Privacy Impact Assessment for Non-Ministry Public Bodies

Arca - Institutional Repository

PIA# 2015-003

Part 1 – General

Name of Department/Branch:	Library
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1. Description of the Initiative

Through the JIBC Library, Faculty, Students and Staff will have anytime, anywhere access to research created by BC post-secondary institutions. This is thanks to a new partnership between the British Columbia Electronic Library Network (BC ELN) and Charlottetown, PEI-based software firm *'Discoverygarden'*, supported by a grant from the Ministry of Advanced Education and the Administrative Services Delivery Transformation (ASDT) Steering Committee.

The BC Shared Digital Resources and Institutional Repository Network (the BC IR Network) will be built on Islandora, a Canadian-developed open-source platform currently in use at over 100 public and private institutions worldwide. This shared platform/software will provide post-secondary institutions with open-access repositories for research, theses, and any other digital assets they wish to make available to the wider community.

To arrive at this milestone, the BC IR Network Software Selection Committee (SSC), comprised of representatives from eight BC post-secondary libraries (BCIT, College of the Rockies, Douglas College, ECUAD, JIBC, SFU, TRU and UFV, evaluated four shortlisted respondents. Islandora, supported and hosted in Canada by *'Discoverygarden'*, emerged as the clear choice for the project. The decision was unanimously endorsed by the BC IR Network Advisory Committee [April Haddad from the JIBC being a member of this committee] and the BC ELN Steering Committee. The name chosen for this repository is Arca.

'Discoverygarden' has been contracted to support the implementation and to manage Canadian hosting. This partnership allows the BC IR Network to take advantage of a robust open-source platform, without the internal technical resources normally required by open-source adopters.

Participating libraries will share a single repository, with individual customized website interfaces providing portals to their own content. The repository will house a broad variety of institutional knowledge, including scholarly material and digital assets such as administrative documents, newsletters, images, multimedia and audiovisual materials. These materials are normally available to the public via other means and contain no information deemed personal or confidential. The invoice to cover JIBC's portion of the BC IR Network Support Fee is attached (Appendix A).

"The BC IR Network will create an environment where institutions of all sizes can contribute to provincial knowledge sharing," says Gilbert Bede of Okanagan College, Chair of the Software Selection Committee. "Working together through BC ELN will ensure the best use of resources, including sharing of expertise, best practices and limited funds, while making the results of publicly funded research at our many institutions available to all British Columbians."
The above text is part of a Communique sent to the BC library community March 16, 2015, by ELN

Since BC Electronic Library Network is housed at Simon Fraser University, Simon Fraser University (SFU) entered into an Online Data Processing and Professional Services Agreement with *'Discoverygarden'* Inc. regarding the implementation of the Institutional Repository. Please refer to the document, for details about this agreement (Appendix B).
Contract Name: *Online Data Processing and Professional Services*
Contact #: *19714*
Service Agreement dated 19 day of March 2015 between **Simon Fraser University** and **Discoverygarden Inc.**
As a consortial host, SFU provides the over-arching administrative, financial, and organizational infrastructure for BC ELN. BC ELN staff are therefore employees of SFU. JIBC, as a consortial member, contributes annually to this multi institutional initiative

2. Scope of this PIA

The part of the initiative that this PIA covers is specifically to determine FOIPPA risk and compliance in joining this collaboration.

3. Related Privacy Impact Assessments

No other PIAs have been conducted at the JIBC with respect to this initiative, however, please find attached (Appendix B, pages 22-24) the Privacy Protection Schedule agreed upon between BC ELN/SFU and *'Discoverygarden'*.

4. Elements of Information or Data

The elements of information or data involved in the initiative are documents, images, streaming media and audio. The Library's eResources Librarian will administer (through an Administration portal, secured by password) the credentials that allow faculty, staff and students to gain access specifically to JIBC's repository in order to upload content. While the repository is part of a consortium, where the holdings of all colleges and universities will be accessible by members all institutions and the general public, only faculty, staff and students associated with JIBC and who receive the proper JIBC credentials will be allowed to upload information or data. The eResources Librarian will ensure that all credentials are kept up-to-date and in synchronization with changes to faculty, staff and students.

