

### 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](mailto:adam.cullum@unbc.ca) or (250) 960-5139 or visit <http://www.unbc.ca/foipppa>.

### 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:	Integrated Planning – Office of the Provost		
PIA Drafter:	Sheena Smith		
Email:	Sheena.Smith@unbc.ca	Phone:	250 960 5106
Department Manager:	Bernadette Patenaude		
Email:	Bernadette.Patenaude@unbc.ca	Phone:	250 960 5334

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

### 1. Description of the Initiative

*Monday.com provides an integrated project management system for use across the University of Northern British Columbia. The system will allow the University of Northern British Columbia to manage and achieve the Strategic Priorities. The Integrated Planning team will use Monday.com to manage agile projects between all stakeholders participating. The Software as a Service (SAAS) provides a web based fully customizable platform to track project timelines, assign tasks, track progress and identify barriers in the completion of the Strategic Priorities, Academic Action plan and Research Action Plan objectives.*

### 2. Scope of this PIA

*All employees of the University of Northern British Columbia are involved in Integrated University Planning, and any employee may need to utilize this software. The Integrated Planning team will be responsible for monitoring the use of the service and ensuring it complies with the Cloud Service Information Management Guidelines (see Appendix 1).*

### 3. Related Privacy Impact Assessments

N/A

### 4. All Elements of Information or Data

*Business contact information, internal project assignments, progress reports, project reports, general correspondence, performance reports, program delivery information, personal experiences, program evaluations can be included in Monday.com. All information types put into the system will be institutionally approved and/or informed consent will be provided before being entered into the Monday.com*

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

*Monday.com uses third party services providers to host their data which are distributed in countries around the world. All UNBC staff will use Monday.com according to the Cloud Service Information Management Guidelines attached to Appendix 1 of the PIA.*

#### 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;	yes
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	yes
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
<b>If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.</b>	N/A

### 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;	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. Information Flow Diagram and/or Information Flow Table

Information is loaded onto searchable and shareable “Boards” which correspond to the Strategic Priorities of the University. Tasks, projects, missions, lists, notes and attachments can be added to the boards to provide context to project plan, track progress, and demonstrate the completion of tasks. Project Boards contain capacity to visualize workload and tasks in progress over time.

Information Flow Table			
	Description/Purpose	Type	FIPPA Authority

# Privacy Impact Assessment

## Monday.com Project Management

PIA# 18-014 (Office of the University Secretariat to assign)

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

1.	The project manager signs into the Monday.com service and reads the Cloud Service Information Management Guidelines.	Protection	30, 30.1
2.	The project manager creates a board associated with the integrated priorities in Monday.com. A board is developed to show all of the current and proposed activity in the projects associated with the university's strategic priorities and to set access controls on the project documentation within Monday.com	Protection	30, 30.1
3.	Project team generates tasks on each board, assigns them to an individual, and estimates the time of completion. Project team members collect information to complete the tasks on the boards.	Collection / Use	26(c), 26(e)
4.	Project team links webpage or SharePoint attachments to a task to frame the requirements of, or to demonstrate the progress made, in a task.	Use / Disclosure	32, 33.1 (a.1), 33.1(b), 33.1(1)(e)
5.	Project team completes tasks and assesses whether further work needs to be completed on each task.	Use / Disclosure	32, 33.1 (a.1), 33.1(b), 33.1(1)(e)
6.	Project reports are finalized and released to the appropriate parties for review.	Disclosure	33.1 (a.1), 33.1(b), 33.1(1)(e)
7.	The Integrated Planning team completes project audits to assess the overall performance of the project team including completion of project deliverables, appropriate access restriction management, board management, and to ensure the Cloud Service Information Management Guidelines are adhered to.	Protection	30, 30.1
8.	The project manager deletes completed projects within Monday.com five years after project completion. All records demonstrating the development of UNBC as an institution are forwarded to the Northern BC Archives and Special Collections for archival preservation	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 (MONDAY.COM)			
	Risk	Mitigation Strategy	Likelihood Impact
1.			
2.			
3.			

