



Privacy Impact Assessment for Non-Ministry Public Bodies

Open Athens Library Access

PIA 2018.005

Part 1 – General

Name of Department/Branch:	Library		
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Program Manager:	April Haddad, Director, Library Services		
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Contact Responsible for Systems Maintenance and/or Security:	George Jones, Director, Technology Services & CIO		
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In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

To implement a library user authentication system called OpenAthens.

JIBC Library subscribes to a number of licensed resources (databases, eJournals, eBooks, streaming videos, citation manager, etc.). In order for our student, staff and faculty to access these resources, they need to sign in with credentials. Currently this is managed by Library staff, using [REDACTED]

Additionally, [REDACTED] has not kept up with the latest technical security advances. May 2018, the *General Data Protection Act (GDPA)* came into force. This privacy legislation imposes stricter requirements than its predecessor, the Data Privacy Directive, and unlike that instrument is not open to interpretation by national governments (<http://www.canadianlawyermag.com/article/getting-ready-for-gdpr-3607/>). To meet BC's strict *Freedom of Information and Protection of Privacy Act (FIPPA)* and the *Personal Information Protection Act (PIPA)* as well as the *GDPA* we are proposing that JIBC licenses a product distributed by EBSCO called OpenAthens. S.21(1)(a-c)

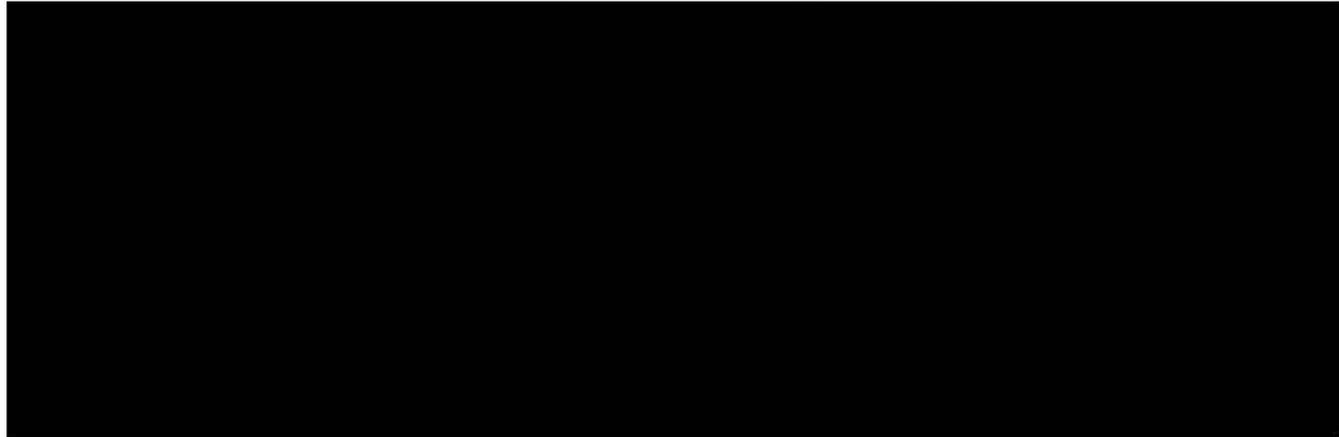
OpenAthens provides single sign-on access for end-users ultimately saving users from the hassle of managing multiple credentials. Authentication is an important issue for libraries and OpenAthens will ensure that licensed resources will only be accessed by authorized users, without obstacles.



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2. Scope of this PIA

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

3. Related Privacy Impact Assessments

No other PIAs have been conducted at the JIBC with respect to this initiative.

4. Elements of Information or Data

As per OpenAthens (<https://openathens.org/identity-management/>)

Most organisations will have a central directory [JIBC uses Active Directory] that stores usernames and passwords and manages individuals' credentials. OpenAthens has the capability to connect with these directories and ensure that the familiar username and password become the one set of login details that powers the seamless, [single sign-on experience](#).

This creates a huge benefit for the Library and IT teams. The central directory is updated with changes of roles and there is no need to synchronise an alternative user directory. There is also no need to pass details over to publishers for activation within their own system.

This solves many administrative and bureaucratic burdens and ultimately saves time and adds clarity for information managers and publishers. It creates "enterprise" single sign-on using existing usernames and passwords.

As per EBSCO:

OpenAthens would not be storing any JIBC patron/user data anywhere.



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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

S.15(1)(l)



6. Data-linking Initiative*

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



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7. Common or Integrated Program or Activity*

<p>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.</p>	
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.	

**** 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.***

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.

8. Risk Mitigation Table



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Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	OpenAthens is down and may not be available to users.	Library databases will be down and not available to users. OpenAthens has redundancy built into the Cloud.	<i>Low</i>	<i>Low</i>
2.	OpenAthens has a security breach.	OpenAthens has no access to personal information. Their services are ISO 27001 compliant and as part of their federation service, they check security certificates and run regular penetration tests to mitigate against cybersecurity attacks.	<i>Low</i>	<i>Low</i>



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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 initiative does not include any personal information. It also replaces an out of date and less secure product and procedures with a supported, and more secure system. This lowers some risks associated with the older system being replaced. I support proceeding with this initiative.

George Jones

Privacy Officer/Privacy Office
Representative

George Jones

Signature

2018 Aug 30

Date



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Part 7 - Program Area Signatures

April Haddad

Program/Department Manager

April Haddad

Signature

Aug. 30/18

Date

George Jones

Contact Responsible for Systems Maintenance and/or Security
(Signature not required unless they have been involved in this PIA.)

George Jones

Signature

2018 Aug 30

Date

Kayoko Takemura

Head of Public Body, or designate

K Takemura

Signature

8/30/2018

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.

