



PRIVACY IMPACT ASSESSMENT MODULE 2

PRELIMINARY RISK ASSESSMENT

Module 2 was developed to assist public sector employees to determine the overall level of privacy risk associated with a proposed enactment, system, project, program, service or a common or integrated program or service involving personal information. It is designed to find out, to what extent is the activity under consideration privacy intrusive, and what level of effort is required in the privacy impact assessment to ensure that identified risks are appropriately mitigated? This module should be completed where the results of Module 1 “Preliminary Privacy Screening Tool” suggest a need for further privacy analysis.

The module also provides a sample self-assessment tool to assist public bodies to evaluate the capacity of their own privacy environment (or privacy management framework) to mitigate the privacy concerns associated with low-risk projects/activities.

PROJECT/ACTIVITY CHARACTERISTICS

The following questions are designed to highlight activity characteristics that present significant risks to the privacy of an individual. This preliminary assessment of privacy risks is not intended to determine the precise nature of risk, but rather the overall level of risk associated with the activity under consideration.

Activity Type

Is the activity related to, or for purposes of law enforcement activities or operations?

For example: Personal information is to be used for purposes of investigations into law enforcement.

Yes

No

If yes, explain:



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Is the activity for purposes of determining an individual's eligibility to participate in a government sponsored programs or receive benefits or services from the GNWT? Or is the activity for purposes of verifying the eligibility an individual participating in a government sponsored programs or receiving benefits or services from the GNWT?

For example: Personal information is to be used to ensure compliance with a regulatory or administrative program or service.

Yes

No

If yes explain:

Technology

Does the activity involve the use of technologies with substantial potential for privacy intrusion?

For example: technologies which may be considered 'privacy intrusive' include, but are not limited to: smart cards, radio frequency identification devices, biometrics, locator technology, visual surveillance, digital imaging or recording, data mining, or the logging of electronic traffic.

Yes

No

If yes, explain:



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Data Type

Does the activity involve the use of personal information generally considered to be of a sensitive nature?

For example: Categories of personal information which might be considered 'sensitive' include, but are not limited to: racial or ethnic origin, sexual orientation, religious affiliation, financial data, health information, correctional information, unique identifiers, or information related to persons at risk (such as information in relation to victims.)

Yes

No

If yes, explain:

Is the information being collected from an entity other than the individual which it concerns?

For example: The data will be obtained from a source other than the individual, for purposes which may not have been known to the individual at the time the information was collected.

Yes

No

If yes, explain:



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Identity Management

Does the activity involve the use of new unique identifiers or rely on existing unique identifiers such as NWT health card numbers or the NWT Drivers Licence Number?

Yes

No

If yes, explain:

Might the activity have the effect of undermining the anonymity of an individual, or otherwise convert previously anonymous transactions into personally identifiable transactions?

Yes

No

If yes, explain:

Activity Stakeholders

Does the activity involve multiple organizations, whether government agencies or private sector entities, where personal information may be shared between activity partners?

Yes

No

If yes, explain:



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Does the activity involve the disclosure of personal information to third parties in jurisdictions not subject to the same privacy laws and regulations in which your organization operates?

Yes No

If yes, explain:

Activity Duration

Is the activity expected to operate over a long term, with no clearly established sunset date?

Yes No

For example: The activity is intended to operate over an indefinite period of time, rather than in support of a short-term goal or objective.

If yes, explain:

Public Perception

Is the activity likely to attract public interest or lead to organizational prejudice or injury?

Yes No

If yes, explain:



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An affirmative answer to any of the above questions suggests that the activity under consideration is, overall, of medium to high privacy risk.

Your activity is likely of high risk if you answered yes to 3 questions or more.

Your activity is likely of medium risk if you answered yes to 2 or less questions.

Your activity is likely of low risk if you did not answer yes to any of the questions.

***Conditions on requirement to move forward:**

If the activity under consideration is of medium to high risk, further privacy analysis will be required. Proceed to Module 3 “Privacy Analysis” of the PIA Modules. If the activity under consideration is low risk, complete the following section.

Retain a copy of this module, along with supporting documentation so as to support any decision not to proceed with further with this privacy impact assessment.

CONCLUSION: Is additional privacy analysis required?

No

Yes (proceed to Module 3)

SIGNATORY AND APPROVAL

Program Manager:

Date:

Department Privacy
Officer or Access and
Privacy Coordinator:

Date: