

SECTION I - OVERVIEW AND PIA INITIATION

Government Institution: Canadian Commercial Corporation

Name of Program or Activity of the Government Institution:
Outsourcing of Payroll and Leave Requests

Description of Program or Activity:

At the present time, Canadian Commercial Corporation (CCC) outsources various

Description of the class of records associated with the program or activity:

CLASSIFICATION OF POSITIONS (Record Number: PRN 919)

Description: Includes records related to the factors, elements, and other criteria used to establish the relative value of work for an occupational group. Classification provides a means of grouping similar types of work together so that it can be ranked by levels of difficulty and differentiated from other, dissimilar work. It also provides a basis for employee compensation in the institution.

Document Types: Employee lists and inventories, position classi

succession planning and knowledge transfer, vacancy and turnover rates, internal staff mobility, priority placements, workforce adjustment, demographic analysis and forecasting, labour market surveying and analysis, environmental scanning, needs analysis, skills and competencies requirements, and planning and performance monitoring activities.

Document Types: Environmental scans and gap analyses, employee surveys, labour market studies and reports, drafts and final versions of institutional multi-year human resource plans, human resources audits, discussion papers, Human Resources Planning Committee records, research studies and reports, special thematic studies, demographic data, statistical reports, and copies of relevant legislation, regulations and policies.

OCCUPATIONAL HEALTH AND SAFETY (Record Number: PRN 922)

Description: Includes records related to the provision of a safe and healthy working environment for all federal employees (including employees of Crown Corporations, Foundations, Commissions, etc.). Records may include information related to occupational health and safety training, health assessments of employees and emergency medical services, environmental health investigations and surveys, first aid training, facilities, services and supplies, the selection and use of personal protective equipment and clothing, the rehabilitation and retraining of employees disabled by work injuries or illnesses, employee assistance services, the development and monitoring of occupational and environmental standards, procedures and other directives for the prevention of occupational illness and injury, the Canada Labour Code, workplace fitness programs, and institutional Occupational Health and Safety (OHS) Committees.

Document Types: Accident/injury reports, safety guides, copies of ergonomic assessments, first aid needs assessments and treatment manuals, first aid reports, advisory notices, exposure to hazardous material case files, safety inspection reports, OHS Committee records (agendas, minutes of meetings, records of decision, etc), medical examination reports, occupational injury or illness investigation reports, first aid training programs, central agency and/or institution-specific policies, standards, guidelines and procedures, and copies of relevant legislation and regulations.

OFFICIAL LANGUAGES (Record Number: PRN 923)

Description: Includes records related to the provision of services to the public and to employees in both official languages in accordance with the Official Languages Act and its pursuant regulations. May include information related to language of work, minority official language rights, equitable participation, signage, communications with and services to the public, use of official languages on institutional web sites, and administration of the official languages program.

Document Types: Reports of the Commissioner of Official Languages, copies of central agency and/or institution-specific policies, procedures and guidelines, complaint investigation reports, reports to Senior Management and/or relevant central agencies and copies of relevant legislation and regulations.

PERFORMANCE MANAGEMENT REVIEWS (Record Number: PRN 946)

Description: Includes records related to the evaluation of the performance of employees based upon regularly established objectives. May include information related to training requirements, employee/employer objectives and expectations, employee misconduct, performance pay, annual increments, probation, and discipline.

Document Types: Performance assessments, investigation reports, work plans, reports, and executive performance agreements.

RECRUITMENT AND STAFFING (Record Number: PRN 920)

Description: Includes records related to the recruitment and staffing of people to fill full-time or part-time positions within the institution. Records may include information related to screening, examining, testing, interviewing, assessing, selecting, hiring, and promoting candidates for employment. May also include information related to terms and conditions of employment (including conflict of interest), deployments, assignments, and secondments, student, professional, and occupational recruitment, post-employment appeals, and area of selection, as well as information received from or shared with central agencies responsible for recruitment and staffing, other employment agencies, or both.

