Privacy Impact Assessment for Non-Ministry Public Bodies

Migration of RefWorks to U.S. server
PIA# 2015.002

Part 1 – General

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1. Description of the Initiative

JIBC Library currently subscribes to RefWorks-COS (generally referred to as RefWorks) from ProQuest LLC (a database vendor, based in the US). "RefWorks is a web-based bibliography and database manager that allows you to create your own personal database of bibliographic information by importing references from text files or online databases and other various sources that the student has visited or added. You can use these references in writing papers and automatically format the paper and the bibliography in seconds".
(http://www.refworks.com/refshare/help/Welcome.htm). Currently there are 304 users at JIBC. RefWorks is now an integral part of the liberal studies Research Methods (RESM200) course taught in several JIBC programs. The cost of this service is $2992.00 USD/year.

Currently, the server for RefWorks is based in the U.S., Scholars Portal offered to host the service for interested universities, colleges and institutes in Canada. "Scholars Portal" is a service of the Ontario Council of University Libraries. "Founded in 2002, Scholars Portal provides a shared technology infrastructure and shared collections for all 21 university libraries in the province". (http://www.scholarsportal.info/) However, Scholars Portal has now advised those sites that use their hosted service (cost of $1,500/year to JIBC) that they no longer wish to do so and to look for other alternatives. Alternatives are:

1. Hosting RefWorks in-house: we met with George Jones and determined that this was not a cost-effective solution,

2. Partnering with another institution or Consortium to host RefWorks in Canada: other institutions such as SFU, UBC, UVic, and University of Alberta have already migrated or are in the process of migrating their students to the US based instance of RefWorks. No other sources of collaboration are available,

3. Connecting directly to the U.S. ProQuest site.

2. Scope of this PIA

The part of the initiative that this PIA covers is point #3 above, specifically to determine the risk and compliance to FOIPPA, in considering connecting directly to the U.S. ProQuest site.

Options 1 and 2 above are not feasible and are not being considered.

3. Related Privacy Impact Assessments

No other PIAs have been conducted at the JIBC with respect to this initiative. Other Institutions have adopted strategies to continue to provide this service to students with services hosted outside of Canada. These strategies are consistent with the proposed solution of providing the service with ProQuest in the US.

4. Elements of Information or Data

The elements of information or data involved in the initiative are e-mail address, username, password and IP address and bibliographic references. This applies to faculty, staff and students, who create an account with RefWorks.

Per RefWorks' site:
(https://www.refworks.com/RefWorks/help/refworks.htm#Terms_and_Conditions.htm)

> **Data Security and Privacy.** All data saved using the Service resides on RefWorks servers which are hosted at an off-site location that is monitored 24 hours a day 7 days a week. Data backups are performed on a regular basis and stored in a separate location.

> RefWorks-COS **uses** reasonable commercial efforts to protect the privacy of the data saved by users of the Service. Access to the data requires the use of a **login name and password** which RefWorks-COS monitors. Subscriptions are set up in such a way that, when possible, **each user is also authenticated by IP address**. The server does not have an ftp site or any email programs loaded so there are limited ways to access the server.

> There will be occasions when users of the Service volunteer information about themselves. **User-specific information volunteered in these instances is archived and may only be used by RefWorks to contact users about RefWorks-COS' programs, services, products and feature releases.** RefWorks-COS does not sell, rent or lease its user information to third parties. If users do not want RefWorks to contact them, they may choose to "opt out," and RefWorks-COS will respect that decision.

Part 2 – Protection of Personal Information

S.15(1)(l)

5. Storage or Access outside Canada

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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.	

