



Internet Summary Form

Section 1 – PIA Overview

1) Name of program or activity:

Outsourced Reference Checking Process

2) Institution(s) responsible for delivering program or activity:

Canadian Nuclear Safety Commission

3) CNSC official responsible for the Privacy Impact Assessment:

Nathalie Harrington, Director General, Human Resources Directorate
Stéphane Cyr, Director General, Finance and Administration Directorate

4) CNSC delegate for section 10 of the *Privacy Act*:

Hugh Robertson, Director General, Information Management and Technology Directorate

5) The new or modified program or activity complies with the following legislation:

Legal and Policy authority for program or activity:

- *Nuclear Safety and Control Act* (sections 12 and 16)
- *Policy on Government Security - Personnel Security Standard*

6) Description of the program or activity

The mission of the Canadian Nuclear Safety Commission (CNSC) is to regulate the use of nuclear energy and materials to protect health, safety, security and the environment, and to respect Canada's international commitments on the peaceful use of nuclear energy.

The CNSC issued a request for proposal (RFP), seeking a contractor to provide a service of verifying individual references of candidates for employment at CNSC. A reference check report will be prepared by the contractor and provided to the CNSC, along with the information retrieved for each request. The CNSC estimates it will require 200 reference checks annually.

These references are of interest to two divisions within the CNSC: the Resourcing and Human Resources Planning Division (RHRPD) (which deals with 90% of the requests), and the Security, Contracting and Procurement Division (SCPD) (representing approximately 10% of the requests). RHRPD reference checks are required to complete the hiring process, while SCPD reference checks are required for the processing of Reliability/Security clearances, as per the *Policy on Government Security - Personnel*



Security Standard. Both the RHRPD and the SCPD will normally request three reference checks per candidate, which could include both employment reference checks and verifications of education.

In response to the RFP issued by CNSC for reference checking services (Solicitation No. 87055-09-0205), First Advantage Canada, Inc. (FACI) submitted a bid that reflected its customized pre-employment screening program, tailored to CNSC's recruitment requirements. CNSC officials subsequently identified FACI as the top-ranking bidder. FACI is wholly owned by CoreLogic Inc., one of the leading U.S. providers of business data.

CNSC is subject to the federal *Privacy Act*. Its outsourced reference checking process involves the collection, use and disclosure of personal information and, as a result, it has initiated a privacy impact assessment (PIA) of that process. Through the conduct of interviews and review of the documentation provided for PIA purposes, it was readily apparent that CNSC officials wish to incorporate privacy and security as core elements of the outsourced reference checking process.

Section 2 - Privacy Impact Assessment Findings

The PIA report, produced according to the Treasury Board Secretariat's PIA directive, examines the privacy-related impacts of the CNSC's reference checking process, and has proposed appropriate mitigation strategies for the identified privacy risks associated with those initiatives.

Of particular note, the assessment process has identified moderate privacy risks related to the relationship of FACI with its parent corporation, as well as the FACI Release form and access rights. Other privacy-related risks (albeit of lesser magnitude) were also highlighted in the report, and several recommendations have been provided to mitigate these issues.

In conducting interviews and reviewing the documentation provided for PIA purposes, it was readily apparent that CNSC officials have properly addressed privacy issues while designing the reference checking process.