Document Types: Unsolicited résumés and curricula vitae, model interview questions and answers, competition posters and announcements, application forms, competition assessment tools and rating guides, reference check procedures, checklists, and letters, inventories of qualified candidates (including pre-qualified pools), candidate inquiries and responses, copies of letters of offer, ratings board assessments, information within automated or Web-based application tools, and second language evaluation results, etc.

RELOCATION (Record Number: PRN 936)

Description: Includes records related to the authorized move of an employee from one place of duty to another or the authorized move of an employee from the employee's place of residence to the employee's first place of duty upon appointment to a position in the institution. Records may include information related to employee entitlements and obligations, employer obligations, third party service providers, interim accommodation, travel to new destination, spousal relocation, advances, legal fees, and long-term storage.

Document Types: Relocation expense claims, copies of institution-specific policies and procedures, and moving and storage company information.

TRAINING AND DEVELOPMENT (Record Number: PRN 927)

Description: Includes records related to formal and informal training received by employees to develop their knowledge, skills and competencies, maximise their potential and increase their productivity. Records may include information related to special development programmes, university fellowships, language training, training requirements, professional development, leadership development programs, learning and training policies, monitoring and reporting requirements, continuous learning and career counseling. May also include records related to liaison with training providers.

Document Types: Annual training reports, individual learning plans, employee orientation information, educational leave criteria, training and skills needs analysis documents, knowledge assessment criteria and results, performance level descriptions, criteria, assessments and agreements, institutional policies on membership fees, and second language training requirements.

Class of Record Number: PRN 920 and PRN 941

- Proposal for a New Personal Information Bank
- Proposal to modify an existing Personal Information Bank - identify PIB registration number and current description:

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Proposed new Standard Personal Information Bank



absenteeism.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 941

Bank Number: PSE 903

DISCIPLINE

Description: This bank describes personal information related to the application of discipline standards in the federal public service and related penalties, including termination of employment, suspension, demotion to a position at a lower maximum rate of pay and financial penalties that may be applied for breaches of discipline

EMPLOYEE ASSISTANCE

Description: The records containing the information described in this bank are treated in a confidential fashion that is relative to an employee's involvement in an Employee Assistance Program (EAP). These records may include notice of voluntary or mandatory (supervisory work performance related) referral; records of reference to, or reports and correspondence from a health professional or rehabilitation agency; and only non-medical interpretations concerning an employee's work capability or limitations. All personal medical data shall be maintained in a medical protected status under the control of the Occupational and Environmental Health Services Agency. Records relating to work performance deficiencies, absenteeism and disciplinary matters are to be held in the appropriate institutional record (with its related personal information bank) and not held with EAP files.

disclosed to Public Works and Government Services Canada or to a third party service provider to facilitate payment of salary including direct deposit, refer to central personal information bank Public Service Pay Systems - PWGSC PCE 705. Where applicable, information may also be disclosed to various provincial health insurance plans or third-party group insurance companies. Where required, information may be used to confirm the identity of employees for access to government and departmental websites and databases. Selected information is shared with previous employers for the purpose of finalizing payments, including retroactive payments and the recovery of outstanding amounts owing to the Crown. Information may also be used or

RDA Number: 98/005

Related Record Number: PRN 942

Bank Number: PSE 918

HUMAN RESOURCES PLANNING

Description: This bank describes information related to salary management and human resources planning, including reporting and forecasting functions. Personal information may include name, contact information, biographical information, educational in

serve on oversight or governance bodies. The information may be used to provide advice to the Minister or Head of the institution to fill existing and/or forthcoming vacancies and to maintain an inventory of potential candidates. The personal information is also used to manage the administration of expenses (e.g., travel) and compensation and benefits packages, conduct performance evaluations, maintain an inventory of current and former appointees, record potential conflicts of interest and any compliance action required, and to communicate with these individuals.

