INTRODUCTION

The purpose of this Short Form is to offer a summary version of the full PIA document. It includes the same questions as the full PIA but without the explanatory notes, annotations and guidelines.

	A. ORGANIZATIONAL PRIVACY	MANA	AGEMEN	T	
1.	POLICIES AND CONTROLS	YES	YES & NO	NO	N/A
	a. Is there an organizational strategic plan or business plan that clearly addresses privacy protection?				
	b. Does a written privacy charter or policy exist?				
	c. Have privacy guidelines been developed for various aspects of the organization's operations?				
	d. Is the organization subject to statutory requirements addressing privacy and confidentiality, other than those provided by the <i>Freedom of Information and Protection of Privacy Act</i> , the <i>Local Authority Freedom of Information and Protection of Privacy Act</i> and the <i>Health Information Protection Act</i> ?				
	e. Are organizational policies or procedures in place to en	sure tha	t:		
	 There is an appropriate business purpose for all personal information/personal health information collected 				
	ii. There is statutory authority for the collection, use and disclosure of all personal information/personal health information				
	iii. Individual consent is obtained whenever possible				
	iv. Individuals are duly informed of the purpose and authority for collection				
	v. Individuals are informed of the anticipated uses and disclosures of the information				

A. ORGANIZATIONAL PRIVACY	MANA	AGEMEN	ΙΤ	
1. POLICIES AND CONTROLS (Continued)	YES	YES & NO	NO	N/A
e. Are organizational policies or procedures in place to en	sure tha	t (continued)):	
vi. Information about privacy/confidentiality policy and procedures is readily available to individuals				
vii. Personal information/personal health information correction and annotation are available when required				
viii. Physical records are appropriately stored and managed to maintain privacy				
f. Are privacy controls in place in the organization?				
 Need-to-know policies and procedures for collection, use, disclosure, access and correction of personal information/personal health information 				
ii. Physical security and access controls				
iii. IT security and access controls				
iv. Waste management controls for personal information/personal health information				
v. Records management & disposition schedules				
vi. Others				
g. If personal information/personal health information is in an electronic format and is used for the delivery of services, have technological tools and system design techniques been considered which may enhance both privacy and security (e.g. encryption, technologies of anonymity or pseudo-anonymity, or digital signatures)?				

		A. ORGANIZATIONAL PRIVACY	MANA	AGEMEN	ΙΤ	
2.	PF	RIVACY STRUCTURE AND ORGANIZATION	YES	YES & NO	NO	N/A
	a.	Have the responsibilities of the Chief Executive Officer and Board of Directors (where applicable) for privacy compliance been identified and defined?				
	b.	Is there an appointed privacy officer or champion within the organization?				
	c.	Does a management reporting process exist to ensure that management is informed of any privacy compliance issues?				
	d.	Is senior management actively involved in the development, implementation and/or promotion of privacy measures within the organization?				
	e.	Do employees with access to personal information/personal health information receive training related to privacy protection?				

		B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
1.	GI	ENERAL	YES	YES & NO	NO	N/A
	a.	Has a summary of the proposed project/program been prepared, including a description of the needs to be addressed by the development of this project/program, and how the proposed project/program will meet those needs?				
	b.	If your organization is private sector and subject to the <i>Personal Information Protection and Electronic Documents Act</i> , will the 'reasonableness test' in section 5(3) be satisfied?				
	c.	Has a listing of all personal information/personal health information or data elements to be collected, used or disclosed in the project/program been prepared?				
	d.	Have diagrams been prepared depicting the flow of personal information for this project/program?				
	e.	Have documents been prepared showing which persons, positions or employee categories will have access to which personal information/personal health information?				
2.	ΑŪ	UTHORITY FOR COLLECTION	YES	YES & NO	NO	N/A
	a.	Is there a detailed description of the type of personal information/personal health information collected for this project/program?				
	b.	Have the purposes for which the personal information/personal health information is collected been documented?				
	c.	Is the personal information/personal health information collected only directly from the individual or an authorized representative?				

		B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
2.	ΑŪ	UTHORITY FOR COLLECTION (Continued)	YES	YES & NO	NO	N/A
	d.	If the personal information/personal health information is collected indirectly (i.e. from a third party), is the indirect collection authorized under section 26 of FOIP or section 25 LA FOIP or section 25 of HIPA?				
	e.	Are individuals notified of the purpose and the authority for the collection and how to contact an officer or employee who can answer questions about the collection?				
3.	ΑŪ	UTHORITY FOR USE	YES	YES & NO	NO	N/A
	a.	Is the personal information/personal health information used only for the purpose for which it was obtained or for a use consistent with that purpose under FOIP or LA FOIP or for a purpose outlined in section 26 of HIPA?				
	b.	Is the personal information/personal health information used for a purpose for which a proper consent has been obtained?				
	c.	Does individual consent provide the primary basis for the collection, use and disclosure of personal information/personal health information for this project/program?				
	d.	Have arrangements been made to provide full disclosure of all purposes for which personal information/personal health information is collected?				
	e.	Is personal information/personal health information used exclusively for the identified purposes or for uses that an individual would reasonably consider consistent with those purposes?				
	f.	Is there a list of the staff position or categories that use this personal information/personal health information?				
	g.	Are there physical, administrative and technical controls that limit access to identifiable personal information/personal health information to those who have a need to know?				

