

Summary of the Privacy Impact Assessment (Web Summary)

Title

Provide the title of the program or activity:

Whistleblower Program (the "**Program**")

Description

Provide a brief, plain language description of the program or activity:

The Program uses xpera ConfidenceLine, an anonymous and secure "whistleblower" ethics reporting service (the "**Service**") to allow for confidential reporting of wrongdoing. The Service provides a secure external, toll-free telephone hotline and a secure online reporting tool allowing for an individual reporting a Wrongdoing (each, a "**Reporter**") to remain anonymous if they choose to do so. The Service also supports anonymous ongoing communications between the workplace and the Reporter. The Service is available 365 days a year, 24 hours a day and offers bilingual English and French services, as well as multilingual capabilities with interpreter services.

Why a privacy impact assessment was completed

Provide an outline of the reason for completing the PIA:

Pursuant to the Treasury Board Secretariat Directive on Privacy Practices and the Privacy Act, RSC 1985, c P-21, DC is required to complete a privacy impact assessment for this Program as it involves the creation, collection, use, disclosure, retention or disposal of personal information for an administrative purpose.

Additional information

List any risks identified and the date any corresponding mitigation measures were implemented:

Risk No.	Risk Description	Affected Privacy Principle(s)	Risk Level	Mitigation Measures
1.	Collection of Data Subjects PII without consent, but with other legal justification.	Consent	Low	<i>Mitigation:</i> Document and conduct investigation in accordance with the PSDPA and DC's Whistleblower and Fraud Policies. <i>Responsible Party:</i> DC

Risk No.	Risk Description	Affected Privacy Principle(s)	Risk Level	Mitigation Measures
				<i>Target Completion Date:</i> Ongoing
2.	Private sector third-party access to the Data Subject's PII.	Accountability Limiting Collection Limiting Disclosure	Low	<i>Mitigation:</i> Conduct due diligence and security assessments on service providers and prepare PIA, if applicable. Ensure adequate contractual protections where possible. <i>Responsible Party:</i> DC <i>Target Completion Date:</i> Complete
3.	DC cannot control what PII the Data Subjects submit.	Limiting Collection	Low	<i>Mitigation:</i> DC employees engage in data privacy training on how to properly handle PII. <i>Responsible Party:</i> DC <i>Target Completion Date:</i> Ongoing
4.	Collection of Data Subjects PII without consent, but with other legal justification.	Consent	Low	<i>Mitigation:</i> Document and conduct investigation in accordance with the PSDPA and DC's Whistleblower and Fraud Policies. <i>Responsible Party:</i> DC <i>Target Completion Date:</i> Ongoing

Related personal information banks

Provide the name and bank number of any relevant personal information banks or classes or record:

- Discipline; TBS Registration #005144
- Employee Performance Management Program; TBS Registration #005145
- Employee Personnel Records; TBS Registration #005134
- Employment Equity and Diversity; TBS Registration #20250043
- Grievances; TBS Registration #005143
- Harassment; TBS Registration #005151
- Occupational Health and Safety; TBS Registration #005140
- Security Incidents and Privacy Breaches; TBS Registration #20250047
- Staffing; TBS Registration #005135

For more information about this privacy impact assessment

Provide the contact information of the person to reach out to for more information:

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