

Privacy Impact Assessment for Non-Ministry Public Bodies

Table of Contents

Before you start.....	Error! Bookmark not defined.
PART 1: GENERAL INFORMATION.....	1
PART 2: COLLECTION, USE AND DISCLOSURE.....	5
PART 3: STORING PERSONAL INFORMATION.....	7
PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA.....	8
PART 5: SECURITY OF PERSONAL INFORMATION.....	12
PART 6: ACCURACY, CORRECTION AND RETENTION.....	14
PART 7: PERSONAL INFORMATION BANKS.....	16
PART 8: ADDITIONAL RISKS.....	17
PART 9: SIGNATURES.....	19

Use this privacy impact assessment (PIA) template if you work for or a service provider to a non-ministry public body in B.C. and are starting a new initiative or significantly changing an existing initiative.

PART 1: GENERAL INFORMATION

PIA file number:

Initiative title:	New Integrated Library System
Organization:	UNBC
Branch or unit:	Geoffrey R. Weller Library
Your name and title:	Michelle McKinnon, CSCM
Your work phone:	25502
Your email:	Michelle.mckinnon@unbc.ca

Initiative Lead name and title:	Heather Empey
Initiative Lead phone:	(T) 250-960-6468
Initiative Lead email:	heather.empey@unbc.ca
Privacy Officer:	Kellie Howitt
Privacy Officer phone:	
Privacy Officer email:	

Data linking

Is personal information from one database linked or combined with personal information from another database?
 The Patron record in the library system downloads its data from the Banner system for employees and UNBC students only

Is the purpose for the linkage different from the original purpose for which the personal information in each database was originally obtained or compiled? No

Is this initiative a data-linking program under FIPPA Section 36?
 Yes
 No

If this PIA addresses a data-linking program, the privacy Office must submit this PIA to the Office of the Information and Privacy Commissioner, and be subject to their examination, advice and timelines.

Common or integrated program or activity

Does this initiative involve a program or activity that provides a service (or services) through a public body and at least one other public body or agency working collaboratively to provide that service?
 Yes
 No

Does this initiative involve a program or activity that provides a service (or services) through a public body that is working on behalf of one or more other public bodies or agencies?

Yes

No

If this PIA addresses a common or integrated program, UNBC must submit this PIA to the Office of the Information and Privacy Commissioner and be subject to their examination, advice, and timelines.

Related PIAs, if any:

1. What is the initiative?

Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.

The Integrated Library system consists of a number of different modules which support Library Collections activity including the end user's engagement with the system for which we need personal information. Modules include acquisitions, serials, electronic resource management, reporting.

2. What is the scope of the PIA?

Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?

PIA covers the integrated library system which will be implemented as one project.

3. What are the data or information elements involved in your initiative?

Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.

The following information is pulled from Banner for UNBC students, staff and faculty to create the Patron record in the library system. Information is imported from Banner to pre-create patron records for both staff and students, which includes the following items such as address, phone, email, patron barcode, UNBC ID, please see the screenshot below with the main patron data that we collect highlighted:

10044334 Last Updated: 07-02-2022 Created: 18-04-2002 Revisions: 644

EXP DATE	30-09-2022	BIRTH DATE	- -	CUR ITEM B	0
PCODE1	- NA	HOME LIBR	wl Geoffrey R Weller Library	OD PENALTY	0
PCODE2	- NON APPLICABLE	PMESSAGE	- NO MESSAGE	ILL REQUES	0
PCODE3	0 NON APPLICABLE	MBLOCK	- NO MANUAL BLOC	CUR ITEM C	0
P TYPE	7 Staff	CL RTRND	0	CUR ITEM D	0
TOT CHKOUT	166	MONEY OWED	\$0.00	CIRCACTIVE	07-02-2022
TOT RENWAL	68	BLK UNTIL	- -	Notice Preference	z EMAIL
CUR CHKOUT	0	CUR ITEM A	0		
PATR N NAME	[REDACTED]				
ADDRESS	[REDACTED]				
	Prince George, BC V2M 5B9				
TELEPHONE	[REDACTED]				
TELEPHONE2	[REDACTED]				
UNIVERSITY ID	[REDACTED]				
P BARCODE	[REDACTED]				
PIN	[REDACTED]				
EMAIL ADDR	[REDACTED]				

