ANNUAL REPORT
PRIVACY AND ACCESS OFFICE

2017

Prepared by L. Wale

1. Introduction

This is the first Annual Report of the University's Privacy and Access Office.

As a public body, Thompson Rivers University (TRU) is subject to the BC *Freedom of Information and Protection of Privacy Act* (FIPPA*).* This legislation has two distinct purposes:

1) Freedom of Information (FOI), which is often referred to as Access to Information; and
2) Protection of Privacy.

Under the supervision of the University's General Counsel, the Privacy and Access Office is responsible to:

- Oversee compliance with the FIPPA;

- Administer applications for Access to Information (FOI) made under the FIPPA;

- Undertake privacy reviews (Preliminary Privacy Impact Assessments and full Privacy Impact Assessments) as requested, when the university brings in a new practice, system or software;

- Initiate and complete Divisional Privacy Compliance Reviews to assess the privacy and records management practices at the departmental level, and provides advice for improvements;

- Develop and provide education and training to the TRU community regarding FOI, privacy, records management practices, and the Canadian Anti-Spam legislation; and

- Develop policies, procedures and guidelines for the university relating to privacy, access to information and records management.

This report is to summarize the activities of the Privacy and Access Office and provides details on those activities for the 2017 calendar year.

2. Accountabilities

a. Access to Information (FOI)

TRU regularly receives requests for access to information. Some of these requests are for routinely available information and are managed at the departmental level. Other requests for information are submitted as a formal FOI application and are managed by the Privacy and Access Office in accordance with the FIPPA.

In 2017, the number of FOI applications received more than doubled from those received in each of the past five years; and the number of pages or records that were reviewed by the Privacy and Access Office in processing these FOI applications increased substantially. This work includes (i) collecting and organizing records that are responsive to the FOI application, (ii) reviewing records in order to redact information that must or should be severed from the records prior to their release to the applicant.

Table 1 provides a summary of the administration and management of FOI files by the Privacy and Access Office in 2017.

Table 1

2017 FOI Summary	
Total Number of FOI applications received in 2017	49 (2016 − 20)
# of FOI applications process and completed in 2017	38
# of FOI applications carried over to 2018	11
# of pages of records received from within TRU and reviewed by the Privacy and Access Office for 2017 applications	21,109 (2016 − 6,293)
Applicant Category	
# of FOI applications received from TRU Students	25
# of FOI applications received from TRU Faculty	7
# of FOI applications received from TRU Staff	1
# of FOI applications received from other external individuals or organizations	16
File Completion Times	
# of files that took less than 31 working days to complete	34
# of files that took 31 - 60 working days to complete	6
# of files that took more than 60 working days to complete	9
Categories of information requested	
# of requests for personal information	15
# of requests for institutional information	32
# of requests for both personal and institutional information	2

b. Protect of Privacy

TRU regularly acquires personal information about individuals such as students, employees and other third parties. TRU is required to manage personal information in accordance with the FIPPA, TRU's Privacy Statement, and other TRU policies and standards.

When the University brings in a new practice, system or software (a project), it is desirable as a matter of due diligence to review these projects prior to implementation for consistency with the principles of the FIPPA and Privacy by Design[1]. These reviews begin with a Preliminary Privacy

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[1] Building user privacy into the design of a project from the beginning.

Impact Assessment (PPIA). The PPIA tool evaluates a project in terms of privacy impact and probability, and based on the results the project may indicate a full Privacy Impact Assessment (PIA). These privacy assessments are the responsibility of the Privacy and Access Office frequently working in collaboration with the Information Security Office. These assessments include advice for improvements relating to each project.

To evaluate the University's information management practices, the Privacy and Access Office has been tasked to undertake Divisional Privacy Compliance Reviews. The purpose of these reviews is to assess individual department's handling of personal information, including their records management practices. Carrying out these reviews allows TRU to understand how well the University is doing in complying with privacy laws, meeting privacy best practices, adhering to the TRU Records Retention/Destruction Policy. These reviews also allows an opportunity to provide advice for improvements.

Table 2 summarizes the privacy related assessments that were administered and managed by the Privacy and Access Office in 2017.

Table 2

2017 - Privacy Reporting Summary	
# of Preliminary Privacy Impact Assessments completed	16
# of full Privacy Impact Assessments completed	1
# of Divisional Privacy Compliance Review completed	4

c. Training, Education, Guidelines and Policy

The Privacy and Access Office is a resource for the TRU community, and provides advice and training to employees on how to properly manage the personal and confidential information they use in the performance of their job duties. The Privacy and Access Officer is also available to answer questions relating to records management and the Canadian Anti-Spam legislation.

In 2017, 61 employees from five different departments attended departmental FIPPA/Records Management training sessions that were presented by the Privacy and Access Officer.

For the third year in a row the Privacy and Access Officer was the master of ceremonies at TRU's 2017 Annual Privacy and Information Security Conference (and was also a presenter). The conference's keynote speaker was from the University of Calgary who spoke about their experience in dealing with ransomware. This conference has been growing in popularity and now attracts registrants from TRU, the broader Kamloops community and the Okanagan.

The Privacy and Access Officer drafted one privacy related policy in response to findings in a Privacy Impact Assessment. The policy relates to the use of cameras on campus, and is currently working its way through the approval process.

In addition, a number of procedures and guideline documents were developed and shared with various departments, updates were made to the Protection of Privacy and Access to Information webpages, and a Records Management webpage was developed.