

### 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/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:	National Collaborating Centre for Indigenous Health		
PIA Drafter:	Donna Atkinson		
Email:	donna.atkinson@unbc.ca	Phone:	250-614-6546
Department Manager:	Margo Greenwood		
Email:	margo.greenwood@unbc.ca	Phone:	250-960-5250

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

### 1. Description of the Initiative

To support Indigenous Services Canada’s (ISC) *COVID-19 Public Health Working Group on Remote and Isolated Communities*, and its related task groups, the NCCIH proposes to set up and administer a web-based project management platform ([OpenText Hightail](#)) for working group and task group members to store and share resources internally (e.g. agendas, meeting minutes, guidance documents) and work collaboratively on products (e.g. edit in real-time). This initiative is being funded by Indigenous Services Canada through a Contribution Agreement. Funded activities through the CA include: the purchase of the platform for use by up to 65 members, delivery of a tutorial to working group and task group members to orient them to the platform and the provision of ongoing technical and administrative support as needed related to the platform for the duration of the Contribution Agreement.

This product will be used for a federal initiative that is housed by UNBC and facilitated by UNBC staff. The initiative itself is not fundamentally an administrative UNBC initiative. This product will not

be used to conduct UNBC business and does not push or pull information to other UNBC systems automatically.

## 2. Scope of this PIA

This PIA relates to the use of OpenText Hightail as a project management platform for ISC's Working Group and Task Group members. Working Group and Task Group members represent a variety of stakeholders external to UNBC, including federal government employees (e.g. Public Health Agency of Canada, Indigenous Services Canada, Department of National Defense), provincial and territorial government employees (e.g. BC First Nations Health Authority, Government of the NWT), and national, provincial and territorial Indigenous organizations (e.g. Assembly of First Nations, Inuit Tapiriit Kanatami, Métis National Council, Dene Nation, and Pauktuutit Inuit Women's Association). Each user would have a unique login and password to access the platform.

The NCCIH's Academic Lead, Dr. Margo Greenwood, sits as an Indigenous health expert advisor on ISC's *COVID-19 Public Health Working Group on Remote and Isolated Communities* and the *COVID-19 and Stigma Task Group*. To support the technical and administrative work of the Working Group and Task Group, the NCCIH's Manager, Donna Atkinson, Administrative Assistant, Teri Delaney, and Communications Assistant, Kelsi Desjarlais, will also have access to the platform.

While this PIA will address the limitations of the use of Opentext Hightail for UNBC business, the jurisdiction of this PIA does not extend to what would be managed by a federal PIA through the Personal Information Protection and Electronic Documents Act and the Privacy Act of Canada.

## 3. Related Privacy Impact Assessments

Not applicable

## 4. All Elements of Information or Data

Data involved in this initiative will include Working Group and Task Group meeting agendas, meeting minutes, and terms of reference as well as COVID-19 guidance documents (e.g. how to use personal protective equipment, how to sterilize surfaces) that members will work on collaboratively to develop content. Some guidance documents will remain internal documents, while others will eventually be public-facing documents for web publication or dissemination.

Meeting minutes and agendas include member's name, job title, organizational affiliation, email address, and phone number – all of which are publically available on federal, provincial and territorial government electronic directory services and on the websites of Indigenous organizations. This information commonly appears on business cards/email signatures. No further personal information will be included.

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

Although Waterloo, Ontario is the global headquarters for OpenText Hightail, data is stored outside of Canada at U.S. AWS data centres in Oregon and Virginia. This information was confirmed in writing (email) from OpenText Hightail Enterprise Account Executive for Western Canada, Jon Wolff. His contact information is:

Cell: [1-416-301-6695](tel:1-416-301-6695)

Email: [jonw@opentext.com](mailto:jonw@opentext.com)

Website: [www.opentext.com](http://www.opentext.com)

The attached *OpenText Hightail Security Features – Product Overview* document, provided by Jon Wolff, outlines security infrastructure, including user and cloud-level security, network security, data security and related components.