### 10. Collection Notice

*Consent Notices will be made as necessary for the initiatives related to the Academic Action Plan and may be provided as supplementary attachments to action items on Monday.com Project Boards. General use of Monday.com will comply with the Cloud Service Information Management Guidelines attached in Appendix 1.*

ACTIVE INITIATIVE

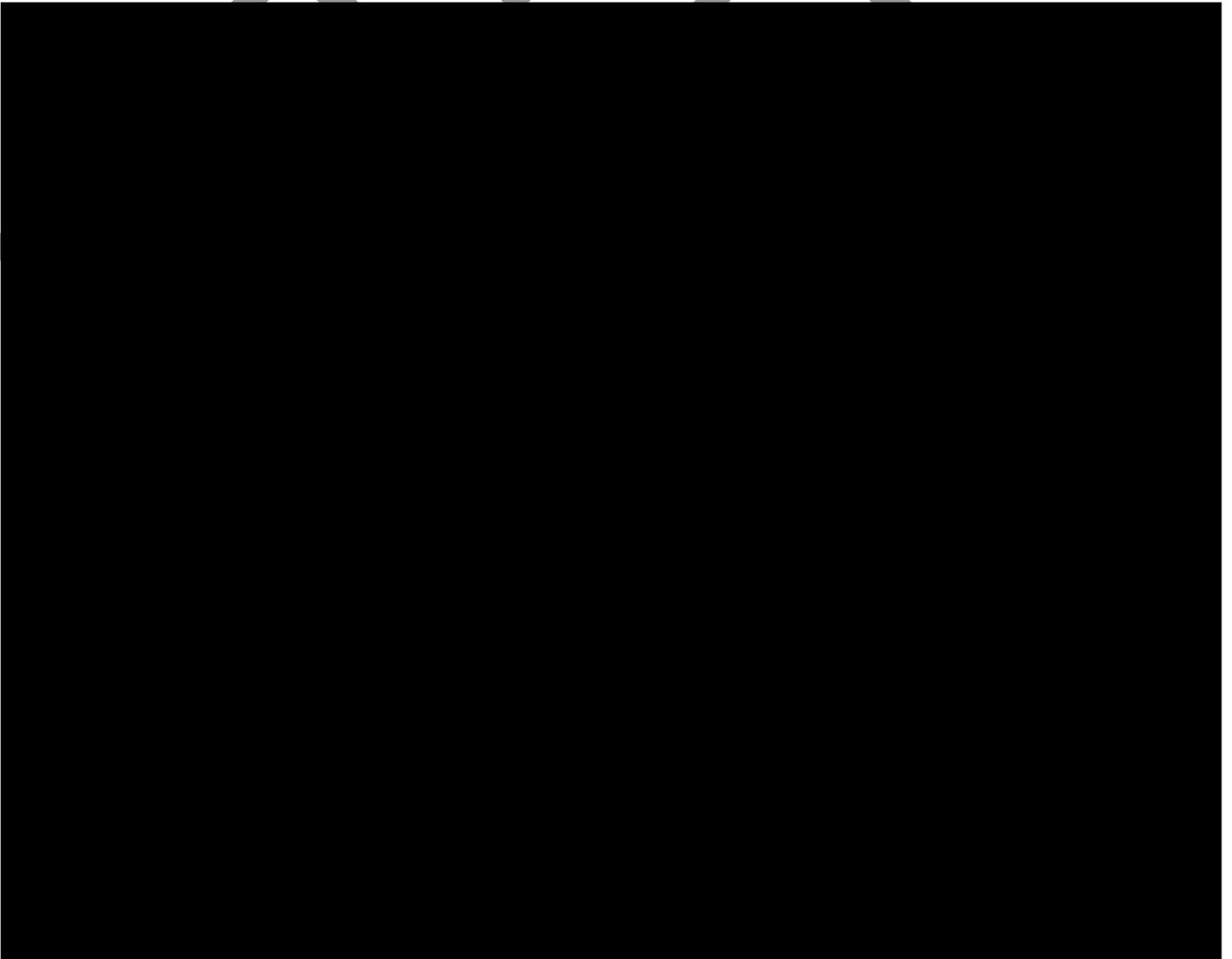
### **Part 3 – Security of Personal Information**

*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).

A large black rectangular redaction box covering the response to question 11.

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

A large black rectangular redaction box covering the response to question 12.



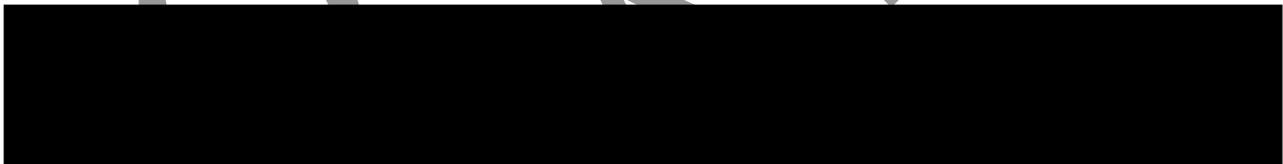
13. Does your department rely on any security policies? If so, indicate here:



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.