Once the content is uploaded, it will be vetted by designated Library staff, to ensure compliance with JIBC repository collection guidelines. The uploaded material will also be vetted to ensure that all necessary copyright documents are signed and provide JIBC Library with the authority to release these documents into the active folders. The information and data that is under control of the Library originates strictly from JIBC faculty, staff or students.

About Islandora
Islandora is an open-source software framework designed to help institutions and organizations and their audiences collaboratively manage and discover digital assets using a best-practices framework. Islandora was originally developed by the University of Prince Edward Island's Robertson Library, but is now implemented and contributed to by an ever-growing international community.

About Discoverygarden
'*Discoverygarden*' helps all manner of organizations manage and preserve important digital assets with the Open Source Islandora framework. As the primary contributor to the Islandora project, they have developed unparalleled expertise. They boast a mix of librarians, developers and systems engineers who understand the complexities of building digital repositories. They use this experience with their clients around the world, providing installation assistance, content migration, customized development, metadata mapping, training, support, and hosting.

About Cloud-A
Cloud-A, a cloud provider partnering with Islandora, is based in Halifax, NS. According to their website, "Your data is guaranteed to live on Canadian soil in our PIPEDA compliant cloud, putting your concerns about Data Localization and Data Residency to rest."

S.15(1)(I)

As per their website page, "Canadian Data Privacy & Data Residency",
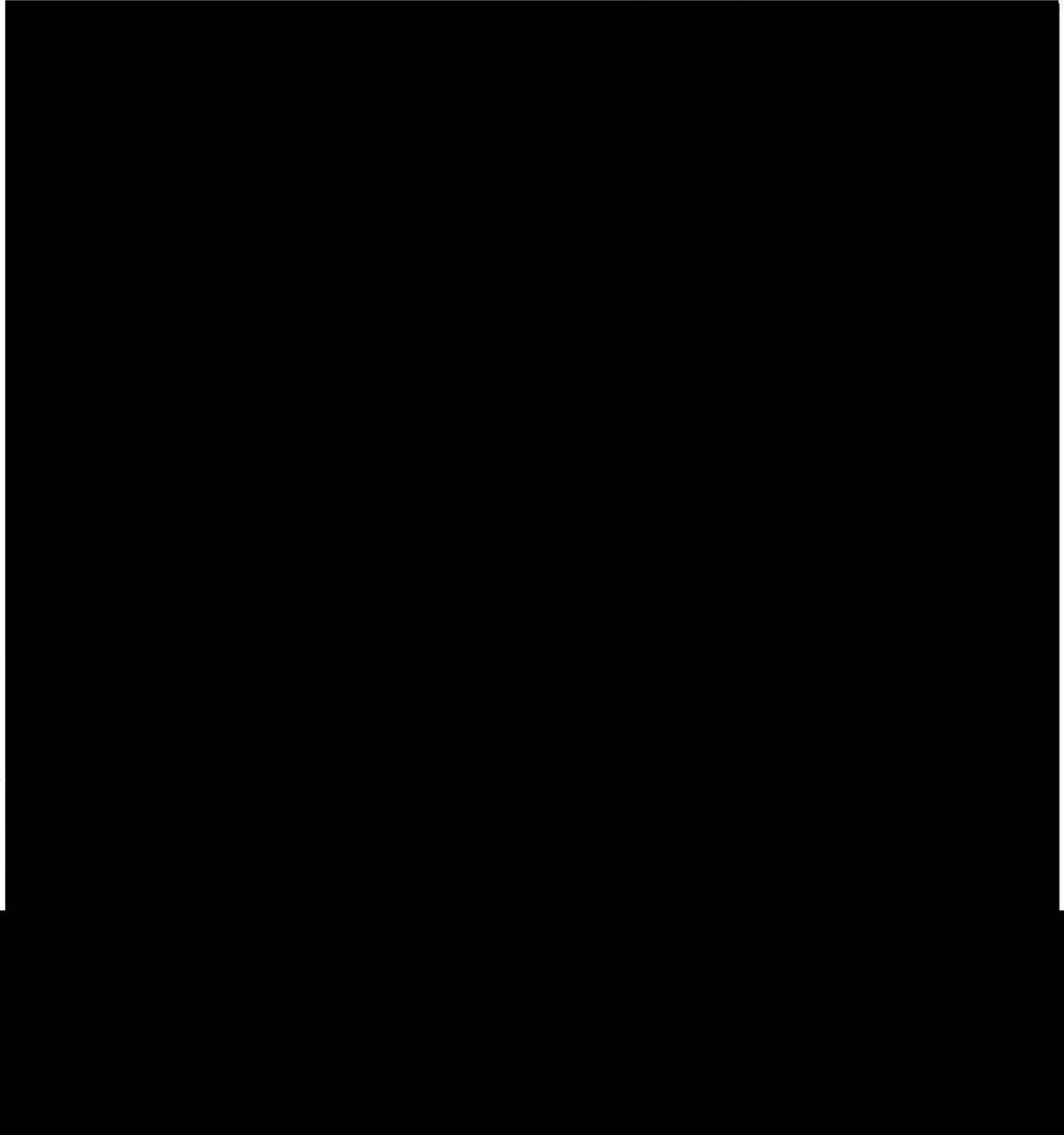
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Part 2 – Protection of Personal Information

