

Collecting Demographic Data: Pilot Survey – PIA Summary

DESCRIPTION OF THE PROJECT

In 2018, the Canada Council commissioned Forum Research and Hill Strategies Research to develop and pilot a voluntary online survey to track the demographic makeup of the workforce and boards of organizations that receive core operational funding through the Artistic Institutions component of the Engage and Sustain program.

This project will further the Council's commitment to diversity, equity and inclusion as outlined in its Strategic Plan and to support the criteria from the Engage and Sustain program which asks organizations how they reflect the diversity of their communities through an understanding, at an aggregate level, of who works in the organizations that the Council funds.

WHY THE PIA WAS NECESSARY

A privacy impact assessment of the pilot demographic survey was conducted to address cross-jurisdictional privacy obligations.

PIA FINDINGS AND RISK SUMMARY

Following the summary PIA, it was determined that the Council is attuned to and addressing the potential impact on privacy of the Demographic Survey.

- The Council has parliamentary authority for the program or activity for which the information is being collected from both the Council's mandate in the *Canada Council for the Arts Act*, and from the *Canadian Multiculturalism Act*;
- Four separate pieces of privacy legislation were considered: the *Privacy Act*; *Personal Information Protection and Electronic Documents Act* ("PIPEDA"); *Alberta's Personal Information Protection Act (PIPA)12*; and *Quebec's Act Respecting the Protection of Personal Information in the Private Sector*;
- The method of distributing the survey is a means to minimize the collection of personal information;
- Individuals are notified that their personal information is being collected, including purpose, disclosures, refusal to disclose consequences, to file a complaint with the Privacy Commissioner of Canada, including links to the Council's and Consultant's Privacy Notices;
- Informed consent will be obtained from individuals at the time the survey is started. The survey is voluntary;
- The consultant is using a "state-of-the-art... online surveying system" to minimize risks of disclosure;
- The Council will house the data in an anonymous format; reporting results only when there is a sufficient number of responses to ensure anonymity; and, the Consultant will not match the data collected with any other data;
- Both the Consultant and the Council will take all reasonable physical, administrative, and technical security safeguard to protect the confidentiality of the information collected through the survey;
- Both the Council and the Consultant have a breach response plan in place; and
- Once the Consultant no longer has ongoing and related work for the Council for which the data is required, it will securely destroy the data in a manner that will render it unrecoverable and/or unidentifiable.