

Privacy Impact Assessment

Bonfire Contract Management Module

PIA#16-019 (Office of the University Secretariat to assign)

Form adapted from the BC Government template for Non-Ministry Public Bodies: June 2014

Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at adam.cullum@unbc.ca or (250) 960-5139 or visit <http://www.unbc.ca/foippa>.

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 Information Governance Officer 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:	Purchasing/Contracts		
PIA Drafter:	Mike Shannon		
Email:	Mike.Shannon@unbc.ca	Phone:	250-960-5502
Program Manager:	Mike Shannon		
Email:	Mike.Shannon@unbc.ca	Phone:	250-960-5502

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

1. Description of the Initiative

Bonfire Contract Management module will be used for management and electronic storage of UNBC contracts.

2. Scope of this PIA

All contracts and affiliation agreements, MOAs, service contracts, research contracts, practicum contracts,

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

Service provider or organization name or legal entity, business address (home address if business is home business), phone number, email, contract terms, correspondence, scope of work.

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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 the Information Governance Officer for review. You will receive support completing the remaining steps of the 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

Storage and access is in Canada on a redundant server platform between Toronto and Montreal.

6. Data-linking Initiative*

<p>In FIPPA, "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>	
<p>1. Personal information from one database is linked or combined with personal information from another database;</p>	No
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	No
<p>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.</p>	No
<p>If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.</p>	

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7. Common or Integrated Program or Activity*

<p>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 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	Yes
<p>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;</p>	no
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	no
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

*** 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) as well. Contact the Information Governance Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.**

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

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Purchasing/Contracts department employee will put the signed contract into the Contract Module.	Retention	31
2.	During the duration of the contract, Purchasing/Contract department employee will make amendments, resolve disputes, invoice payments, contract rates, payment	Use	32(a)

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	timelines, to review the terms and conditions, force majeure clauses,		
3.	Contract is removed from the Bonfire Contracts module within ninety days after expiry/termination and transferred to the shared drive for long term storage.	Disposition	31

9. Risk Mitigation Table

Please identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact
1.	[Redacted Content]		
2.			
3.			

10. Collection Notice

(NOTE: Not for posting) Business contracts will not inherently contain personal sensitive information. Home based businesses will be warned that public body contracts are available to individuals making Freedom of Information requests. UNBC will comply with the Freedom of Information and Protection of Privacy Act to ensure that third party requests for home based business contracts do not violate the personal privacy of the entrepreneur.

Part 3 – Security of Personal Information

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.

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

[REDACTED]

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

[REDACTED]

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

[REDACTED]

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.

[REDACTED]

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

[REDACTED]

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?

The owner, or a designate of the contract would update and correct personal and other contract information.

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

Only under rare circumstances where personal information is required such contracts with home based businesses.

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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.

All contracts are reviewed by the signatories for the accuracy of terms of the contract before signing.

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?

Contracts will be kept for ninety days after the contract ends on Bonfire Contract Management module. Contracts will be kept for an additional seven years in hard copy.

Part 5 - Further Information

20. 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 the Information Governance Officer.

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 the Information Governance Officer, the UNBC Research Office or UNBC Archives.

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 FIPPA. Under this same section, this information is required to be published in a public directory.

No.

Please ensure Parts 6 and 7 are attached to your submitted PIA.

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Part 6 – Information Governance Officer Comments

This PIA is based on a review of the material provided to the Information Governance Officer 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 for approval.

Further modules of Bonfire will require additional PIAs.

ACTIVE INITIATIVE

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Part 7 – Program Area Signatures

Mike Shannon

PIA Drafter and
Program/Department Manager

Signature

Date

Aug 9/16

N/A

Contact Responsible for Systems
Maintenance and/or Security
(if applicable)

Signature

Date

N/A

N/A

Adam Cullum

Information Governance Officer

Signature

Date

Aug 9/16

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.