SECTION I - OVERVIEW AND PIA INITIATION

Government Institution: Canadian Commercial Corporation

Name of Program or Activity of the Government Institution: Outsourcing of Payroll and Leave Requests

Description of Program or Activity:

At the present time, Canadian Commercial Corporation (CCC) outsources various human resources (HR) functions such as the processing of payroll and leave balances to another federal government institution, being Public Works and Government Services Canada. The relationship with the current third party provider is in the midst of a significant change and as a result CCC is reviewing its options to determine if these functions can be completed more effectively and cost efficiently by a private third party while still maintaining privacy controls.

CCC has reviewed various options and is currently considering entering into a contract to outsource payroll, leave processing functions and storage of human resources administration information to a private company called "ADP Canada Co.". ADP Inc., being the parent company of ADP Canada Co., has over 585,000 clients worldwide including 50,000 in Canada and it produces one in five payroll cheques in North America.

A general description for each of the HR programs or activities that the corporation intends to outsource to ADP Canada is as follows:

COMPENSATION AND BENEFITS

Description: This program includes activities that establish and administer pay, pension, and other benefit standards and practices to ensure that employees receive fair compensation/remuneration/payment for work performed. This activity may include maintaining records related to continuous service, garnishment, maternity and parental benefits, attendance and leave, rates of absenteeism, overtime, pay authorities, performance pay, rates of pay, severance pay, workforce adjustment, part-time, term employees, pay administration, life, disability, health and dental insurance plans, Canada Pension Plan, and Public Service Superannuation.

PAY AND BENEFITS

Description: This activity relates to the administration of pay and benefits within government institutions. Personal information may include name, contact information, biographical information, date of birth, date of death, Employee identification number, employee personnel information, financial information, and Social Insurance Number (SIN).

ATTENDANCE AND LEAVE

Description: This activity may include absence reports and leave applications, all of which include the individual's Personal Record Identifier (PRI) and correspondence about attendance and leave. The annual record of attendance and leave may be attached to the Employee Personnel Record. Some attendance and leave information exists in automated form in institutional personnel databases, especially in time/attendance, leave control and absenteeism systems.

EMPLOYEE PERSONNEL RECORD

Description: This activity includes a bank that describes information about an individual's employment with government institutions. Personal information may include name, contact information, biographical information, citizenship status, date and place of birth, educational information, employee identification number, employment equity information, assets loaned to employees, alternative work arrangements (e.g., telework, compressed work week), information related to superannuation, benefits, training and development, grievances, security incidents, any other employment-related requirements (e.g., security clearances, passport/visa information), financial information (for pay administration), medical information (including any special needs identified under duty to accommodate, or in the event of an emergency), other identification numbers, and Social Insurance Number (SIN).

Note: This should align with the program named and described in the institution's Info Source Chapter as required under section 5 of the <u>Access to Information Act.</u> For institutions that develop a Program Activity Architecture (PAA) as per the <u>Management</u>, Resources, and Results Structure Policy, the institutional Info Source chapter must align with the programs, activities and sub-activities described in the PAA.

Description of the class of records associated with the program or activity:

CLASSIFICATION OF POSITIONS (Record Number: PRN 919)

Description: Includes records related to the factors, elements, and other criteria used to establish the relative value of work for an occupational group. Classification provides a means of grouping similar types of work together so that it can be ranked by levels of difficulty and differentiated from other, dissimilar work. It also provides a basis for employee compensation in the institution.

Document Types: Employee lists and inventories, position classifications and reclassifications, institution-specific classification policies, organization charts, copies of Treasury Board Secretariat and/or internal policies, directives and guidelines, identification of functions or positions, classification standards, classification performance reports, language requirements of positions, competency requirements and/or profiles, classification grievances, statistical data, audit reviews and reports, generic work descriptions and, where applicable, documents related to the mandatory on-line publication of the reclassification of occupied positions.

COMPENSATION AND BENEFITS (Record Number: PRN 941)

Description: Includes records related to the programs and activities that establish and administer pay, pension, and other benefit standards and practices to ensure that employees receive fair compensation/remuneration/payment for work performed. May include records related to continuous service, garnishment, maternity and parental benefits, attendance and leave, rates of absenteeism, overtime, pay authorities, performance pay, rates of pay, severance pay, workforce adjustment, part-time, term employees, pay administration, life, disability, health and dental insurance plans, Canada Pension Plan, and Public Service Superannuation.

Document Types: Benefits chart, correspondence, compensation surveys, insurance plan directives and rules, copies of internal audit reports, terms and conditions relating to insurance eligibility, premiums, contributions, and benefits, memoranda of clarification, copies of collective agreements and terms and conditions of employment, part-time work agreements, and copies of relevant legislation, regulations, Treasury Board Secretariat policies and directives (if applicable), and/or institution-specific policies, procedures and guidelines.

EMPLOYMENT EQUITY AND DIVERSITY (Record Number: PRN 942)

Description: Includes records related to the programs and activities that ensure equitable representation and distribution in the workplace of Aboriginal people, members of visible minority groups, persons with disabilities and women. May include records related to workforce analysis, barriers identification, employment equity initiatives, monitoring activities, duty to accommodate, flexible work arrangements, self-identification, adaptive technologies, advertising campaigns and recruitment programs.

Document Types: Internal employment equity policies, copies of relevant legislation, regulations and policies, review and assessment reports, research studies and reports, repositories and/or inventories, guidelines for contractors, operational plans, statistical reports, surveys, delegation instruments, and Reports to Parliament.

HUMAN RESOURCES PLANNING (Record Number: PRN 949)

Description: Includes records related to the assessment of current human resources, the identification of future human resource requirements, and the development of plans to meet those requirements. Records may include information related to human resource planning and utilization, staff requisitions, pre-retirement,

succession planning and knowledge transfer, vacancy and turnover rates, internal staff mobility, priority placements, workforce adjustment, demographic analysis and forecasting, labour market surveying and analysis, environmental scanning, needs analysis, skills and competencies requirements, and planning and performance monitoring activities.

Document Types: Environmental scans and gap analyses, employee surveys, labour market studies and reports, drafts and final versions of institutional multi-year human resource plans, human resources audits, discussion papers, Human Resources Planning Committee records, research studies and reports, special thematic studies, demographic data, statistical reports, and copies of relevant legislation, regulations and policies.