5. **Storage or Access outside Canada**

S.15(1)(l)

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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;	yes/**no**
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	yes/**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.	yes/**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***

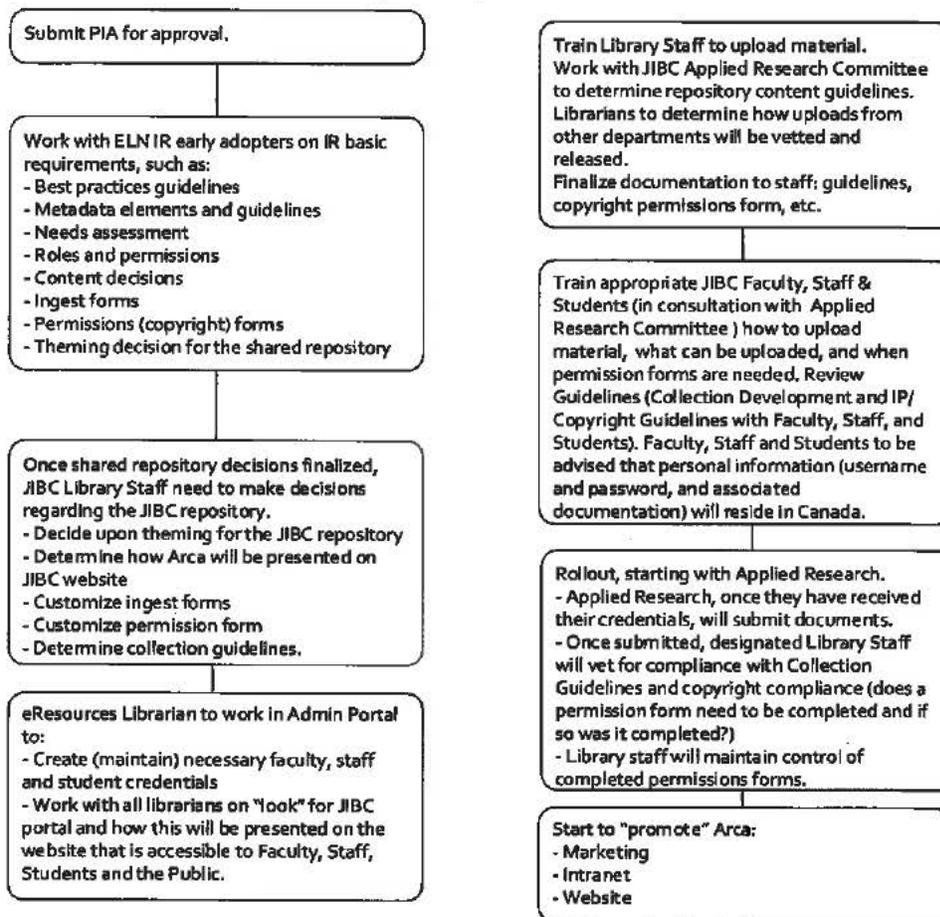| In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements 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/no
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;	yes/no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes/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

IR Privacy Impact Assessment

Submit PIA for approval.