		B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
3.	ΑŪ	JTHORITY FOR USE (Continued)	YES	YES & NO	NO	N/A
	h.	Is the least amount of personal information/personal health information collected and used to meet the stated purpose?				
	i.	Is the personal information/personal health information used with the highest degree of anonymity to meet the stated purpose?				
4.	ΑŪ	JTHORITY FOR DISCLOSURE	YES	YES & NO	NO	N/A
	a.	Is individual consent obtained before disclosing personal information/personal health information to another government institution, local authority or other third party?				
	b.	If consent is not obtained, is the disclosure authorized by section 29 of FOIP or section 28 of LA FOIP or sections 27 or 28 HIPA?				
	c.	If disclosure is required and authorized, is the amount and type of information disclosed limited on a 'need-to-know' basis?				
	d.	Is disclosure made at the highest degree of anonymity possible while still achieving the purpose?				
	e.	Does staff maintain a disclosure log or audit trail of:				
		i. What information has been disclosed				
		ii. The recipient				
		iii. Purpose and authority for the disclosure				
5.	DI	SCLOSURE FOR RESEARCH PURPOSE	YES	YES & NO	NO	N/A
	a.	Is there a written records/data policy that meets all relevant legislative requirements?				
	b.	Is the personal information/personal health information used to make a decision that directly affects an individual retained for a reasonable time to allow the individual access to it?				

		B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
5.		SCLOSURE FOR RESEARCH PURPOSE ontinued)	YES	YES & NO	NO	N/A
	c.	Have you determined which archives have been "designated" under s. 29 of HIPA?				
	d.	Is the health research project "not contrary to the public interest" per s. 29(a) of HIPA?				
	e.	Has the health research project been approved by a "research ethics committee" per s. 29(b)?				
	f.	Has the research ethics committee been approved by the Minister of Health?				
	g.	Is there an agreement with the researcher that meets the requirements of s. 29(c) of HIPA?				
	h.	Is it reasonably practicable to obtain consent to use or disclose for health research purposes?				
	i.	If it is not reasonably practicable, have those reasons been documented?				
	j.	Are there procedures in place to verify personal information/personal health information and to manage requests for corrections that comply with sections 32 FOIP, section 31 LA FOIP or section 13 HIPA?				
6.	PF	RIVACY CONTROLS AND SECURITY	YES	YES & NO	NO	N/A
	a.	Have security procedures for the collection, transmission, storage, and disposal of personal information/personal health information, and access to it, been documented?				
	b.	Is the authority to modify or correct personal information/personal health information clearly established to ensure that those without this authority may not or are unable to alter these records?				
	c.	Is there an audit trail maintained to document when and by whom a file or record was compiled or updated?				
	d.	Are there written information security policies including a definition of roles and responsibilities and sanctions for breaches of policy?				

		B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
6.		RIVACY CONTROLS AND SECURITY ontinued)	YES	YES & NO	NO	N/A
	e.	Are there security measures in place for personal information/personal health information regardless of media format?				
	f.	Do staff receive ongoing training about security policies and procedures, and are they made aware of the importance of security and confidentiality on an ongoing basis?				
	g.	Are security breaches and violations documented and responded to according to established policies?				
	h.	Is access to personal information/personal health information regularly monitored and audited?				
	i.	Is the personal information/personal health information stored or maintained in a physically secure location?				
	j.	Are personal information/personal health information in all media disposed of securely to prevent unauthorized access?				
	k.	Is physical removal of personal information/personal health information of any medium from secure designated area always undertaken in manner and in accordance with procedures that continue to ensure the security of the information at all times?				
7.	EI	LECTRONIC SYSTEMS SECURITY	YES	YES & NO	NO	N/A
	a.	Are users assigned unique user identifications and passwords for access to personal information/ personal health information and are passwords changed regularly?				
	b.	Are network and application security status assigned on a 'need-to-know' basis according to the particular requirements of specific roles within the organization?				
	c.	Are access privileges revoked promptly when required (e.g. when an employee leaves or moves)?				

		B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
7.		LECTRONIC SYSTEMS SECURITY ontinued)	YES	YES & NO	NO	N/A
	d.	Do systems contain audit trails for tracking data access, and audit logs to provide information about abnormal or unusual access?				
	e.	Are access logs and audit trails reviewed on a regular basis?				
	f.	Is personal information/personal health information transmitted by secure means to minimize opportunities for unauthorized or accidental interception by third parties?				
	g.	Is virus protection implemented and is an effective firewall in place where necessary, for all information systems that contain personal information/personal health information?				
	h.	Are external providers of information management or technology services covered by written agreements dealing with risks including unauthorized access, use, disclosure, retention, and destruction or alteration as required under section 18 HIPA?				
8.		CCESS TO PERSONAL INFORMATION ND PERSONAL HEALTH INFORMATION	YES	YES & NO	NO	N/A
	a.	Is there a process to respond to access requests under the Act(s) in place?				
	b.	Are individuals informed that the organization holds personal information/personal health information about them and that access to that data is provided, except in limited circumstances as defined in legislation?				
	c.	Are requests for access responded to within the legal time limits at minimal or no cost, or in compliance with the legislation?				