3.1 Did you list personal information in question 3?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

Yes

No

- If yes, go to [Part 2](#)
- If no, answer [question 4](#) and submit questions 1 to 4 to your Privacy Officer. You do not need to complete the rest of the PIA template.

4. How will you reduce the risk of unintentionally collecting personal information?

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

The Banner interface controls the PI gathering for the internal UNBC community.

For external community members, the staff person only collects the PI that is required to complete the fields in the Patron record.

When a Patron is going to use certain modules including interlibrary loan requests, world database search and reading list “saves”, the system records the FIRST NAME/LAST NAME and in certain instances the patron’s record “number”.

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FIPPA authority	Other legal authority
Step 1: Interface to Banner pulls the data from the Banner record into the Pre-patron record in the ILS	X	X	
ALTERNATE Step 2: FOR community members who do not have a UNBC ID, the CUPE Library staff creates a manual record	X	X	
Step 3: CHANGES Any updates are done verbally for changes between a CUPE circ staff and a non-UNBC patron – there is currently no form	X	X	
The patron when they wish to access certain modules including Interlibrary Loan requests, world database search and reading list “saves” must provide FIRST NAME / LAST NAME – patron’s record unique number identifier to gain access.	X		

Optional: Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

6. Collection Notice

If you are collecting personal information directly from an individual the information is about, FIPPA requires that you provide a collection notice (except in limited circumstances).

Review the [sample collection notice](#) and write your collection notice below. You can also attach the notice as an appendix.

SEE APPENDIX attached showing proposed screen shots

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7. Is any personal information stored outside of Canada?

Yes

No

8. Does your initiative involve [sensitive personal information](#)?

- Personal health information - NO
- Genetic and biometric data - NO
- Personal financial information - no credit card information stored?
CONFIRM - NO -
- Geolocation data - NO
- Criminal records - NO

Yes

No

- If yes, go to [question 9](#)
- If no, go to [question 10](#)

9. Is the sensitive personal information being disclosed outside of Canada under [FIPPA section 33\(1\)](#)? NA

Yes

No

If yes, go to [question 10](#)

- If no, go to [Part 4](#)

10. Where are you storing the personal information involved in your initiative?

The Patron record information is being stored on host servers in Canada.

Patron first and last name and patron’s record unique number identified (see section 5) will be stored on US server IF the patron chooses to order an interlibrary loan (“ILL”), or create saved search or reading list save. The Patron will read a privacy statement before entering the ILL or search modules which internal clients will accept and external clients will read.

After you answer this question go to [Part 5](#).

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization’s Privacy Officer. More help is available in the <https://www.oipc.bc.ca/resources/guidance-documents/>

11. Is the sensitive personal information stored by a service provider? NA

Yes

No

- If yes, fill in the table below (add more rows if necessary) and go to [question 13](#)
- If no, go to [question 12](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?
UNBC Moneris machine through cashier’s office		

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

12. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

Form is submitted to finance to allocate CODING – no patron information

13. Does the contract you rely on include privacy-related terms?

Yes

No

- If yes, describe the contractual measures related to your initiative.

The contract has specific terms to discuss security breaches and a new negotiated clause to address the privacy notices which will be custom installed in the software implementation.

