

Privacy Impact Assessment I Roadmap

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Communications & Engagement Plan

Establish a clear communications and engagement plan to undergo and maintain communication around change process updates.

- Establish champion for change
- Announce clear plan to undergo process changes
- Provide stakeholders with regular updates.

Establish champion for change

- Identify owner of change process
- Assemble working group and other supports as necessary
- Refine plans for change

Announce & engage on plans for change

- Clearly announce intention to undergo process changes
- Clearly outline rationale behind changes and give time for feedback

Scheduled updates to stakeholders

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Update web-content

Inform users about the PIA & rectify common confusions around process, expected timelines & outcomes.

- Provide the user with context for the PIA
- Set expectations and clearly describe the process
- Clearly answer: what, why, how, when?

Current status: Research has demonstrated high degrees of confusion among new users

Cycle 1: Develop new content to reflect current PIA process

- Draft new content (V1) using research from service design project
- Test & validate with users
- Iterate new content (V2)

Launch ready

Cycle 2: Add in online intake form

- Add intake form to process outline
- Update content to reflect new process

Cycle 3: Continuously update to reflect future process changes

- Collapsed review process
- Delegated authority review process
- PID 2.0 implementation
- Collaborative writing tool

Online intake form

Ask users a series of questions and connect them to the appropriate MPO to continue process.

- Customized to suit each MPO's needs
- Gather enough information to identify which MPO, if any, should be assigned
- Identify hot button issues at the beginning
- Provide PCT with insight into users initiatives

Current status: Concept untested with MPOs. Recommend concept test and development with MPOs.

Develop V1 with MPOs

- Draft low-fidelity concept
- Test with MPOs to gather their specifications
- Usability testing with users
- Develop V1 and release on web for limited testing

Technical

- Identify software options
- Determine tech needs
- Technical build into web-content

Test & Iterate

- Review results with MPOs
- Develop V2 and release on web for testing
- Review results with MPOs
- Develop and release V3 if needed

Launch ready

Intermittent reviews with MPOs for continuous improvement

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MPO Chat Channel

Helps break down the silos across ministries by providing a quick help line for professionals across government to discuss issues, get help that they might need and share resources.

- ❑ Available to: MPOs, privacy staff, MISOs, PCT and other stakeholders involved with supporting PIAs
- ❑ Multiple channels available, with users able to start conversations with peers as needed

Current status: Needs currently inadequately met by e-mail

Research & Prep

- Identify MPO needs from service design research
- Draft first iteration requirements

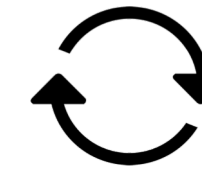
Technical

- Identify software options
- Determine technological needs
- Apply for funding as necessary

Build & Launch

- Technical build
- Set up chat channels
- Test with limited users
- Communicate chat channel procedures to stakeholders
- Release & continue to improve

Launch ready



Intermittent reviews
with MPOs for
Continuous
improvement

MPO Training & Resources

PCT to draft and share directives and resources

- ❑ Contain resources related to common privacy best practices
 - e.g. language for procurement, standard description of government physical security measures, policies for Gmail usage, standard FOIPPA interpretation, how to use corporate PIA
 - Develop resources in the open
- ❑ Be accessible by MPOs + policy staff and PCT
- ❑ Allow contributions from MPOs & staff

Current status: Demand for resources from MPOs clear from research (do not have capacity)

Identify resource needs with MPOs

- Identify which best practice references to develop
- Solicit input from MPOs & users
- Prioritize list: balance MPO & PCT needs


Staffing

- Identify staffing needs & strategy

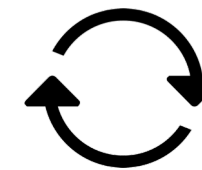
Document development cycle:

- Learn from MPOs – any resources already developed?
- Create functional draft (V1)
- Solicit feedback and update (v2)
- Allow MPOs to adapt to their ministries

 Leverage MPO chat channel

 Need to develop some shared understandings before roll-out of **Delegated Review**

Launch ready



Intermittent
reviews with MPOs
for Continuous
improvement

Delegated Sign-off

Allows MPOs to sign off on completed PIAs without input from PCT. This stream is for PIAs which defined as simple.

- ❑ Must be supported across all ministries and stakeholders involved

Current status: Demand from members of both PCT & MPOs

Develop policy structure

- Identify a provisional set of PIAs to be “delegated”
- Develop policy / guidelines for expectations & controls (V1)

Policy

- Identify policy barriers & legal mechanisms
- Incorporate into directives changes
- Approval from DM / ADM

 Ensure standard FOIPPA interpretations

 Leverage resources for MPOs

Pilot delegated sign-off and iterate

- Publish guidelines & make delegated path available to pilot using controlled audits with select PIAs or MPOs
- Scale to include more MPOs and types of PIAs
- Evaluate with feedback (Issues? Add supports?)
- Revise policy / guidelines (V2)

💡 Potential to sync with intake form to provide additional oversight

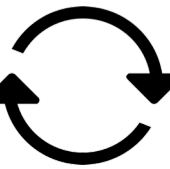
Staffing

- Evaluate for changes in staffing and resource allocation

Scale

- Formalize process (V2)
- Develop strategy to scale
- Start scaling in limited fashion to iterate on strategy
- Develop long-term vision for this stream

Launch ready



Intermittent reviews with stakeholders for Continuous improvement



Action Plan

PIA summary with next steps

Acts as a clear reference for users: what are the privacy risks and what has been agreed upon as appropriate mitigation.