OCCUPATIONAL HEALTH AND SAFETY (Record Number: PRN 922)

Description: Includes records related to the provision of a safe and healthy working environment for all federal employees (including employees of Crown Corporations, Foundations, Commissions, etc.). Records may include information related to occupational health and safety training, health assessments of employees and emergency medical services, environmental health investigations and surveys, first aid training, facilities, services and supplies, the selection and use of personal protective equipment and clothing, the rehabilitation and retraining of employees disabled by work injuries or illnesses, employee assistance services, the development and monitoring of occupational and environmental standards, procedures and other directives for the prevention of occupational illness and injury, the Canada Labour Code, workplace fitness programs, and institutional Occupational Health and Safety (OHS) Committees.

Document Types: Accident/injury reports, safety guides, copies of ergonomic assessments, first aid needs assessments and treatment manuals, first aid reports, advisory notices, exposure to hazardous material case files, safety inspection reports, OHS Committee records (agendas, minutes of meetings, records of decision, etc), medical examination reports, occupational injury or illness investigation reports, first aid training programs, central agency and/or institution-specific policies, standards, guidelines and procedures, and copies of relevant legislation and regulations.

OFFICIAL LANGUAGES (Record Number: PRN 923)

Description: Includes records related to the provision of services to the public and to employees in both official languages in accordance with the Official Languages Act and its pursuant regulations. May include information related to language of work, minority official language rights, equitable participation, signage, communications with and services to the public, use of official languages on institutional web sites, and administration of the official languages program.

Document Types: Reports of the Commissioner of Official Languages, copies of central agency and/or institution-specific policies, procedures and guidelines, complaint investigation reports, reports to Senior Management and/or relevant central agencies and copies of relevant legislation and regulations.

PERFORMANCE MANAGEMENT REVIEWS (Record Number: PRN 946)

Description: Includes records related to the evaluation of the performance of employees based upon regularly established objectives. May include information related to training requirements, employee/employer objectives and expectations, employee misconduct, performance pay, annual increments, probation, and discipline.

Document Types: Performance assessments, investigation reports, work plans, reports, and executive performance agreements.

RECRUITMENT AND STAFFING (Record Number: PRN 920)

Description: Includes records related to the recruitment and staffing of people to fill full-time or part-time positions within the institution. Records may include information related to screening, examining, testing, interviewing, assessing, selecting, hiring, and promoting candidates for employment. May also include information related to terms and conditions of employment (including conflict of interest), deployments, assignments, and secondments, student, professional, and occupational recruitment, post-employment appeals, and area of selection, as well as information received from or shared with central agencies responsible for recruitment and staffing, other employment agencies, or both.

Document Types: Unsolicited résumés and curricula vitae, model interview questions and answers, competition posters and announcements, application forms, competition assessment tools and rating guides, reference check procedures, checklists, and letters, inventories of qualified candidates (including pre-qualified pools), candidate inquiries and responses, copies of letters of offer, ratings board assessments, information within automated or Web-based application tools, and second language evaluation results, etc.

RELOCATION (Record Number: PRN 936)

Description: Includes records related to the authorized move of an employee from one place of duty to another or the authorized move of an employee from the employee's place of residence to the employee's first place of duty upon appointment to a position in the institution. Records may include information related to employee entitlements and obligations, employer obligations, third party service providers, interim accommodation, travel to new destination, spousal relocation, advances, legal fees, and long-term storage.

Document Types: Relocation expense claims, copies of institution-specific policies and procedures, and moving and storage company information.

TRAINING AND DEVELOPMENT (Record Number: PRN 927)

Description: Includes records related to formal and informal training received by employees to develop their knowledge, skills and competencies, maximise their potential and increase their productivity. Records may include information related to special development programmes, university fellowships, language training, training requirements, professional development, leadership development programs, learning and training policies, monitoring and reporting requirements, continuous learning and career counseling. May also include records related to liaison with training providers.

Document Types: Annual training reports, individual learning plans, employee orientation information, educational leave criteria, training and skills needs analysis documents, knowledge assessment criteria and results, performance level descriptions, criteria, assessments and agreements, institutional policies on membership fees, and second language training requirements.

Class of Record Number: PRN 920 and PRN 941	
 Proposal for a New Personal Information Bank Proposal to modify an existing Personal Information Bank - identify PIB registration number and current description: 	I

	Proposed new Standard Personal Information Bank
\boxtimes	Proposal to modify an existing Standard Personal Information Bank - identify Standard PIB number
	and current description:

APPLICATIONS FOR EMPLOYMENT

Description: This bank describes personal information related to individuals who have submitted applications for employment or provided curricula vitae (solicited or unsolicited) and related correspondence. The personal information provided by individuals on application forms, curricula vitae, and correspondence may include name, contact information, employment status and history, educational background, marital status, date of birth, gender, official language proficiency, employment equity, physical disability considerations, citizenship, Personal Record Identifier (PRI), Client Service Number, transcripts, letters of recommendation, and other personal information.

Class of Individuals: Public service employees and non-public service employees seeking employment with the institution; individuals whose names have been provided as employment references, personal references, or both; and individuals referring another individual for a position.

Purpose: To maintain an inventory of potential candidates that may be used for consideration in a staffing process when vacancies arise within the institution.

Consistent Uses: Relevant information would be transferred to an employee personnel record (see "Employee Personnel Record" - Standard Personal Information Bank PSE 901) if the individual accepts an offer of employment. This information may also be used for planning and evaluation purposes. The information may also be transferred to another institution, if the other institution is deemed to be more appropriate for potential employment opportunities for the individual. The data collected and maintained may be used for statistical purposes, training requirements, and other development opportunities. The personal information about individuals self-identified in employment equity groups may be used for statistical purposes by the institution and may be shared with the Public Service Commission of Canada, Treasury Board of Canada Secretariat, and the Canada Public Service Agency for the same purpose.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 920

Bank Number: PSU 911

ATTENDANCE AND LEAVE

Description: The records containing the information described in this bank may include absence reports and leave applications, as well as physicians' certificates associated with sick leave, all of which include the individual's Personal Record Identifier (PRI) and correspondence about attendance and leave. The annual record of attendance and leave may be attached to the Employee Personnel Record. Some attendance and leave information exists in automated form in institutional personnel databases, especially in time/attendance, leave control and absenteeism systems.