Work with ELN IR early adopters on IR basic requirements, such as:
- Best practices guidelines
- Metadata elements and guidelines
- Needs assessment
- Roles and permissions
- Content decisions
- Ingest forms
- Permissions (copyright) forms
- Theming decision for the shared repository

Once shared repository decisions finalized, JIBC Library Staff need to make decisions regarding the JIBC repository.
- Decide upon theming for the JIBC repository
- Determine how Arca will be presented on JIBC website
- Customize ingest forms
- Customize permission form
- Determine collection guidelines.

eResources Librarian to work in Admin Portal to:
- Create (maintain) necessary faculty, staff and student credentials
- Work with all librarians on "look" for JIBC portal and how this will be presented on the website that is accessible to Faculty, Staff, Students and the Public.

Train Library Staff to upload material. Work with JIBC Applied Research Committee to determine repository content guidelines. Librarians to determine how uploads from other departments will be vetted and released.
Finalize documentation to staff: guidelines, copyright permissions form, etc.

Train appropriate JIBC Faculty, Staff & Students (in consultation with Applied Research Committee) how to upload material, what can be uploaded, and when permission forms are needed. Review Guidelines (Collection Development and IP/ Copyright Guidelines with Faculty, Staff, and Students). Faculty, Staff and Students to be advised that personal information (username and password, and associated documentation) will reside in Canada.

Rollout, starting with Applied Research.
- Applied Research, once they have received their credentials, will submit documents.
- Once submitted, designated Library Staff will vet for compliance with Collection Guidelines and copyright compliance (does a permission form need to be completed and if so was it completed?)
- Library staff will maintain control of completed permissions forms.

Start to "promote" Arca:
- Marketing
- Intranet
- Website

Personal Information Flow Table

	Description/Purpose	Type	FOIPPA Authority
1.	eResources Librarian, using Arca Admin Module, to create credentials for Library staff that will upload material to Arca. - eResources Librarian will be charged with administering these accounts on an on-going basis. This includes decommissioning accounts when Faculty, Staff, or Students are no longer associated with JIBC. - Faculty, Staff and Students to be advised that their personal information (username and password) will be stored in Canada.	*Disclosure & Use*	*33.2(c) and 32(a)*
2.	Train JIBC Library Staff on: - Uploading material via ingest forms - Vetting for compliance to Collection Guidelines, and - Vetting for compliance to IP/Copyright Guidelines (are permission forms needed and if so completed)	*Disclosure & Use*	*33.2(c) and 32(a)*
4.	Designated Library Staff train appropriate JIBC Staff (starting with Applied Research) how to upload material. - Staff will also review Collection Guidelines and Copyright/IP Guidelines with those uploading material to Arca.	*Disclosure & Use*	*33.2(c) and 32(a)*
5.	Publicize Arca through Marketing Dept., Intranet and Internet.	*Use*	*32(a)*
6.	Roll out to rest of JIBC. - Continually training as new Faculty, Staff and Students join JIBC.	*Disclosure & Use*	*33.2(c) and 32(a)*

9. **Risk Mitigation Table**

| Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	None as data is stored in Canada.	None	Low	Low

10. **Collection Notice**

The JIBC Library will not collect information about the user. Statistics are gathered to record the number of users accessing the material.

This information is gathered to justify the licensing of this product. Statistics are reviewed yearly, when the invoice is due, to determine if the cost of the product is justified against the benefits to students and staff.

