

# PIA02652 – Core Strength Assessment Tool

---

PIA REVIEW – EXECUTIVE REPORT



## PREFACE

This document forms part of UBC Safety and Risk Services (SRS) PrISM’s internal documentation for support and administration of the Privacy Impact Assessment (PIA) Review Process. In particular, it documents the final report of the specified PIA review.

This segment serves to provide and record document control capabilities for this document.

### Controlled Document

The template and final report documents are controlled documents. The master electronic versions of each reside on the SRS TeamShare S-drive. Any copies or versions not provided directly by the SRS PrISM team, or which have a broken chain of custody, are not to be considered as official copies.

### Document Control

The following sub-sections provide a record of the base document template revision history and control.

#### CONTRIBUTORS

CONTRIBUTOR	DEPARTMENT	POSITION
Taylor Bohn	Safety and Risk Services	Privacy and Information Security Risk Advisor

Figure 1 - Major Document Revision Approval History

#### TEMPLATE REVISION HISTORY

REVISION #	DATE	REVISED BY	DESCRIPTION
1.0	2023-06-23	Taylor Bohn	Report Creation

Figure 2 - Document Revision History and Revision Summary

#### TEMPLATE REVISION APPROVAL

REVISION #	DATE	REVISED BY	DESCRIPTION
1.00	2023-06-23	Shannon Ballance	Initial release of document

Figure 3 - Major Document Revision Approval History

# TABLE OF CONTENTS

---

<b>PREFACE</b> .....	<b>1</b>
Controlled Document .....	1
Document Control .....	1
CONTRIBUTORS.....	1
TEMPLATE REVISION HISTORY .....	1
TEMPLATE REVISION APPROVAL.....	1
<b>TABLE OF CONTENTS</b> .....	<b>2</b>
<b>TABLE OF FIGURES</b> .....	<b>4</b>
<b>PART 1: GENERAL INFORMATION &amp; OVERVIEW</b> .....	<b>1</b>
1.1 Executive Summary .....	1
1.2 Description of the Program, System, Application, or Initiative Assessed.....	1
1.3 Scope .....	1
1.4 Related PIAs.....	1
1.5 Data Elements .....	1
1.6 Storage or Access Outside of Canada (including back-ups and recovery) .....	1
1.7 Data-Linking Initiative.....	2
1.8 Is this a Common or Integrated Program or Activity? .....	2
<b>PART 2: PROTECTION OF PERSONAL INFORMATION</b> .....	<b>2</b>
2.1 Personal Information Flow Diagram / Table .....	2
2.2 Risk Mitigation Table .....	2
2.3 Collection Notice .....	3
2.4 Consent for Storage/Access Outside of Canada & Opt-Out Procedure (If Any) .....	3
2.5 Consent Withheld Procedure .....	3
<b>PART 3: SECURITY OF PERSONAL INFORMATION</b> .....	<b>4</b>
3.1 Physical Security Measures .....	4
3.2 Technical Security Measures .....	4
3.3 Security Policies, Procedures, and Standards.....	4
3.4 Tracking Access / Access Controls .....	4
<b>PART 4: ACCURACY, CORRECTION, AND RETENTION</b> .....	<b>4</b>
4.1 Updating and Correcting Personal Information .....	4
4.2 Decisions That Directly Affect an Individual.....	4
4.3 Records Retention and Disposal.....	4

<b>PART 5: FURTHER INFORMATION .....</b>	<b>4</b>
5.1 Systematic Disclosures of Personal Information .....	4
5.2 Access for Research or Statistical Purposes .....	4
5.3 Other Applicable Legislation and Regulations .....	4
<b>PART 6: ACCESS AND PRIVACY MANAGER COMMENTS.....</b>	<b>5</b>
6.1 Information or Materials Reviewed .....	5
6.2 Analysis and Findings.....	5
6.3 Conditions of Approval.....	5
6.4 Review and Distribution .....	5

## TABLE OF FIGURES

---

Figure 1 - Major Document Revision Approval History .....	i
Figure 2 - Document Revision History and Revision Summary .....	i
Figure 3 - Major Document Revision Approval History .....	i
Figure 4 - Risk Mitigation Table.....	2

## PART 1: GENERAL INFORMATION & OVERVIEW

---

### 1.1 Executive Summary

Core Strengths is an online platform which provides strengths assessment, identifying your core motives, how you experience conflict, along with your strengths. The information collected will not be used by UBC Workplace Learning & Engagement and/or HR to make decisions that affect the individual. Any communication and/or notes about the individual's improvement/performance and/or tracking of goals will not be tracked in the Core Strengths platform. Participation in the program is not mandatory.

