

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	General Tumblr Blog

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
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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). 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.

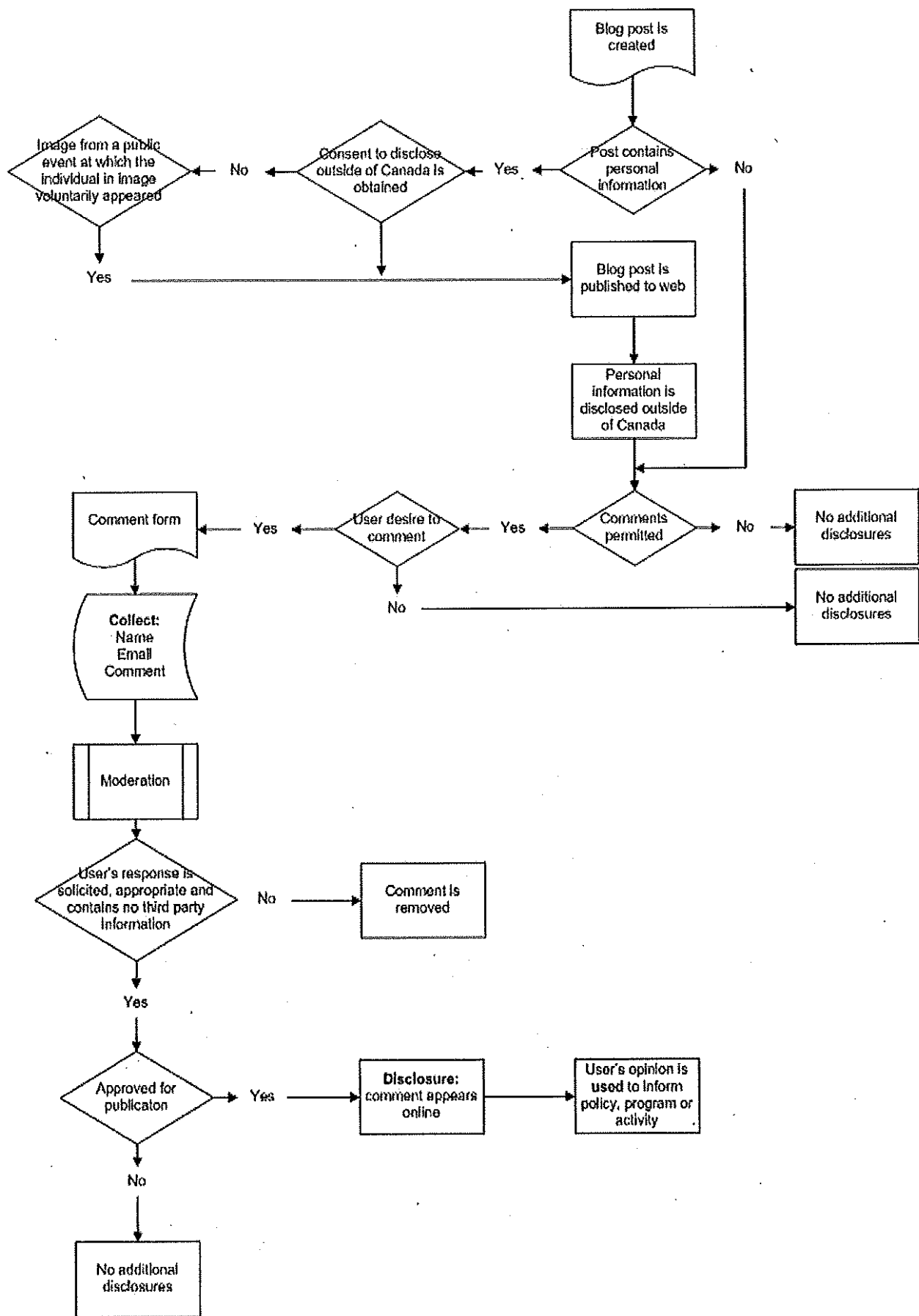
- Name of user posting text comments
- Time of posting of an individual's comment (e.g. "Post 2 hours ago." "Post 5 days ago.").
- Photos depicting individuals (e.g. attached to profile as part of a posted comment).
- An individual's personal opinion about a subject in a posted text comments.
- Images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

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	
	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?		X	
	and			
	(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	
	Please identify event:			
(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		
	Additional details as required (e.g., method of notification) See Discussion of Notification			

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>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.</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	
	Specify subsection(s) being applied:			

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	
	Specify name of enactment and relevant section(s)			

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	
Specify name of enactment and relevant section(s)				
(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	
Specify name of enactment and relevant section(s)				
(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	
and (ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary				
(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,			
and (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	
If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary				
(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	
	and (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			
	If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i>			
(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. Please identify event:	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, and		X	
	Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).			
	Additional details as required			
(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>Additional details as required</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>There are other disclosure authorities that may apply, however, in these cases a separate PIA should be completed.</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		
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:			
	Contact person:	Blog moderator		
	Phone number:			
Additional details as required				
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		
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:	Policy No. 33 Use of Social Media in the BC Public Service		
	Contact person:			
	Phone number:			
Additional details as required				
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	
Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances				
7.	Does the audit identify inappropriate accesses to the system?			X
Additional details				
<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>Please explain</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>Please explain</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>Please explain</p>			


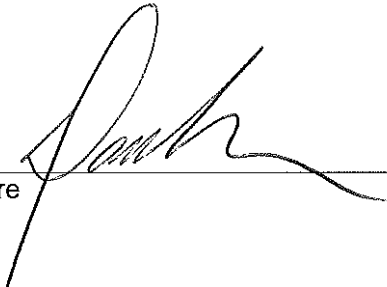
VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

		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>Purpose 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"> • Provide a forum for citizen engagement and discussion; • Hear users' thoughts and 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 <p>Please provide a description of the purpose:</p>		
<p>Collection and Notification 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>Use and Disclosure 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>Records Management 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).