#### 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
<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><b>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.</b></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
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	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.	[REDACTED]	Protection	30

2.		Protection	30
3.	Contributors will be able to add files to the repository, share files from the repository out to other stakeholders, and collaboratively work on documents in real time.	Collection, Use, Disclosure	26(c), 32(a) and 33.1(1)(c)
4.	The arrangement, storage and disposal of these records will follow instructions provided through Government of Canada Directive on Service and Digital Section 4.3. Information used to make an impactful decision about a person will be retained for at least one year	Storage and Disposal	31 Government of Canada Directive on Service and Digital Section 4.3

AC INITIAL

### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
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2.				
3.				

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### 10. Collection Notice

*Collection Notices will need to be created as directed by ISC's Privacy Officer based on the requirements detailed in the federal PIPEDA and the federal Privacy Act. The ISC will advise when appropriate collection notice is required and guide NCCIH staff to ensure compliance.*

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).

[REDACTED]

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

[REDACTED]

[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?

*NCCIH managed at UNBC will be responsible for making corrections or updates to personal information from an external request. Internal individuals that can make their own changes to personal information will be responsible for doing so.*

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

No.

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.

N/A

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?

N/A

### 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.

N/A.

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 National Collaborating Centre for Indigenous Health (“NCCIH”) staff located at UNBC are required to manage UNBC administrative information based on British Columbia’s Freedom of Information and Protection of Privacy Act. When completing work as described in the Contribution Agreement with Indigenous Services Canada (“ISC”), UNBC employees under the NCCIH will be taking direction from ISC on the appropriate management of personal information to comply with Canada’s Personal Information Protection and Electronic Document Act (“PIPEDA”) and Canada’s Privacy Act.*

*The UNBC employees signing this PIA agree they will ensure that Opentext Hightail is not used to conduct internal UNBC business without an amendment to this PIA.*

### Part 7 - Program Area Signatures

<p>Donna Atkinson</p> <hr/> <p>Name of Individual leading the Program/Project <i>(Normally the individual who completed the PIA)</i></p>	<p>As per email chain</p> <hr/> <p>Signature</p> <p style="text-align: center;">[REDACTED]</p>	<p>July 16 2020</p> <hr/> <p>Date</p>
<p>Margo Greenwood</p> <hr/> <p>Lead for Overseeing the Program/Project</p>	<p>Signature</p>	<p>July 16, 2020</p> <hr/> <p>Date</p>
<p>N/A (Outside UNBC initiative not dependent on UNBC systems)</p> <hr/> <p>Contact Responsible for Systems Maintenance and/or Security <i>(if applicable)</i></p>	<p>Signature</p>	<p>Date</p>
<p>Adam Cullum</p> <hr/> <p>Information Governance Officer (Privacy Officer)</p>	<p>As per email chain</p> <hr/> <p>Signature</p>	<p>July 20 2020</p> <hr/> <p>Date</p>

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.

**From:** [Donna Atkinson](#)  
**To:** [Adam Cullum](#)  
**Cc:** [Teri Delaney](#)  
**Subject:** FW: Hightail - Privacy Impact Assessment  
**Date:** Thursday, July 16, 2020 11:07:16 AM  
**Attachments:** [20200714 PIA 20-xxx OpenText Hightail for NCCIH Review \(ISC edit 20200716\).docx](#)

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Hi Adam

See attached word change (last page). It is very minor, so I will accept the change and get Margo to sign. Talk to you when you are back in the office next week  
thanks

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**From:** Vetsutanapibul, Nicholas (SAC/ISC)  
**Sent:** Thursday, July 16, 2020 10:59 AM  
**To:** Donna Atkinson  
**Cc:** Dulude, Stephanie (SAC/ISC) ; Dumulon, Louis (SAC/ISC) ; Larose, Mathieu (SAC/ISC) ; Cummings, Melissa (SAC/ISC)  
**Subject:** RE: Hightail - Privacy Impact Assessment

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Hi Donna,

We did a review and only one small wording change (please see tracked change in the attached document).