### 1.2 Description of the Program, System, Application, or Initiative Assessed

Workplace Learning & Engagement at UBCO aims to implement the Core Strengths online platform along with Core Strength self-assessments and associated learning opportunities via our in-house certified Core Strengths facilitator. Our objective is to provide easily accessible and practical training and resources for our workplace teams, culture, and relationships as we work towards more effective, collaborative, and inclusive interactions. Over time, our colleagues will share a common vocabulary when engaging in work and discussions around leadership, conflict, change, wellbeing, team building, and connections. We also see the potential with this platform to boost employee engagement, productivity, satisfaction and retention.

#### RISK CLASSIFICATION

The inherent privacy risk classification level of this PIA submission is 4 - **High**.

The residual risk classification level of this PIA submission at closure is 3 - **Medium**.

### 1.3 Scope

The scope of this PIA will cover privacy risks relating to the Core Strengths services specific to the use described by Workplace Learning & Engagement, within Human Resources at UBCO. The scope does not include a review of any system integrations as its current iteration will be a stand-alone product.

Limited information was gathered on the vendors information security posture, other than the vendor providing a valid copy of their ISO27001:2013 certification for this reason the vendors information security is excluded from the scope of this review.

### 1.4 Related PIAs

Not Applicable

### 1.5 Data Elements

All Information required/provided by the service:

- First & Last name
- Job title
- UBC email address
- Assessment Answers
- Assessment Results

Optional information:

- Profile photo
- Alternate email address (e.g. a personal email address)

### 1.6 Storage or Access Outside of Canada (including back-ups and recovery)

Core Strengths is hosted by AWS in a region outside of Canada.

### 1.7 Data-Linking Initiative

This project is not considered a data linking initiative as contemplated under s.(36) of FIPPA.

### 1.8 Is this a Common or Integrated Program or Activity?

This project is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.

## PART 2: PROTECTION OF PERSONAL INFORMATION

### 2.1 Personal Information Flow Diagram / Table

Information will be collected directly from the individual by providing answers to the assessment. They platform will then analyze the answers and provide a report outlining the assessment results.

### 2.2 Risk Mitigation Table

The following table indicates the associated risk levels as applicable and the potential or intended mitigation steps.

Category: Security					
Risk	Ref#	Inherent Likelihood	Inherent Impact	Response	Residual Risk
Not ensuring informed PI sharing with third parties	RK0021506	4 - High	4 - Major	Mitigate	3 - Medium
	<p>The vendor's Privacy Policy States the following: "We may provide information to our distributors or partners in local and foreign markets to improve the Products or Services provided, and the use of such information is in accordance with the principles of this Privacy Policy. Partners providing learning and development services (as Facilitators) will have access to individual and team Reports based on your results."</p> <p><b>Mitigation Plan:</b> When asked the vendor specified "Core Strengths does not share any data with distributors or partners".</p> <p>What is stated in the privacy policy differs from what the vendor has specified. This conflicting information presents a potential risk while the probability of this happening is low and will need to be accepted as their privacy policy states this is a possibility.</p>				
PI stored / accessible outside of Canada	RK0021446	4 - High	4 - Major	Mitigate	2 - Low
	<p>Core Strengths is hosted on AWS in a region outside of Canada.</p> <p><b>Mitigation Plan:</b> Individuals who use the Core Strengths platform will be provided a privacy notice specifying that data stored in Core Strengths will be outside of Canada.</p>				

Figure 4 - Risk Mitigation Table

### 2.3 Collection Notice

#### PRIVACY NOTIFICATION:

When you register for an account with Core Strengths, they will only require the following personal information from you to create an account, your name, job title, and work email. Any additional information is optional UBC recommends only providing information that is required.

Assessment answer and results will be visible to in-house facilitator, Workplace Learning & Engagement admins, as well as anyone the individual and anyone they choose to share the assessment results with. Sharing your information with Core Strengths will result in your personal information being disclosed outside of Canada. UBC and Core Strengths will not share this information with any other parties without your consent. Should you have any questions or concerns about the collection or use of this information, please contact XXXX@ubc.ca.

