



Royal Roads
UNIVERSITY

**Royal Roads University
Privacy Impact Assessment
MindWell U**

Part 1 – General

Name of Department/Branch:	BA Professional Communication (BAPC) – School of Communication and Culture (SCC)		
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1. Description of the Initiative

In an effort to enhance student experience and to support better mental health, the BAPC provides students with a membership to participate in the MindWell U 30-Day Mindfulness Challenge.

As described by MindWell U (www.mindwellu.com): *"The evidence-based 30 Day Mindfulness Challenge is an online training that's just 5-10 minutes a day yet proven by university researchers to significantly increase: Resilience & Mental Health; Self-care; Engagement & Focus; Performance & Leadership; Communication & Team Building.*

The Challenge is comprised of short and sharp videos, podcasts, emails and texts and each person gets to take the training with a buddy of their choice at no additional cost.

*What makes the Challenge **unique** is that it teaches a real curriculum (it's not just another meditation app) where people learn how to become more mindful wherever they are, whatever they're doing.s "*

To access the web-based course, students will need to provide MindWell U with an email address. The personal information collected through the system will be used to create a user profile to allow access to the course.

Students access the Challenge through a link they are provided app.mindwellu.com. Students have an option to answer two surveys throughout the challenge pertaining to their experience on the training. All data is aggregate and not connected to any one person. The aggregate data is made available to RRU admin. Throughout the training students have the option to answer multiple choice or fill in the blank questions pertaining to their learning. This data is not utilized in any capacity.

RRU is committed to ensuring that this project meets privacy and security policies and practices, and will manage the privacy risks associated with legislative requirements accordingly. Initiative risks are managed through a combination of technical, administrative and physical controls that mitigate the associated risk. This privacy impact assessment (PIA) is intended to ensure that this program is offered in a way that is compliant with the *Freedom of Information and Protection of Privacy Act* (FIPPA).

2. Scope of this PIA

This Privacy Impact Assessment (PIA) covers the collection, use, disclosure and security of personal information provided by students for this initiative. In particular, this PIA supports the access of MindWell U 30-day Mindfulness Challenge as a part of the BAPC curriculum.

3. Related Privacy Impact Assessments

No other PIA's have been completed related to this initiative.

4. Elements of Information or Data

User's Email, Password (hashed), Name, Phone Number, Survey Results, Daily Check-in Answers, Buddy Messages and Aggregate Pseudonymous Data for tracking the overall effectiveness in the HR Dashboard.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Digital Oceans is a service provider providing storage services for MindWell U data.

Digital Oceans stores data in servers located in Toronto, Ontario Canada.

6. Data-linking Initiative*

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.

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;	No
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.	No

If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.

7. Common or Integrated Program or Activity*

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.

1. This initiative involves a program or activity that provides a service (or services);	Yes
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;	No
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No

Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Email is entered into MindWell U	Collection	26(c)
2.	Student accesses MindWell U and takes part in the Mindfulness Challenge	Use	32(a)
3.	Student has the option to complete a survey during training to report on their experience which is then aggregated and shared with RRU in a non identifiable format.	Collection and Use	26(c) and 32(a)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized individuals could access the personal information in the system and use or disclose it for personal purposes (within RRU).	Limited user access based on need to know for operational purposes only. Password protected sign in to access personal information in the system. All employees are required to abide by RRU's privacy policies and guidelines.	Low	High
2.	User's information is incorrect or inaccurately updated (by RRU).	It is the User's obligation to ensure that all personal information is accurate at time of submission. RRU staff do not update user's personal information.	Low	Low
3.	User's personal information is compromised when transferred through the service provider.	Section 15(1)(l), Section 21	Low	High
4.	Inherent risks in providing access to the third party (MindwellU)	All Mindwell U employees are required to abide by contractual obligations including the appended privacy protection schedule and any RRU related privacy policies and guidelines. When the contract is over all data is deleted from MindwellU	Low	Medium

10. Collection Notice

The following collection notice including notification of storage of personal information is provided prior to the collection of personal information:

The personal information provided is collected under the authority of the *University Act* and is subject to the *Freedom of Information and Protection of Privacy Act*. Your personal information will be used to register you for MindWell U, a program supported by Royal Roads University. Your personal information will be stored by our third party service provider, Digital Ocean whose servers are located in Toronto, Ontario, Canada. No other external disclosures will be occurring unless required by law or directed by you.

By registering with MindWell U, you are consenting to the storage of your personal information for this purpose only. Royal Roads University maintains the highest standards for the protection of your personal information that is in our custody and control. As such, Royal Roads University also contractually requires its service providers to equally maintain these standards. If you have any questions please contact Royal Roads University's Privacy Officer at 250 391-2600 Local 4178 or via mail: 2005 Sooke Road, Victoria, BC V9B 5Y2.

Part 3 – Security of Personal Information

11. Please describe the physical security measures related to the initiative.

RRU:

Section 15(1)(I)

MindWell U: Section 15(1)(I), Section 21
Section 15(1)(I), Section 21

12. Please describe the technical security measures related to the initiative.

RRU: NA

Mindwell U: Section 15(1)(I), Section 21
Section 15(1)(I), Section 21

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

RRU:

<http://policies.royalroads.ca/policies/information-security-policy>

Mindwell U: *Mindwell U Privacy Policy and Data Security Technical Specifications*

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:

RRU employees do not have any access to the data.

Mindwell U: Section 15(1)(l). Section 21

Section 15(1)(l), Section 21

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

RRU:

Access to the system is granted based on an individual's role. Staff access may be tracked based on login and students must use a code provided by their program to make a reservation in the WEBREZPRO

Mindwell U: Section 15(1)(l). Section 21

Section 15(1)(l), Section 21

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?

Students will access the system directed and will update any personal information as necessary. RRU and Mindwell U will not be making changes on behalf of the student.

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.

NA

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

NA

Part 5 – Further Information

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

No

Please check this box if the related Information Sharing Agreement (ISA) is attached.

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).

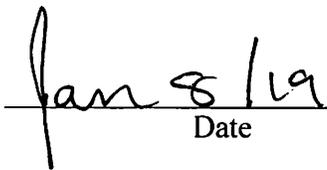
22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

No

Signatures:



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Royal Roads University



Date

Jessica Subin
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Royal Roads University

Date

Don Ostergard
A/Chief Information Officer
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Approved by:

Cheryl Eason
Vice-President and CFO
Royal Roads University

Date