I trust that this is okay. Please feel free to contact me if you wish to discuss.

Thanks,

Nicholas Vetsutanapibul  
A/Manager, Northern Region  
Indigenous Services Canada / Government of Canada  
[nicholas.vetsutanapibul@canada.ca](mailto:nicholas.vetsutanapibul@canada.ca) / Tel: 613-884-1762  
Gestionnaire par intérim, Région du nord  
Services aux Autochtones Canada / Gouvernement du Canada  
[nicholas.vetsutanapibul@canada.ca](mailto:nicholas.vetsutanapibul@canada.ca) / Tél: 613-884-1762

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**From:** Dumulon, Louis (SAC/ISC) <[louis.dumulon@canada.ca](mailto:louis.dumulon@canada.ca)>  
**Sent:** 2020-07-16 7:41 AM  
**To:** Donna Atkinson <[Donna.Atkinson@unbc.ca](mailto:Donna.Atkinson@unbc.ca)>; Ibrahim, Alisar (SAC/ISC) <[alisar.ibrahim@canada.ca](mailto:alisar.ibrahim@canada.ca)>; Larose, Mathieu (SAC/ISC) <[mathieu.larose@canada.ca](mailto:mathieu.larose@canada.ca)>  
**Cc:** Dulude, Stephanie (SAC/ISC) <[stephanie.dulude@canada.ca](mailto:stephanie.dulude@canada.ca)>; Vetsutanapibul, Nicholas (SAC/ISC) <[nicholas.vetsutanapibul@canada.ca](mailto:nicholas.vetsutanapibul@canada.ca)>  
**Subject:** RE: Hightail - Privacy Impact Assessment

Thanks Dona,

Stephanie and Nick cced will review and get back to you.

Louis

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**From:** Donna Atkinson <[Donna.Atkinson@unbc.ca](mailto:Donna.Atkinson@unbc.ca)>  
**Sent:** 2020-07-15 6:17 PM  
**To:** Ibrahim, Alisar (SAC/ISC) <[alisar.ibrahim@canada.ca](mailto:alisar.ibrahim@canada.ca)>; Larose, Mathieu (SAC/ISC)

<[mathieu.larose@canada.ca](mailto:mathieu.larose@canada.ca)>; Dumulon, Louis (SAC/ISC) <[louis.dumulon@canada.ca](mailto:louis.dumulon@canada.ca)>

**Subject:** RE: Hightail - Privacy Impact Assessment

Hi Louis

I've been working with Alisar (see email below) on setting up the Hightail platform for this project, however, UNBC asked me to do a privacy impact assessment before we could proceed. The draft PIA is attached and I need to ensure that ISC has no issues with it before we can finalize. Who should this go to for review in Alisar's absence?

Thanks, donna

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**From:** Ibrahim, Alisar (SAC/ISC) <[alisar.ibrahim@canada.ca](mailto:alisar.ibrahim@canada.ca)>

**Sent:** Tuesday, June 30, 2020 9:48 AM

**To:** Donna Atkinson <[Donna.Atkinson@unbc.ca](mailto:Donna.Atkinson@unbc.ca)>

**Subject:** Hightail - Privacy Impact Assessment

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Hi Donna –

Just following up to see how the Privacy Impact Assessment is going. I can't remember if you are on leave this week or not.

Please let me know if you need anything.

Thanks!

Alisar

Alisar Ibrahim

Senior Policy Analyst, Policy Development

Northern Region, First Nations and Inuit Health Branch

Indigenous Services Canada | Government of Canada

[alisar.ibrahim@canada.ca](mailto:alisar.ibrahim@canada.ca) | C: (343) 548-7519

Analyste principale des politiques, Élaboration des politiques

Région du Nord, Direction Générale de la Santé des Premières Nations et des Inuits

Services aux Autochtones Canada | Gouvernement du Canada

[alisar.ibrahim@canada.ca](mailto:alisar.ibrahim@canada.ca) | C: (343) 548-7519

N'hésitez pas à me répondre dans la langue officielle de votre choix.