### 2.4 Consent for Storage/Access Outside of Canada & Opt-Out Procedure (If Any)

Individuals who will use the platform will be provided a privacy notice stating their data will be stored outside of Canada.

### 2.5 Consent Withheld Procedure

Not applicable as consent for storage of information outside of Canada is not a requirement of FIPPA.



## PART 3: SECURITY OF PERSONAL INFORMATION

---

### 3.1 Physical Security Measures

This project is required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards).

### 3.2 Technical Security Measures

This project is required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards).

### 3.3 Security Policies, Procedures, and Standards

This project is required to comply with UBC Policy SC14 (Information Systems Policy) and applicable UBC ISS (Information Security Standards).

### 3.4 Tracking Access / Access Controls

Users are provided access to the platform by the Workplace Learning & Engagement admins at UBCO when they sign up for the course. At this time their contact information will be added into the platform and then used to send them a unique link. The user will then login, creating their own password, in order to complete the assessment and navigate the site.

Users will be offboarded when they leave UBCO and will be given the option (by UBCO admin) to change the email address associated with their core strengths account to a personal email address. The alternatively option is the individual can request that their account be deleted along with all other personal information tied to the Core Strengths platform.

## PART 4: ACCURACY, CORRECTION, AND RETENTION

---

### 4.1 Updating and Correcting Personal Information

Individuals will have direct access to the platform to update or change any information. At any time, they wish they are able to contact support@corestrengths.com to delete their account and personal information which will not require UBC's approval.

### 4.2 Decisions That Directly Affect an Individual

Not applicable as the information gathered and stored on the platform will not be used in decisions that directly affect the individual.

### 4.3 Records Retention and Disposal

Workplace Learning & Engagement team will store assessment data in accordance with retention schedule HR4000: Human Resources – General - Staff Training & Professional Development.

## PART 5: FURTHER INFORMATION

---

### 5.1 Systematic Disclosures of Personal Information

Not applicable.

### 5.2 Access for Research or Statistical Purposes

Not applicable as data will not be used for research or statistical purposes.

### 5.3 Other Applicable Legislation and Regulations

Not applicable.

## PART 6: ACCESS AND PRIVACY MANAGER COMMENTS

### 6.1 Information or Materials Reviewed

The Vendors privacy Policy States: "In connection with Assessments, we use the responses to an Assessment to score the Assessment and to generate Reports and other data related to the Respondent. We may combine data from multiple Respondents; combine Respondent data with our general research data; or compare or associate Respondent data with other Respondent data."

When asked to clarify they specified: "The ability to combine and compare user's data can only occur among users associated with that Client – there is no inter-Client sharing of data. A Client can elect whether the ability to combine and compare their users' data occurs by default or occurs by the individual request of a user to another user for access. The user to whom the request was made can approve or deny the request. In terms of the data shared, there is no PII within the data shared outside of what is already known to the user."

### 6.2 Analysis and Findings

The information provided for the review has established that Core Strength can be used in the proposed manner in compliance with FIPPA the following are the key factors in that determination:

1. The data that is collected is only used for its initial intended purpose.
2. Access to data will be limited to those who require it.
3. UBC employees will be notified that any information shared with Core Strengths will be stored outside of Canada.

### 6.3 Conditions of Approval

Risk Mitigation plans should be followed to ensure compliance with FIPPA.

### 6.4 Review and Distribution

*This refers to the report approval process. The Owner is accepting the accuracy of the data provided to PrISM for this review and the risk responses. The Owner is responsible for the on-going operational activities and must ensure that this project continues to meet legislative and legal requirements, along with Information Systems Policy (SC14) requirements. Any change in PI collection or use will require new PIA.*

#### Assessment Acceptance

Mark Belsito

*This refers to the report distribution, including Requestor, Project Manager, Owner, and assigned Risk Advisor.*

#### Distributed To

**Requestor:** Gordon Chan, Senior Systems Administrator  
**Project Manager:** Gordon Chan, Senior Systems Administrator  
**Owner:** Mark Belsito, Manager  
**Risk Advisor:** Taylor Bohn, Information Security Risk Advisor

#### PIA Request Date

2023-04-11 11:27:46

#### Report Created

2023-05-16 17:24:32