Class of Individuals: Employees of the institution.

Purpose: The purpose of these records is to support administration of employee attendance and leave within government departments and agencies.

Consistent Uses: To record attendance and authorize leave. To support decisions on pay and benefits, such as those concerning leave and termination of employment, and to evaluate use of leave and rates of

absenteeism.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 941

Bank Number: PSE 903

DISCIPLINE

Description: This bank describes personal information related to the application of discipline standards in the federal public service and related penalties, including termination of employment, suspension, demotion to a position at a lower maximum rate of pay and financial penalties that may be applied for breaches of discipline or misconduct in government institutions. Personal information may include name, contact information, biographical information, date of birth, employee identification number, employee personnel information, financial information, legal advice, medical information, nature of the misconduct and the disciplinary measure, opinions and views of, or about, individuals, and signature.

Class of Individuals: Employees and former employees of the institution who are/were the subject of the alleged misconduct, interviewees, medical practioners, representatives or bargaining agents, and witnesses.

Purpose: Personal information is used to investigate alleged misconduct in government institutions and to determine the need for, and nature of, disciplinary actions. Information is also collected to support decisions on pay and benefits, attendance and leave, transfer, demotion and termination of employment. For many institutions, personal information is collected pursuant to paragraph 12(1)(c) of the Financial Administration Act. For those institutions not subject to the FAA, consult the institution's Access to Information and Privacy Coordinator to determine the legal authority for the collection.

Consistent Uses: Some discipline measures may also be described in Standard Personal Information Bank Employee Personnel Record - PSE 901. Information concerning grievances is described in Standard Personal Information Bank Grievances - PSE 910. Where applicable, information may be shared with the following entities: 1) the Treasury Board of Canada Secretariat in cases of terminations / demotions, interpretation / application of cases involving important jurisprudential issues, and other special instances; 2) professional regulatory bodies, as required; and 3) law enforcement agencies in the event of an alleged criminal offence. Information may also be used or disclosed for program evaluation.

Retention and Disposal Standards: (1) For information about the length of time that specific types of common administrative records are maintained by a government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator. (2) Documentation concerning a specific employee including documentation related to disciplinary action - the time limit for disposal is that specified in applicable collective agreements or a minimum of two years following the date of disciplinary action, provided no further disciplinary action has been recorded in the meantime. (3) In cases where a disciplinary action has been rescinded, the onus is on the institution to ensure that the documentation of the action concerned is immediately destroyed.

RDA Number: 98/005

Related Record Number: PRN 926 and PRN 946

Bank Number: PSE 911

EMPLOYEE ASSISTANCE

Description: The records containing the information described in this bank are treated in a confidential fashion that is relative to an employee's involvement in an Employee Assistance Program (EAP). These records may include notice of voluntary or mandatory (supervisory work performance related) referral; records of reference to, or reports and correspondence from a health professional or rehabilitation agency; and only non-medical interpretations concerning an employee's work capability or limitations. All personal medical data shall be maintained in a medical protected status under the control of the Occupational and Environmental Health Services Agency. Records relating to work performance deficiencies, absenteeism and disciplinary matters are to be held in the appropriate institutional record (with its related personal information bank) and not held with EAP files.

Class of Individuals: Employees of the institution.

Purpose: The purpose of these records is to document information necessary for the administration of the Employee Assistance Program. To determine the need for employee assistance counseling, referrals for medical evaluations and participation in rehabilitation programs.

Consistent Uses: To support decisions regarding employee assistance measures.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 922

Bank Number: PSE 916

EMPLOYEE PERSONNEL RECORD

Description: This bank describes information about an individual's employment with government institutions. Personal information may include name, contact information, biographical information (including any military service, professional certifications or designations), citizenship status, date and place of birth, educational information, employee identification number, employment equity information, delegated authorities given or assets loaned to employees (e.g., staffing and financial signing authorities, usage of institutional materiel), alternative work arrangements (e.g., telework, compressed work week), information related to superannuation, benefits, training and development, grievances, security incidents, any other employment-related requirements (e.g., firearms permits, security clearances, passport/visa information), financial information (for pay administration), medical information (including any special needs identified under duty to accommodate, or in the event of an emergency), other identification numbers, signature and Social Insurance Number (SIN).

Class of Individuals: Current and former employees of government institutions, emergency contacts of employees, and may also include spouses, dependants, and beneficiaries.

Purpose: Personal information is used to facilitate personnel administration in the employing institution and to ensure continuity and accuracy when an employee is transferred to another institution. For most government institutions, personal information is collected under the authority of the Public Service Employment Act (PSEA). For those institutions not subject to the PSEA, consult the institution's Access to Information and Privacy Coordinator to determine the legal authority for the collection. The Social Insurance Number is collected under the authority of the Income Tax Act.

Consistent Uses: Information is disclosed to Canada Revenue Agency, refer to institution-specific personal information bank - Information Returns (Infodec) Databank - CRA PPU 150, and to the Province of Quebec (where applicable) for income tax purposes. Information is also disclosed to Human Resources and Skills Development Canada (HRSDC) for employment insurance and pension purposes. Information may also be

disclosed to Public Works and Government Services Canada or to a third party service provider to facilitate payment of salary including direct deposit, refer to central personal information bank Public Service Pay Systems - PWGSC PCE 705. Where applicable, information may also be disclosed to various provincial health insurance plans or third-party group insurance companies. Where required, information may be used to confirm the identity of employees for access to government and departmental websites and databases. Selected information is shared with previous employers for the purpose of finalizing payments, including retroactive payments and the recovery of outstanding amounts owing to the Crown. Information may also be used or disclosed for program evaluation purposes.

Retention and Disposal Standards: The personnel file shall be retained by the employing government institution (as defined under section 3 of the Privacy Act) for the duration of employment plus one (1) year. The government institution shall then transfer the file to Library and Archives Canada-Federal Records Centre. Library and Archives Canada will destroy the civilian personnel file when the individual reaches eighty (80) years of age or two years after the individual's death, if there is no further action pending.