Please feel free to reply in the official language of your choice.

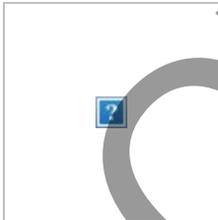
**From:** [Donna Atkinson](#)  
**To:** [Adam Cullum](#)  
**Cc:** [Teri Delaney](#)  
**Subject:** FW: PIA  
**Date:** Thursday, July 16, 2020 2:44:57 PM  
**Attachments:** [OpenText Hightail for NCCIH Review \(ISC edit 20200716\).docx](#)  
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[image010.png](#)

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Hi Adam  
See attached.  
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**From:** Margo Greenwood  
**Sent:** Thursday, July 16, 2020 2:05 PM  
**To:** Donna Atkinson  
**Subject:**



Margo Greenwood, PhD  
Academic Leader, National Collaborating Centre for Indigenous Health  
Professor, School of Education | Professor, First Nations Studies Program  
University of Northern British Columbia  
3333 University Way, Prince George BC V2N 4Z9  
1-250-960-5239 (office) | 1-250-961-6077 (mobile)  
Email: [margo.greenwood@unbc.ca](mailto:margo.greenwood@unbc.ca)

[Web site](#) | [Browse publications](#) | [Mailing list sign-up](#)



**From:** [Adam Cullum](#)  
**To:** [Margo Greenwood](#)  
**Cc:** [Donna Atkinson](#)  
**Subject:** RE: Draft PIA for Opentext Hightail your review  
**Date:** Tuesday, July 14, 2020 5:06:39 PM  
**Attachments:** [20200714 PIA 20-xxx OpenText Hightail for NCCIH Review.docx](#)  
**Importance:** High

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Awesome! Thanks for the quick review Donna,  
Any concerns providing the up signature Margo? If you don't have any concerns with this PIA and you are willing to be accountable as the overseer of the project then I am happy to change the status of the PIA and get it attached to the web requisition. The email chain will also be attached to the package and you will each receive a copy for your records.

I will just need you or Donna to confirm that you have provided this draft to your ISC contact and they do not have any concerns over the contents.

**Adam Cullum, BA, CRA (Certified Records Analyst)**

*Information Governance Officer*

**Office of the University Secretariat**

**Room ADMN 2021**

University of Northern British Columbia

3333 University Way

Prince George, BC V2N 4Z9

**Telephone: 250 960 5139**

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**From:** Donna Atkinson  
**Sent:** Tuesday, July 14, 2020 1:17 PM  
**To:** Adam Cullum  
**Cc:** Margo Greenwood  
**Subject:** Re: Draft PIA for Opentext Hightail your review

Hi Adam

This looks good to me!

D

Sent from my iPhone

On Jul 14, 2020, at 11:36 AM, Adam Cullum <[Adam.Cullum@unbc.ca](mailto:Adam.Cullum@unbc.ca)> wrote:

Good morning Donna,

I am attaching the draft PIA for your review. Once you have read over everything and made requests for any adjustments, I will be happy to make those changes for you, convert it to PDF and send it for "signing". Signing during the pandemic can be satisfied with a date and time stamped notice indicating "I have read and agree to the contents of the PIA" which can be satisfied by an email chain. You will want to check in with your

ISC contacts to ensure that they are happy with this PIA review and that they understand the NCCIH team will require their guidance on meeting federal privacy requirements.

Sorry for the delays here. I am hoping we can clean this up over today so that it can be attached to the requisition as soon as possible.

**Adam Cullum, BA, CRA (Certified Records Analyst)**

*Information Governance Officer*

**Office of the University Secretariat**

**Room ADMN 2021**

University of Northern British Columbia

3333 University Way

Prince George, BC V2N 4Z9

**Telephone: 250 960 5139**

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