15. What controls are in place to prevent unauthorized access to sensitive personal information? NA

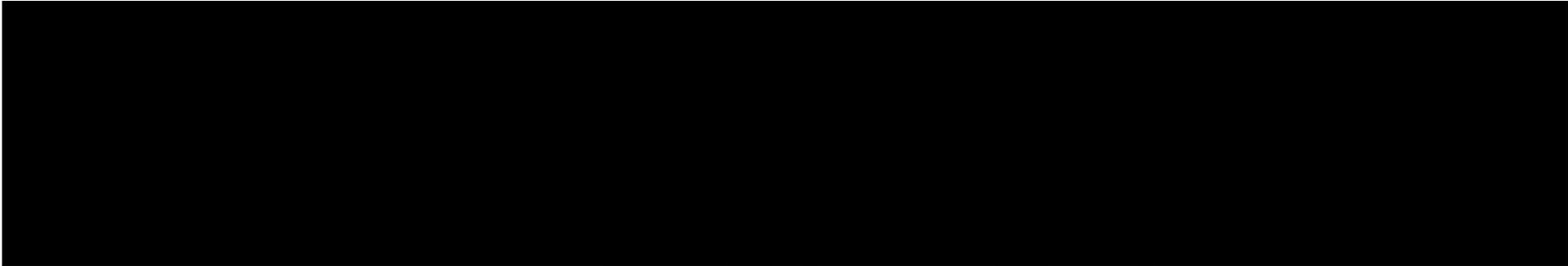
16. Provide details about how you will track access to sensitive personal information.

17. Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.



ACTIVE INITIATIVE

Outcome of Part 4

The outcome of Part 4 will be a **risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

PART 5: SECURITY OF PERSONAL INFORMATION – SEPARATE ASSESSMENT COMPLETED and approved by CISO – see Appendix B

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

18. Does your initiative involve digital tools, databases or information systems?

Yes

No

- If yes, work with your Privacy Officer to determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of [FIPPA section 30](#)

18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of [FIPPA section 30](#)?

Yes

No

- If yes, you may want to append the security assessment to this PIA. Go to [question 20](#)
- If no, go to [question 19](#)

19. What technical and physical security do you have in place to protect personal information?

Describe where the digital records for your initiative are stored (e.g., on your organization’s LAN, on your computer desktop, etc.) and the technical security measures in place to protect those records. Technical security measures include secure passwords, encryption, firewalls, etc. Physical security measures include restricted access to filing cabinets or server locations, locked doors, security guards, etc.

If you have completed a security assessment, please append it to the PIA.

20. Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
We only allow employees in certain roles access to information	
Employees that need standing or recurring access to personal information must be approved by executive lead	
We use audit logs to see who accesses a file and when	
Describe any additional controls:	

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

21. How will you make sure that the personal information is accurate and complete?

[FIPPA section 28](#) states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.

The Patron Record information is pulled from Banner for students, staff, faculty. Various mechanisms including online access for students to information and through HR allow these people to check and update themselves or request an update be done in Banner. Those updates are periodically pulled into the ILS patron record.

External community members can check and update their patron record.

22. Requests for correction

[FIPPA](#) gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

22.1 Do you have a process in place to correct personal information?

Yes

No

Sometimes it's not possible to correct the personal information. [FIPPA](#) requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes

No

22.2 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, [FIPPA](#) requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes

No N/A

23. Does your initiative use personal information to make decisions that directly affect an individual?

Yes

No XX

The Library has recently eliminated fines for overdue items – previously a student could not graduate or staff/faculty terminate employment without that fine being recovered.

yes, go to [question 25](#)

- If no, skip ahead to [Part 7](#)

24. Do you have an information schedule in place related to personal information used to make a decision?

[FIPPA](#) requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. In addition, the [Information Management Act](#) requires that you dispose of government information only in accordance with an approved information schedule.

Yes

No

- If no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.

PART 7: PERSONAL INFORMATION BANKS

A personal information bank is a collection of personal information that is organized or searchable by the name of the individual or an identifying number, symbol or other identifier. A personal information bank can be a simple list of personal information. Personal information banks contain personal information that is:

- Linked to an identifiable individual
- Organized and capable of being retrieved by a personal identifier
- Normally compiled for a single purpose

25. Will your initiative result in a personal information bank?

Yes

No

- If yes, please complete the table below.

