

## **PIA Compliance Checklist**

		Yes	No	Don't Know
1a	Does the project collect, use or disclose any amount of personal information about identifiable individuals? (e.g., OEN, MEN, DOB, SIN, OHIP, employee number, telephone number and address) MFIPPA 29(1), (2), 28(2), 31, 32, 33			
1b	Has the legal authority for the collection, use and disclosure of all personal information for this project been established (e.g., Education Act, OSR Guidelines, MFIPPA, Income Tax Act, Occupational Health and Safety Act, Employment Standards Act)? Provide relevant reference and/or documentation for compliance with the appropriate legislation.			
1c	Does individual consent provide the primary authority for the collection, use and disclosure of personal information for this project? If individual consent does NOT form the basis for the collection, use and disclosure of personal information, please identify the alternative authority that applies (e.g., no consent necessary for direct collection under MFIPPA). This may be cross-referenced with question 1(b) above (e.g., admissions/assessment information). Please provide any documentation that clearly sets out the purposes for which personal information will be collected.			
1d	Have the purposes for which the personal information is collected been determined and documented (e.g., student registration, employment purposes)? Do the data collection documents meet the requirements for providing legal notice? MFIPPA s.29(2)			
1e	Will personal information be used exclusively for the identified purposes and/or for uses that an individual would reasonably consider consistent with those purposes (e.g., sharing of student achievement data for research purposes, which should be limited and exclusive)? If not, does the law permit other uses? MFIPPA s.31 and 32			
2	Does the project create entirely new identifiers to provide access to personal information about specific individuals?			
3	Does the project consolidate, interlink, cross reference, or match personal information from multiple sources? (e.g., data warehouse, class portal)			
4	Does the project expand existing services, programs or technologies which collect personal information, such that they require the sharing or dissemination of personal information among other institutions? (e.g., transportation consortia)			







## **PIA Compliance Checklist**

		Yes	No	Don't Know
5a	Does the project expand existing services, programs, or technologies that collect personal information such that they require the sharing or dissemination of personal information to third party organizations that are adherent to (or governed by) MFIPPA, FIPPA, PHIPA or comparable privacy protection (e.g., district health units, faculties of education, Ministry of Community and Social Services)?  MFIPPA 14(1) (e) (iii), PHIPPA 10(4)			
5b	Does the project require the outsourcing of information management functions to third party organizations that are adherent to (or governed by) MFIPPA, FIPPA, PHIPA or comparable privacy protection (e.g., legal counsel, security services, or achievement software such as Media-X's MXWeb product, which can be housed on Media-X's servers or may involve sharing a copy of our student systems database with the vendor to assist in troubleshooting a problem that the vendor is unable to replicate in-house)?			
6a	Does the project expand existing services, programs, or technologies that collect personal information such that they require the <u>sharing or dissemination</u> of personal information to third party organizations that are <u>not adherent to</u> (or not governed by) MFIPPA, FIPPA, PHIPA or comparable privacy protection?			
6b	Does the project require the <u>outsourcing of information management functions</u> to third party organizations that are <u>not adherent to</u> (or not governed by) MFIPPA, FIPPA, PHIPA or comparable privacy protection (e.g., payroll)?			
7	Does the project span multiple jurisdictions or multiple government institutions or otherwise involve a high degree of organizational complexity, with the potential of data sharing (e.g., OnSIS, consortia, EDI or other partnerships)?			
8	Does the project involve the disclosure of personal information outside Ontario or the exchange of personal information with organizations that have head offices outside Canada (including project vendors, contractors, partners and others)?			

