

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:	Department of Health Sciences		
PIA Drafter:	Diana Kutzner – ECHO Network Research Manager		
Email:	Diana.kutzner@unbc.ca	Phone:	250 960 6342
Department Manager:	Margot Parkes		
Email:	Margot.Parkes@unbc.ca	Phone:	250 960 6813

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

1. Description of the Initiative

Igloo will be used to establish a collaborative environment where researchers can share information and report on their findings. Igloo incorporates blogs, calendars, file sharing, forums, user directories, microblogs, search engines, digital work spaces, task management functions, and wikis to maintain consistent process in developing the presentation of their research findings to everyone involved in managing a research project. UNBC will be responsible for administering the environment and will control access and use of Igloo's functions for the Environment, Community, Health Observatory (ECHO) Network during the ECHO Network research project.

2. Scope of this PIA

The scope will be to review how collection, use, storage, disclosure and disposition of personal information will be managed while researchers collaborate and UNBC manages and tracks the development of ECHO Network research project. The native application, desktop app, and the mobile app will all be used by the ECHO Network research team.

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

Name, position, affiliated institution, intellectual property, character references, agendas, meeting outcomes, tasking, meeting schedules, statistics, email addresses, correspondence, project summaries, project related financial information, photos, comments on a blog

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.

COMPLETED
INITIATIVE

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

Igloo is an external cloud solution with servers located in Mississauga Ontario and Vancouver BC.

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.	N/A

7. Common or Integrated Program or Activity*

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.

1. This initiative involves a program or activity that provides a service (or services);	yes
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
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	n/a

*** 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.	Researchers who have been given access to Igloo by the ECHO Network Research Manager ("administrator") will start a discussion, start a blog, comment on a task, set a task; schedule a meeting, or set an agenda to begin sharing or collaborating on their research	Collection / Use	26(c), 32(a)

2.	Other researchers will observe the initial post and directly or indirectly comment on another researcher's post, alert another researcher to a post; upload a responsive document; privately respond to a post using an igloo-defined email address, or alert members of pre-defined groups to a post.	Disclosure/ Collection/Use	26(c), 32(a), 33.2(a)
3.	Once the project is complete and closed, the administrator will remove each researcher's access to Igloo and export the information to a data repository managed by UNBC which will be accessible to the Principle Investigators leading the project at UNBC (Dr. Margot Parkes; Dr. Henry Harder).	Disclosure	33.2(c)
4.	The ECHO Network Research Manager will export the data to a UNBC shared drive folder and generate an aggregate report from the contributions of all of the researchers and present the report to ECHO Network.	Use	32(a)

9. Risk Mitigation Table

Examples can be removed and additional lines added as needed.

Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact
1.			
2.			

3.	
4.	

10. Collection Notice

Collection notice is not required for the use of Igloo by researchers. However, if individual research requires consent notices of any kind those will be provided by the individual researcher and the individual researcher will be responsible for managing the information they collect.

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?

Users have access to update their own information.

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

No. By only using the service, no decisions will be made that directly affect an individual, but each researcher may use the service in a way that makes a decision that directly affects individuals. That researcher will need to ensure measures for handling accuracy and clear retention timelines are transparent and that these measures are reported to the ECHO Network Research Manager.

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.

Creating complete and accurate records is the responsibility of individual researchers.

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?

The ECHO Network Research Manager will ensure that all information is extracted from the Igloo to UNBC's servers one year after the Igloo project ends. Researchers will be asked to remove any information they do not want published from Igloo before this migration happens. Migration of data to UNBC servers may happen as the project progresses if the ECHO Network Research Manager discovers it is necessary for the preservation and organization of information. If migration does occur throughout the project, the ECHO Network Research Manager will inform researchers the data that will be migrated and when migration will occur.

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.

N/A

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.

N/A

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 – Comments, Conditions & Concerns

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.

The ECHO Network Research Manager will be responsible for ensuring that individual researchers have been informed on the appropriate use of Igloo as a resource for the ECHO Network research project. Once informed, individual researchers will be responsible for the proper use of Igloo for collaboration and sharing with the ECHO Network.

Part 7 – Program Area Signatures

Diana Kutzner

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

Signature

Date

June 29/2017

Dr. Margot Parkes

Director or Dean Overseeing the Program/Project

N/A

Signature

Date

June 29/2017

N/A

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

N/A

Signature

Date

Adam Cullum

Information Governance Officer
(Privacy Officer)

Date

June 29/17

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.