

Privacy Impact Assessment

[ITSPR]

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

PIA# _____ (Office of the University Secretariat to assign)

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:	UNBC Finance Department		
PIA Drafter:	William Chew		
Email:	william.chew@unbc.ca	Phone:	250-960-5516
Department Manager:	Colleen Smith		
Email:	Colleen.Smith@unbc.ca	Phone:	250-960-5519

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

1. Description of the Initiative

International Tuition Student Payments and Refunds (ITSPR) Initiative:

In the BCNet business case, fourteen (14) members along with UNBC are looking for a solution that will facilitate convenient and cost-effective options for processing international wire tuition payments and refunds for foreign students and agents, while offering a full range of services that will ensure secure and efficient processing of the member's international wire transactions.

Members can direct award this type of service as is an exemption to the trade treaties.

This procurement falls under "treasury service" which under the New West Trade Partnership Agreement is an exclusion. Treasury services include:

a. Accounts receivable services,

b. Accounts Payable services:

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c. Helping the client with products and solutions for making payments to its business;

d. Consolidate its receivables and payable positions across the countries of operation.

As the fees are ultimately paid by the end user, not the institution, there is no ongoing expenses related to this.

2. Scope of this PIA

Does the scope include all international student tuition payments and refunds or are there particular international students that this applies to?

3. Related Privacy Impact Assessments

This section will identify if any other PIAs have been completed or are in the processes of being conducted that are related to this PIA. The Information Governance Officer may need to complete this question N/A.

4. All Elements of Information or Data

Using concise point form, please list the elements of information or data involved in the initiative, even if no personal information is involved. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area.

Student signs on to UNBC student online account and takes student to service provider secure site to initiate payment. Student name and Student ID information is captured (pre-populated student details) on secure interface to perform banking or credit card transaction. Student may need to disclose email address information for confirmation purpose. Once payment is made, a secure file with student name, student ID, payment amount is transfer to UNBC Treasury Services from the service provider.

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.

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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

Please provide a brief description of whether your information can be accessed from outside Canada, for example, by a service provider that is repairing a system, or if your information is being stored outside Canada, for example, in the “cloud”. If your data is stored within Canada and accessible only within Canada, please indicate this. The Information Governance Officer or CIO will require proof that you have investigated and understand where active and backup records are stored.

International financial platform (encrypted data) determined by industry is used to facilitate payment and refunds between parties. For the purpose of answering this question, do we know if the ITSPR is going to be a cloud based service with servers located in a variety of places internationally, or is this going to be a centralized service located in a particular location? You mention below that there are Canadian offices. Where approximately are these located?

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>	
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.	yes
If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.	no

Commented [AC1]: With data linking it suggests there is a back and forth with data where both parties have simultaneous access. Is this the case on an ongoing basis, or is the student disclosing their need for a payment or refund and then this platform is reporting that back?

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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>	
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;	yesno
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yesno
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	yesN/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

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.

Student name and Student ID is information shared with service provider through student online signon to initiate payment. A secure payment transaction file with student name and student ID is sent to UNBC Treasury Services from service provider.

Commented [AC2]: Is this Single Sign On (SSO) where they can use their student user ID and password or is this a totally external service that they log into?

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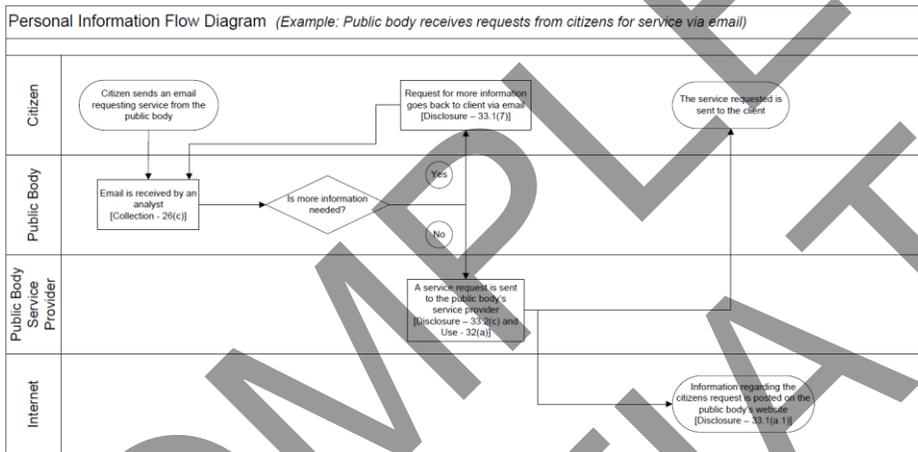
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For ease of reference, the collection, use, and disclosure authorities in FIPPA can be found in the appendices. If you do not know what the relevant authorities are, please contact the Information Governance Officer.

Depending on the complexity of your initiative, you may choose to provide one general diagram for the initiative, and more specific diagrams for particular components. If multiple organizations will collect, use, or disclose personal information, the diagram should identify how each organization is involved in the initiative.

Example:



Remove examples and replace them with how personal information flows in your initiative under Description/Purpose. Separate each step into a new row and place these steps in chronological order of how the information is used. Add additional lines as needed until you have completely described all collection, use, disclosure, and disposition of the information. The Information Governance Officer will complete the type and FIPPA authority columns.

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Online account signon requesting service	Collection	26(c)
2.	Service request transferred to service provider contracted by public body	Disclosure & Use	33.1 (1)2(e.1e) and 32(a)
3.	Provide client email address on service provider site (tracking transaction)	Collection	26(c)

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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]		
2.			
3.			
4.			

Commented [AC3]: We'll review the specific risks that could come from this initiative.

10. Collection Notice

If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:

1. The purpose for which the information is being collected (to perform payment)
2. The legal authority for collecting it, and (financial service requirement)
3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection. (student name, ID number, returning email address)

Services providers all have Canadian offices.

Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place. You can also

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attach a screen shot or a copy of your form where the collection notice would be located.

COMPLETED INITIATIVE

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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?

No access for user to change personal information. If a student accidentally enters incorrect wire transfer information or has a typo on their name that causes a payment or refund to not be processed, how are we adjusting the data to ensure that we are able to complete money transfers?

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

No. Do they automatically complete a payment or receive a refund using this service or is there some decision making that happens through this service?

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.

For example: check to see that the information was obtained from a reputable source.

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?

If you do not yet have a schedule, please document how these records will be kept until the schedule is in place. Please describe retention schedules that apply where retention exceeds the one year requirement of FIPPA. Please contact the Information Governance Officer if you require assistance.

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

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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.

N/A

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Part 7 – Program Area Signatures

William Chew

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

Signature

Date

Colleen Smith

Director or Dean Overseeing the
Program/Project

Signature

Date

~~N/A~~ Pat Herbert

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

Signature

Date

Adam Cullum

Information Governance Officer
(Privacy 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.