

### 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:	Student Life (Student Affairs)		
PIA Drafter:	Dakota Den Duyf		
Email:	<a href="mailto:dakota.denduyf@unbc.ca">dakota.denduyf@unbc.ca</a>	Phone:	<b>250-960-5449</b>
Department Manager:	<b>Amelia Kaiser</b>		
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***In the following questions, delete the descriptive text and replace it with your own.***

### 1. Description of the Initiative

*CampusRight helps universities move away from their convoluted paper processes into a world of easy automation. With CampusRight, you can enjoy the most flexible university specific web forms on the market. Data collection, ticketing, cash management – all in one platform.*

### 2. Scope of this PIA

*The scope of this PIA is to manage student participation in Student Life events from ticketing to evaluation. The solution will not integrate with UNBC's Student Integration System (Banner).*

### 3. Related Privacy Impact Assessments

N/A.

#### 4. All Elements of Information or Data

*First name, last name, UNBC email address, personal preferences, location information (associated with events), accessibility needs, student card information?, association with UNBC, event information, institutional information.*

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

*RightLabs corporate officers are located in Edmonton, Alberta. (Ask about the specific location of the Amazon Web Services servers).*

#### 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. <i>Note: We'll need to see a demo to get these details. Contact Contracts department (Evelyn Evens and/or Leslie Burke) for assistance. I'm sure we have to make it clear that we are not necessarily using their service, but we'll get a general idea of whether this program would work and/or if we have to do (or would benefit from doing) an RFP.</i>	Collection	26(c)
2.	Disclosure	33.1(7)

3.		Disclosure & Use	33.2(c) and 32(a)
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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.				
2.				
3.				
4.				

### 10. Collection Notice (Need to complete section 8 before filling in).

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
2. The legal authority for collecting it, and
3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

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

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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).

*(Ask for technical security protocols).*

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.

*Need more information from RightLabs.*

### 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 Student Life Coordinator will be responsible for updating and correcting any personal information that a student identifies as incorrect. (Unless students can update their own data with ease?) if information must be disclosed to others for purposes under the Act, the Student Life Coordinator will inform the student at the time the disclosure occurs.*

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

*Yes, it is an event management tool.*

**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.**

*Students will be inputting information themselves and will be informed that the Student Life Coordinator will provide support if the student has any issues.*

**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?**

*RightLabs will hold information on their servers for (determine number of years). Personal information in events will be anonymized after a period of one year and one day.*

### **Part 5 – Further Information**

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

*For example: your department has a regular exchange of personal information (both collection and disclosure) to provide services to your clients.*

***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.**

*For example: your public body will be disclosing information to PhD students so that they can conduct research.*

***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.*

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### Part 7 – Program Area Signatures

Dakota Den Duyf

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

Signature

Date

Amelia Kaiser (Interim)

Manager, Student Affairs

Signature

Date

N/A

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.