

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:	Facilities		
PIA Drafter:	Kevin Ericsson		
Email:	kevin.ericsson@unbc.ca	Phone:	2509607059
Program Manager:	Kevin Ericsson		
Email:	Kevin.ericsson@unbc.ca	Phone:	2509607059

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

1. Description of the Initiative

A system to schedule shifts for Facilities Management employees working under the Infrastructure Manager and Chief Engineer.

2. Scope of this PIA

To assess the use of Findmyshift from the time the employee is hired to the time the employee ceases being employed at the University of Northern British Columbia.

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

Employee names, scheduled shifts, work email, position, start date of employment, type of work.

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

Operational servers are located in Dublin, Ireland with backup servers located in three offsite locations in the USA, Singapore and the UK.

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 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;	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
If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.	

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>	
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.	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

Please provide a diagram and/or table that shows how your initiative, program or IT solution will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged. **Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.**

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Infrastructure Manager/Chief Engineer adds employees by going to Add Staff in the staff selection menu. Information inputted into fields includes first name, last name, and work email. By selecting the Add Staff button the employee is registered to the schedule. Each employee signs an informed consent notice before that employee is added to Findmyshift.	Collection & Disclosure	26(c), 33.1(1)(b)
2.	Employee appears on the schedule as soon as that employee is inputted into the system. The Infrastructure Manager/Chief Engineer can drag and drop to adjust the order that the employees appear in but new employees will usually start at the bottom.	Use	32(a)
3.	By highlighting the cell that corresponds the date with the employee, the Infrastructure Manager/Chief Engineer can manually fill in the scheduled time of work. All scheduling is done manually.	Use	32(a)
4.	By selecting the save option, the schedule is made final. Employees use their Findmyshift profile in order to access the schedule of all Facilities Management employees that the Infrastructure Manager/Chief Engineer supervises and find out when their scheduled shifts are.	Use & Disclosure	32(a), 33.1(1)(b)
5.	When the schedule is finalized, an outbox notification appears above the schedule, and then by selecting outbox the Infrastructure Manager/Chief Engineer can see all of the queued messages to send that will inform employees that the schedule is complete or changes have been made to when their shifts are.	Use & Disclosure	32(a), 33.1(1)(b), 33.2(a)
6.	The Infrastructure Manager/Chief Engineer tracks when employees check their schedule by selecting login logs under the reports field. Findmyshift tracks when employees view the schedule and this report provides the last date and time that individual employees checked the schedule.	Collection & Use	26(c), 32(a)
7.	When an employee officially stops working for Facilities Management, whether permanently or to go on leave, the Infrastructure Manager/Chief Engineer resets the	Protection	30

	employee's password to prevent the employee from accessing the schedule of other employees.		
8.	One month after the employee stops working for Facilities Management, the Infrastructure Manager/Chief Engineer removes the employee from the schedule by selecting the employee, and under the profile field deleting the employee's profile. The employee's access to the profile and the department schedule is permanently removed and the employee cannot be scheduled for shifts. The Infrastructure Manager/Chief Engineer retains a copy of the schedule on the Facilities Management shared drive to be able to access a record of the former employee's schedule outside of the Findmyshift site.	Protection & Disposition	30, 31
9.	The Infrastructure Manager/Chief Engineer contacts Findmyshift annually and requests that the backups of the former employees' profile and scheduling information from the past fiscal year is deleted from Findmyshift's servers.	Protection & Disposition	30, 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.			
2.			

Privacy Impact Assessment

Findmyshift Scheduling Service

PIA#16-022 (Office of the University Secretariat to assign)

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



COMPLETED
INITIATION

Privacy Impact Assessment

Findmyshift Scheduling Service

PIA#16-022 (Office of the University Secretariat to assign)

10. Informed Consent Notice

University of Northern British Columbia

Facilities Management

Consent for the Disclosure of Shift Scheduling Information

to Findmyshift's Scheduling Software Service

I hereby consent to Facilities Management at the University of Northern British Columbia, disclosing personal information pertaining to my own employee contact information and work schedule to Findmyshift in order for the Infrastructure Manager/Chief Engineer to facilitate creating and adjusting the shift schedule for shift engineers.

I understand that the Infrastructure Manager/Chief Engineer only provides Findmyshift with the minimum information necessary to use the Findmyshift program including my first and last name, my work email address, and my status as current employee with Facilities Management at the University of Northern British Columbia. I understand that Findmyshift will store my personal information on their servers pertaining to the work I do for Facilities Management until the business day following one year after the next fiscal year end. The Infrastructure Manager/Chief Engineer will request that outdated schedule data be removed from Findmyshift annually.

I understand that in order to continue to be scheduled for shifts using Findmyshift, I need to consent in writing to the disclosure of my personal information to Findmyshift. My consent in writing is required as per section 33.1(1)(b) of the Freedom of Information and Protection of Privacy Act RSBC 1996 c. 165 because that information will be stored on an operational server in Dublin, Ireland with backup servers in the USA, UK, and Singapore. If I have any questions regarding the storage, use, disclosure or accuracy of the information stored on Findmyshift, I can contact the Infrastructure Manager/Chief Engineer at kevin.ericsson@unbc.ca or 250 960 7059.

By signing below, I consent to the conditions within the above Informed Consent Notice.

Full Name(Please Print): _____

Signature: _____

Date: _____

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?

Infrastructure Manager/Chief Engineer or the Assistant Chief Engineer (if Infrastructure Manager/Chief Engineer is away) can update inaccurate information. Employees are responsible for assessing how their personal information appears on the schedule and informing the Infrastructure Manager/Chief Engineer or the Assistant Chief Engineer of any incorrect information that has been entered.

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

Yes, the Infrastructure Manager/Chief Engineer enters personal information into Findmyshift to schedule specific shifts for the employee to work.

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.

Only the Infrastructure Manager/Chief Engineer and the Assistant Chief Engineer have access to enter information onto the schedule.

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?

Infrastructure Manager/Chief Engineer keeps individuals in the schedule for the month after the employment relationship has ended. At the end of each fiscal year, the Infrastructure Manager/Chief Engineer will contact Findmyshift to delete the previous fiscal year's scheduling information each year from Findmyshift servers. (i.e at the end of fiscal year 2016/2017, a request to delete all data from 2015/2016 will be sent to Findmyshift.)

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.

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, or there are different methods to the collection, storage, use, disclosure or disposition of the information within the software or initiative, the department will have to complete a PIA update and submit it for approval.

Culling data from Findmyshift annually will allow that information to be restored within the year that Facilities Management is responsible for managing it, while also not exposing unnecessary risk to the breach of employment history for former employees of Facilities Management at UNBC.

Part 7 - Program Area Signatures

Kevin Ericsson



November 7 2016

Name of Individual leading the
Program/Project
(Normally the individual who
completed the PIA)

Signature

Date

Kevin Ericsson



November 7 2016

Program/Department Manager or
Project Sponsor

Signature

Date

N/A

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

Signature

November 7 2016

Date

Adam Cullum



November 7 2016

Information Governance Officer

Signature

Date

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.

COMPLETED
INITIATIVE