RDA Number: 98/005 and 98/018 Related Record Number: PRN 920

Bank Number: PSE 901

EMPLOYMENT EQUITY AND DIVERSITY

Description: The records containing the information described in this bank include personal information on employees such as education, work history and career aspirations, and training and development, which is collected by means of questionnaires and/or interviews or compiled from employees' files or automated data systems. The information is collected on a voluntary basis, and respondents are asked to identify whether they are male or female, whether they are an aboriginal person, and whether they have a disability or are a member of a visible minority group. The Personal Record Identifier (PRI) may be used to identify employees in instances where government institutions are not able to employ an anonymous questionnaire, as well as when these identifiers are required to locate employee records.

Class of Individuals: Employees of the institution.

Purpose: Related records provide documentation for the implementation of the employment equity policy in government institutions. Data are collected to provide a comprehensive picture of employees by sex and by target group status (e.g., women, aboriginal peoples, persons with disabilities and members of visible minority groups). This information is used to compile a personnel profile of employees and to compare the situation of target group members with non-target group members within a government institution and with their counterparts in the general labour market. The Personal Record Identifier (PRI) may be used to link information in this bank with that in another bank containing employee information (e.g., the Personnel Management Information System) in order to obtain statistical information, where the securing of such information would be consistent with the uses for which the personal information was collected. Self-identification information may be obtained from the departmental records as described in Staffing (PSE 902).

Consistent Uses: The department may collect data for statistical purposes, for purposes relating to individuals, or for both. Personal data are released to the Employment Equity Target Group Data Bank (CPSA PCE 739) for statistical purposes only. The information gathered will be used for institutional purposes in the government's employment equity program to identify and eliminate systemic discrimination in employment and to introduce temporary special measures to ensure that target groups participate in and are equitably represented in the federal public service. It may also be used for policy and planning purposes related to employment equity.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 942

Bank Number: PSE 918

HUMAN RESOURCES PLANNING

Description: This bank describes information related to salary management and human resources planning, including reporting and forecasting functions. Personal information may include name, contact information, biographical information, educational information, employee identification number, employee equity information, employee personnel information, and opinions and views of, or about, individuals.

Class of Individuals: Current and former employees of government institutions, job applicants, students, casual and contract employees, and Interchange Canada participants.

Purpose: Personal information is collected to assess current and future human resources and salary requirements. Information may be used for a number of activities, including succession planning, facilities management, duty to accommodate persons with disabilities, determining vacancy and turnover rates, and workforce adjustment. Some information may be collected by means of employee exit interviews, which are used to identify issues, trends, and needs in the organization. For many institutions, personal information is collected pursuant to the Financial Administration Act (FAA), Public Service Employment Act, Employment Equity Act, and the Canadian Human Rights Act (section 16). For those institutions not subject to these Acts, consult the institution's Access to Information and Privacy Coordinator to determine the legal authority for the collection.

Consistent Uses: Some employee information may also be shared with/described in the following Standard Personal Information Banks: Employment Equity Program - PSE 918, Employee Personal Record - PSE 901, Pay and Benefits - PSE 904, Staffing - PSE 902, Training and Development - PSE 905, and Official Languages - PSE 906. Information may be also be used or disclosed for program evaluation.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator

RDA Number: Institution-specific Related Record Number: PRN 949

Bank Number: PSU 935

MEMBERS OF BOARDS, COMMITTEES AND COUNCILS

Description: This bank describes information used in the identification and selection of individuals to fill positions on institutional Boards, Committees and Councils. The personal information collected may include the following: full name, contact information, official language of choice, date of birth, country of birth, citizenship, gender, marital status, Social Insurance Number (SIN), unique identification number (e.g., unique employee number), terms and conditions of appointment including remuneration (e.g., salary, honoraria, per diem rate) and benefits, signature, physical limitations and any other relevant medical information, photographs or other image recordings, educational background, employment status, work history, professional affiliations, credit card and financial institution information, government security clearances, biographical information (including information about family members), conflict of interest declarations, letters of reference/recommendation, appointment date, and duration and resignation dates, if applicable.

Class of Individuals: Candidates, as well as current and former members of Boards, Committees, and Councils, their family members, and individuals whose names have been provided as personal references.

Purpose: The personal information collected is used to support the identification and selection of individuals to

serve on oversight or governance bodies. The information may be used to provide advice to the Minister or Head of the institution to fill existing and/or forthcoming vacancies and to maintain an inventory of potential candidates. The personal information is also used to manage the administration of expenses (e.g., travel) and compensation and benefits packages, conduct performance evaluations, maintain an inventory of current and former appointees, record potential conflicts of interest and any compliance action required, and to communicate with these individuals.

Consistent Uses: This information may be used in the preparation of reports for senior management and broader audiences (e.g., Annual Reports), planning and evaluation purposes, and communications materials (e.g., press releases, biographies, etc.) that may be disseminated in multiple formats, including the institution's web site. The Social Insurance Number (SIN) is collected for the Canada Revenue Agency (CRA) under the authority of the Income Tax Act (Information Returns (Infodec) Databank - CRA PPU 150) and, where applicable, the Province of Quebec Income Tax Act.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: Institution-Specific. Related Record Number: PRN 938

Bank Number: PSU 919

OCCUPATIONAL HEALTH AND SAFETY

Description: This bank describes information that is used in support of a government institution's occupational health and safety activity, including the prevention of accidents and injuries or illnesses related to occupations, authorization of leave and benefits associated with work-related injury or illness, employee assistance services, fitness to return to work assessments, duty to accommodate, health and ergonomic assessments, health and safety complaints, injury compensation, and rehabilitation and retraining. Personal information may include name, contact information, employee identification number, employee personnel information, financial information, nature of complaint, medical information, opinions and views of, or about, individuals, and signature.

