

# Privacy Impact Assessment

## Springshare LibCal

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

PIA#18-020 (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](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:	Geoffrey R. Weller Library		
PIA Drafter:	Annelise Dowd		
Email:	<a href="mailto:Annelise.dowd@unbc.ca">Annelise.dowd@unbc.ca</a>	Phone:	2509605149
Department Manager:	Heather Empey		
Email:	<a href="mailto:Heather.empey@unbc.ca">Heather.empey@unbc.ca</a>	Phone:	2509606612

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

### 1. Description of the Initiative

*LibCal is a web platform designed to handle the Geoffrey R. Weller library's catering needs including hours of operation management, room reservations and librarian appointment management.*

### 2. Scope of this PIA

*LibCal will be used by all patrons of the Geoffrey R. Weller library for conducting room reservations and requesting appointments with librarians.*

### 3. Related Privacy Impact Assessments

*PIA #17-011 Springshare LibAnswers.*

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

*Name of patron, UNBC email address, # of people in a room, subject of support needs, hours of operation, scheduled booking times (room and duration).*

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.

ACTING  
INITIATIVE

### 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
<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>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.</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
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.	Student accesses a link from the library website that brings them to the LibCal website to login using their UNBC credentials to the service.	Collection	26(c)
2.	Once logged in, the student selects whether they need a room booking or an appointment with a librarian.	Collection	26(c)

# Privacy Impact Assessment

## Springshare LibCal

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

PIA#18-020 (Office of the University Secretariat to assign)

3.	For a room booking, the student's name and email address will populate from active directory using CAS. The student will enter the number of people in the room, and select an available date/time.	Collection	26(c)
4.	The Supervisor – Circulation Services accesses the room booking information as needed to provide customer service to patrons.	Use/Disclosure	32(a), 33.1(e), 33.1(e.1)
5.	For an appointment with a librarian, the student's name and email address will populate from active directory using CAS. The student will provide the subject matter of the request for support.	Collection	26(c)
6.	The Access Services Librarian uses booking information to prepare supports for the student as needed.	Use/Disclosure	32(a), 33.1(e), 33.1(e.1)
7.	Student will receive confirmation that the booking or appointment has been completed. Resources will be made available for the student to use the service as requested	Use	32(a)
8.	All identifiable personal information is scrubbed after being backlogged for one month and replaced with hashed content.	Protection/ Disposition	30, 31

### 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.				



### 10. Collection Notice

The library contacts section of the website will include the following statement:

#### Use of Springshare Services:

Emails and SMS messages sent to library addresses indicated by an asterisks will be processed through the library's ticketing software LibAnswers. Library room bookings and scheduling appointments with librarians will be processed using LibCal. These services are hosted by a third-party company (Springshare LLC.) in Toronto, Ontario. Springshare's privacy policies are available [here](#). 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 or LibCal 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 [heather.empey@unbc.ca](mailto:heather.empey@unbc.ca) or 250 960 6612.

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.

LibCal's service will include a custom message when students make requests for access to support from librarians with the following message:

This booking service is provided by Springshare and information you enter when booking an appointment with a librarian is not directly controlled by UNBC. The Geoffrey R. Weller library does not ask you to input any additional identifying personal information such as student number in order to book an appointment. Please put in enough information to allow a librarian to support you, but do not input any information that is proprietary or confidential into this booking service. By using this service you accept any risk to your privacy associated with disclosing your personal information to a third party service. If you have questions or concerns, please contact the University Librarian at [heather.empey@unbc.ca](mailto:heather.empey@unbc.ca) or 250 960 6612.

### 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]

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?

*Information taken from active directory will need to be changed there. The student is responsible for ensuring the accuracy of any information they enter into the system.*

**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?**

*In the LibCal service, Springshare scrubs all identifying information out of the request after one month. LibCal will retain statistical information indefinitely.*

### 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

# Privacy Impact Assessment

## *Springshare LibCal*

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

PIA#18-020 (Office of the University Secretariat to assign)

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.*

*The first Collection Notice in this PIA will replace the Collection Notice created to satisfy the conditions of PIA 17-011 Springshare LibAnswers. The second Collection Notice in this PIA will be visible to students before the time they complete their booking for librarian support.*

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

### Part 7 - Program Area Signatures

Annelise Dowd

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

Signature

Date

Nov 7/18

Heather Empey

Director or Dean Overseeing the Program/Project

Signature

Date

Nov 7/18

Geoffrey Bayol  
David Pettitt  
Contact Responsible for Systems Maintenance and/or Security  
(if applicable)

Signature

Date

Nov 7/18

Adam Cullum  
Information Governance Officer  
(Privacy Officer)

Signature

Date

Nov 7/18

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.