Appendix B – Privacy Impact Assessment Initial Questionnaire

This form is to be completed by the Business Owner / Board employee and submitted through the TAP Portal. The form is used to determine whether a Privacy Impact Assessment (PIA) is necessary for a Board project, product or initiative. A PIA is a risk management and compliance review tool designed to proactively identify and address potential privacy issues and minimize exposure to privacy breaches. Beginning January 1, 2027, PIAs are expressly required under Ontario's *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and other privacy legislation if a technology or process involves the collection, use, disclosure, transfer, storage, or deletion of identifiable personal information (PI). They may also be required if there are significant modifications to existing technology or processes involving PI.

Under MFIPPA, PI includes any recorded information about an identifiable individual, such as:

- Demographic information (e.g., personal email, mailing address, phone numbers, parent information, religion, age)
- Educational information (e.g., report cards, IEPs, attendance, behavioral notes, disciplinary actions, transportation data, counselling or social-work notes, information about vulnerable students)
- EDI information (e.g., gender, nationality, inclusion in an equity deserving group, race)
- Financial or Medical information (e.g., fee payments, doctor's notes, disability or accommodation information)
- Biometric data (e.g., fingerprints, facial features, CCTV footage)
- Employment information (e.g., resume, performance feedback)
- Identifying Numbers (e.g., SIN, OEN, Employee ID, license plate numbers)
- Personal opinions/views of, or about the individual (e.g., student submitted a complaint, email about a student)
- Correspondence with or about the individual (e.g., emails, teams' messages)

DDSB Legal/IT may request the completion of a PIA in certain circumstances.

The Board employee/Principal working on the project, product or initiative can contact IT/Security at infosec@ddsb.ca if they have any questions or require assistance in completing this questionnaire.

Please provide the following information:

Name of project/product/initiative	
Name of Employee/Principal initiating request	
Company name and company representative name and title	
Brief description of initiative's purpose, scope and key objectives/use cases	

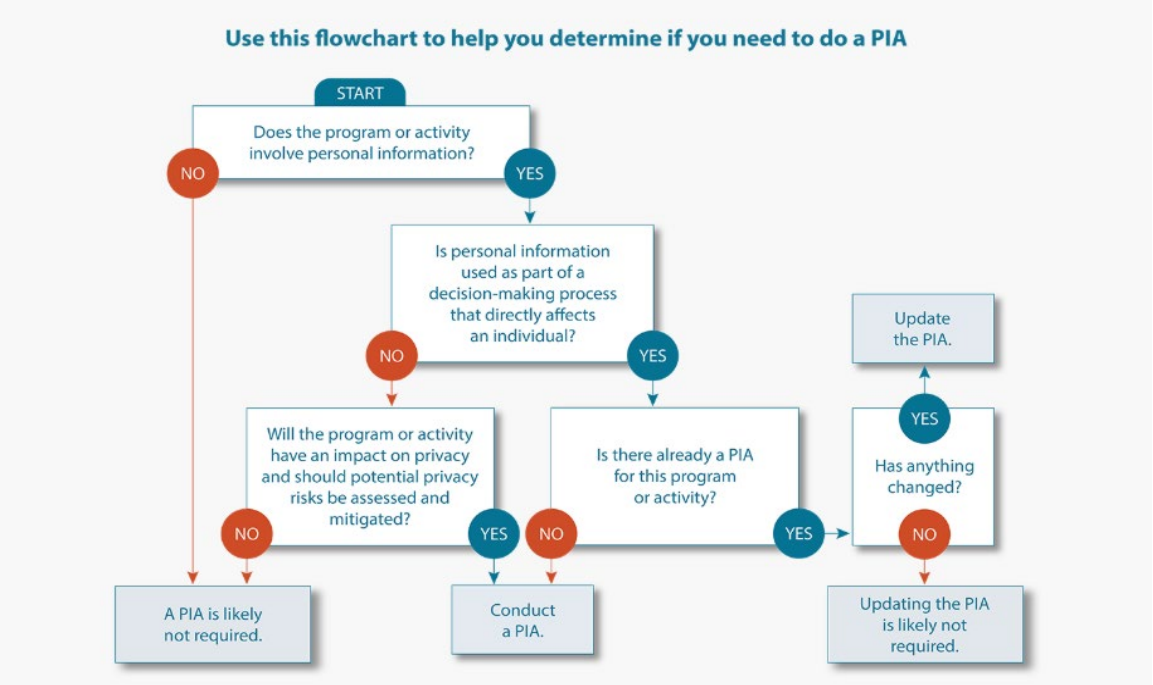
Has a PIA previously been completed? If yes, provide the date of completion.	
Brief description of the types of information collected and which individuals are impacted (e.g., students/staff, general public, contracted third parties) and anticipated volume OR What types of information are involved? Identify whether the initiative involves PI, business contact information only, de-identified or aggregated information, or no PI. If PI is involved, describe the types of PI, the individuals affected (e.g., students, staff, general public, or contracted third parties), and the anticipated volume. For de-identified or aggregated information, describe the method used and any risk of re-identification.	
Date form completed	

Does the initiative involve the collection, use, disclosure, retention, storage, processing or other handling of Personal Information (PI), or a significant change to an existing initiative involving PI?

If yes, a PIA is required. The following are examples of circumstances that may increase the nature or level of privacy risk and should be identified as part of the assessment.

Does the initiative involve the collection, use, disclosure, storage, processing or handling of a significant volume of PI (e.g., an institution-wide Student Information System, Learning Management System, or cloud platform used to collect or process student, employee or applicant information)?	Yes ☐ No ☐
Does the initiative involve a platform or technology through which students perform educational activities, submit work or other content, receive grades or assessments, or otherwise generate PI that is collected or stored?	Yes ☐ No ☐
Does the initiative involve the collection, use, disclosure, storage, processing or handling of Sensitive Personal Information (e.g., equity-related information, OEN,	Yes ☐ No ☐

SIN, financial, health, biometric or other sensitive information)?	
Will PI be used to make or support a decision about an individual, or does the initiative involve Artificial Intelligence (AI), automated decision-making or machine learning that may affect an individual (e.g., application processes, assessments, eligibility determinations or student appeals)?	Yes ☐ No ☐
Does the initiative involve biometric information, monitoring or surveillance activities (e.g., facial recognition, video surveillance or body-worn cameras)?	Yes ☐ No ☐
Does the initiative involve integrating a system or technology with another system, dataset or technology in a manner that involves PI or may create additional privacy or security risks (e.g., exchanging information with a student record system or combining information from multiple systems to create student profiles)?	Yes ☐ No ☐
Does the initiative involve a third party collecting, accessing, using, storing, processing or otherwise handling PI on behalf of the DDSB?	Yes ☐ No ☐
Does the initiative introduce a new or significantly changed purpose for the collection, use or disclosure of PI?	Yes ☐ No ☐
Does the initiative involve a significant change to an existing program, process, service, system or technology that collects, uses, discloses, stores or otherwise handles PI?	Yes ☐ No ☐



Source: Office of the Privacy Commissioner of Canada