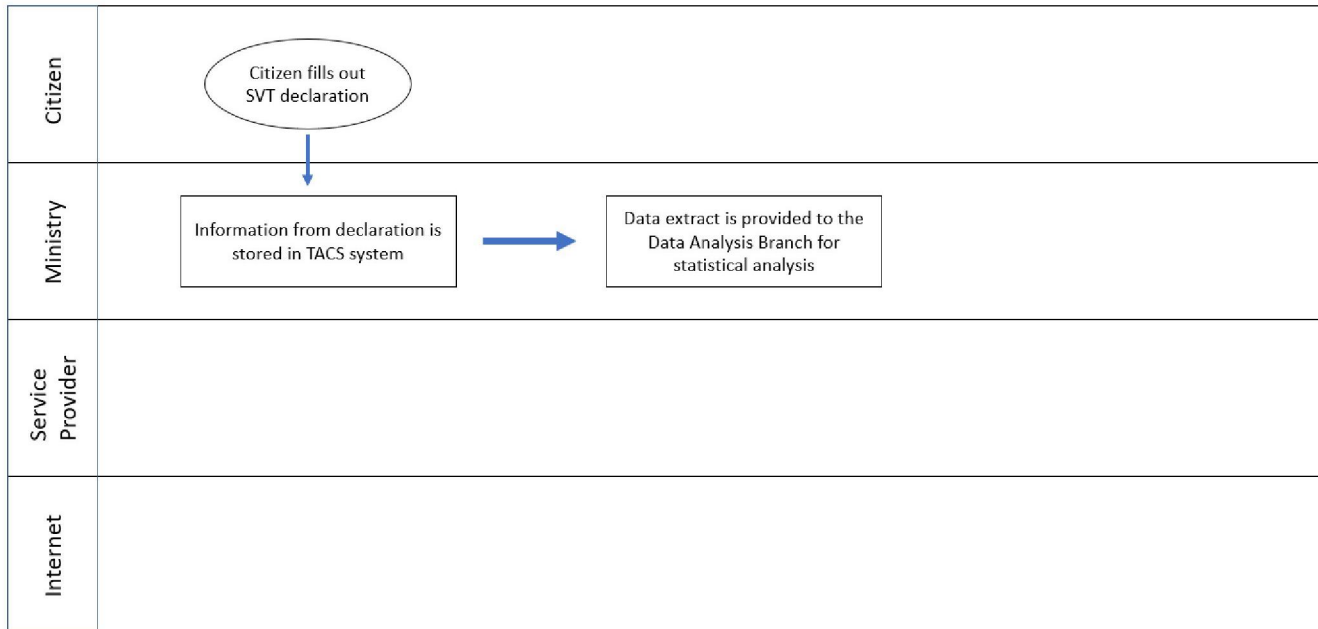


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8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Diagram (Example: Speculation and Vacancy Tax Declaration)



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Use Ministry of Finance administrative tax data for statistical analysis (including SVT, PST, PTT, PIT, and CIT)	Use	32(a)
2.	Use data from the LTSA Land Title Register for statistical analysis	Use	32(a)
3.	Use data from BC Assessment's property roll for statistical analysis	Use	32(a)

9. Risk Mitigation Table

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



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Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1	Data is intercepted while in transit. Person to person transfer using the portable drive increases risk.	Data transfer is encrypted. IM117 Information Incident Management Policy (IIMP)	Low	High
2	Data is stolen from FREDA office storage location.	IM117 IIMP (IIMP) Data is encrypted on hard drive and dedicated office computer.	Low	High
3	Data is lost from FREDA office storage location	Data is in portable format while on the portable hard drive. The hard drive is encrypted. It is unlikely data will be lost from other storage locations (LAN for example) and present a data breach risk to government. The plan is to migrate away from this storage location. IM117 IIMP (IIMP)	Low	High
4	Intrusion originating from outside of government (such as tricking an employee into running a malicious file from a phishing email).	Staff are trained and aware, limiting the likelihood that this will occur.	Medium	High
5	Insertion of malicious code into R programming software before it is downloaded and installed on a FREDA computer.	The FREDA team downloads R from a secure server, verifies the MD5 checksums, and downloads R packages from a secure server. Staff are trained and aware, limiting the likelihood that this will occur.	Low	High



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10. Collection Notice

Tax data is collected under the authorities of the statutes that enact those taxes, such as the Income Tax Act, the Speculation and Vacancy Tax Act, the Property Transfer Tax Act, and the Provincial Sales Tax Act.

A collection notice is not required as no new information is being collected.

Part 3 – Security of Personal Information

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

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

Building/room is locked, with key card access only. Individual offices have solid doors and are kept locked when we are away. We keep locked cabinets in our offices for sensitive documents or storage drives.

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

- Data is stored on secure ministry file server.
- Access to the data on the file server is very strictly limited to those individuals who must have access for their work.
- The LAN folders that are used for data storage are hidden so nobody can find or access them without knowing the precise location address.
- Data is transferred in an encrypted form, on a government secure file transfer platform.

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

No.

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

Access to the personal information is restricted to the smallest possible number of individuals, and the data is refreshed periodically so any unauthorized change would quickly be replaced by the official information. The data held by this branch is purely for analysis, there would be no purpose or impact of an unauthorized change.



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

The access is restricted to a small user group that will use the data on a daily basis for their work. Access is based on security groups that are controlled by the Executive Director.

Part 4 – Accuracy/Correction/Retention of Personal Information

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

Data files will be updated periodically by receiving a new data file to replace the old. Personal information in this branch is not disclosed or used in the administration of any programs.

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

No.

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

N/A

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

N/A

Part 5 – Further Information

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

No.

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

No, however, the branch will be using the data at its disposable for research and the compilation of statistical information. This is done internally, not by outside researchers.



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

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

Yes.

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

Personal Information Bank – Required Information	
Description	Administrative tax records.
Primary ministry/government agency involved	Ministry of Finance
All other ministries/government agencies and public bodies involved	None
Business contact title	Executive Director, Data Analysis Branch
Business contact telephone number	[REDACTED]

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



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Part 6 – PCT Comments and Signatures

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

Joann Berekoff
Privacy Analyst
Privacy, Compliance and Training
Branch
Ministry of Citizens' Services

Signature

14 May 2020

Date

Dwayne McCowan
Manager, Privacy Operations
Privacy, Compliance and Training
Branch
Corporate Information and
Records Management Office
Ministry of Citizens' Services

Signature

May 15, 2020




Date



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Part 7 – Program Area Comments and Signatures

Jonathan Baron A/Executive Director Finance Real Estate and Data Analytics	 Signature	May 19 2020 Date
Richard Barlow Director of Information Security & Privacy Information Management Branch	 Signature	May 15 2020 Date
Tara Richards Assistant Deputy Minister Policy & Legislation Ministry of Finance	 Signature	May 19 2020 Date
Executive Director or equivalent (if no Personal Information is involved in this initiative)	Signature	Date

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

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