



PIA Guidelines: Survey Tools

Overview

This document provides Privacy Impact Assessment (PIA) guidelines for expected use of UBC's most frequently used survey tools, and explains how to ensure that these tools comply with BC's *Freedom of Information and Protection of Privacy Act* (FIPPA) requirements and UBC's *Information Security Standards*.

The following tools are covered by these guidelines:

- [UBC Survey Tool](#) (provided by Qualtrics)

If you are conducting surveys for research purposes, consider using the [UBC REDCap](#) tool, which offers survey as well as other data capture and analysis capabilities.

These guidelines do not apply to the use of other third-party survey tools (e.g. *Survey Monkey*, *Fluid Surveys*, and non-UBC versions of *Qualtrics*). Many of these tools are not compliant with FIPPA because they store personal information (PI) outside Canada. A PIA request must be submitted if you are planning to use this or any other tools and will be collecting PI. For more information about how to submit a PIA request, refer to the [UBC PIA Webpage](#).

General Requirements

A PIA has been conducted for the *UBC Survey Tool*. This tool can be used within the University community for most purposes. However, you may be required to submit a supplementary PIA request depending on a number of factors, such as the nature of PI collected, how such information is used, shared or disclosed, and where it will be stored. For information about what constitutes PI, refer to the Fact Sheet [What is Personal Information?](#)

Supplementary PIA Required

A supplementary PIA is required if **any** of the following factors apply:

- Any of the following or similar types of high-risk PI elements are collected or accessed: date of birth, SIN number, government-issued identification, personal health information, biometric data, gender identity, financial information (e.g. bank account or credit card number)
- The survey will be distributed using a third-party mass mailing tool (e.g. *Campaigner*, *SendGrid*)
- PI will be used for marketing or promotional purposes, or disclosed to the general public
- PI will be used for purposes other than the original purpose that are not expressly stated in the survey
- Survey data will be linked to other PI without the data subject's consent

Supplementary PIA Not Required

If none of the above factors are applicable, then you are not required to request a supplementary PIA. However, you are still required to provide a privacy notification on your survey (see below).

A supplementary PIA is also not required if your use of these tools is part of a research project that has received Research Ethics Board approval, or if you are using these tools as a student for academic purposes. However, you should still follow the Tips and Reminders below.

(continued)

Tips and Reminders

Administrators should always adhere to the following principles when designing surveys and managing data collected using these tools:

- **Aim for anonymous participation whenever possible:** Avoid asking questions that could allow the individual to be identified, such as precise age, address, place of birth, etc. (To ensure participant anonymity, turn off data tracking capabilities via the 'Survey Options' button within the *UBC Survey Tool*).
- **Collect only the information you need:** These tools should collect only the information that is absolutely necessary and avoid excess data collection. If PI is not required, do not collect it.
- **Retain only as long as required:** The *UBC Survey Tool* is meant only for data collection. Data from completed surveys should be purged from the tool upon survey completion.
- **Avoid creating 'phishy' surveys:** Never ask people to provide their CWL ID or password. A common way for hackers to gain personal information is through fake survey invitations that ask for login credentials. UBC IT has developed [guidelines](#) to help you make your surveys look authentic.
- **Distribute surveys using only UBC-endorsed tools:** If you are using e-mail to send out invitation links to participate in your survey, UBC-endorsed e-mail platforms can be found in the *PIA Guidelines for Mass Mailouts*.
- **Don't use surveys to conduct other activities:** The above survey tools are not endorsed or recommended to support core UBC processes (e.g. program applications, course registrations, etc.). Other tools are optimized to perform these functions and better meet administrative and compliance requirements.
- **Grant access to data sparingly:** Survey creators are responsible for ensuring that access to survey data containing PI is granted on a "need-to-know" basis to limit unintentional disclosure of PI.
- **Appoint consultants securely:** Ensure data is shared securely with third parties outside the University to avoid unintentional PI exposure. Disclosure of PI may only be done in accordance with an information sharing agreement or security and confidentiality agreement.
- **Don't disclose PI:** Do not make PI available to the general public.
- **Student academic use is allowed:** Students collecting PI for academic (e.g. class) purposes are not subject to FIPPA requirements, but they should still provide a notification.

Privacy Notification

Generally speaking, it is preferable to conduct surveys anonymously. If it is necessary for you to collect PI, under FIPPA, you must provide a privacy notification anytime PI is collected or used. As long as the individual sees the notification, it is not necessary for them to click "I agree." A sample privacy notification follows:

PRIVACY NOTIFICATION

This is a confidential survey which will collect personal information such as your name, contact information, and information about your health and family status. UBC is collecting this information under the authority of section 26(e) of the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA). This information will only be used for <purpose>.

If you have any questions or concerns about the collection or use of this information, please contact <contact details>.

Contact Us

Guidance about designing surveys using the *UBC Survey Tool* as well as technical support options may be found on the [UBC IT Service Catalogue](#).

For questions about the information contained in these guidelines or the PIA process, contact pia.process@ubc.ca.