

Privacy Impact Assessment

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ROME0 (Research Portal)

PIA #15-005 (Privacy Officer to complete)

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the Privacy Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FOIPPA generally, please contact Shelley McKenzie (Privacy Officer) at shelley.mckenzie@unbc.ca or (250) 960-6310 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 their privacy office(r) 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:	Office of Research		
PIA Drafter:	Nicole Balliet		
Email:	nicole.balliet@unbc.ca	Phone:	250-960-5815
Program Manager:	Ranjana Bird		
Email:	ranjana.bird@unbc.ca	Phone:	250-960-6110

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

1. Description of the Initiative

Currently, at UNBC, the processes and procedures around the management of grants, contracts and awards, as well as certifications, ethics and intellectual property are all completed manually; resulting in time consuming processes and procedures, increased risk of mismanagement and miscommunication, as well as a lack of connectivity between departments.

ROME0 is an online, database-driven research administration software solution to manage grants, contracts and awards, as well as certifications, ethics and intellectual property. ROME0 is customizable, flexible and scalable. ROME0 will lead to increased workflow productivity, as well as better communication and connectivity within and between UNBC Research Services (including: Office of Research, Finance Office, Purchasing Office) and researchers. The software also features tracking and reporting capabilities. What's more, ROME0 will ensure accountability and compliance in a highly regulated environment, minimizing risk.

Privacy Impact Assessment

ROMEO (Research Portal)

PIA #15-005 (Privacy Officer to complete)

APPROVED

There are three modules of interest to Research Services at UNBC:

- Awards Module: capture, manage and report on research activity. Project management. Document control.
- Certifications Module: regulatory compliance and accountability. Track and review events and renewals for human ethics, animal care, biohazard and radiation certifications
- Research Portal Module: workflow, communication, collaboration, real-time view of status

The Office of Research, Finance Office, Purchasing Office, ITS, and UNBC Researchers are the major stakeholders in this project.

2. Scope of this PIA

This PIA covers all phases related to this project, including: installation, customization, training, pilots, and implementation/rollout. This PIA may also cover future tie-in to Banner (if deemed necessary).

3. Related Privacy Impact Assessments

There are no additional PIAs related to this project.

4. All Elements of Information or Data

The elements of information that will be involved in this project are: researcher name, work address, work phone, work email, position/status at UNBC, information specific to research area, and grant/certification application information (some of this may be sensitive or confidential depending on the project).

Each researcher user will be responsible for creating and managing his/her own account.

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 your privacy office(r). They will guide you through the completion of your 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

All of the information gathered on ROMEO (cloud hosted) will be stored in Canada (Calgary and Toronto) and will only be accessed by authorized personnel. There is disaster back-up/recovery between the two locations. There is also monitoring of security and data protection.

6. Data-linking Initiative*

In FOIPPA, "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 Privacy Officer to discuss the requirements of a data-linking initiative.

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7. Common or Integrated Program or Activity*

<p>In FOIPPA, "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
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

*** 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 Privacy Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.**

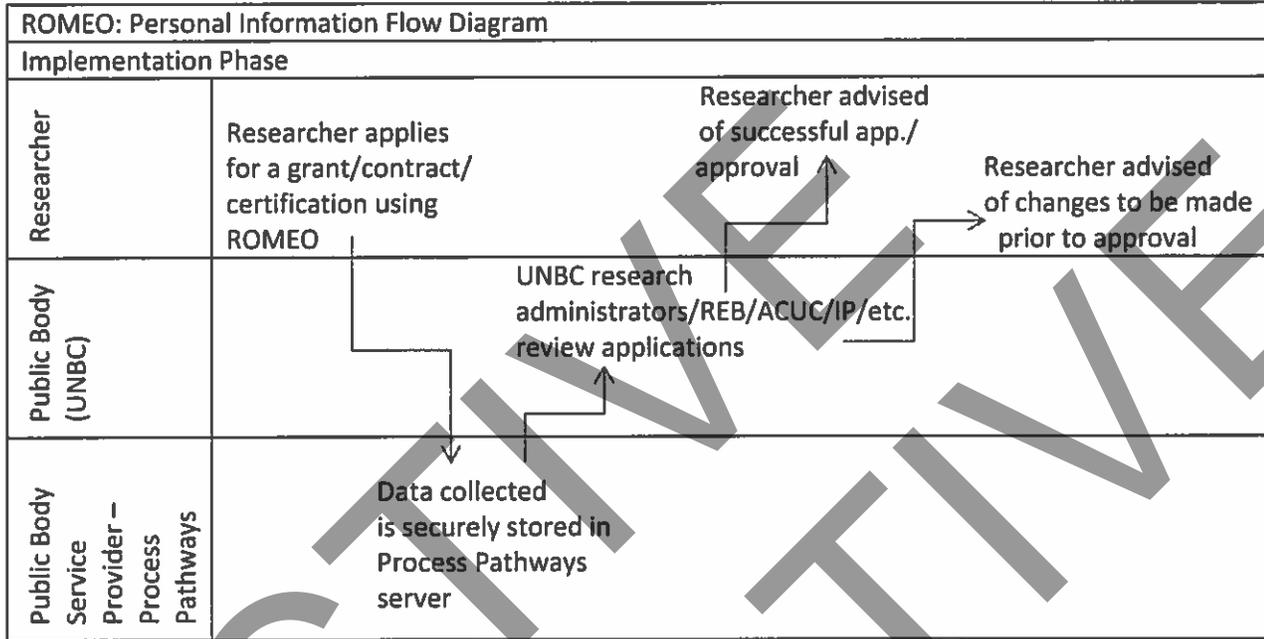
8. Personal Information Flow Diagram and/or Personal Information Flow Table

