



Shared Services for Higher Education & Research

## Privacy Impact Assessment – IBM SPSS

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### 1. Description of the Initiative

BCNET is taking the lead on the development of this Privacy Impact Assessment (PIA) of IBM SPSS on behalf of its members and affiliations.

BCNET is a federally incorporated not-for profit, services information technology organization that represents the interests of its members (including 25 publicly funded post secondary institutions) made up of universities, colleges, institutes, and research institutes across British Columbia. It represents all public, post-secondary education institutions in the province and provides shared services to its members in the areas of networks, procurements, licensing and IT services.

This unique and collaborative shared services model provides a multitude of benefits to its members from reducing and containing costs and increasing spending power, to decreasing duplication and improving service quality and productivity. The model cultivates a strong community, where members actively engage with peers to share, explore and develop innovative ideas and solutions as they tackle a broad spectrum of common and unique research and education technology challenges and topics. BCNET strives to add value to its membership by leveraging an advanced network that provides economies of scale to maximize efficiencies and drive down collective costs, while at the same time, continuing to facilitate collaborative innovative solutions that meet the needs of their stakeholders in support of world-class research and education.

As government, education and public-sector organizations face unique challenges to accomplish complex mandates with limited resources, they are overwhelmingly turning to the power and speed of technology and infrastructure to serve citizens more effectively, achieve scientific breakthroughs, and educate students.

## IBM SPSS

BCNET has purchased IBM SPSS perpetual concurrent licenses for use by its members. Licenses may be leased by member institution departments or directly by faculty members. Though SPSS licenses are primarily used by faculty, institutions may wish to install several licenses in a lab for student use. As licences are designed for academic purposes, they are typically installed on institution provided devices.

The SPSS software platform offers statistical analysis, a library of machine-learning algorithms, text analysis, open-source extensibility, integration with big data, and deployment into applications. The licenses operate in EduCloud for which a PIA was developed in 2018.

The four SPSS license types that BCNET has purchased are:

- IMB SPSS Statistics Standard
- IBM SPSS Statistics Campus Edition Standard
- IBM SPSS Statistics Premium Campus Edition Academic
- IBM SPSS Statistics Premium Campus Edition Academic + Amos

No personal information is stored on the license servers. Users of SPSS, however, may use data that includes personal information. Members are responsible for creating a PIA on their use of SPSS as appropriate.

### **2. Scope of this PIA**

This PIA addresses the SPSS license servers only. It will be the responsibility of members who lease licences to create a PIA if they will be collecting or using personal information when using SPSS.

### **3. Related Privacy Impact Assessments**

A PIA has been created by BCNET for EduCloud on which the license servers run.

### **4. Elements of Information or Data**

No personal information is stored on the license servers.

### **5. Storage or Access outside Canada**

No personal information is stored on the license servers.

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

**7. Common or Integrated Program or Activity\***

<b>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.</b>	
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.	N/A
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	

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

There is no personal information collected or used.

**9. Risk Mitigation Table**

No risks are identified as no personal information is collected.

**10. Collection Notice**

Collection notice is not required as there is no personal information collected.

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

N/A

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

N/A

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

BCNET, its members and their service providers are responsible for the deployment, dissemination and administration of all organizational security policies etc. as it relates to the handling and management of personal information in their custody and/or control.

**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.**

N/A

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

N/A

**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?**

N/A

**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.**

N/A

**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?**

N/A

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

No.

**21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.**

No.

**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.

**Signed on Behalf of BCNET:**

*Dean Crawford*

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Dean Crawford  
Director, Shared Systems and  
Technology  
BCNET

14 May, 2019

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Signature

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Bala Kathiresan  
President and Chief Executive  
Officer  
BCNET

May 15, 2019

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Signature