

Human Resources Management Information System – Phase 1

Privacy Impact Assessment

Summary

This document summarizes the project and the Privacy Impact Assessment (the “**PIA**”)’s recommendations as they pertain to the first implementation phase of a new Human Resources Management Information System (the “**HRIS**”). The goal is to replace the existing platform with a modernized system that will, in time, positively transform the user experience from the perspective of employees, managers, and Human Resources (“**HR**”) staff. This will help to improve and streamline HR processes and operations.

This first phase aims to deliver the fundamental components of the HRIS, including the organizational structure, individual employee profiles, as well as the tools needed to manage timesheets. (e.g. overtime, leave requests, etc.).

The risk identification and classification carried out in accordance with the PIA’s standard evaluation grid enabled Telefilm Canada to address the risks potentially tied to the collection and use of personal information through the new HRIS, including the sensitivity of the information, the long-term duration of the program, the transmission of personal information using wireless technology, and the potential for reputational damage or embarrassment in the event of a privacy breach. This PIA allowed Telefilm Canada to determine the adequacy of the planned risk mitigation measures related to the implementation of the new HRIS, including: (i) controlling access to and handling of personal information on the basis of positions or functions that have a valid reason for accessing and handling such information; (ii) protecting personal information by limiting access and use through appropriate administrative and technical means; and (iii) a program implemented by the platform provider and its subcontractors ensuring the platform’s security management based on recognized certification standards, as well as the verification of controls implemented in accordance with recognized audit standards related to the security, availability, processing integrity, confidentiality and protection of personal information. In addition, the PIA allowed Telefilm Canada to determine that the planned measures in relation to the rollout of the new HRIS, including the acceptance by employees logging into the platform of the terms and conditions set out in a privacy statement, as well as limiting collection to personal information which is directly related to and demonstrably necessary for HR management programs, are in accordance with the *Privacy Act*.