There is no disclosure/sharing of personal information. Only those UNBC employees who are granted access (role-based access) will have access to information.

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ROMEО (Research Portal)

PIA #15-005 (Privacy Officer to complete)



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Researcher data is collected in ROMEО	Collection	
2.	Researcher is sent confirmation of receipt of application	Disclosure	
3.	Application is reviewed by Office of Research/REB/ACUC/etc	Use	
4.	Application is approved or returned for revisions	Disclosure	

9. Risk Mitigation Table

- UNBC access will be managed by the Office of Research
- Data will be backed up and stored on a redundant system in Canada
- Data centres have physical security measures that only allow authorized personnel in

Privacy Impact Assessment

ROMEIO (Research Portal)

PIA #15-005 (Privacy Officer to complete)

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Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.				
2.				
3.				
4.				

10. Collection Notice

The following is the proposed wording for the collection notice:

Information collected in ROMEIO will be used primarily for internal UNBC administrative purposes. Only authorized research services personnel (Office of Research, Finance Office, Purchasing, IT) will have role-based access to the information.

In addition to internal administrative uses, information collected in ROMEIO may also be used in strict confidence for University research and planning. Certain information is also provided on a confidential basis to external funding agencies (e.g. Tri-Council Agencies, etc.) for reporting, audit and compliance purposes, as required.

Information will be stored and accessed on secure servers and the information will be backed up regularly on redundant systems in Canada. Information will be retained in accordance with UNBC policy or external funding agency requirements.

Researchers are advised that the use of information collected in ROMEIO, complies with the *BC Freedom of Information and Protection of Privacy Act*, and with the policies and procedures of the University of Northern British Columbia.

If you have any questions about the collection, use or disclosure of personal information, please contact:

Manager of Access, Privacy and Records
3333 University Way, Prince George, BC V2N 4Z9
Phone: 250-960-6310
Email: records@unbc.ca

Privacy Impact Assessment

APPROVED

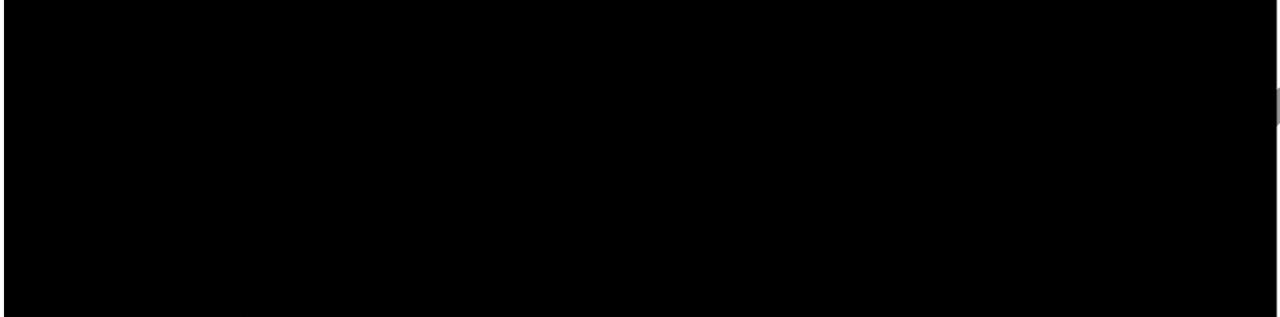
ROMEEO (Research Portal)

PIA #15-005 (Privacy Officer to complete)

Part 3 - Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with the Privacy Officer, CIO or IT Security Officer when filling out this section.

