

HUMAN RESOURCES MANAGEMENT SYSTEM (T.A.N.D.E.M.)

Privacy Impact Assessment

Executive Summary

In September 2011, Telefilm Canada implemented a new human resources management system (T.A.N.D.E.M.) that offers its employees a self-service tool to consult and update their personal information. The system will also allow the implementation of processes to facilitate the processing of time sheets and performance evaluations. These processes involve the initial entering of information by employees, followed by the validation and approval of this information by their manager and the sending of the approved information to human resources.

A Privacy Impact Assessment (PIA) was conducted to identify potential privacy risks related to implementing the new human resources management information system. This assessment has helped reduce or eliminate these risks by recommending corrective actions.

Based on the recommendations of the Privacy Impact Assessment, the project included the changes needed in order to comply with the following aspects of the Privacy Act:

- Appoint a custodian of personal information who is in charge of Human Resources Administration and not an individual from IT as recommended. Define the custodian's mandate based on the recommendations.
- Add a notice of collection of personal information on the T.A.N.D.E.M. home page that is consistent with the notice and consent guidelines.
- Activate a log to record accesses and modifications to employee files and add the date and name of the most recent modification to reduce the risks of inappropriate use and improve the accuracy of the information.
- Activate a log to record changes to information and function access rights of T.A.N.D.E.M. to ensure that only authorized individuals have access to the information.
- Make sure that the custodian of personal information for the "human resources management" activity has validated the notice of collection, the PIBs (personal information banks) and the access rights by role assigned in T.A.N.D.E.M.
- Enter the PIBs used in HR.net for the next publication on the Info-sources website.
- Publish a summary of the PIA (this document) on Telefilm Canada's website.

In conclusion, the PIA report identified a number of privacy risks, which are mitigated by the implementation of recommended corrective measures.