

Privacy Impact Assessment

Library – SirsiDynix Symphony SaaS

Colin Elliott

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Why do I need to do a PIA?

Section 69(5.3) of the Freedom of Information and Protection of Privacy Act (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FIPPA generally, you may contact Stephen Salem or Michael Doyle. Please see our PIA Guidelines for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies (which include CMTN) still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch	Library		
PIA Drafter:	Colin Elliott, Dean of Business, Access Education & Libraries		
Email:	celliot@coastmountaincollege.ca	Phone:	250-635-6511 x5298

1. Description of the Initiative

Symphony SaaS is the SirsiDynix-hosted version of Symphony. Symphony is the system the library uses to manage the borrowing of its physical collection. It includes patron records. Currently, Symphony is hosted on a Coast Mountain College server in Terrace. Symphony SaaS is hosted on a SirsiDynix server in Montreal. Future upgrades are performed automatically by SirsiDynix.

2. Scope of this PIA

The part of the initiative that this PIA covers is specifically to determine FOIPPA risk and compliance in implementing hosted SirsiDynix Symphony.

3. Related Privacy Impact Assessments

No other PIAs have been conducted at CMTN with respect to this initiative

4. Elements of Information or Data

Patron names, home addresses, phone numbers, email addresses, student or employee numbers.



Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Personal data is stored within Canada and only accessible within Canada.

Patrons outside Canada can access a list of their loans and requests. Patrons cannot view their personal data.

6. Data-linking Initiative

Personal information is not linked or combined with personal information from another database.

7. Common or Integrated Program or Activity

The initiative is not a "common or integrated program or activity".

8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>Client requests library card</i>	<i>Collection</i>	<i>26(c)</i>
2.	<i>Library may contact client to request return of overdue loans</i>	<i>Use</i>	<i>32(a)</i>
3.	<i>Library may contact client to notify client that requested loans are available</i>	<i>Use</i>	<i>32(a)</i>

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access personal information and use or disclose it for personal purposes</i>	<i>Role-based access</i>	<i>Low</i>	<i>Low</i>
2.	<i>Request may not actually be from patron (i.e. their email)</i>	<i>Implementation of identification verification procedures</i>	<i>Low</i>	<i>Low</i>



<i>address may be being used by someone else)</i>			
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10. Collection Notice

Upon registering for a course students are informed of the following:

I understand that both the information provided and any other information placed on my student record will be protected and used in compliance with Bill 50 Freedom of Information and Protection of Privacy Act (1992) and the operations of the College.

In addition, the library will post a notice on its website and in campus libraries:

To provide our borrowers with circulation services, Coast Mountain College library obtains and stores borrower's information (i.e. name, home address, phone number, and email address) in its Integrated Library System. This system is located in Montreal. Personal information is collected under the legal authority of the [College and Institute Act](#) section 41.1(2)(a) and the [Freedom of Information and Protection of Privacy Act](#) section 26. This information is used by the library only and is used for borrowing, placing holds, renewing library material and notifying borrowers when items are due or ready to be picked up. For questions and additional information contact Michele Cook, Coordinator, Library Services (1.877.277.2288 or mcook@coastmountaincollege.ca).

Part 3 – Security of Personal Information

11. Physical Security Measures

Password-protected access to Symphony's WorkFlows client software. WorkFlows client software is restricted to library staff computers.

12. Technical Security Measures

SirsiDynix SaaS is NIST SP 800-53 accredited and ISO 27001 certified.

13. Security Policies and Procedures

[Freedom of Information and Protection of Privacy Policy](#) (Policy Number: ADM-003)

Michele Cook can answer further questions regarding security policies and procedures.

14. Access Controls to Prevent Unauthorized Changes to Personal Information

Unauthorized changes to personal information are prevented by role-based access.



15. Tracking Access to the Personal Information

All library employees have access to patron personal information. Personal information use is not tracked.

Part 4 – Accuracy/Correction/Retention of Personal Information**16. How is an individual's information updated or corrected?**

Personal information is updated by personal communications from patrons or from personal records in Colleague.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)?

The library does not use client personal information to make decisions that directly affect clients.

18. If you answered "yes" to question 17, please explain . . .

Not applicable. Answered "no" to question 17.

19. If you answered "yes" to question 17, do you have . . .

Not applicable. Answered "no" to question 17.

Part 5 – Further Information**20. Does the initiative involve systematic disclosures of personal information?**

No.

21. Does the program involve access to personally identifiable information for research or statistical purposes?

No.

22. Will a personal information bank (PIB) result from this initiative?

No.



Part 6 – Privacy Officer Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).

As this information is being stored securely within Canada, there is low concern from a privacy impact perspective

Stephen Salem



Feb 4, 2021

Privacy Officer/Privacy Office
Representative

Signature

Date

Part 7 – Program Area Signatures

Colin Elliott

Feb. 5, 2021

Program/Department Manager

Signature

Date

Contact responsible for Systems
Maintenance and/or Security
(Signature not required unless
they have been involved in the
PIA)

Signature

Date

Head of Public Body (or
designate)

Signature

Date

A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact or call the OCIO's Privacy and Access Helpline at 250 356-1851.

