



Public Reporting of the Core Privacy Impact  
Assessment:

OSH Injury/Illness Module IIR - DevonWay

OPEX & Corrective Actions  
Atomic Energy of Canada Limited

November 2013

# Public Reporting of the Core Privacy Impact Assessment

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## Acronyms and Abbreviations

Acronym / Abbreviations	Definition
AECL	Atomic Energy of Canada Limited
ATIP	Access to Information and Privacy
CAP	Corrective Action Program
CNSC	Canadian Nuclear Safety Commission
CRL	Chalk River Laboratories
FAA	<i>Financial Administration Act</i>
HOIR	Determines whether Hazardous Occurrence Investigation Report
HR	Human Resources
IT	Information Technology
MOU	Memorandum of Understanding
OIS	Occupational Injury System
OHS	Occupational Safety and Health
OPC	Office of the Privacy Commissioner
OPEX	Operating Experience
OSH	Occupational Safety and Health
PA	Program Activity
PAA	Program Activity Architecture
PI	Personal Information
PIA	Privacy Impact Assessment
PIB	Personal Information Bank
S&T	Science and Technology
TBS	Treasury Board Secretariat
TRA	Threat and Risk Assessment
UAT	User Acceptance Testing
WSIB	Workplace Safety & Insurance Board

## Executive Summary

Atomic Energy of Canada Limited (AECL) is Canada's premier nuclear science and technology organization. For over 60 years, AECL has been a world leader in developing peaceful and innovative applications from nuclear technology through its expertise in physics, metallurgy, chemistry, biology and engineering.

Highly skilled employees enthusiastically deliver a range of nuclear services – ranging from research and development, design and engineering to specialized technology, waste management and decommissioning.

Today, AECL continues its commitment to ensure that Canadians and the world receive energy, health, environmental and economic benefits from nuclear science and technology with confidence that nuclear safety and security are assured.

AECL is committed to protecting employee and public health and safety. The objective of Occupational Safety and Health (OSH) is to provide a safe and healthy work environment and to minimize losses to AECL due to hazardous conditions, accidents and injuries in the workplace.

All occupational injuries and illness, incidents and hazardous occurrences must be reported and investigated, and actions taken to prevent their occurrence in compliance with the regulatory requirements of the Canada Labour Code Part II [2], Part XV of the Canada Occupational Health and Safety Regulations [3], and applicable provincial Workers' Compensation legislation.

Currently, the Occupational Injury System (OIS), an in-house developed Oracle application is used to record employee injuries and subsequent follow-up activities. The system includes reporting capability for workers' compensation purposes and general summary information by department. OIS is a legacy system that does not support current business needs for workflow, systems integration, and reporting. The existing system is also difficult to maintain and to change. Overall, OIS does not fully meet current business requirements and due to several deficiencies, results in significant manual effort to support program requirements.

ActionWay, the product that is used to support the Corrective Action Program has an Incident Management Program and is flexible enough to address the requirements.

AECL procedure requires that employees report every incident or injury that has occurred. An incident could be a non-injury related event, such as someone fell on the ice, or an injury might be a result of someone falling.

Incidents and injuries can be initiated in several ways:

1. AECL Nurse enters injury when someone arrives at the health center
2. Injured person records their injury
3. Manager or supervisor initiates an injury

This Privacy Impact Assessment (PIA) analyzed the potential privacy risks associated with the implementation of the OSH Incident / Injury Reporting (IIR) module created by DevonWay and established the following recommendations on the mitigation or elimination of the privacy risks:

**1.1 Use of Personal Information**

Risks	Risk Level	Risk Mitigation Measures	Risk Mitigation
Anytime there are differences in practices related to how information is used, what information is being collected, or where information is being relocated, there is a potential privacy risk.	Low	OSH should consider a review of business processes and practices to ensure a consistent approach.	All case managers and users are mandated to participate in OSH Injury-Illness Module Information Session.

