



# Royal Roads University Privacy Impact Assessment

## *RRU Student Association*

PIA #2022-04

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### PART 1: GENERAL INFORMATION

<b>PIA Drafter</b>	Donneil McNab
<b><i>Business unit:</i></b>	Student Services
<b><i>Your name and title:</i></b>	Donneil McNab
<b><i>Your work phone:</i></b>	
<b><i>Your email:</i></b>	Donneil.1mcnab@royalrads.ca
<b>Initiative</b>	RRUSA Membership Information Database
<b><i>Initiative Lead name and title:</i></b>	Dranna Andrews-Brown, manager, student engagement
<b><i>Initiative Lead phone:</i></b>	250.391.2600 ext 4760
<b><i>Initiative Lead email:</i></b>	Dranna.andrewsbrown@royalroads.ca



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## GENERAL INFORMATION ABOUT THE PIA:

<b>Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.</b>
This initiative is a data-linking program under FOIPPA No
<b>Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.</b>
This initiative is a common or integrated program or activity No
<b>Related PIAs, if any:</b>

### 1. What is the initiative?

Royal Roads Student Association (RRUSA) has a statutory requirement to maintain lists of their membership. The purpose of this initiative is to grant the RRUSA Executive access to the personal information of their members so that they can meet this statutory requirement. The personal information being shared with RRUSA includes:

- First Name
- Last Name
- Program
- Email Address (personal)
- Phone Number

### 2. What is the scope of the PIA?

The initiative will be covered by this PIA in its entirety.

### 3. What are the data or information elements involved in your initiative?



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The information listed below will be collected for each student who is a member of RRUSA:

- First Name
- Last Name
- Program
- Email Address (personal)
- Phone Number

### **3.1 Did you list personal information in question 3?**

Yes

### **4. How will you reduce the risk of unintentionally collecting personal information?**

The personal information listed is collected from RRU records of registered students. There is no mechanism which could result in a non-registered individual having their information collected and provided to RRUSA.

## **PART 2: COLLECTION, USE AND DISCLOSURE**

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.



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## 5. Collection, use and disclosure

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: The students' information is collected by RRU and put in database	Collection	26 (c)	
Step 2: The necessary information is shared with RRUSA Executive members on a monthly basis to ensure RRUSA always has the most up-to-date list.	Disclosure	32 (d), (e)	PIPA 11 (b), 12 (2)
Step 3: The students' contact information is used by the RRUSA Executive to contact their members	Use		BC Societies Act 20 (1) (h)

## 6. Collection Notice

*All personal information is collected under the authority of the University Act and is subject to the Freedom of Information and Protection of Privacy Act (FOIPPA). Except as provided for under FOIPPA, your personal information will not be disclosed to any other third parties unless directed by you. For more information about the collection, use and/or disclosure of your personal information, please contact the Royal Roads University's Privacy Officer at 2005 Sooke Road, Victoria BC V9B 5Y2 or via email at [privacyofficer@royalroads.ca](mailto:privacyofficer@royalroads.ca)*



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### **PART 3: STORING PERSONAL INFORMATION**

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

**7. Is any personal information stored outside of Canada?**

No

**8. Does your initiative involve sensitive personal information?**

No

**9. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?**

No

**10. Where are you storing the personal information involved in your initiative?**

n/a

### **PART 5: SECURITY OF PERSONAL INFORMATION**

**15. Does your initiative involve digital tools, databases or information systems?**

Yes

**15.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?**

No



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16. What technical and physical security do you have in place to protect personal information?

RRU

# Section 15(1)(I)

RRUSA

RRUSA is responsible for the security of personal information in their custody and/or control, and as required under the Information Sharing Agreement.

17. Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
We only allow RRUSA Executives in certain roles access to information	√
RRUSA Executives that need standing or recurring access to personal information must be approved by executive lead	√
We use audit logs to see who accesses a file and when	√
<b>Describe any additional controls:</b>	



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### **PART 6: ACCURACY, CORRECTION AND RETENTION**

#### **18. How will you make sure that the personal information is accurate and complete?**

Students may correct their personal information either through the self-service MyAdmin portal or by contacting the RRU Registrar's Office. Where the specific data element relates to their enrolment as an RRU student, verification is required.

#### **19. Requests for correction**

**FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.**

##### **19.1 Do you have a process in place to correct personal information?**

Yes

##### **19.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?**

Yes.

##### **19.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?**

Yes.



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20. Does your initiative use personal information to make decisions that directly affect an individual?

No

### **PART 7: AGREEMENTS AND INFORMATION BANKS**

Please provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank.

21. Does your initiative involve an information sharing agreement?

Yes

22. Will your initiative result in a personal information bank?

No

### **PART 8: ADDITIONAL RISKS**

23. Risk response

*Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.*

Add new rows if necessary.

Possible risk	Response
Risk 1: RRUSA experiences a data breach	The ISA requires RRUSA to: a) notify RRU of any data breach involving RRU information, and



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Possible risk	Response
	b) to investigate any data breach involving RRU information and to provide RRU with the results of that investigation.
Risk 2: Unauthorized access to personal information by RRU	Access to personal information at RRU is controlled by: <ul style="list-style-type: none"> <li>a) Confidentiality agreements;</li> <li>b) Training;</li> <li>c) Network / application-based access controls; and</li> <li>d) Access auditing.</li> </ul>
Risk 3: Unauthorized access to personal information by RRUSA	The ISA and relevant privacy legislation require RRUSA to protect the personal information in its custody and control.