Class of Individuals: Current and former employees of government institutions, including casual and contract employees; private sector health practitioners; health and safety professionals; attendants for persons requiring assistance; and individuals designated as emergency contacts of employees

Purpose: Personal information is used to administer occupational safety and health activities in government institutions, which includes the promotion of a safe and healthy workplace for employees and others, the prevention of accidents, occupational injuries and illnesses and, where applicable, the investigation of occurrences of such injuries and illnesses. Information may be collected pursuant to paragraph 7(1)(e) and subsection 11.1 of the Financial Administration Act; sections 114 and 240 of the Public Service Labour Relations Act; Part II of the Canada Labour Code and Part XVI of the Canada Occupational Health and Safety Regulations, the Government Employees Compensation Act (GECA), and the National Joint Council Directives.

Consistent Uses: Information may be used or disclosed for the following reasons: to support decisions related to worker's compensation and injury-on-duty leave; as a means of preventing injuries and illnesses and subsequent disabilities arising out of, or aggravated by, conditions of work; to establish that individuals subject to certain identified occupational risks are able to continue working without detriment to their health or safety or to that of others; and to establish the conditions under which certain individuals with identified illnesses or disabilities are able to continue to work under controlled conditions. Information may be shared with private sector health care providers. Information may be used to communicate with contacts of employees in emergency situations. Information concerning occupational health evaluations and all personal medical information is retained by the Medical Services Branch, Health Canada under medical confidential status; refer to central personal information banks Occupational Health Medical Records - HCan PCE 701 and Public

Service Health Medical Advisory Committee - HCan PCE 702. Information with respect to safety and health complaints and causes of accidents/injuries for accident prevention and health protection purposes is used to support the effective administration of each institution's safety and health activity; such information is also disclosed to the institution's work place health and safety committee. Information is also used to process payments and charge-backs with respect to injury compensation claims. Information related to injury compensation claims, including related correspondence and amounts paid, is retained by Human Resources and Skills Development Canada (HRSDC) or a third party service provider and is shared with the institution of the affected employee and, where applicable, the relevant provincial or territorial workers' compensation board. HRSDC holds information pertaining to employee compensation amounts, which are charged to institutions and distributed on a cost-recovery basis; refer to central personal information bank Government Compensation Records - HRSDC PCE 701 and Pilot Project in Disability Management - HRSDC PCE 705. Information may also be shared with HRSDC, specifically, with safety officers for the purposes of accident and refusal to work investigations and the stipulation of corrective measures. Information may be shared with/described in other Standard Personal Information Banks pertaining to human resources activities including: Employee Personnel Record - PSE 901; Attendance and Leave - PSE 903; Employee Assistance - PSE 916; Pay and Benefits PSE 904; and Grievances - PSE 910. The investigation and settlement of vehicle accidents is also described in Standard Personal Information Bank Vehicle, Ship, Boat and Aircraft Accidents PSE 908. Information may also be used or disclosed for planning and program evaluation purposes.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 922

Bank Number: PSU 907

OFFICIAL LANGUAGES

Description: This bank contains course enrolment and attendance information; language training applications containing basic personal data, such as first official language, date of birth, and Personal Record Identifier (PRI) for purposes of identification; language knowledge examination scores; training certificates and correspondence about the official languages qualifications of employees. The bank may also contain duplicate input forms for the Official Languages Information System (OLIS). Language examination, exemption and training records are attached to the Employee Personnel Record. Similar data is also described by translation required Particular Banks of the Public Service Commission and Treasury Board Secretariat.

Class of Individuals: Employees of the institution.

Purpose: The purpose of the information described by this bank is to provide documentation for administration of official languages policies as they pertain to employees of the federal public service, to document and support decisions pertaining to official languages qualifications and language testing and to document the language training needs and accomplishments of employees.

Consistent Uses: To support and document decisions concerning individual employees on staffing, entitlement to bilingual bonus, transfers and promotions; and to aid in determining the linguistic status of employees and auditing of the administration of official language programs.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 923

Bank Number: PSE 906

PAY AND BENEFITS

Description: This bank describes information related to the administration of pay and benefits within government institutions. Personal information may include name, contact information, biographical information, date of birth, date of death, Employee identification number, employee personnel information, financial information, and Social Insurance Number (SIN).

Class of Individuals: Current and former employees of government institutions

Purpose: Personal information is shared with Public Works and Government Services (PWGSC) or a third party service provider and is used to disburse salaries and allowances and to process deductions and orders for garnishment and diversion of funds. Personal information is collected under various Acts including the Financial Administration Act, the Government Employees Compensation Act, and the Public Service Labour Relations Act. The Social Insurance Number (SIN) is collected under the authority of the Income Tax Act, Canada Pension Plan, and the Employment Insurance Act, and for some institutions, the SIN is shared with PWGSC to create the Personal Record Identifier (PRI).

Consistent Uses: Information is shared with Public Works and Government Services Canada or a third party service provider, refer to central personal information banks Public Service Pay Systems -PWGSC PCE 705 and Public Service Pensions Data Bank, PWGSC - PCE 702). Information, including the Social Insurance Number, is disclosed to the Canada Revenue Agency (refer to institution-specific personal information bank Information Returns (Infodec) Databank - CRA PPU 150) and the Province of Quebec (if applicable) for taxation and pension purposes. Information may also be shared with the Department of Justice Canada to administer the Family Orders and Agreements Enforcement Assistance Act and the Garnishment, Attachment and Pension Diversion Act; refer to the following institution-specific personal information banks: Family Orders and Agreements Enforcement Assistance - JUS PPU 125 and Garnishment Registry - JUS PPU 150. Information may be shared with third party service providers, for select institutions. Some information on pay and benefits may also be shared with/described in the following Standard Personal Information Banks: Employee Personnel File - PSE 901, Grievances - PSE 910, and Discipline - PSE 911. Information may also be used or disclosed for program evaluation.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 941

Bank Number: PSE 904

PERFORMANCE MANAGEMENT REVIEWS

Description: The records containing the information described in this bank may include appraisals, reports and correspondence concerning an employee's work performance in terms of skills, abilities, accomplishments and interests.

Class of Individuals: Employees of the institution.

Purpose: The purpose of these records is to maintain information regarding the level of performance on individual employees within government institutions and to determine the level of performance of individual employees, including the identification of training and development needs, approval of performance pay and annual increments, retention of employees, extension of probation and rejection of employees on probation.