**1.2 Disclosure and Retention of Personal Information**

Risks	Risk Level	Risk Mitigation Measures	Risk Mitigation
Information in the DevonWay IIR Module is kept indefinitely	Low	Provide a Records Disposition Submission to Library and Archives Canada describing the records containing the personal information.	Obtain a RDA from Library and Archives Canada to allow, under certain conditions, to dispose of records that no longer have operational utility for the program or activity

**1.3 Safeguarding Personal Information**

Risks	Risk Level	Risk Mitigation Measures	Risk Mitigation
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Risks	Risk Level	Risk Mitigation Measures	Risk Mitigation
<p>Information in the DevonWay IIR Module can be printed, copied or transferred to a USB or other portable device</p>	<p>Low</p>	<p>OSH should consider developing and communicating specific measures related to the printing of reports or forms that contain personal information and their proper handling and labeling.</p>	<p>A Confidentiality/ Non-Disclosure Agreement is signed by users .A privacy message will also be delivered to the DevonWay IIR Module users every time the application is started outlining the privacy requirements associated with using the application.</p>
<p>It is also unlikely but possible that a breach of privacy can occur through internal users.</p>	<p>Low</p>	<p>This risk is mitigated through several technical and procedural processes, testing and training.</p>	<p>All DevonWay IIR Module activity is monitored through audit logs and other security mechanism. A User Acceptance Testing and a TRA have been completed. AECL's ATIP Office provides on-going awareness sessions to inform all employees of their obligations and responsibilities regarding the <i>Privacy Act</i></p>

Risks	Risk Level	Risk Mitigation Measures	Risk Mitigation
<p>It is also unlikely but possible that a breach of privacy can occur through unauthorized access of Information in the DevonWay IIR Module</p>	<p style="text-align: center;"><b>Medium</b></p>	<p>User accounts and access rights to the the DevonWay IIR Module are heavily controlled using the need to know principle; access to the electronic system is segmented into modules and individuals can have access to specific modules rather than having access to the entire system. Controls in place to grant authorization to modify (add, change or delete) personal information.</p> <p>System designed so that access and changes to personal information can be audited by date and user identification</p> <p>Contingency plans and documented procedures in place to identify and respond to security breaches or disclosures of personal information in error</p>	<p>TRA has been completed.</p> <p>ATIP Office has developed a Privacy Breach Reference (Appendix 7) that is intended to provide guidance to appropriately deal with privacy incidents and breaches. The process is consistent with the Guidelines for Privacy Breaches issued by TBS and includes content from those guidelines.</p> <p>Plan for quality assurance and audit programs to assess the ongoing state of the safeguards applicable to the system</p>

In conclusion, the privacy issues identified in this Privacy Impact Assessment can be resolved through the development and documentation of appropriate procedures and processes that ensures compliance with the *Privacy Act*. The reporting of injury/illness sensitive data through the DevonWay IIR Module will only be used for the purpose it is collected. AECL has demonstrated an ongoing commitment to the security and protection of its application.

In conducting interviews and reviewing the documentation provided for the PIA, it became apparent that departmental officials wish to incorporate privacy as a core element at the early stage of the project. Mitigating the privacy issues that have been identified above will greatly contribute to designing a privacy-friendly DevonWay IIR Module.

The principle of openness states that an organization should make readily available to individuals specific information about its policies and practices relating to the management of personal information.

The summary of this PIA will be made public and posted on AECL’s external website in both official languages.



## 2 SECTION I - OVERVIEW & PIA INITIATION

### Government Institution

Atomic Energy of Canada Limited (AECL)

Officials Responsible for the Privacy Impact Assessment (PIA)	Head of the institution / Delegate for section 10 of the <i>Privacy Act</i>
<p>Troy Purcell, Occupational Safety and Health (OHS), Health Centre Section Head</p> <p>Frank Szostak, Manager of Operating Experience (OPEX) &amp; Corrective Action</p> <p>Jean Boulais, Director of Access to Information and Privacy</p>	<p>Dr. Robert Walker, President and Chief Executive Officer</p>

### Name of program or activity of the government institution

Occupational Safety and Health – Incident / Injury Reporting (IIR) module DevonWay

#### 2.1 Description of the Program or Activity:

Aligned with AECL's Program Activity Architecture (PAA) and also described in AECL's 2010-2011 Info Source Chapter, AECL's Occupational Safety and Health will operate the OSH Incident / Injury Reporting (IIR) module under the Program Activity (PA) 2001121 Internal Services as following:

**PA 2001121 – INTERNAL SERVICES:** Internal Services are groups of related activities and resources that are administered to support the needs of programs and other corporate obligations of an organization. These groups are: Management and Oversight Services; Communications Services; Legal Services; Human Resources Management Services; Financial Management Services; Information Management Services; Information Technology Services; Real Property Services; Material Services; Acquisition Services; and Travel and Other Administrative Services. Internal Services include only those activities and resources that apply across an organization and not to those provided specifically to a program. Internal Services provide the business and administrative support functions and infrastructure to enable the efficient and effective delivery of all program outputs.