Consistent Uses: This information may be used in the preparation of reports for senior management and broader audiences (e.g., Annual Reports), planning and evaluation purposes, and communications materials (e.g., press releases, biographies, etc.) that may be disseminated in multiple formats, including the institution's web site. The Social Insurance Number (SIN) is collected for the Canada Revenue Agency (CRA) under the authority of the Income Tax Act (Information Returns (Infodec) Databank - CRA PPU 150) and, where applicable, the Province of Quebec Income Tax Act.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: Institution-Specific.

Service Health Medical Advisory Committee - HCan PCE 702. Information with respect to safety and health complaints and causes of accidents/injuries for accident prevention and health protection purposes is used to support the effective administration of each institution's safety and health activity; such information is also disclosed to the institution's work place health and safety committee. Information is also used to process payments and charge-backs with respect to injury compensation claims. Information related to injury compensation claims, including related correspondence and amounts paid, is retained by Human Resources and Skills Development Canada (HRSDC) or a third party service provider and is shared with the institution of the affected employee and, where applicable, the relevant provincial or territorial workers' compensation board. HRSDC holds information pertaining to employee compensation amounts, which are charged to institutions and distributed on a cost-recovery basis; refer to central personal information bank Government Compensation Records - HRSDC PCE 701 and Pilot Project in Disability Management - HRSDC PCE 705. Information may also be shared with HRSDC, specifically, with safety officers for the purposes of accident and refusal to work investigations and the stipulation of corrective measures. Information may be shared with/described in other Standard Personal Information Banks pertaining to human resources activities including: Employee Personnel Record - PSE 901; Attendance and Leave - PSE 903; Employee Assistance - PSE 916; Pay and Benefits - PSE 904; and Grievances - PSE 910. The investigation and settlement of vehicle accidents is also described in Standard Personal Information Bank Vehicle, Ship, Boat and Aircraft Accidents PSE 908. Information may also be used or disclosed for planning and program evaluation purposes.

Retention and Disposal Standards: For information about the length of time that specific types of common administrative records are maintained by a federal government institution, including the final disposition of those records, please contact the institution's Access to Information and Privacy Coordinator.

RDA Number: 98/005

Related Record Number: PRN 922

Bank Number: PSU 907

OFFICIAL LANGUAGES

Description: This bank contains course enrolment and attendance information; language training applications containing basic personal data, such as first official language, date of birth, and Personal Record Identifier (PRI) for purposes of identification; language knowledge examination scores; training certificates and correspondence about the official languages qualifications of employees. The bank may also contain duplicate input forms for the Official Languages Information System (OLIS). Language examination, exemption and training records are attached to the Employee Personnel Record. Similar data is also described by translation required Particular Banks of the Public Service Commission and Treasury Board Secretariat.

Class of Individuals: Employees of the institution.

Purpose: The purpose of the information described by this bank is to provide documentation for administration

PAY AND BENEFITS

Description: This bank describes information related to the administration of pay and benefits within

Purpose: Personal information is used to administer recruitment and staffing activities in government institutions, which includes maintaining an inventory of potential candidates for future staffing actions. For most government institutions, personal information is collected pursuant to the Public Service Employment Act (PSEA), the Employment Equity Act (EEA), and the Canadian Human Rights Act (section 16). For those institutions not subject to these Acts, consult the institution's Access to Information and Privacy Coordinator to determine collection authority.