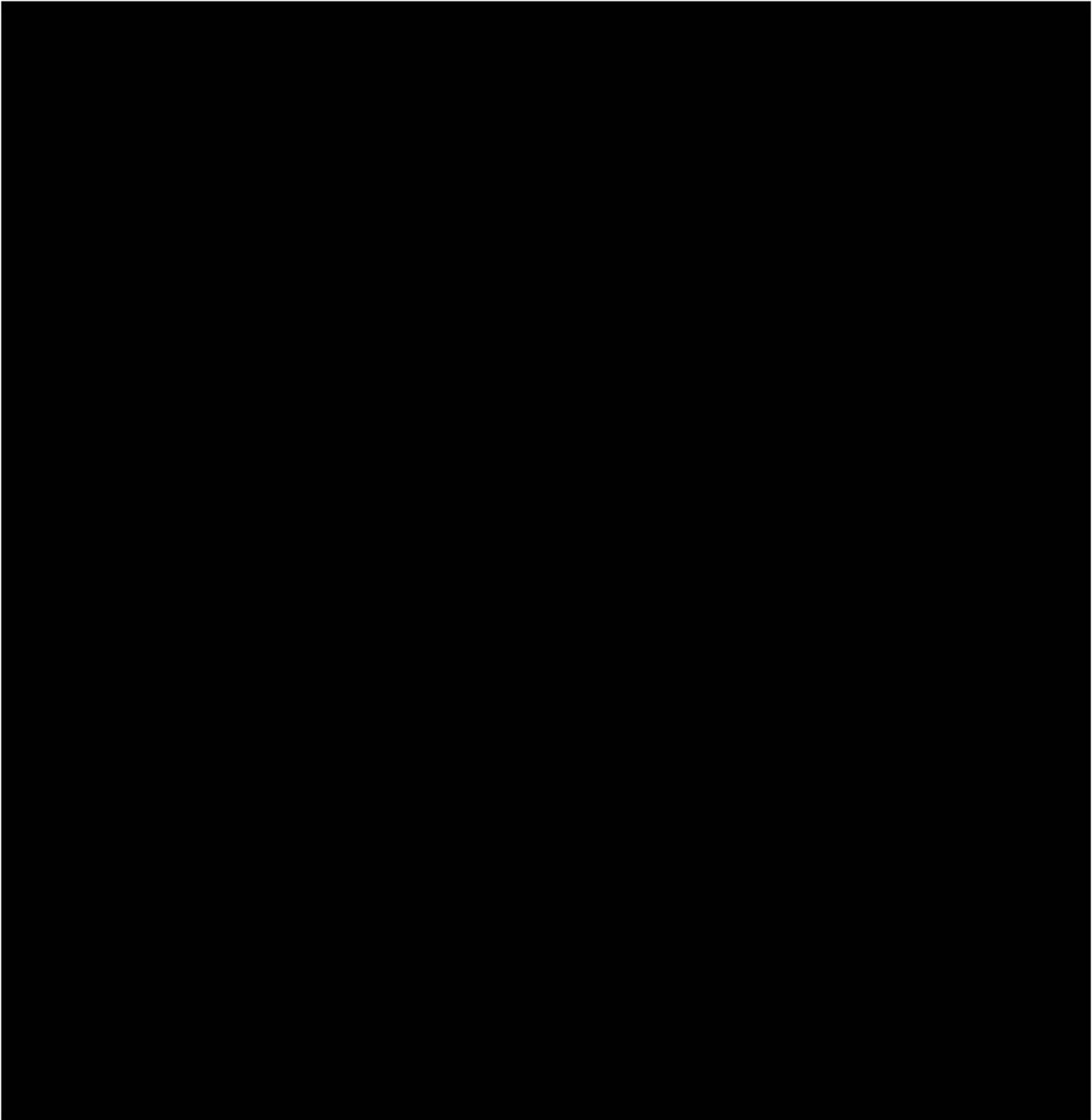**8. Personal Information Flow Diagram and/or Personal Information Flow Table**   S.21(1)

Examples can be removed and additional lines added as needed.   S.21(1)

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	Submit PIA for approval before proceeding with next steps.	*Disclosure & Use*	*33.2(c) and 32(a)*
2.	███████████████████████████████	*Disclosure & Use*	*33.2(c) and 32(a)*
3.	███████████████████████████████	*Disclosure & Use*	*33.2(c) and 32(a)*

4.	███████████████████████████	Disclosure & Use	33.2(c) and 32(a)
5.	███████████████████████████	Disclosure	33.1(b)
6.	███████████████████████████	Collection	26(c)
7.	RefWorks validates the request and immediately provides access to user.	Disclosure	33.1(7)
8.	Server retains user information (email address, username, password, IP address and bibliographic citations).	Disclosure & Use	33.2(c) and 32(a)

9. Risk Mitigation Table

Risk Mitigation Table			
Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1. Request may not actually be from client (i.e. their email address or username/password may be compromised)	Implementation of identification verification procedures	Low	Low
2. Client's personal information is compromised when transferred to the service provider	Not to send data to US	Low	Medium

10. Collection Notice

The JIBC Library will not collect information about the user. Statistics are gathered to record the number of new users registered each month, and the number of times the service was accessed.