Consistent Uses: To support decisions regarding promotions, transfers, demotion, employee assistance, discipline and termination of employment.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 946

Bank Number: PSE 912

RELOCATION

Description: This information is used to document the processes involved in the relocation of employees and their families. The personal information collected includes the individuals' name and job title, organization name, work telephone, work address, job classification and level, Personal Record Identifier (PRI), name of delegated departmental officer or manager, signatures, name of spouse or common-law partner, names of children and/or extended family members, special medical needs that may need to be accommodated, monthly statement of credit card expenses, personal declarations of expenses when receipts are not obtainable or have been inadvertently destroyed, mortgage or rental cost information, legal fees and real estate fees.

Class of Individuals: Employees who relocate and their spouses or common-law partners, their children and/or extended family members. Also includes individuals representing third party suppliers, such as moving and storage companies.

Purpose: The purpose of this information is to document and administer the relocation of individuals and their family members. This includes information related to relocation planning, selection of new accommodations, shipment of personal and household effects, and move authorizations and claims.

Consistent Uses: Non-personal information may be used to provide reports on employee relocations to management. The information may also be used for research, planning, audit and evaluation purposes.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/001 and 99/004 Related Record Number: PRN 936

Bank Number: PSU 910

STAFFING

Description: This bank describes information about recruitment and staffing activities, which includes solicited and unsolicited applications for employment, position reclassifications, secondments, deployments, and other work assignments or arrangements within government institutions. Personal information may include name, contact information, assessment/test results, biographical information, citizenship status, date and place of birth, educational information, employee identification number, employment equity information, employee personnel information, financial information, official language proficiency, medical information, opinions and views of, or about, individuals, and signature.

Class of Individuals: Employees of the institution and other individuals who apply for employment in the institution including through recruitment initiatives, as well as individuals who provide references or are supervisors of applicants.

Purpose: Personal information is used to administer recruitment and staffing activities in government institutions, which includes maintaining an inventory of potential candidates for future staffing actions. For most government institutions, personal information is collected pursuant to the Public Service Employment Act (PSEA), the Employment Equity Act (EEA), and the Canadian Human Rights Act (section 16). For those institutions not subject to these Acts, consult the institution's Access to Information and Privacy Coordinator to determine collection authority.

Consistent Uses: Information may be disclosed to the Public Service Commission, Treasury Board Secretariat and other government institutions for recruitment, employment equity, and staffing purposes, including complaints - refer to the following personal information banks: for the Public Service Commission of Canada: Applicant Inventories and Referrals - PSC PPU 015; Occupational Test Results - PSC PPU 025, Second Language Evaluation (SLE) Test Results - PSC PPU 030. Executive Resourcing - PSC PCE 746. Analytical Environment - PSC PCE 707, and Investigations - PSC PPU 010; for Treasury Board of Canada Secretariat: Employment Equity Data Bank - CPSA PCE 739 and Workforce Adjustment Monitoring (WFAM) System - CPSA PCE 804. Information relating to staffing complaints may be shared with the Public Service Commission (Investigations - PSC PPU 010) and the Public Service Staffing Tribunal, when required. On request, selected information may be disclosed to a participant in a staffing process. Information may also be shared with third party service providers to manage recruitment initiatives. Information may also be used or disclosed for human resources planning and studies (refer to Standard Personal Information Bank Human Resources Planning - PSU 935) and staffing decisions may also be described in Standard Personal Information Bank Employee Personnel Record - PSE 901. Voluntary self identification information relating to employment equity programs and services is also described in Standard Personal Information Bank Employment Equity and Diversity - PSE 918. Selected information about reclassifications may be proactively disclosed on government institutions' websites. Information may also be used or disclosed for program evaluation and reporting purposes.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 919 and PRN 920

Bank Number: PSE 902

TRAINING AND DEVELOPMENT

Description: This bank describes personal information collected to support an institution's training and development programs (e.g., mentoring, career orientation, developmental work assignments or arrangements, etc.). Personal information may include name, contact information, educational information, employee identification number, employment equity information, employee personnel information, financial information, biographical information, and assessment and training results.

Class of Individuals: Individuals who are employed by federal institutions who register for training or development courses or programs.

Purpose: Personal information is used to register and pay for approved training and development activities. Where applicable, government institutions may receive information from the Canada School of Public Service or other course providers about registration costs and training results. For most government institutions, personal information is collected under the authority of the Public Service Staff Relations Act (PSSRA) and the Public Service Employment Act (PSEA). For those institutions not subject to the PSSRA or the PSEA, consult the institution's Access to Information and Privacy Coordinator to determine collection authority.

Consistent Uses: Information may be used to link voluntary self-identification data to information contained in other banks (refer to Standard Personal Information Bank Employment Equity and Diversity - PSE 918) for the purpose of implementing and evaluating government policies relating to employment equity and diversity.

Some information may also be shared with/described in the following Standard Personal Information Banks: Accounts Receivable - PSU 932, Performance Management Reviews - PSE 912 and Employee Personnel Record - PSE 901. Information may also be used or disclosed for program evaluation.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 927

Bank Number: PSE 905

Legal Authority for Program or Activity:

Subsections 8(1) to (3) of the Canadian Commercial Corporation Act provides the legal authority for the processing of payroll and other HR administration activities:

Employment of officers and employees

<u>8.</u> (1) The Corporation may employ such officers or employees as it deems necessary to carry out this Act and may determine their conditions of employment and their remuneration.

Corporation pays remuneration

(2) The remuneration determined under subsection (1) shall be paid by the Corporation.

Control and supervision

(3) The Corporation has, under the Minister, the control and supervision of the officers and employees employed under this Act.

Note: Prior to proceeding with the assessment it is essential that Parliamentary authority for the relevant program or activity be established. Generally, Parliamentary authority is usually contained in an Act of Parliament or subsequent regulations, or approval of expenditures proposed in the Estimates and authorized by an *Appropriations Act*. If legal authority is unclear consult your Legal Service to determine authority for the program or activity. (See question 1 of **Section V**)

Summary of the project / initiative / change:

At the present time, CCC obtains signed consent from employees at the commencement of their employment to collect personal information for the processing of payroll and HR administration. The collection, use and disclosure of the personal information submitted is used solely to complete payroll and benefit requirements, process leave requests and HR administration. The processing of these functions is currently being completed by a third party, being Public Works and Government Services Canada. The proposed change is to outsource these functions to a private third party for cost savings and efficiency improvements.