Consistent Uses: Information may be disclosed to the Public Service Commission, Treasury Board Secretariat and other government institutions for recruitment, employment equity, and staffing purposes, including complaints - refer to the following personal information banks: for the Public Service Commission of Canada: Applicant Inventories and Referrals - PSC PPU 015; Occupational Test Results - PSC PPU 025, Second Language Evaluation (SLE) Test Results - PSC PPU 030, Executive Resourcing - PSC PCE 746, Analytical Environment - PSC PCE 707, and Investigations - PSC PPU 010; for Treasury Board of Canada Secretariat: Employment Equity Data Bank - CPSA PCE 739 and Workforce Adjustment Monitoring (WFAM) System - CPSA PCE 804. Information relating to staffing complaints may be shared with the Public Service Commission (Investigations - PSC PPU 010) and the Public Service Staffing Tribunal, when required. On request, selected information may be disclosed to a participant in a staffing process. Information may also be shared with third party service providers to manage recruitment initiatives. Information may also be used or disclosed for human resources planning and studies (refer to Standard Personal Information Bank Human Resources Planning - PSU 935) and staffing decisions may also be described in Standard Personal Information Bank Employee Personnel Record - PSE 901. Voluntary self identification information relating to employment equity programs and services is also described in Standard Personal Information Bank Employment Equity and Diversity - PSE 918. Selected information about reclassifications may be proactively disclosed on government institutions' websites. Information may also be used or disclosed for program evaluation and reporting purposes.

At the present time, CCC obtains signed consent from employees at the commencement of their employment to collect personal information for the processing of payroll and HR administration. The collection, use and disclosure of the personal information submitted is used solely to complete payroll and benefit requirements, process leave requests and HR administration. The processing of these functions is currently being completed by a third party, being Public Works and Government Services Canada. The proposed change is to outsource these functions to a private third party for cost savings and efficiency improvements.

CCC employees will use the internet (Microsoft Internet Explorer) to access and modify their respective personal information that will be stored at ADP. Access by employees to their own information will be protected with an account name/password combination. In sending notifications to CCC employees and to their managers as needed, ADP will use Simple Mail Transfer Protocol (SMTP). If, for example, an employee requests leave, it will do so through an e-mail to ADP, which will in turn generate a notification to the employee's manager who will in turn approve or disapprove the leave. The approval or disapproval of leave will then be communicated back to the employee and the leave databank at ADP will be updated depending on the result of the request. For CCC HR personnel accessing the ADP database regarding payroll and other functions, the security is heightened and they must use the ADP specific Public Key Infrastructure (PKI) application or key that will be a uniquely encrypted access key for HR personnel to use on their desktop. .

As part of their risk mitigation strategy, ADP maintains an enterprise-wide Information Security Program and has implemented administrative, physical and technical safeguards that reasonably and appropriately protect the Confidentiality, Integrity and Availability of client confidential information from unauthorized access or disclosure.

ADP also follows a comprehensive series of checks and controls that correlate or map with the COSO/COBIT standards framework, an industry standards framework used to optimize enterprise risk management. CobiT is a widely recognized set of Information Technology Standards that provide a framework for overall best practices to control internal operations. The COBIT framework links IT processes, resources and information to enterprise strategies and objectives. The COSO/COBIT framework is supported by best practices as defined by The National Institute of Standards and Technology which through its Computer Security Division (CSD), provides standards and technology to protect information systems against threats to the confidentiality

COMPENSATION

Description: Includes records related to the programs and activities that establish and administer pay, pension, and other benefit standards and practices to ensure that employees receive fair compensation/remuneration/payment for work performed. May include records related to continuous service, garnishment, maternity and parental benefits, attendance and leave, rates of absenteeism, overtime, pay authorities, performance pay, rates of pay, severance pay, workforce adjustment, part-time, term employees, pay administration, life, disability, health and dental insurance plans, Canada Pension Plan, and Public Service Superannuation.

PAY AND BENEFITS

Description: This bank describes information related to the administration of pay and benefits within government institutions. Personal information may include name, contact information, biographical information, date of birth, date of death, Employee identification number, employee personnel information, financial information, and Social Insurance Number (SIN).

