



Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

PIA# 2020.001

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. 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 FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies 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:	Technology Services		
PIA Drafter:	Michael Currie		
Email:	mcurrie@jibc.ca	Phone:	604-528-5971
Program Manager:	Michael Currie		
Email:	mcurrie@jibc.ca	Phone:	604-528-5971

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

1. Description of the Initiative

This privacy impact assessment (PIA) is intended as a guide to assist JIBC in facilitating the provision of Microsoft Office 365 cloud-based services for staff, faculty, and students across BC and to ensure that these services are offered in way that is compliant with the Freedom of Information and Protection of Privacy Act (FOIPP Act).

JIBC is considering using Microsoft Cloud Services with an in-Canada data residency option for the delivery of its Information Technology services. As a first step, Technology Services plans to implement: The O365



Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

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Microsoft cloud-based offers the following products online which are Azure AD, Teams, Exchange (Email), Skype for Business, Sharepoint and OneDrive for students, staff, and faculty members.

The conclusion is that Microsoft can offer its services in a lawful manner and that Justice Institute of BC needs to ensure that the customer-activated controls are appropriately invoked; that any required policies, procedures training or guidelines are developed; and that any further PIAs that may be required are also completed.

2. Scope of this PIA

The scope of this PIA covers the following Microsoft cloud offerings of Azure Active Directory, Exchange (email) online, Sharepoint, OneDrive, and Skype for Business and their compliance with the Freedom of Information and Protection of Privacy Act of British Columbia. Technology Services has set up JIBC Tenant in one of the two Microsoft Canadian Data Centers. This PIA does not assess the existing JIBC's on-premises Microsoft products, i.e., Exchange, Skype for Business, etc.

3. Related Privacy Impact Assessments

A PIA has been conducted for O365 Dynamics and has been approved.

4. Elements of Information or Data

Some of the elements of information of data involved are related to the Azure Active Directory as many Microsoft services rely on for authentication, single sign-on, and creation of accounts to leverage any other O365 Services. In addition, the other Microsoft services like email, SharePoint, OneDrive, and Skype for Business, JIBC controls all data and Microsoft does not collect personal information or data from those systems.

Data elements are broken down into four primary components:

3.1 Data storage

S.15(1)(l)



3.2 Data Synchronization



3.2 Data Traversing via Internet





Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

PIA# 2020.001

3.4 Data Security

[Redacted]

[Redacted]

[Redacted]



Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

PIA# 2020.001

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.

As no personal information is involved, Only Parts 6 and 7 are attached to this PIA.

Part 2 – Protection of Personal Information

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

5. Storage or Access outside Canada

There is no storage or access to data outside Canada, except as permitted in FIPPA.

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.	



Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

PIA# 2020.001

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);	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;	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.	

**** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.***

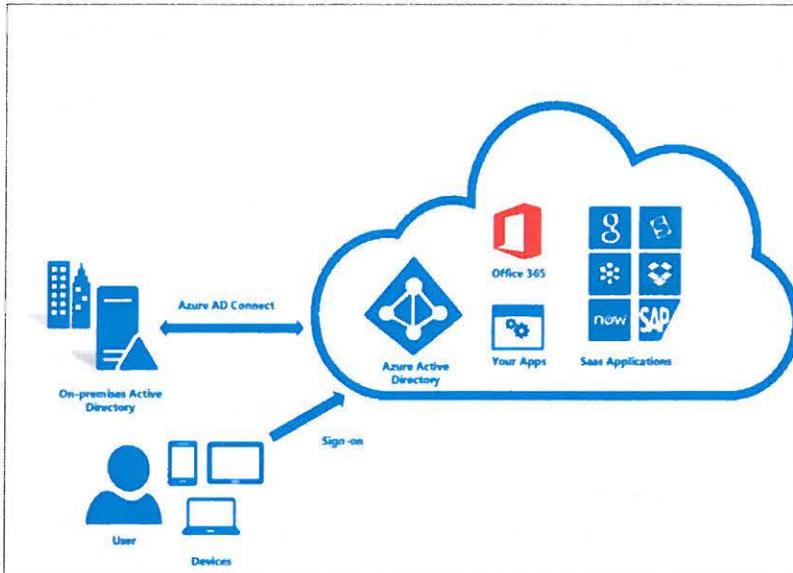


Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

PIA# 2020.001

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



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Contact information from JIBC is accessed and uploaded to Azure.	Use	32(a)
2.	Initial load of data and ongoing synchronization between on-premise Active Directory with Azure Active Directory	No PI	
3.	Data in the following systems Email, SharePoint, OneDrive, Skype for Business	Use	33.2

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Oath of Employment; contractual terms, etc.	Low	Low



Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft 0365

PIA# 2020.001

2.	Employees could with permissions to do so could enter personal information in AD (such as their photo), which would result in personal information being stored outside Canada. Information	Education, training and governance.	Low	Low
3.	Employees could share personal information of others by email, online via SharePoint or a file from OneDrive	Education, training, and governance. Data	Low	High
4.	Client's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure line	Low	High

10. Collection Notice

The initiative does not involve the collection of any new information.

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.

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

[Redacted]

S.15(1)(l)

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

[Redacted]

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

JIBC's Information Security Policy (2502) and Records and Information Management Policy (2102) protect the security of JIBC's information assets and are applicable to all JIBC staff, faculty and students.



Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

PIA# 2020.001

4. 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.



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

O365 currently has robust auditing which is enabled and in operation.

Part 4 – Accuracy/Correction/Retention of Personal Information

1. 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?

Currently, the only option for staff members to update their information is via Service Desk where one of JIBC Technology Services administrator will update the system that contains the information in the appropriate container.

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

No

3. If you answered "yes" to question 7, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

N/A

4. If you answered "yes" to question 7, 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?

N/A



Privacy Impact Assessment for Non-Ministry Public Bodies

Microsoft O365

PIA# 2020.001

Part 5 – Further Information

1. 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. If you require assistance completing an ISA, please contact your privacy office(r).

2. 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).

3. 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).

This change in location of some Microsoft applications from internal to Microsoft locations in Canada increases data security and lowers effort for the JIBC while keeping the application software at a current level. There is no additional cost. The change conforms to BC legislation. I support this change.

Privacy office
George Jones

Signature

George Jones

2020 Jan 10



Privacy Impact Assessment for Non-Ministry Public Bodies

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Additional Privacy Office(r) comments

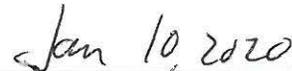
Part 7 - Program Area Signatures



Program/Department Manager



Signature



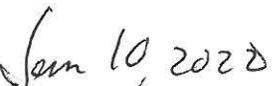
Date



Contact Responsible for Systems
Maintenance and/or Security
(Signature not required unless they
have been involved in this 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 your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.