UNBC
UNIVERSITY OF
NORTHERN BRITISH COLUMBIA

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

Privacy Impact Assessment
Springshare LibAnswers
PIA#*17-011* *(Office of the University Secretariat to assign)*

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 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:	Library		
PIA Drafter:	James MacDonald		
Email:	James.macdonald@unbc.ca	Phone:	250-960-6601
Program Manager:	**James MacDonald & Heather Empey**		
Email:	Heather.empey@unbc.ca	Phone:	250-960-6478

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

1. **Description of the Initiative**

   Expansion of library ticketing software, LibAnswers, to encompass departments outside of Reference Services: Copyright, Circulation, Inter-library Loans, Technical Services. Emails and SMS communication from library users of all types will be funneled through this library ticketing software.

2. **Scope of this PIA**

   The PIA will examine the use of this ticketing software (already in use since 2007) in the library. The collection of personal data via Email and SMS. The following email addresses will be routed through the system: library@unbc.ca, serials@unbc.ca, copyright@unbc.ca, ill@unbc.ca, circulation@unbc.ca

3. **Related Privacy Impact Assessments**

   Not related to any known PIA.

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4. All Elements of Information or Data

- *User's email address*

- *User's name*

- *User's phone number*

- *User's library research needs*

- *Communication between the user and library staff regarding any use of the library, or its collections*

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**

   Data is stored within Canada with active and backup servers located in Toronto, Ontario.

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
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*

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

Personal Information Flow Table			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	*Email or SMS received from client with query or requesting service*	*Collection*	*26(d)*
2.	*Email or SMS client back requesting more information or providing answer to query*	*Use*	*32(a), 32(b)*
3.	*Query and Answer saved on LibAnswers for the purposes of metrics and reuse of answers to frequently asked questions.*	*Storage / Disclosure*	*30.1, 33.1(b), 33.2(c), 33.2(l)*

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The Data Flow Diagram is attached in Appendix A.

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.			

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10. Collection Notice

In the library contacts section of the website we will include the following statement:

Use of LibAnswers services:

*Emails and SMS messages sent to library addresses indicated by an asterisks will be processed through the library's ticketing software LibAnswers. This software is hosted by a third-party company (Springshare LLC.) in Toronto, Ontario. Springshare's privacy policies are available <u>here</u>. The library takes precautions to protect the personal data you provide in order for us to address your questions and assist in your library research. By using this service, you are consenting to the transfer of your information to LibAnswers when you make an information request and accept any risk to your privacy associated with disclosing your personal information to a third party service. UNBC does not guarantee the security of your information when you are using third party services. Your questions and our answers will be used and stored by the university for three years to allow aggregate analysis of trends and to enhance customer support to regular users. If you have questions or concerns please contact the University Librarian at **[email address, phone number, office location].***

Emails will provide a footer URL linking to this statement. All staff will also direct students and community members to this statement before advising students and community members to use this service.

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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** <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 will not be disclosed to others. Individual information is generally not updated as it is transaction based.

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

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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?

Springshare controls the retention of user's information and the library will work with Springshare to ensure that data over three years old is disposed of annually. The library will retain requests for three years in order to comply with copyright regulations, analyze the short term history of a user's requests, and analyze the frequency of types of requests in order to improve customer service.

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.

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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.

Emails will provide a footer URL linking to the collection statement. All staff will also direct students and community members to this statement before advising students and community members to use this service.

Approval is conditional to the library developing a library accounts capstone email account to provide an option to users that want to make personal enquiries about their own library account without having that information put into this external cloud.

Approval is conditional to the Library Systems Administrator initiating quarterly updates with the service provider to ensure industry standard security measures are in place in the service provider's systems and that these security measures are updated to meet developing threats.

Since one of the University Librarians is the project manager and project sponsor, the other University Librarian will need to sign for approval.

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Part 7 – Program Area Signatures

James MacDonald (Co-University Librarian)

Name of Individual leading the Program/Project
(Normally the individual who completed the PIA)
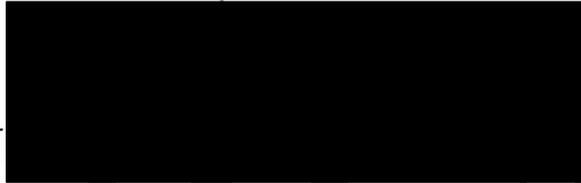
Jan 10, 2018
Date

Heather Empey (Co-University Librarian)

Program/Department Manager or Project Sponsor

Jan 10/18
Date

David Pettitt

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

Signature

Jan 10/2018
Date

Adam Cullum

Information Governance Officer

Jan 10/2018
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.