ATTENDANCE AND LEAVE

Description: The records containing the information described in this bank may include absence reports and leave applications, all of which include the individual's Personal Record Identifier (PRI) and correspondence about attendance and leave. The annual record of attendance and leave may be attached to the Employee Personnel Record. Some attendance and leave information exists in automated form in institutional personnel databases, especially in time/attendance, leave control and absenteeism systems.

EMPLOYEE PERSONNEL RECORD

Description: This bank describes information about an individual's employment with government institutions. Personal information may include name, contact information, biographical information, citizenship status, date and place of birth, educational information, employee identification number, employment equity information, assets loaned to employees, alternative work arrangements (e.g., telework, compressed work week), information related to superannuation, benefits, training and development, grievances, security incidents, any other employment-related requirements (e.g., security clearances, passport/visa information), financial information (for pay administration), medical information (including any special needs identified under duty to accommodate, or in the event of an emergency), other identification numbers, and Social Insurance Number (SIN).

Note: Short description of the institutions business objectives, project objectives, project / initiative / change scope, product scope, stakeholders and assumptions.

SECTION II - RISK AREA IDENTIFICATION AND CATEGORIZATION

sensitive factual details.	
Social Insurance Number, medical, financial or other sensitive personal information and/or the context surrounding the personal information is sensitive. Personal information of minors or incompetent individuals or involving a representative acting on behalf of the individual. For example: the personal information by association indirectly reveals information on the health, financial situation, religious or lifestyle choices of the individual.	<input checked="" type="checkbox"/> 3
Sensitive personal information, including detailed profiles, allegations or suspicions, bodily samples and/or the context surrounding the personal information is particularly sensitive. For example: personal information that reveals intimate details on the health, financial situation, religious or lifestyle choices of the individual and which, by association, reveals similar details about other individuals such as relatives.	<input type="checkbox"/> 4
Details: At the present time, CCC obtains signed consent from employees at the commencement of their employment to collect personal information for the processing of payroll and HR functions. The collection, use and disclosure of the personal information submitted is used solely to complete payroll and benefit requirements, to process leave requests and for HR administration. The processing of these functions is currently being completed by a third party. The personal information collected includes date of birth, SIN (not used as an identifier), language preference, marital status, complete address, email, phone number, cellular number, and personal record identifier.	

C: Program or Activity Partners and Private Sector Involvement	Level of risk to privacy
Within the institution (amongst one or more programs within the same institution)	<input type="checkbox"/> 1
With other federal institutions	<input type="checkbox"/> 2
With other or a combination of federal/ provincial and/or municipal government(s)	<input type="checkbox"/> 3
Private sector organizations or international organizations or foreign governments	<input checked="" type="checkbox"/> 4
Details: The payroll and leave processing functions will be performed by a private sector organization that specializes in these functions. The proposed private sector organization is called "ADP Canada Co." ADP Inc., being the parent company of ADP Canada Co., has over 585,000 clients worldwide including 50,000 in Canada and it produces one in five payroll cheques in North America. ADP specializes in providing HR support functions and prides itself on its ability to protect confidential information.	

D: Duration of the Program or Activity	Level of risk to privacy
One time program or activity Typically involves offering a one-time support measure in the form of a grant payment as a social support mechanism.	<input type="checkbox"/> 1
Short-term program A program or an activity that supports a short-term goal with an established "sunset" date.	<input type="checkbox"/> 2
Long-term program Existing program that has been modified or is established with no clear "sunset".	<input checked="" type="checkbox"/> 3
Details: The commercial contract between CCC and ADP will provide that either party can terminate the contract upon written notice and there will be no long term commitment, however, provided that the service and cost are acceptable to CCC, and that there are no breaches of confidentiality, CCC intends to retain this service provider	

indefinitely.

E: Program Population

**Level of
risk to
privacy**

information matching, record linkage, personal information mining, personal information comparison, knowledge discovery, information filtering or analysis. Such activities involve some form of artificial intelligence and/or machine learning to uncover knowledge

I: Risk Impact to the Individual or Employee