### **HUMAN RESOURCES MANAGEMENT**

Human Resources Management Services involve activities undertaken for determining strategic direction, allocating resources among services and processes, as well as activities relating to analyzing exposure to risk and determining appropriate countermeasures. They ensure that the service operations and programs of the federal government comply with applicable laws, regulations, policies, and/or plans. Human Resources Management Services provide the support functions and processes to enable program activities to manage human resources in accordance with collective agreements, policies and legislation. Human Resources also provide the supporting programs to promote a safe work environment and healthy work force.

- **Occupational Safety and Health:** AECL is committed to protecting employee and public health and safety. The objective of Occupational Safety and Health (OSH) is to provide a safe and healthy work environment and to minimize losses to AECL due to hazardous conditions, accidents and injuries in the workplace.
- **Compensation, Pension & Benefits:** This section deals with compensation, pension and benefits for all AECL employees.

## 2.2 Description of the Associated Classes of Records

AECL's Access to Information and Privacy Office is responsible for providing a full accounting of information holdings to the Treasury Board Secretariat for inclusion in the Info Source publication. The Info Source publication contains a description of the classes of institutional records by AECL. Descriptions of the records created, collected and maintained by Occupational Safety and Health and Compensation Pension & Benefits can be found under the following classes of records:

### **Occupational Health and Safety:**

**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 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.

**Record Number:** PRN 922

### **Compensation and Benefits:**

**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, bilingualism bonus, pay authorities, performance pay, rates of pay, severance pay, workforce adjustment, part-time, casual and seasonal employees, pay administration, emergency salary advance, life, disability, health and dental insurance plans, Canada Pension Plan, and Public Service Superannuation and/or institution-specific pension plans.

**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.

**Record Number:** PRN 941

### **2.3 Associated Existing Standard Personal Information Bank**

Sections 10 and 11 of the Privacy Act require a government institution to include in Personal Information Banks (PIB) all information under the control of the government institution and to publish an index of all personal information banks within the institution. OSH Incident / Injury Reporting (IIR) module information is collected by virtue of Occupational Health and Safety PIB AECL PSU 907, Treasury Board Secretariat (TBS) registration number 20120315 and Pay and Benefits PIB AECL PSE 904 sent July 22, 2013 to TBS for registration (See Appendix 1).

**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; family members who are part of the same household and eligible for corporate rates for Wellness programs; 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, provision of corporate Wellness programs, 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*, 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 - HC PCE 701 and Public Service Health Medical Advisory Committee - HC 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 and is shared with the institution of the affected employee and, where applicable, the relevant provincial or territorial workers' compensation board. Human Resources and Skills

**Consistent Uses(cont'd):** Development Canada holds information pertaining to employee compensation amounts, which are charged to institutions and distributed on a cost-recovery basis (refer to Personal Information Bank: Federal Workers Compensation - HRSDC PPU 032). Information may also be shared with Human Resources and Skills Development Canada, 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:** AECL PSU 907

### 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.

**Class of Individuals:** Current and former employees of government institutions.

**Purpose:** Personal information is shared with Public Works and Government Services 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 is collected pursuant to the *Income Tax Act*, Canada Pension Plan, and the *Employment Insurance Act*, and for some institutions, the Social Insurance Number is shared with Public Works and Government Services to create the Personal Record Identifier.

**Consistent Uses:** Information is shared with Public Works and Government Services Canada (refer to Central Personal Information Banks: Public Service Compensation 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 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 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:** AECL PSE 904

## 2.4 Legal Authority

Atomic Energy of Canada Limited was incorporated in 1952 under the provisions of the Canada Corporations Act (and continued in 1977 under the provisions of the Canada Business Corporations Act), pursuant to the authority and powers of the Minister of Natural Resources under the Nuclear Energy Act. On September 1st, 2007 the Federal Accountability Act amended the Access to Information Act and Privacy Act to include AECL.

The Corporation is a Schedule III Part I Crown corporation under the Financial Administration Act and an agent of Her Majesty the Queen in Right of Canada. The collection of personal information for the purpose of occupational health and Safety is given authority under 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 and the Government Employees Compensation Act.

## 2.5 Summary of the project / initiative / change

### **AECL's Corporate Profile**

Atomic Energy of Canada Limited (AECL) is Canada's premier nuclear science and technology organization. For over 60 years, AECL has been a world leader in developing peaceful and innovative applications from nuclear technology through its expertise in physics, metallurgy, chemistry, biology and engineering.