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.
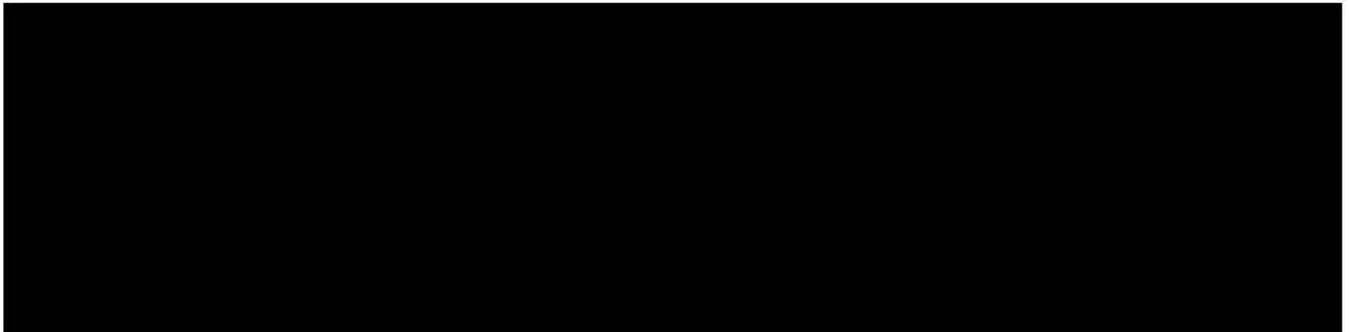
Part 3 – Security of Personal Information

S.15(1)(I)

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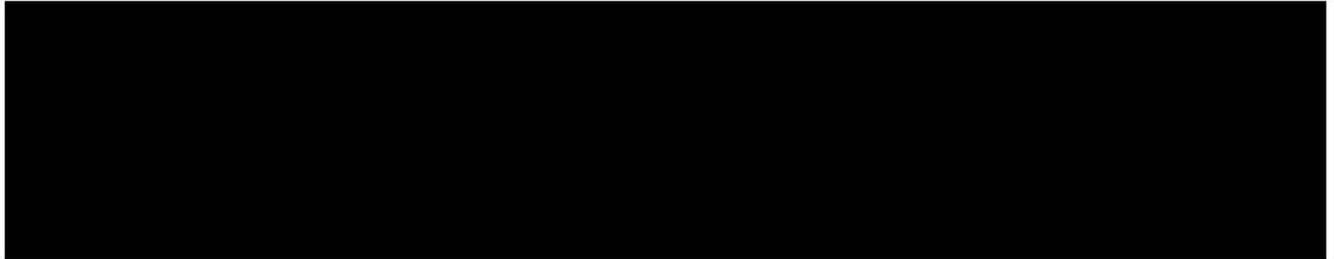
12. Please describe the technical security measures related to the initiative (if applicable).

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

Yes, the JIBC relies on security policies, specifically the **Information Security Policy** and the **Information & Educational Technology Acceptable Use Policy**.

14. 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.

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

The JIBC Library administrator for the RefWorks product has access to a user's email address, the ability to reset a user's password, and to add new accounts. The administrator can also manage which users have access to attachments as well as monitor disk space usage of attachments. The administrator cannot access any data related to the attachments.

Part 4 – Accuracy/Correction/Retention of Personal Information

16. 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?

    Users have access to update their own account information and can reset their password.

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

    No

18. 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.

19. 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

20. 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).	

21. 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).	

22. 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).

PETER KINGTON

**Privacy Officer/Privacy Office
Representative**

Signature

2/25/2015

Date

Part 7 – Program Area Signatures

CHRISTINE-LOUISE DUJMOVICH
Program/Department Manager

Signature

Feb. 24/15
Date

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

Signature

2015.02.24
Date

PETER KINGSTON
Head of Public Body, or designate

Signature

2/25/2015
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.