	B. PROJECT/PROGRAM PRIVACY	MAN	AGEME	NT	
8.	ACCESS TO PERSONAL INFORMATION AND PERSONAL HEALTH INFORMATION	YES	YES & NO	NO	N/A
	d. Is requested information provided in an understandable format and is the organization prepared to explain any terms or abbreviations?				
	e. Does a refusal to grant access to all or part of an individual's information include clear reasons for refusal?				
9.	CHALLENGING COMPLIANCE	YES	YES & NO	NO	N/A
	a. Are there communication policies and procedures in place that ensure individuals are routinely informed that they may make a complaint to the organization and are informed about their statutory right to make a complaint to the OIPC respecting their personal information/personal health information rights?				
10.	. ACCOUNTABILITY	YES	YES & NO	NO	N/A
	a. Is it understood in the organization that the Head is accountable for compliance with access and privacy legislation, and that any delegation of powers and duties should be formally recorded?				
	b. Is an employee within the organization formally designated responsibility for the daily administration of privacy compliance? Is the identity of the individual known throughout the organization?				
	c. Are there written organizational policies and procedures that define the responsibility for protecting personal information/personal health information?				
	d. Are appropriate staff provided with on-going training to implement privacy policies and procedures?				
	e. Are information managers and agents and others, who may have authorized access to personal information aware of and do they comply with organizational privacy policies and relevant procedures?				

	B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
10. A	CCOUNTABILITY	YES	YES & NO	NO	N/A
f.	Can individuals within the organization obtain information about privacy policies and procedures with reasonable ease?				
g.	Can individuals outside the organization obtain information about privacy policies and procedures with reasonable ease?				
h.	Does a clear procedure exist for responding to questions or concerns about privacy policies?				
	SSESSING PRIVACY RISKS IN LECTRONIC SERVICE DELIVERY (ESD)	YES	YES & NO	NO	N/A
a.	Are diagrams available to illustrate the flow of personal information/personal health information for this project?				
b.	Has responsibility for control and custody for all personal information/personal health information processed by the ESD system been identified and assigned?				
c.	If the ESD system will process transactions for more than one program, agency or department, have constraints been placed on data integration?				
d.	If this ESD project involves the use of common identifiers or a common identification infrastructure, have privacy-enhancing measures been implemented to limit the risk to privacy?				
e.	Will this ESD initiative require data linking (data profiling) or data matching?				
f.	Is there a means of obtaining, authenticating, registering and maintaining individual consent electronically, where required?				
g.	Have privacy-enhancing technologies and/or techniques been considered for this ESD project?				

	B. PROJECT/PROGRAM PRIVACY	MAN	AGEMEN	NT	
	SSESSING PRIVACY RISKS IN LECTRONIC SERVICE DELIVERY (ESD)	YES	YES & NO	NO	N/A
h.	Have all risks to privacy for this ESD project been minimized or averted?				
i.	Has a comprehensive risk analysis been undertaken to identify and implement appropriate ongoing monitoring and regular auditing requirements to protect personal information/personal health information including that of end-users, for all aspects of the ESD system?				
j.	Have key stakeholders been consulted about the privacy implications of this project?				
k.	Where risks to privacy are not completely mitigated, is there a strategy for responding to public concerns over privacy protection?				
1.	Have constraints been placed on ESD service providers regarding the collection, use and disclosure of information subject to FOIP, LA FOIP and HIPA?				
m.	Do all contracts related to the implementation of this ESD project contain data protection provisions?				
12. PR	RIVACY RISK ASSESSMENT	YES	YES & NO	NO	N/A
a.	Will personal information/personal health information collected or used in this project/program be disclosed to any persons who are not employees of the responsible organization?				
b.	Will this project involve the collection, use or disclosure of any personal information/personal health information outside the province of Saskatchewan?				
c.	Have this project's/program's potential risks to privacy been assessed?				
d.	If potential risks to privacy have been identified, have means to avert or mitigate those risks been incorporated into the project/program design?				

B. PROJECT/PROGRAM PRIVACY MANAGEMENT					
12. PRIVACY RISK ASSESSMENT (Continued)		YES	YES & NO	NO	N/A
e.	Have key stakeholders been provided with an opportunity to comment on the privacy protection implications of the proposed project/program?				
f.	Are project/program staff trained in the requirements for protecting personal information/personal health information and aware of the relevant policies regarding breaches of security or confidentiality?				
g.	Are personal identifiers used to link or cross-reference multiple databases?				
13. AUDIT AND ENFORCEMENT		YES	YES & NO	NO	N/A
a.	Have arrangements been made for audit, compliance and enforcement mechanisms for the proposed project, including fulfillment of the commitments made in the PIA?				