Privacy Impact Assessment for Ministries

PART 1: GENERAL INFORMATION

JIBC PIA Number: <mark>XXX-2022</mark>

Initiative title:	Monday.com
Your name and title:	Robert Walker - Director CTLI
Your email address:	rwalker@jibc.ca
Program/Department Manager	Ron Bowles - Dean
Email address	rbowles@jibc.ca
Chief Privacy Officer:	Derek Deacon, General Counsel
CPO email address:	ddeacon@jibc.ca

Your CPO will complete the questions in the table below.

FOR CPO USE ONLY
Is this a PI or non-PI assessment?
PI
Is this initiative a data-linking program under FOIPPA?
No
Is this initiative a common or integrated program or activity under FOIPPA?
No
Related PIAs, if any:
No
Does this initiative involve disclosures of sensitive personal information outside of Canada?
No

1. What is the initiative?

Monday.com is a customizable web and mobile project management platform, designed to help teams and organizations with operational efficiency by tracking projects and workflows, visualizing data, and team collaboration. Projects are connected across all levels. Team members have full visibility to statuses, tasks, ownership, and files in one secure place. The Centre for Teaching Learning and Innovation (CTLI) will use Monday.com to manage agile learning development projects between all team members involved. The Software as a Service (SAAS) provides a web based fully customizable platform to track project timelines, assign tasks, track progress, and identify barriers.

2. What is the scope of the PIA?

All CTLI staff members are involved in the development of educational content and will utilize Mondat.com. The scope of this PIA is limited to the use of Monday.com.

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

Information Collected using Monday.com

Project content information, internal project assignments, progress reports, project reports, general project correspondence, performance reports, project delivery information, status updates can be included in Monday.com.

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Yes.

- If yes, go to Part 2

PART 2: COLLECTION, USE AND DISCLOSURE

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

4. Collection, use, and disclosure

Typical Learning Use Case

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.	Personal Information	CPO fills in Collection, use, disclosure	CPO fills in FOIPPA authority	CPO fills in Other legal authority
CTLI staff member inputs a project client and subject matter experts (SME) name and email	Client and SME name and email addresses	Use	S. 33(2)(d)	

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.	Personal Information	CPO fills in Collection, use, disclosure	CPO fills in FOIPPA authority	CPO fills in Other legal authority
Personal information is used as a reference for contacting client or SME by CTLI staff	Names and email addresses are used (via Outlook) to send meeting requests and share project updates or request	Use	S. 33(2)(d)	

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.

5. Storage or access outside of Canada?

███████████████████████████████████████
████████████

6. Data-linking initiative

In FIPPA, "data linking" and "data-linking initiative are strictly defined. Answer the following questions to determine whether your initiative qualifies as "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 complied;	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

7. Common or integrated Program or Activity

In FIPPA, "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 questions, you must comply with specific requirements under the Act for common or integrated program or activities.		
1.	This initiative involves a program or activity that provides a service (or services);	Yes
2.	Those services are provided through: 1. A public body and at least one other public body or agency working collaboratively to provide that service; or 2. One public body working on behalf on 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.		N.A.

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

Information is loaded onto searchable and shareable "Boards" which correspond to instructional program and course content design and development. Tasks, projects, lists, notes and attachments can be added to the boards to provide context to project plan, track progress, and demonstrate the completion of tasks. Project Boards contain capacity to visualize workload and tasks in progress overtime.

Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	CTLI staff creates a board associated with the instructional design and development of an individual project in Monday.com. A board is developed to show all the current and proposed activity that CTLI, along with program areas	*N/A*	*N/A*

	will undertake in the design and development if JIBC educational technologies supported programming.		
2.	The Project team generates updates, tasks and milestones on each board, assigns them to an individual, and estimates the time of completion. Project team members collect information to complete the tasks on the boards.	*N/A*	*N/A*
3.	Project team may link attachments to a task to frame the requirements of, or to provide addition information and detail, in a task or overall project.	*N/A*	*N/A*
4.	Project team completes tasks and assesses whether further work needs to be completed on each task.	*N/A*	*N/A*
5.	The Project team completes a project review to assess the project deliverables meet the learning objectives and design with the program area or client. Projects are finalized and released to the appropriate program area or client.	*Use*	*S. 33(2)(d)*
6.	The CTLI Program Manager deletes completed projects within Monday.com five years after project completion. All records demonstrating the development of JIBC as an institution are forwarded to the BC Archives and Special Collections for archival preservation.	*Use*	*S. 33(2)(d)*

9. Risk Mitigation Table

	Risk	Mitigation Strategy	Likelihood	Impact
1.	Individuals could access personal or proprietary information and use or disclose it for personal purposes.	Access to Monday.com will be granted only to those with JIBC accounts, and sign-in will be achieved only by entering JIBC credentials.	Low	Low
2.	Information transferred to Monday.com will be intercepted by a third party.	Cloud Service Information Management Guidelines are built to reduce the impact of intercepted information.	Low	Low

PART 5: SECURITY OF PERSONAL INFORMATION

This part captures information about the privacy aspects of securing personal information. People, organizations, or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical (e.g., your office building or work environment) and technical (e.g., online cloud service) environments.

Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.

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

    ███████████

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

    ██

    ████████████████████████████████   S.15(1)(l)

3. **Does your department rely on any security policies? If so, indicate here:**

    ██

    ██████████████████████████████

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.**

    ██

    ███████████

PART 6: ACCURACY, CORRECTION, AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

6. How will you make sure that the personal information is accurate and complete?

It is the user's responsibility to ensure that any personal information that they provide in connection with the development of instructional course/program content is accurate and complete.

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

No.

- If no, skip ahead to Part 7

PART 7: PERSONAL INFORMATION BANKS

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

8. Will your initiative result in a Personal Information Bank?

No.

PART 8: ADDITIONAL RISKS

9. Risk response

In the table below describe any additional risks that arise from collecting, using, disclosing, or storing 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: Unauthorized interception or access to personal information transmitted by or stored in the system.	Monday.com has acceptable security controls in place.
Risk 2: CTLI team member will share meeting recordings with unauthorized individuals.	CTLI staff receive privacy training. They are aware of the principles that govern the protection of privacy and the disclosure of personal information. Also, there is minimal personal information stored in Mondat.com.
Risk 3: Records are retained longer than required.	*Requires input here*
Risk 4: Vendor may change terms of use of the service.	JIBC will monitor the terms of use for changes.

[Approvals and Signatures to Follow]

PART 9: CHIEF PRIVACY OFFICER COMMENTS AND APPROVAL

Requires input here

Derek Deacon

_____   _____   _____

Chief Privacy Officer   Signature   Date

PART 10: PROGRAM AREA SIGNATURES

Robert Walker

_____   _____   _____

Program/Department Manager   Signature   Date

Peter Gregorowicz

_____   _____   _____

Technology Services   Signature   Date
(only required if involved in
preparing this PIA)

Mike Proud

_____   _____   _____

Vice-President, Finance &   Signature   Date
Operations