



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

Part 1 – General

Name of Department/Branch:	Board of Governors – Royal Roads University		
PIA Drafter:	Karen Hakkarainen		
Email:	Karen.hakkarainen@royalroads.ca	Phone:	250 391-2600 ext 4173
Program Manager:	Philip Steenkamp		
Email:	Philip.steenkamp@royalroads.ca	Phone:	250 391-2517

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

The Royal Roads Board of Governors requires a software solution to facilitate the governance of the institution. Across the Canadian post-secondary sector, electronic management of board dockets, meeting scheduling and meeting minutes has emerged as a preferred means of efficiently managing board business and collaborating and sharing documents, while safeguarding the confidentiality of institutional information.

Diligent software has been identified as the preferred tool to support the RRU Board of Governors. This software will not only improve the efficiency of assembling board books but also increase efficiency in their distribution by eliminating the need for hardcopy board books. Diligent supports meeting scheduling and includes a library function that will provide easy access to key institutional documents that support the Board in meeting its governance and fiduciary responsibilities, for example, the university’s strategic direction, the board strategic plan, the academic and operating plans and institutional policies. Diligent also includes a secure messaging feature that allows board members to communicate confidentially without the risk of security breaches associated with email communications.

Board members are provided password protected log-on credentials and access to information held on the Diligent platform is controlled by a university administrator in the board governance office.

2. Scope of this PIA

The scope of this PIA covers Diligent Board Management software: the collection, use, disclosure, security and storage of board member and award nominee personal information.



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

3. Related Privacy Impact Assessments

No PIAs related to this project or aspects of it have previously been completed.

4. Elements of Information or Data

This software will be used primarily to share confidential and non-confidential institutional data.

Personal information on nominees for honours and awards may be collected, including names, home addresses, home phone numbers, personal email addresses, and details of type of award being nominated for/reason for nomination.

Board member information will also be stored in this system, including:

- Board member names, home addresses, personal phone numbers and email addresses
- Board member height, dietary needs, degrees earned, make, model and licence number of vehicle,
- Documents pertaining to board member recruitment and performance feedback
- President's annual goals and performance feedback

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.



Privacy Impact Assessment for Non- Ministry Public Bodies

Board Management Software

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Diligent stores data on servers located in Quebec, Canada. No data is stored outside of Canada.

Board members reside in Canada and will access data only from within Canada.

6. Data-linking Initiative*

<p>In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	N/A
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	N/A
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

7. Common or Integrated Program or Activity*

<p>In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	yes
<p>2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;</p>	no
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	N/A
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>Upon appointment or election to the board of governors, personal information (Board member name, home address, telephone, email and date of birth) is collected</i>	<i>Collection</i>	<i>Section 26(a) and (c)</i>
2.	<i>Nominations of members of the public for honours and awards include personal information such as home addresses, home telephone, personal email addresses, and type of award being nominated for/reason for nomination-</i>	<i>Collection</i>	<i>Section 26(c) and Section 27(1)(c)(i)</i>
3.	<i>The university must file annually with Canada Revenue</i>	<i>Use &</i>	<i>Section 32(a)</i>

Privacy Impact Assessment for Non- Ministry Public Bodies

Board Management Software

	<i>Agency to maintain its charitable tax status; the filing requires that the university provides the personal contact details of Board members.</i>	<i>Disclosure</i>	<i>and Section 33(1)(c)</i>
4.	<i>In conferring awards and honorary degrees, nominees' personal information (telephone numbers and/or personal emails) are used by university staff to contact nominees to invite them to accept awards.</i>	<i>Use</i>	<i>Section 32(a)</i>

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Board member personal information or the personal information of individuals nominated for honours or awards could be disclosed by board members, board governance office staff or members of the university's executive team for purposes other than that for which it was collected.</i>	<i>Code of Conduct and Conflict of Interest Guidelines for Governors; Employee Code of Conduct; Access to the Diligent platform is limited to board members, university executive and board governance office staff; permission to access records held on the platform is controlled by the administrators within the board governance office and permission is granted on a "need to access" basis</i>	<i>Low</i>	<i>Medium</i>

10. Collection Notice

Please see the notification statement below for notification to Board Members:

The personal information collected on this form is collected under the Authority of the University Act and is subject to the Freedom of Information and Protection of Privacy Act. The personal information provided will be used for the administration of your position and duties as a member of the Royal Roads University Board of Directors. If you have any questions regarding the collection and use of your personal information please contact Royal Roads University's Privacy



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

Officer at 250 390-2600 ext. 4178 xxxx or via regular mail at 2005 Sooke Road, Victoria, BC V9B 5Y2.