### **PART 9: SIGNATURES**

#### **Privacy Office Comments**

RRUSA has a requirement under their bylaws and the *Personal Information Protection Act* of BC (PIPA) to maintain a list of their membership, and they're looking to RRU to provide students' personal information that will allow them to meet those requirements.

RRU has initiated an Information Sharing Agreement that will formalise the assertions made in RRUSA's initial request for student information, including details on how RRUSA is planning to secure the data provided. The ISA forms part of this PIA.



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### Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative	Don Devenney		2022-05-06

### Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

### Program Area Comments:

Role	Name	Electronic signature	Date signed
Initiative lead	Dranna Andrews-Brown		May 17, 2022
Program/Department Manager	Kyla McLeod		May 17, 2022
Vice-President Academic & Provost	Veronica Thompson		June 9, 2022
Head of public body, or designate	<i>Philip Taylor</i> Cheryl Eason		<i>June 29, 2022</i>



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**INFORMATION SHARING AGREEMENT TEMPLATE**

dated the 6<sup>th</sup> day of May 2022

**BETWEEN:**

**Royal Roads University  
("Party X")**

**Agreement Administrator:** Dranna Andrews-Brown  
Party X

Ph: 250.391.2600 ext. 4760

Fax:

Email: Dranna.andrewsbrown@royalroads.ca

**AND:**

**Royal Roads University Student Association  
("Party Y")**

**Agreement Administrator:** Riley Huntley  
Party Y

Ph: 250.391.2600 ext. 4036

Fax:

Email: president@rrusa.ca

**1. Purpose of this Agreement**

The purpose of this Agreement is to document the terms and conditions of the exchange of certain personal information by the Parties, in compliance with the *Freedom of Information and Protection of Privacy Act* and other applicable legislation (if any).

**2. Summary of Information Sharing**

This Agreement is to document the sharing of student contact information by Royal Roads University (RRU) with the Royal Roads University Students Association (RRUSA).

**3. Purpose of the Information Sharing**

The purpose of information sharing is to provide RRUSA with contact information of currently enrolled RRU students who are, by virtue of being RRU students, members of RRUSA. RRUSA has a statutory requirement to maintain lists of their membership.

#### 4. Personal Information

In this Agreement, "Personal Information" means:

Student information, consisting of: <ul style="list-style-type: none"><li>• First Name</li><li>• Last Name</li><li>• Program</li><li>• Email Address (personal)</li><li>• Phone Number</li></ul>
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#### 5. Collection and Disclosure of Personal Information

Describe the exchange of information under the Agreement. If different types of information are to be collected and/or disclosed differently, break the description down accordingly. For each receiving body that is a public body, state the authority (under sections 26 and 27) for collection. For each disclosing body that is a public body, state the authority (under section 33) for disclosure. If there are other legislative provisions that work together with the *Freedom of Information and Protection of Privacy Act* to provide authority for collection and/or disclosure, state what those provisions are. This information can be found in the Privacy Impact Assessment (PIA) related to this initiative.

Action	FOIPPA	Other Legislation
Student information is shared with RRUSA Executive members	Disclosure 32 (d), (e)	PIPA 11 (b), 12 (2)
The students' contact information is used by the RRUSA Executive to contact their members		BC Societies Act 20 (1) (h)

#### 6. Use of Personal Information

Describe the use(s) to which each body will put the information and state the authority (under section 32) for those use(s). If there are other legislative provisions that govern the use of the information, state what those provisions are.

See table in #5.

#### 7. Accuracy

Each Party will make every reasonable effort to ensure the Personal Information in its custody is accurate, complete and up-to-date.

## **8. Security**

- 8.1 Each Party will make reasonable arrangements to maintain the security of the Personal Information in its custody, by protecting it against such risks as unauthorized access, collection, use, disclosure or disposal.
- 8.2 Each Party will implement this Agreement in conformity with the government's Information Security Policy.
- 8.3 Each Party will advise the other Party immediately of any circumstances, incidents or events which to its knowledge have jeopardized or may in future jeopardize:
  - the privacy of individuals;
  - the security of any computer system in its custody that is used to access the Personal Information.

## **9. Compliance Monitoring and Investigations**

- 9.1 Each party will record and monitor access to the Personal Information in its custody, in order to establish a chain of responsibility.
- 9.2 Each Party will investigate all reported cases of:
  - unauthorized access to or modification of the Personal Information in its custody;
  - unauthorized use of the Personal Information in its custody;
  - unauthorized disclosure of the Personal Information in its custody;
  - breaches of privacy or security with respect to the Personal Information in its custody or with respect to any computer system in its custody that is used to access the Personal Information.
- 9.3 Each Party will report to the other the results of any such investigation and the steps taken to address any remaining issues or concerns about the security of the Personal Information or computer systems, or the privacy of individuals to whom the Personal Information relates.

## **10. Modification or Termination of Agreement – General**

- 10.1 This Agreement may be modified or terminated at any time by agreement, in writing, of [both/all] parties.

## **11. Termination for Non-Compliance with Agreement**

- 11.1 This Agreement may be terminated at any time by either Party if the other Party fails to meet its obligations under this Agreement.

## **12. Term of Agreement**

This Agreement will be in force during the period commencing April 1, 2022 and ending March 31, 2027 unless sooner terminated in accordance with paragraph 10.1 or paragraph 11.1.

Agreed to on behalf of Party X:



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Veronica Thompson,  
Vice-President Academic & Provost

June 9, 2022

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Date

Agreed to on behalf of Party Y:



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(Authorized representative)

June 23, 2022

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Date