11. Please describe the physical security measures related to the initiative (if applicable).

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

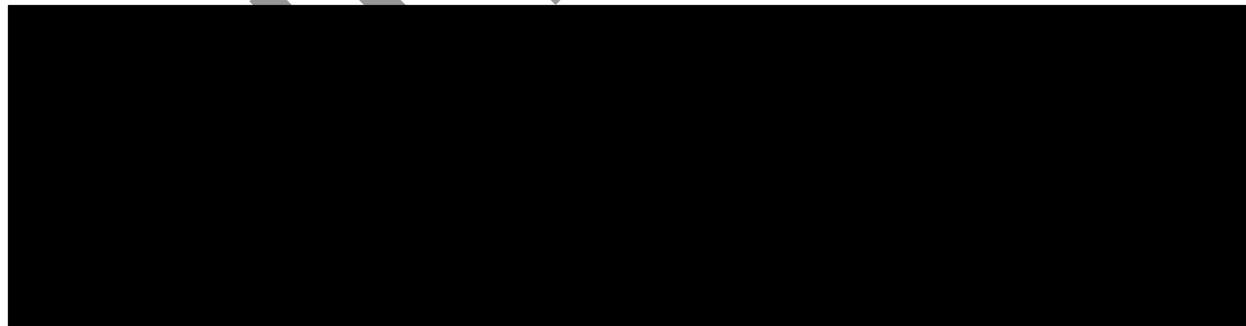
12. Please describe the technical security measures related to the initiative (if applicable).

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

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

A black rectangular redaction box covering the answer to question 13.

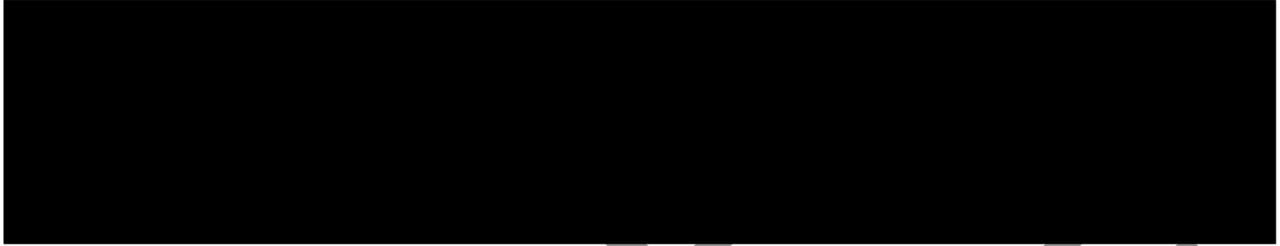
14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

A large black rectangular redaction box covering the answer to question 14.

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

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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?**

Researchers have access to update their own information, and designated staff has access to administer an application on behalf of the researcher. Staff members include positions that deal directly with research administration (Office of Research, Finance Office, Purchasing Office, etc.).

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

Yes, potentially. It will depend on how the system evolves and how it will be used in the future (for example, the information collected may be used in a research CV or performance review such as may be required to show accomplishments for tenure and promotion committees at UNBC).

- 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.**

UNBC employees will trust that the information provided by the researcher is accurate, as that researcher entered in their own data accordingly. Researchers will have the ability to change/edit their submissions and other personal information, however.

- 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?**

Retention of information will be for a minimum of 1 year in accordance with the *BC Freedom of Information and Protection of Privacy Act*. Most records will be retained much longer to correspond with the length of research project. Retention will also be influenced and managed in compliance with the requirements of the Tri-Council Agencies and any other external granting agencies. A detailed UNBC record retention and disposition schedule is in progress.

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Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No. The information collected is for internal research administration/planning/reporting purposes. Information will only be disclosed on a need to know basis. Information will also be disclosed, as required, regularly and routinely, to external granting agencies in compliance with applicable legislation or other agreements.

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the Privacy Officer.

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

Potentially – in the future, statistics may be pulled to help with auditing and planning.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Privacy Officer, the UNBC Research Office or UNBC Archives.

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 FOIPPA. 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.

Privacy Impact Assessment

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Part 6 – Privacy Officer Comments

This PIA is based on a review of the material provided to the Privacy 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 it to Privacy Officer.

Reviewed in person with Nicole Balliet June 19, 2015. I'm satisfied that the system infrastructure is compliant with Section 30.1 of the BC FOIPP Act. Romeo (Process Pathways) is a Canadian-based "cloud" solution for Researchers & Research Administrators. In addition, having UNBC ITS available as an internal resource to the system and employees is ideal.

Should any changes or revisions happen to the original scope or details of this PIA, a revised PIA will need to be submitted.

Privacy Officer/Privacy Office
Representative

Shelley McKenzie
Manager of Access, Privacy & Records

Signature



Date

23-June-2015

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Part 7 - Program Area Signatures

Ranjana Bird
Program/Department Manager

[Redacted Signature]

June 23, 2015
Date

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

[Redacted Signature]

June 24th, 2015
Date

Shelley McKenzie
Head of Public Body, or designate
(at UNBC, this is the Privacy Officer)

[Redacted Signature]

Signature

23-June-2015
Date

Please send a copy of this PIA with the respective signatures to Shelley McKenzie for comment, review, approval & filing.
A final copy of this PIA (with all signatures) will be kept on record with the Privacy Office.

ACTIVE
INITIATIVE