Describe the type of information in the bank			
See next page			
>10044334 Last Updated: 07-02-2022 Created: 18-04-2002 Revisions: 644			
EXP DATE	30-09-2022	BIRTH DATE	- -
PCODE1	- NA	HOME LIBR	w/ Geoffrey R Weller Library
PCODE2	- NON APPLICABLE	PMESSAGE	- NO MESSAGE
PCODE3	0 NON APPLICABLE	MBLOCK	- NO MANUAL BLOC
P TYPE	7 Staff	CL RTRND	0
TOT CHKOUT	166	MONEY OWED	\$0.00
TOT RENWAL	68	BLK UNTIL	- -
CUR CHKOUT	0	CUR ITEM A	0
		CUR ITEM B	0
		OD PENALTY	0
		ILL REQUES	0
		CUR ITEM C	0
		CUR ITEM D	0
		CIRCACTIVE	07-02-2022
		Notice Preference	z EMAIL
PATRN NAME	[REDACTED]		
ADDRESS	[REDACTED]		
	Prince George, BC V2M 5B9		
TELEPHONE	[REDACTED]		
TELEPHONE2	[REDACTED]		
UNIVERSITY ID	[REDACTED]		
P BARCODE	[REDACTED]		
PIN	[REDACTED]		
EMAIL ADDR	[REDACTED]		

VIEWING the patron record – any library staff member Editing 2 nd telephone and 2 nd address may be manually added by CUPE staff – Access Services Librarian Supervisor, Circulation Services Circulation Staff can create a manual patron record for community members, ie those that do not have Banner account; otherwise WMS will update from Banner automatically as it does currently with Sierra – may include manual for staff that are not regular
Name of main organization involved
UNBC
Any other ministries, agencies, public bodies or organizations involved
No linking with any other library – collection item is the tracking field, not the patron information
Business contact title and phone number for person responsible for managing the Personal Information Bank – Annelise Dowd

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

26. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Add new rows if necessary

RISK	MITIGATION STRATEGY	LIKELIHOOD	IMPACT

ACTIVE
INITIATIVE

PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative*	Wendy Rodgers	[REDACTED]	October 25, 2022

**Vice President Academic & Provost*

Chief Information Security Officer

This PIA is based on a review of the material provided to the Security Office as of the date below.

Role	Name	Electronic signature	Date signed
CISO / CISO Representative	Dave Kubert	[REDACTED]	October 19, 2022

Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Program Area Comments:

Role	Name	Electronic signature	Date signed
Initiative lead			
Program/Department Manager	Trina Fyfe	[REDACTED]	October 17, 2022
Contact Responsible for Systems Maintenance and/or Security Only required if they have been involved in the PIA			
Governance Officer for Access , Privacy and Records Management			
Head of public body, or designate (if required)			

