

STEP 2 | DEFINE THE PROJECT

PIAs should be started at the early stages of the designing or development of a project. Having a good understanding of the purpose, objectives, and structure of the project will assist organizations in identifying the privacy impacts.

1. PROJECT DESCRIPTION

Provide a description of the project. This could be the same/similar to the Project Description documented in Step 1.

Project Title:	
Purpose/Objectives:	
Project Lead (Name, contact information, and organization)	
List all organizations involved in the project:	

2. PROJECT AUTHORITY

The applicable privacy legislation should have been identified in Step 1. Now, identify the regulatory and legal framework for the project. This includes the applicable legislation and regulations (other than the privacy legislation that has already been identified in step 1), bylaws, memoranda of understandings (MOU), agreements, contracts and other relevant instruments. Attach copies of relevant legislation, regulations, bylaws, MOUs, agreements, contracts and other relevant instruments to your PIA.

Name of legislation, regulation, MOU, contract or other relevant instruments	Description

3. PROJECT STRUCTURE

A PIA is focused on PI/PHI and the flow of the PI/PHI (collection, use, and/or disclosure) as part of a project. Identifying the organizations and program areas that will be handling PI/PHI will assist in identifying where privacy impacts may occur. If there is sharing of PI/PHI between organizations, developing an Information Sharing Agreement is a good idea. Check out the IPC’s resource *Best Practices for Information Sharing Agreements* at www.oipc.sk.ca under the “Resources” tab for more information.

While it is not necessary, creating a visualization of the project may be helpful in explaining the project structure, as well as in completing the privacy analysis in Step 3.

3.1 List all organizations involved in developing or implementing the project

Organizations (government institutions, local authorities, health trustees, third parties)	Project Role	PI/PHI the organization will have in its possession or control

3.2 List contractors or service providers that will manage PI/PHI on behalf of your organization.

Contractors or service provider	Relationship to your organization	Project Role	PI/PHI the contractor or service provider will be managing	Instrument used to bound contractor or service provider to relevant privacy and security requirements (contract, memoranda of understanding, agreements, other)

3.3 Identify any location outside of the province where PI/PHI may be stored and the third parties involved.

PI/PHI stored outside the province	Location	Third party storing the PI/PHI outside of the province	Instrument used to bind third party to relevant privacy and security requirements

4. PROJECT CHARACTERISTICS

A PIA is focused on characteristics of a project that may present a privacy impact. The following questions are meant to help identify areas where there may be a privacy impact. The questions below are not a comprehensive list. Therefore, please use the space at the end of the table if there is any activity that you think may have a privacy impact.

Since PIAs should be started at the early stages of the design or development of a project, there may be a lot of “unknowns”. If you check the “Unknown” box, use the “Additional Information/Action items” column to document what will be done to define the project characteristic.

	Yes	No	Unknown	Additional Information/Action items
Will information technology be used to transmit, process, and/or store PI/PHI?				
If information technology will be used, is your security department involved to ensure security policies and procedures are in place?				
Will electronic PI/PHI be stored within the province?				
If electronic PI/PHI will not be stored in the province, then have you determined what applicable legislation will apply to the electronic PI/PHI that would impact the safety of the data?				
If electronic PI/PHI will be stored in a different jurisdiction, what agreements are in place to ensure that your organization retains control over the electronic PI/PHI in order to comply with the legislation?				
Are policies and procedures in place, or being developed, to guide employees in handling the				

<p>PI/PHI in this project?</p> <p>Policies and/or procedures should include identifying the types of PI/PHI they will manage in the project, and the acceptable (and unacceptable ways they are to handle the PI/PHI)</p>				
<p>Will training be given to employees on how to manage PI/PHI?</p>				
<p>Is your records management office involved to ensure records management policies and/or procedures are in place to manage the records in this project?</p>				
<p>Identify other activities that may present a privacy impact?</p>				
<p>Other comments:</p>				