Part 3 – Security of Personal Information

S.15(1)(l)

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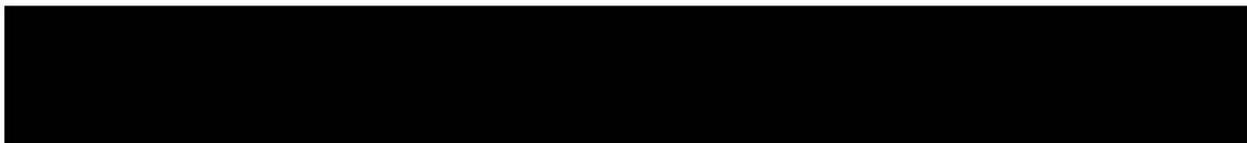
12. **Please describe the technical security measures related to the initiative (if applicable).**

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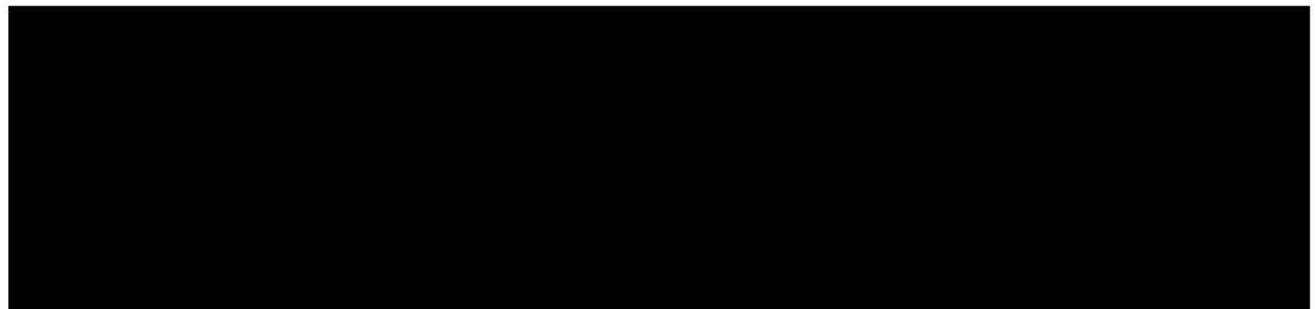
[1] JIBC Policies located on JIBC Website (About JIBC, Governance, Policies)

13. 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.

[REDACTED]

S.15(1)(l)

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

The JIBC Library will administer the accounts within the Institutional Repository administrative module.

Part 4 – Accuracy/Correction/Retention of Personal Information

15. 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?

We do not retain personal information, other than their name. Contributors will be required to sign a release prior to uploading data to Arca.

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

No

17. 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.

Not applicable.

18. 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?

Not applicable.

Part 5 – Further Information

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

No, it does not.

> *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).*

20. 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).*

21. 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.

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).

LRL ① Proposed solution is commensurate with Freedom of Information and Protection of Privacy Act as it relates to having information reside and accessed in Canada. – (Cloud-A)

LRL ② Initiative stores little to no private information that needs to be protected.

LRL ③ A Privacy Protection Schedule is extended to Discovery Garden from SFU, the Consortium administrator for ARCA.

Kayoko Takeuchi
Privacy Officer/Privacy Office Representative
For Peter Kingston.

Signature

2015-11-03
Date

Part 7 – Program Area Signatures

_____ **Program/Department Manager**	*R Dymarch for april Hall* Signature	*2015.10.27* Date
_____ **Contact Responsible for Systems Maintenance and/or Security** (Signature not required unless they have been involved in this PIA.)	Signature	*2015.10.27* Date
Kayoko Takeuchi *for PETER KINGSTON.* **Head of Public Body, or designate**	Signature	*2015.11.03* Date

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

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.

Appendix A

BCELN

BRITISH COLUMBIA
ELECTRONIC LIBRARY NETWORK

Invoice

Invoice No.: BCELN_2014_15.JIBC.IR
Fiscal Year: April 1, 2014 - March 31, 2015
Invoice Date: March 11, 2015

Justice Institute of British Columbia
715 McBride Boulevard
New Westminster, BC
V3L 5T4

Attn: April Haddad

Description : BC Institutional Repository Support Fee

Item	Cost
2015 BC Institutional Repository Network Support Fee	5,000.00
Total	$5,000.00

All charges in Canadian Funds
Cheque payable to **SFU – BC Electronic Library Network.**

Send to:

BC Electronic Library Network
W.A.C. Bennett Library, Simon Fraser University,
8888 University Drive,
Burnaby BC,
Canada, V5A 1S6

Appendix B

S.21(1)