Highly skilled employees enthusiastically deliver a range of nuclear services – ranging from research and development, design and engineering to specialized technology, waste management and decommissioning.

Today, AECL continues its commitment to ensure that Canadians and the world receive energy, health, environmental and economic benefits from nuclear science and technology with confidence that nuclear safety and security are assured.

AECL is committed to protecting employee and public health and safety. The objective of Occupational Safety and Health (OSH) is to provide a safe and healthy work environment and to minimize losses to AECL due to hazardous conditions, accidents and injuries in the workplace.

All occupational injuries and illness, incidents and hazardous occurrences must be reported and investigated, and actions taken to prevent their occurrence in compliance with the regulatory requirements of the Canada Labour Code Part II [2], Part XV of the Canada Occupational Health and Safety Regulations [3], and applicable provincial Workers' Compensation legislation.

### **PIA Objectives**

This report is a Privacy Impact Assessment for the OSH Incident / Injury Reporting (IIR) module created by DevonWay for AECL. This application is an extension of the existing Corrective Action Program (CAP) software – ActionWay.

The PIA will ensure that privacy is considered throughout the acquisition and implementation of the Module. This is documented assurance that privacy issues have been identified and adequately addressed.

The Objectives of this PIA are:

- Review the business process to identify the data flow of personal information;
- Analyze the collection, use, disclosure and retention of personal information;
- To determine if there are privacy issues or risks associated with the implementation of



the Incident / Injury Reporting (IIR) module;

- To recommend measures to avoid, control and mitigate any privacy issues or risks to help ensure compliance with the *Privacy Act*.

The information presented in this report follows the format of the Treasury Board Secretariat's Directive on Privacy Impact Assessment and OPC's guidance document "*Expectations: A Guide for Submitting Privacy Impact Assessments to the Office of the Privacy Commissioner of Canada*".

The TBS Directive on Privacy Impact Assessment came into effect on April 1, 2010 and applies to government institutions as defined in section 3 of the *Privacy Act*, including parent Crown corporations.

### **Project Scope**

The scope of work embodied in this PIA is the implementation of the Incident / Injury Reporting (IIR) module to the existing Corrective Action Program (CAP) software – ActionWay from the vendor DevonWay. Module (IIR) is limited in scope to the tracking of work related injuries and illnesses of AECL employees. More specifically it will help the health and safety division track and manage issues within AECL. The scope of this PIA is limited to an analysis of the collection, use, protection, retention and disclosure of personal information in the Incident / Injury Reporting (IIR) module.

### **Project Initiative**

Currently, the Occupational Injury System (OIS), an in-house developed Oracle application is used to record employee injuries and subsequent follow-up activities. The system includes reporting capability for workers' compensation purposes and general summary information by department. OIS is a legacy system that does not support current business needs for workflow, systems integration, and reporting. The existing system is also difficult to maintain and to change. Overall, OIS does not fully meet current business requirements and due to several deficiencies, results in significant manual effort to support program requirements.

ActionWay, the product that is used to support the Corrective Action Program has an Incident Management Program and is flexible enough to address the requirements.

### **Benefits of the DevonWay Incident / Injury Reporting (IIR) module**

Occupational Safety and Health (OSH) module is an incident and injury tracking application whose purpose is to help the health and safety organizations at AECL track and manage their

issues. OSH features are closely tied to AECL’s ActionWay implementation because often times ImpActs and Actions in ActionWay have injuries or near-injury related events associated with them.

OSH high-level business objectives:

- Record injuries and illnesses without restraint
- Record every near-miss or other as specified non-injury event
- Be available to anyone working at AECL with access to a computer
- Use work flow tasks to encourage proper and timely involvement from AECL employees
- Push notifications to AECL health and safety workers for proper escalation
- Push reminders regarding regulatory requirements
- Provide necessary forms (ex. Compensation forms)
- Provide critical management and department level reports
- Have reports that adapt as specified to department-level changes
- Provide key performance indicators for monitoring injuries over time
- Integrate with ActionWay to notify ImpAct and Action managers when they need to complete an injury/incident report