CCC employees will use the internet (Microsoft Internet Explorer) to access and modify their respective personal information that will be stored at ADP. Access by employees to their own information will be protected with an account name/password combination. In sending notifications to CCC employees and to their managers as needed, ADP will use Simple Mail Transfer Protocol (SMTP). If, for example, an employee requests leave, it will do so through an e-mail to ADP, which will in turn generate a notification to the employee's manager who will in turn approve or disapprove the leave. The approval or disapproval of leave will then be communicated back to the employee and the leave databank at ADP will be updated depending on the result of the request. For CCC HR personnel accessing the ADP database regarding payroll and other functions, the security is heightened and they must use the ADP specific Public Key Infrastructure (PKI) application or key that will be a uniquely encrypted access key for HR personnel to use on their desktop.

As part of their risk mitigation strategy, ADP maintains an enterprise-wide Information Security Program and has implemented administrative, physical and technical safeguards that reasonably and appropriately protect the Confidentiality, Integrity and Availability of client confidential information from unauthorized access or disclosure.

ADP also follows a comprehensive series of checks and controls that correlate or map with the COSO/COBIT standards framework, an industry standards framework used to optimize enterprise risk management. CobiT is a widely recognized set of Information Technology Standards that provide a framework for overall best practices to control internal operations. The COBIT framework links IT processes, resources and information to enterprise strategies and objectives. The COSO/COBIT framework is supported by best practices as defined by The National Institute of Standards and Technology which through its Computer Security Division (CSD), provides standards and technology to protect information systems against threats to the confidentiality of information, integrity of information and processes, and availability of information and services in order to build trust and confidence in Information Technology systems.

COMPENSATION

Description: Includes records related to the programs and activities that establish and administer pay, pension, and other benefit standards and practices to ensure that employees receive fair compensation/remuneration/payment for work performed. May include records related to continuous service, garnishment, maternity and parental benefits, attendance and leave, rates of absenteeism, overtime, pay authorities, performance pay, rates of pay, severance pay, workforce adjustment, part-time, term employees, pay administration, life, disability, health and dental insurance plans, Canada Pension Plan, and Public Service Superannuation.

PAY AND BENEFITS

Description: This bank describes information related to the administration of pay and benefits within government institutions. Personal information may include name, contact information, biographical information, date of birth, date of death, Employee identification number, employee personnel information, financial information, and Social Insurance Number (SIN).

ATTENDANCE AND LEAVE

Description: The records containing the information described in this bank may include absence reports and leave applications, all of which include the individual's Personal Record Identifier (PRI) and correspondence about attendance and leave. The annual record of attendance and leave may be attached to the Employee Personnel Record. Some attendance and leave information exists in automated form in institutional personnel databases, especially in time/attendance, leave control and absenteeism systems.

EMPLOYEE PERSONNEL RECORD

Description: This bank describes information about an individual's employment with government institutions. Personal information may include name, contact information, biographical information, citizenship status, date and place of birth, educational information, employee identification number, employment equity information, assets loaned to employees, alternative work arrangements (e.g., telework, compressed work week), information related to superannuation, benefits, training and development, grievances, security incidents, any other employment-related requirements (e.g., security clearances, passport/visa information), financial information (for pay administration), medical information (including any special needs identified under duty to accommodate, or in the event of an emergency), other identification numbers, and Social Insurance Number (SIN).

Note: Short description of the institutions business objectives, project objectives, project / initiative / change scope, product scope, stakeholders and assumptions.

SECTION II - RISK AREA IDENTIFICATION AND CATEGORIZATION

A: Type of Program or Activity	Level of Risk to Privacy
Program or activity that does NOT involve a decision about an identifiable individual	□ 1
Personal information is used strictly for statistical / research or evaluations including mailing list where no decisions are made that directly have an impact on an identifiable individual. The Directive on PIA applies to administrative use of personal information. The Policy on Privacy Protection requires that government institutions establish an institutional Privacy Protocol for addressing non-administrative uses of personal information.	
CCC Note: Any decision is made outside of the program and the personal information is used for processing only.	
Administration of Programs / Activity and Services	⊠ 2
Personal information is used to make decisions that directly affect the individual (i.e. determining eligibility for programs including authentication for accessing programs/services, administering program payments, overpayments, or support to clients, issuing or denial of permits/licenses, processing appeals, etc.)	
Compliance / Regulatory investigations and enforcement	□ 3
Personal information is used for purposes of detecting fraud or investigating possible abuses within programs where the consequences are administrative in nature (i.e., a fine, discontinuation of benefits, audit of personal income tax file or deportation in cases where national security and/or criminal enforcement is not an issue).	
Criminal investigation and enforcement / National Security	☐ 4
Personal information is used for investigations and enforcement in a criminal context (i.e. decisions may lead to criminal charges/sanctions or deportation for reasons of national security or criminal enforcement).	
<u>Details:</u> CCC will be responsible for the inputting and maintenance of the personal information databanks to ADP. ADP will in turn use the information to process payroll and benefits and other HR administration functions. ADP will store the data bank to be populated by CCC. In all functions, CCC will provide information to ADP and ADP then processes the request with CCC reviewing and approving the final action. No decisions will be made by ADP that would have an impact on employees as ADP will only process the requests as made by CCC. Any dispute regarding the processing of the request is dealt with by CCC. ADP will only use the personal information for administrative purposes of payroll processing and human resources administration.	

B: Type of Personal Information Involved and Context	Level of risk to privacy
Only personal information, with no contextual sensitivities, collected directly from the individual or provided with the consent of the individual for disclosure under an authorized program. For example: general licensing, or renewal of travel documents or identity documents.	□ 1
Personal information, with no contextual sensitivities after the time of collection, provided by the individual with consent to also use personal information held by another source. For example: an application process with a requirement for independent verification of certain non-	□ 2

sensitive factual details.	
Social Insurance Number, medical, financial or other sensitive personal information and/or the context surrounding the personal information is sensitive. Personal information of minors or incompetent individuals or involving a representative acting on behalf of the individual.	⊠ 3
For example: the personal information by association indirectly reveals information on the health, financial situation, religious or lifestyle choices of the individual.	
Sensitive personal information, including detailed profiles, allegations or suspicions, bodily samples and/or the context surrounding the personal information is particularly sensitive.	
For example: personal information that reveals intimate details on the health, financial situation, religious or lifestyle choices of the individual and which, by association, reveals similar details about other individuals such as relatives.	