- ❑ Provide user with PIA summary + clear next steps
- ❑ Risk mitigations in the action plan **must be agreed upon** by both MPO & PCT

Current status: In limited use by CITZ, addressed in other ways by other ministries. Concept needs to be tested with other MPOs.

Collapsed Review Process

Combine multiple review stages into a single writing process to increase the efficiency of the process

- ❑ Assign PCT analyst to work with MPO for entire duration of PIA to reduce knowledge gaps

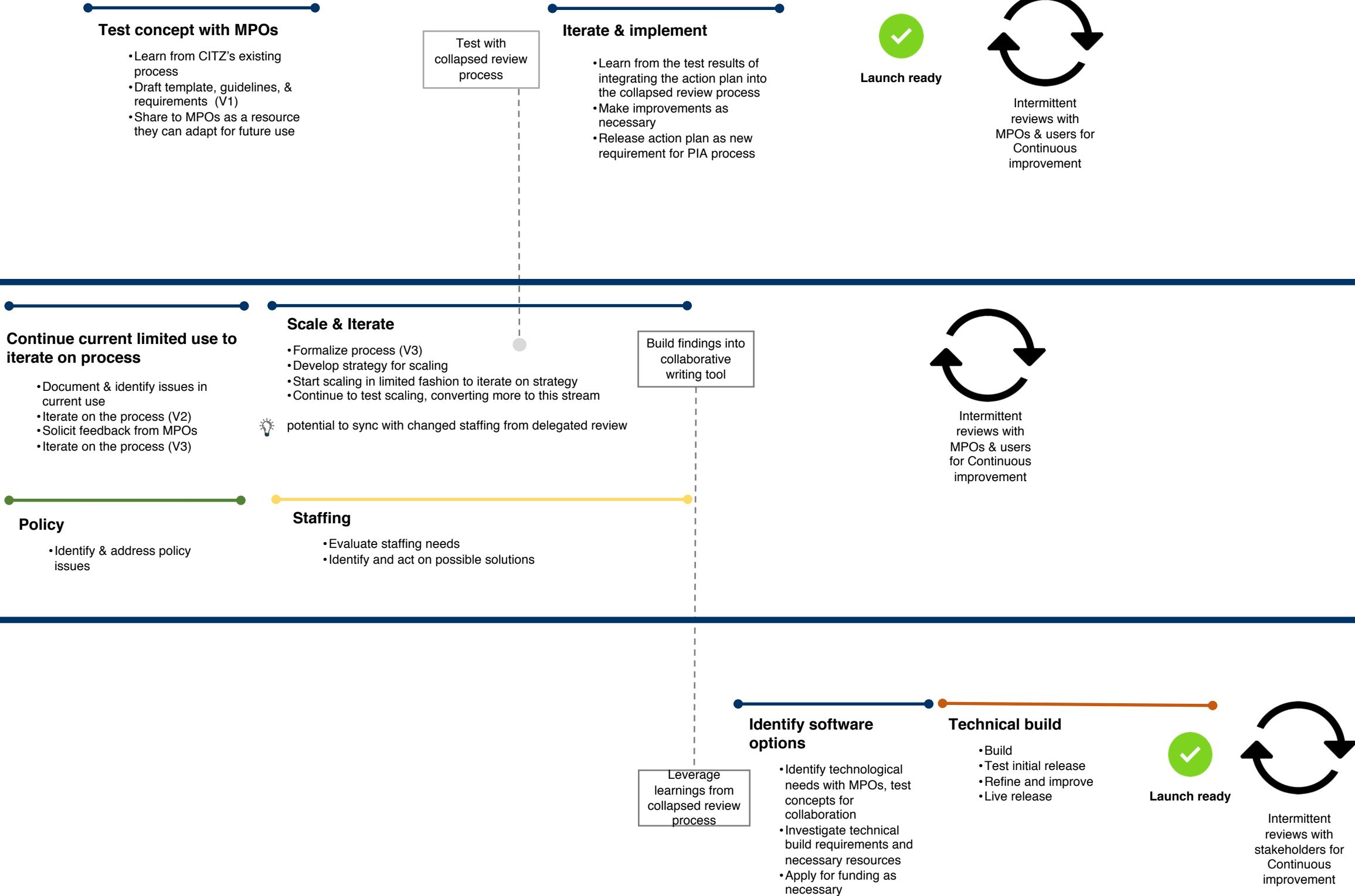
Current status: In limited use, with some sticky spots

- Address tensions in current use
- Identify capacity & policy ramifications
- Identify strategy to scale

Collaborative Writing Tool

Facilitates the write & review stage of the PIA process. Allows multiple people to work on a single document, manages cases, and capture the privacy communications that have happened throughout.