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



### 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 Integrated Planning team is responsible for correcting or annotating any information that needs to be updated on Monday.com. In cases where other employees or external individuals have access to Boards, it will be the Integrated Planning team that ensures updates and corrections have been made by those individuals as needed.*

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

*In limited circumstances, yes*

**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.**

*If identifiable individuals are involved in an issue being addressed, the project manager will work with those individuals to ensure personal information about them is accurate before decisions impacting those individuals are made. In most cases, this information will be previously published information.*

**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?**

*Project records will be kept in Monday.com for five years after a project is complete.*

### 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.*

*Monday.com is an internationally cloud hosted Software as a Service. The Integrated Planning department will monitor the use of this service to ensure it complies with the Cloud Service Information Management Guidelines attached in Appendix 1.*

ACTIVATED INITIATIVE

### Part 7 – Program Area Signatures

Sheena Smith

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

Signature

Sept 7, 2018  
Date

Bernadette Patenaude  
Department Head

Signature

September 7, 2018  
Date

N/A

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

N/A

Signature

Date

Adam Cullum

Information Governance Officer  
(Privacy Officer)

Signature

Sept 7/2018  
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.

**Cloud Services Information Management Guidelines**

Monday.com

GUIDELINES

The guidelines below are to assist in determining the information **not** to be included in Monday.com, a cloud based service, without receiving documented and informed consent first.

**DO NOT INCLUDE:**

- Employment, occupational or educational history, except the duties functions, and pay of UNBC employees.
- Excerpts from or complete personal recommendations or evaluations, character references or personnel evaluations
- racial or ethnic origin, sexual orientation, religious or political beliefs or associations
- personal contact information
- Trade secrets or commercial, financial, labour relations, scientific or technical information if it isn't already public information.
- SIN numbers or tax information
- Personal finances, income, assets, liabilities, net worth, bank balances, financial history or activities, or creditworthiness,
- Medical, psychiatric or psychological history, diagnosis, condition, treatment or evaluation,
- Reports or notes part of an investigation into violation of the law.
- Eligibility for income assistance or social service benefits or to the determination of benefit levels,

**Examples:**

<b>Appropriate</b>	<b>Not Appropriate</b>
<i>"[names of students] volunteered will distribute a survey to review their satisfaction with [department]" is not an appropriate entry into a cloud service unless you have documented informed consent from students to have their educational and/or occupational histories stored in this cloud service.</i>	<i>"The student volunteers from [department] are conducting a satisfaction survey with their peers" is a more appropriate alternative to enter into the cloud service.</i>
<i>"[Name of employee] did not meet expectations when generating this report" is not an appropriate note to enter into a cloud service.</i>	<i>"Please address the following additional items in this report: [list of areas to address]" OR "Please schedule a review meeting to review the posted report" would be appropriate notes.</i>

INTEGRATED UNIVERSITY PLANNING



## MAYBE INCLUDE

Information that would reveal **advice or recommendations** developed by or for a public body or a minister can only be put onto any cloud service **if that information is ready to be released to the public.**

Appropriate	Not Appropriate
<p><i>"Human Resources recommends we reorganize the [department] for greater efficiency" would not be an appropriate piece of advice to put onto a cloud service.</i></p>	<p><i>"The [committee name] recommends and is committed to developing [concept or practices in the public interest]" is low risk advice if there are real plans to act on that recommendation because it shows how UNBC is providing service to the public.</i></p>

## CAN INCLUDE

The following information **can** be put onto any cloud service **after being reviewed and approved by a director, an executive, or a governing body of UNBC.**

- any factual material
- a public opinion poll
- a statistical survey,
- an economic forecast
- an environmental impact statement or similar information,
- a final report or final audit on the performance or efficiency of a public body or on any of its policies or its programs or activities,
- a consumer test report or a report of a test carried out on a product to test equipment of the public body,
- a feasibility or technical study, including a cost estimate, relating to a policy or project of the public body,
- a final report on the results of field research undertaken before a policy proposal is formulated,
- a final report of a task force, committee, council or similar body that has been established to consider any matter and make reports or recommendations to a public body,
- a plan or proposal to establish a new program or activity or to change a program or activity, if the plan or proposal has been approved by the appropriate governing bodies (Senate or the Board of Governors),
- information that has been cited publicly as the basis for making a decision or formulating a policy

If you have any questions about appropriate information management using cloud services, please contact the Information Governance Officer with your questions.

**Examples:**

<b>Appropriate</b>	<b>Not Appropriate</b>
<i>"Begin planning for change to [course/program] being proposed to college council" is not appropriate for cloud service because the approval hasn't reached full Senate or the Board.</i>	<i>Complete the requirements approved in motion [motion number] to set up [course/program]" is appropriate because that motion received Senate/Board for approval.</i>

Please Print, Sign and Return this form to the Director of Integrated Planning before continuing work in Monday.com

Name: \_\_\_\_\_ Position: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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