UNBC UNIVERSITY OF NORTHERN BRITISH COLUMBIA

Privacy Impact Assessment
SMARTair Mul-T-Lok Residence Access System
PIA# 16-005 *(Office of the University Secretariat to assign)*

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

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 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 FOIPPA 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 <u>does not include personal information</u>?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to the 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:	Ancillary Services		
PIA Drafter:	Brenda Schlesinger/Katie Sven		
Email:	Brenda.schlesinger@unbc.ca/Kative.Sven@unbc.ca	Phone:	960-5827 / 960-6434
Program Manager:	**Aaron LeBlanc**		
Email:	Aaron.leblanc@unbc.ca	Phone:	960-6431

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

1. **Description of the Initiative**

   Mul-T-Lok is a system that uses the student card to allow secure access to students to the residence buildings, suites, and bedrooms. The student card provides tap and pin verification to allow authorized access to predetermined areas.

2. **Scope of this PIA**

   The Mul-T-Lok system is required to provide a database that will connect the student's account to associate appropriate access to the buildings, suites, and bedrooms. The database is required for the system's functionality.

3. **Related Privacy Impact Assessments**

   Privacy Impact Assessment to do with "One Card" (note later).

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4. All Elements of Information or Data

Name, student number/employee number, room number, student/employee card number, access expiry dates, access privileges, pin codes.

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**

   Internal storage and access for the following groups: Housing, Security [Sarah Elliot], Facilities, Cashier's Office and ITS.

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 Information Governance Officer to discuss the requirements of a data-linking initiative.	N/A

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7. **Common or Integrated Program or Activity***

<table>
<tr><td colspan="2">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.</td></tr>
<tr><td>1. This initiative involves a program or activity that provides a service (or services);</td><td>No</td></tr>
<tr><td>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;</td><td>No</td></tr>
<tr><td>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</td><td>No</td></tr>
<tr><td>**Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.**</td><td>N/A</td></tr>
</table>

* 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**	**FOIPPA Authority**
1.	*Initial manual upload of data from BANNER for student numbers and room assignments. Housing Office edits the access charts in SMARTair Mul-T-Lok as student rooms are re-assigned.*	Collection	26(c)
	Student emails picture to housing@unbc.ca from their	Collection &	26(c),

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	unbc.ca account. This picture is saved to the shared drive for Housing staff and the Cashier's Office to assist in generating and activating the student card.	Use	
	Cashier's Office prints copies of the student cards and asks for government issued ID to be able to release the card once the verification is complete. Student cards are not activated in the SMARTair Mul-T-Lok system until after the verification process is complete.	Collection & Use	26(c), 32(a)
2.	When students receive their student card they will use a keypad to enter a pin and acquire regular access to the building, suites and bedrooms the students are assigned to.	Collection & Use	26(c), 32(a)
	If the student reports the student card lost or stolen, access to that student's room is immediately revoked by Housing Office, Facilities, or Security which they can determine by seeing the room access tables.	Disclosure & Use	32(a), 33.2(c)
3.	The student cards will be coded for termination at move-out when they are given to the students. The expiration can be manually updated remotely by Housing staff through the use of the SMARTair Mul-T-Lok system.	Use	32(a)
	███████████████████████████████	Protection	30
	When access privileges are no longer assigned to a student/employee their information will no longer be part of the active database. Data is cleared at the end of each academic year. Except for the encoded PIN, which the Housing office cannot provide, all other information stored in the system is duplicate information.	Disposition	31

9. Risk Mitigation Table

Examples can be removed and additional lines added as needed.

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Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	███	███	███	███
2.	███	███	███	███
4.	███	███	███	███

10. Collection Notice

N/A – No new information collected, information taken from Banner Student or in regular process of receiving student card.

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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 UNBC Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section.

11. Please describe the <u>physical</u> security measures related to the initiative (if applicable).

12. Please describe the <u>technical</u> security measures related to the initiative (if applicable).

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?

Personal information is not directly collected from Mul-T-Lok. Personal information from Banner Student would need to be updated at the Registrar's Office.

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

   Yes, Mul-T-Lok uses personal information to determine physical access to personal spaces.

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.**

   Role-based access will limit access to the personal information contained in the Mul-T-Lok system. ID verification to make changes to PIN information to provide access to rooms will allow staff to ensure that the student is the right individual by matching the face on the picture to the person registering or changing the PIN on site.

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?**

   Yes. Data is kept in the system until the end of the academic year and will be cleared to new student data to be entered. This information is all duplicate information that can be derived from other sources and is not required to be kept for the full year. The only information that is not duplicate information is the secure PIN, which the Housing office could not meaningfully release in an FOI request.

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

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> ***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 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.

Part 6 – Information Governance Officer Comments

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

Katie Sven
_____

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

Signature   September 22, 2016
                   Date

Aaron Leblanc
_____

Program/Department Manager or Project Sponsor

                   Sept. 22/2016
                   Date

Kevin Stewart
_____

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

Signature   Oct. 3/16
                   Date

Adam Cullum
_____

Head of Public Body, or designate (at UNBC, this is the Information Governance Officer)

Signature   September 22, 2016
                   Date

Please send a copy of this PIA with the respective signatures to Adam Cullum, Information Governance Officer for comment, review, approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.