<u>Details:</u> At the present time, CCC obtains signed consent from employees at the commencement of their employment to collect personal information for the processing of payroll and HR functions. The collection, use and disclosure of the personal information submitted is used solely to complete payroll and benefit requirements, to process leave requests and for HR administration. The processing of these functions is currently being completed by a third party. The personal information collected includes date of birth, SIN (not used as an identifier), language preference, marital status, complete address, email, phone number, cellular number, and personal record identifier.

C: Program or Activity Partners and Private Sector Involvement	Level of risk to privacy
Within the institution (amongst one or more programs within the same institution)	<u> </u>
With other federal institutions	2
With other or a combination of federal/ provincial and/or municipal government(s)	□ 3
Private sector organizations or international organizations or foreign governments	⊠ 4

<u>Details:</u> The payroll and leave processing functions will be performed by a private sector organization that specializes in these functions. The proposed private sector organization is called "ADP Canada Co." ADP Inc., being the parent company of ADP Canada Co., has over 585,000 clients worldwide including 50,000 in Canada and it produces one in five payroll cheques in North America. ADP specializes in providing HR support functions and prides itself on its ability to protect confidential information.

D: Duration of the Program or Activity	Level of risk to privacy
One time program or activity	□1
Typically involves offering a one-time support measure in the form of a grant payment as a social support mechanism.	
Short-term program	□2
A program or an activity that supports a short-term goal with an established "sunset" date.	
Long-term program	⊠ 3
Existing program that has been modified or is established with no clear "sunset".	

<u>Details:</u> The commercial contract between CCC and ADP will provide that either party can terminate the contract upon written notice and there will be no long term commitment, however, provided that the service and cost are acceptable to CCC, and that there are no breaches of confidentiality, CCC intends to retain this service provider

indefinitely.			

E: Program Population	Level of risk to privacy
The program affects certain employees for internal administrative purposes.	1
The program affects all employees for internal administrative purposes.	⊠ 2
The program affects certain individuals for external administrative purposes.	□ 3
The program affects all individuals for external administrative purposes.	<u> </u>
<u>Details:</u> All employees will have their payroll and leave functions processed through this private third party provider.	

F: Technology and Privacy	
1. Does the new or modified program or activity involve the implementation of <u>a new electronic system</u> , software or application program including collaborative software (or groupware) that is implemented to support the program or activity in terms of the creation, collection or handling of personal information?	⊠ YES □ NO
2. Does the new or modified program or activity require any modifications to <u>IT legacy</u> systems and / or services?	☐ YES ☑ NO
3. Does the new or modified program or activity involve the implementation of one or more of the following technologies:	
3.1 Enhanced identification methods This includes biometric technology (i.e. facial recognition, gait analysis, iris scan, fingerprint analysis, voice print, radio frequency identification (RFID), etc) as well as easy pass technology, new identification cards including magnetic stripe cards, "smart cards" (i.e. identification cards that are embedded with either an antenna or a contact pad that is connected to a microprocessor and a memory chip or only a memory chip with non-programmable logic). Please specify:	□YES ☑ NO
3.2 Use of Surveillance: This includes surveillance technologies such as audio/video recording devices, thermal imaging, recognition devices, RFID, surreptitious surveillance / interception, computer aided monitoring including audit trails, satellite surveillance etc. Please specify:	□YES ☑ NO
3.3 Use of automated personal information analysis, personal information matching and knowledge discovery techniques: For the purposes of the Directive on PIA, government institutions are to identify those activities that involve the use of automated technology to analyze, create, compare, cull, identify or extract personal information elements. Such activities would include personal	□YES ⊠ NO

information matching, record linkage, personal information mining, personal information comparison, knowledge discovery, information filtering or analysis. Such activities involve some form of artificial intelligence and/or machine learning to uncover knowledge (intelligence), trends/patterns or to predict behaviour.	
Please specify:	
A YES response to any of the above indicates the potential for privacy concerns and risks that will need to be considered and if necessary mitigated.	

G: Personal Information Transmission	Level of risk to privacy
The personal information is used within a closed system.	□ 1
No connections to Internet, Intranet or any other system. Circulation of hardcopy documents is controlled.	
The personal information is used in system that has connections to at least one other system.	⊠ 2
The personal information is transferred to a portable device or is printed.	□ 3
USB key, diskette, laptop computer, any transfer of the personal information to a different medium.	
The personal information is transmitted using wireless technologies.	4
Details: As in the current situation, CCC will populate a database that will reside on a server located at ADP Canada. The server will be accessed and updated by CCC and ADP employees will access the data on a "need-to-know" basis.	

H: Risk Impact to the Institution	Level of risk to privacy
Managerial harm.	⊠ 1
Processes must be reviewed, tools must be changed, change in provider / partner.	
Organizational harm.	□ 2
Changes to the organizational structure, changes to the organizations decision-making structure, changes to the distribution of responsibilities and accountabilities, changes to the program activity architecture, departure of employees, reallocation of HR resources.	
Financial harm.	□3
Lawsuit, additional moneys required reallocation of financial resources.	
Reputation harm, embarrassment, loss of credibility.	□ 4
Decreased confidence by the public, elected officials under the spotlight, institution strategic outcome compromised, government priority compromised, impact on the Government of Canada Outcome areas .	

<u>Details:</u> In the event that a security breach occurs within the service provider, employee personal information may be disclosed to third parties. In this instance, CCC would have the option to discontinue use of the service provider. This release of information could also happen to CCC itself.

I: Risk Impact to the Individual or Employee	Level of risk to privacy
Inconvenience.	<u> </u>
Reputation harm, embarrassment.	2
Financial harm.	⊠ 3
Physical harm.	<u>4</u>

<u>Details:</u> Employees salaries and home contact information may be released. In some situations, this information may be public information as contact information may be available through phone books and the internet and pay scales and grades are available publically for unionized employees and some management.