Collection of personal information for nominees is made informally under Section 27(1)(c)(i) and as such notification is not required.

General Information

Full Name: _____

Date of Birth: _____
(For annual filing of Charitable tax status with CRA – required of all Board members)

Height: _____
(To ensure appropriately sized academic robes are provided at convocation ceremonies)

Degree(s) earned _____
(To ensure appropriate regalia are provided at convocation ceremonies)

Dietary Needs: _____
(Please list all food allergies/sensitivities/special dietary requirements)

Vehicle _____
(Please provide the make, model and license for your vehicle(s))

Information to be included on Board Member Contact List

(The Contact List is distributed to Board members and RRU executive team)

Home Phone: _____

Business Phone: _____

Cell Phone: _____

Mailing Address: _____

Courier Address: _____

Email: _____



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

11. Please describe the physical security measures related to the initiative (if applicable).

RRU:
Not applicable

Diligent:

Section 15(1)(l), Section 21

12. Please describe the technical security measures related to the initiative (if applicable).

RRU:
Not applicable

Diligent:

Section 15(1)(l), Section 21

Privacy Impact Assessment for Non- Ministry Public Bodies *Board Management Software*

Section 15(1)(I), Section 21

13. -Does your branch/department rely on any security policies?

RRU:

Information Security Policy: <http://policies.royalroads.ca/policies/information-security-policy>
IT Security Policy: <http://policies.royalroads.ca/policies/it-services-information-security-policy>
Privacy Policy: <http://policies.royalroads.ca/policies/privacy-policy>

Diligent:

Diligent Information Security Policies:

O:\Staff\academic and information services\Projects-PMO\Projects_ACTIVE\[President]
Diligent\3_Deliverables\Security Package\CONFIDENTIAL Diligent Information Security Policies 7.2
– External

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

RRU:

Access to the system is restricted to board members, members of the university's executive team and board office staff. Within the system, access to information is granted on a need-to-know basis to users.

Only board office staff (administrators) will have the authority to upload or alter documents on the platform.

Diligent:

Page 10 - O:\Staff\academic and information services\Projects-PMO\Projects_ACTIVE\[President]
Diligent\3_Deliverables\Security Package\CONFIDENTIAL Diligent Boards Security Overview 2019 -
EXT

15. Please describe how you track who has access to the personal information.



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

RRU:

Access to personal information will be tracked by tracking user access permissions.

Diligent:

Page 10 - O:\Staff\academic and information services\Projects-PMO\Projects_ACTIVE\[President] Diligent\3_Deliverables\Security Package\CONFIDENTIAL Diligent Boards Security Overview 2019 - EXT

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

Personal information can be corrected or updated by the administrators (board office staff) at the direction of the person to whom the personal information pertains.

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

No.

18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No.



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

No.

Please ensure Parts 6 and 7 are attached to your submitted PIA.



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

Part 6 – Privacy Office(r) 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).

Prof. Devenney

Nov 19, 2019



Don Devenney
Privacy Officer
Royal Roads University

Nov 19, 2019

Date



Privacy Impact Assessment for Non-Ministry Public Bodies

Board Management Software

Part 7 - Program Area Signatures

M. Bracewell

Margot Bracewell
Manager, Board Governance and
Planning
Royal Roads University

28 Nov 2019

Date

Donald J. Ostergaard

Don Ostergaard
Chief Information Officer
Royal Roads University

Nov 19, 2019

Date

Jessica Subin

Jessica Subin
Associate Director, Financial Services
Royal Roads University

Nov 25, 2019.

Date

Cheryl Eason

Cheryl Eason
Vice President and Chief Financial
Officer
Royal Roads University

Nov. 19, 2019

Date