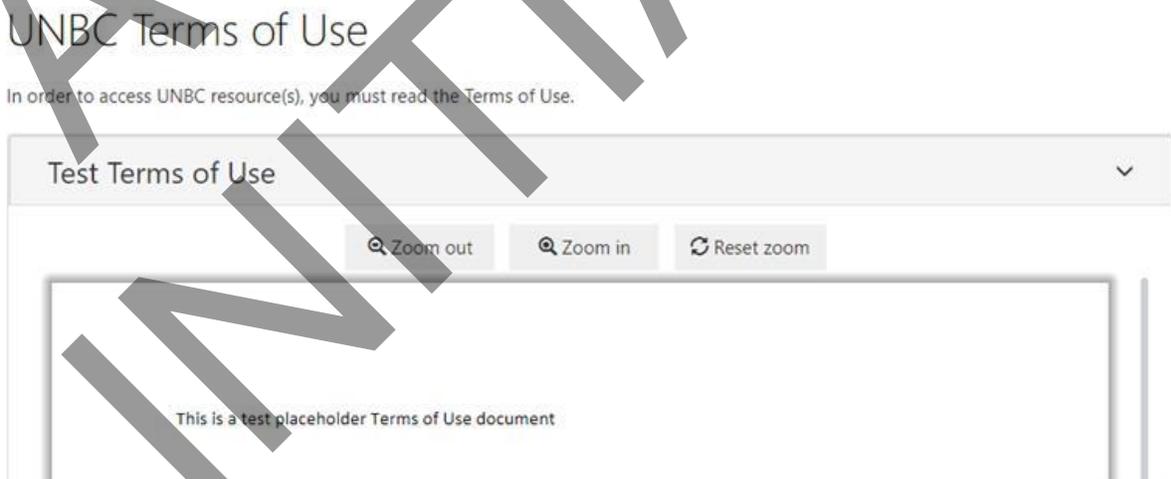
APPENDIX A

INTERNAL USERS – Students, Faculty and Staff with ID#

When entering a module or service that is going to be using personal information outside of the country, the user would see the following:



and then if i click the arrow on "test terms of use" it expands to a full document- **the language of the full document will be approved by UNBC Privacy Officer**



EXTERNAL COMMUNITY USERS

For External users, there will be no “accepting terms of use”

We have 500 characters in each of the head and footer.

Proposed text:

The user understands and accepts that by proceeding beyond this point [or continuing to log in?], the user’s name and patron record unique identifier will be stored in data servers in the United States,

OCLC drafted mock-up of what the WorldShare authentication screen could look like for UNBC. The WAYF page for EZproxy would direct them to either this screen with the added text for the privacy policy – which can be added either in the header or footer by their implementation manager – or to the institution authentication page for Azure which would have the privacy policy configured on their end to appear on the login page.

NOTE: There is no option to HYPERLINK to a full privacy statement pdf.

We have 500 character limit on each of header and footer.

ACCEPTED
INITIATIVE



Customize header text to provide more information for your users at login. Must be added by your OCLC Implementation Manager.

SIGN IN

User Name*

Password*

SIGN IN

SET/RESET PASSWORD

CANCEL

UNBC Privacy Policy: TEXT GOES HERE. Footer must be added by your OCLC Implementation Manager.

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APPENDIX B

SECURITY REVIEW



OCLC - IT Security Assessment for Clou

Michelle McKinnon

From: Dave Kubert
Sent: Tuesday, July 26, 2022 8:39 AM
To: Michelle McKinnon
Subject: Re: OCLC security response
Attachments: OCLC - IT Security Assessment for Cloud Vendors edits to 07132022.pdf

Hi Michelle,

I thought that I'd responded to this but it seems that I hadn't. The response gets my stamp of approval. (Now I have to spend the morning cleaning stamp ink from my iPad screen, but that's my burden to bear).

Dave Kubert
Chief Information Security Officer, University of Northern BC

On Jul 26, 2022, at 8:23 AM, Michelle McKinnon <Michelle.McKinnon@unbc.ca> wrote:

Hi Dave
I don't think I've had a response from you yet on whether OCLC's security response "passed"?

Michelle

Michelle McKinnon
Mgr, Contracts & Supply Chain
250-960-5502

From: Long, Nigel <longn@oclc.org>
Sent: Wednesday, July 13, 2022 8:00 AM
To: Michelle McKinnon <Michelle.McKinnon@unbc.ca>
Cc: Schmidt, Jeffrey <schmidtj@oclc.org>
Subject: FW: [External] Follow-up on PIA and security

CAUTION: This email is not from UNBC. Avoid links and attachments. Don't buy gift cards.

Good day Michelle,

The public body that OCLC passed a PIA in BC with, for WorldShare Management Services, was Royal Roads University. The PIA was done in 2016.

Attached is the completed Security Assessment.

Please let me know if there are further questions or clarifications needed.

Thanks so much,