### 3 SECTION II - RISK AREA IDENTIFICATION & CATEGORIZATION

<b>A: <u>Type of Program or Activity</u></b>	<b>Level of Risk to Privacy</b>
<p><b>Program or activity that does NOT involve a decision about an identifiable individual</b></p> <p>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.</p>	<input type="checkbox"/> 1
<p><b>Administration of Programs / Activity and Services</b></p> <p>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...).</p>	<input checked="" type="checkbox"/> 2
<p><b>Compliance / Regulatory investigations and enforcement</b></p> <p>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).</p>	<input type="checkbox"/> 3
<p><b>Criminal investigation and enforcement / National Security</b></p> <p>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).</p>	<input type="checkbox"/> 4

<b>B: <u>Type of Personal Information Involved and Context</u></b>	<b>Level of risk to privacy</b>
<p>Only personal information provided by the individual – at the time of collection -- relating to an authorized program &amp; collected directly from the individual or with the consent of the individual for this disclosure / with no contextual sensitivities.</p> <p>The context in which the personal information is collected is not particularly sensitive. For example: general licensing, or renewal of travel documents or identity documents.</p>	<input type="checkbox"/> 1
<p>Personal information provided by the individual with consent to also use personal information held by another source / with no contextual sensitivities after the time of collection.</p>	<input type="checkbox"/> 2
<p>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.</p> <p>For example: the personal information by association indirectly reveals information on the health, financial situation, religious or lifestyle choices of the individual.</p>	<input checked="" type="checkbox"/> 3
<p>Sensitive personal information, including detailed profiles, allegations or suspicions, bodily samples and/or the context surrounding the personal information is particularly sensitive.</p> <p>For example: the personal information by association indirectly reveals intimate details on the health, financial situation, religious or lifestyle choices of the individual and other individuals, such as relatives.</p>	<input type="checkbox"/> 4

<b>C: <u>Program or Activity Partners and Private Sector Involvement</u></b>	<b>Level of risk to privacy</b>
Within the institution (amongst one or more programs within the same institution)	<input checked="" type="checkbox"/> 1
With other federal institutions	<input type="checkbox"/> 2
With other or a combination of federal/ provincial and/or municipal government(s)	<input type="checkbox"/> 3
Private sector organizations or international organizations or foreign governments	<input type="checkbox"/> 4

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

<b>E: <u>Program Population</u></b>	<b>Level of risk to privacy</b>
The program affects certain employees for internal administrative purposes.	<input checked="" type="checkbox"/> 1

The program affects all employees for internal administrative purposes.	<input type="checkbox"/> 2
The program affects certain individuals for external administrative purposes.	<input type="checkbox"/> 3
The program affects all individuals for external administrative purposes.	<input type="checkbox"/> 4

<b>F: <u>Technology and Privacy</u></b>	<b>Risk to privacy</b>
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?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Does the new or modified program or activity require any modifications to <u>IT legacy systems and / or services</u> ?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. 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).  Identify the applicable category(ies): <input style="width: 600px; height: 20px;" type="text"/>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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...  Identify the applicable category(ies): <input style="width: 600px; height: 20px;" type="text"/>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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 institution 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 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 behavior.  Identify the applicable category(ies): <input style="width: 600px; height: 20px;" type="text"/>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
A <b>YES</b> response to any of the above indicates the potential for privacy concerns and risks that will need to be considered and if necessary mitigated.	

<b>G: <u>Personal Information Transmission</u></b>	<b>Level of risk to privacy</b>
The personal information is used within a closed system. No connections to Internet, Intranet or any other system. Circulation of hardcopy documents is controlled.	<input type="checkbox"/> 1
The personal information is used in system that has connections to at least one other system.	<input checked="" type="checkbox"/> 2
The personal information can be transferred to a portable device or printed. USB key, diskette, laptop computer, any transfer of the personal information to a different medium.	<input checked="" type="checkbox"/> 3
The personal information is transmitted using wireless technologies.	<input type="checkbox"/> 4

<b>H: <u>Risk Impact to the Institution</u></b>	<b>Level of risk to privacy</b>
Managerial harm. Processes must be reviewed, tools must be changed, change in provider / partner.	<input checked="" type="checkbox"/> 1
Organizational harm. 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.	<input type="checkbox"/> 2
Financial harm. Lawsuit, additional moneys required reallocation of financial resources.	<input type="checkbox"/> 3
Reputation harm, embarrassment, lost of credibility. Decrease confidence by the public, elected officials under the spotlight, institution strategic outcome compromised, government priority compromised, impact on the <u>Government of Canada Outcome areas</u> .	<input type="checkbox"/> 4