- ❑ Provide status tracking for all stakeholders involved
- ❑ Allow for multiple viewers and editors
- ❑ Captures privacy conversations and the program reviews that have taken place
- ❑ Supports issues management



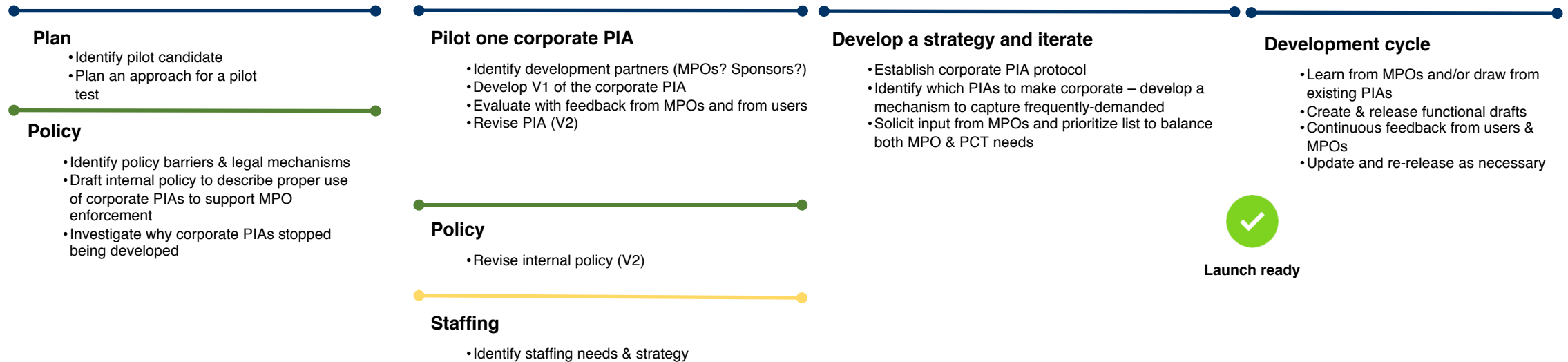


Corporate PIAs

Allow for users to leverage the privacy impact assessments of other ministries and program areas.

- Contain clear usage guidelines so users can evaluate whether the corporate PIA is appropriate
- Clearly indicate what to do if the usage pattern is different than what's described in the corporate PIA
- Searchable by function

Current status: Clear demand from users and MPOs. Responsibilities are currently unclear

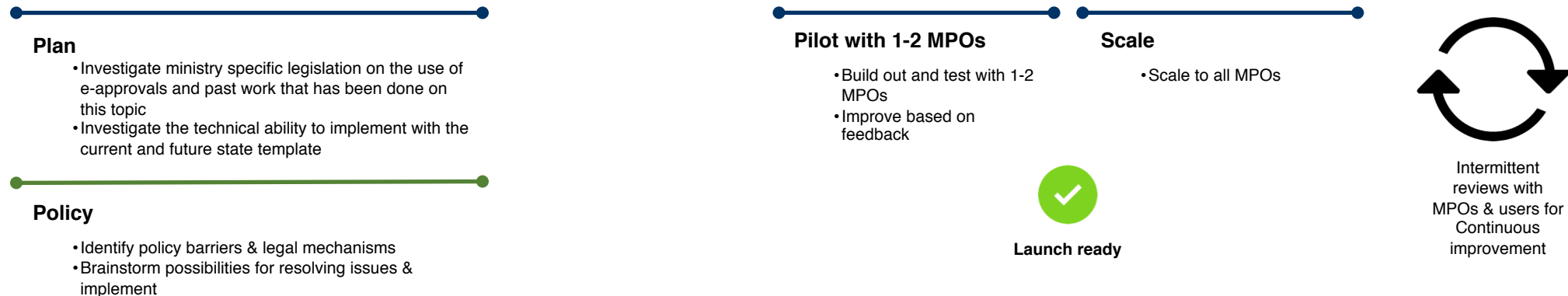


E-Approvals

Replaces pen and paper signatures. Allows anyone who needs to sign a PIA the ability to do so electronically.

- Improve the formatting issues currently associated with word and PDF documents

Current status: Corporate appetite untested



PID 2.0

Acts as a database for past work done on PIAs and supports stakeholders in the creation of new PIAs by serving as a reference.

- Provides PIA access to anyone in government, with user friendly browsing
- Includes a summary statement for each PIA to improve search

Current status: In limited use by CITZ, addressed in other ways by other ministries. Concept needs to be tested with other MPOs.

