

Privacy Impact Assessment

StageClip – Virtual Convocation

PIA# 20-005 (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 privacy@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:	Office of University Advancement		
PIA Drafter:	Zarrah Holvick		
Email:	Zarrah.Holvick@unbc.ca	Phone:	250 960 6304
Department Manager:	Christine Dillabaugh		
Email:	Christine.Dillabaugh@unbc.ca	Phone:	250 960 5724

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

1. Description of the Initiative

Due to the COVID 19 pandemic, UNBC is creating a virtual convocation to allow graduates to experience the ceremony while maintaining social distancing. StageClip has been chosen as the service provider to conduct the ceremony online. Students will be informed of this ceremony, have a picture of themselves appear as a virtual procession and will be able to watch this public event with family as it occurs online.

2. Scope of this PIA

This assessment pertains to the virtual presentation of Convocation 2020 and all information collection and disclosure that would usually happen at this public event.

3. Related Privacy Impact Assessments

Some preliminary assessment of StageClip has been done in the past but the PIA was not finalized.

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4. All Elements of Information or Data

Student first and last name, academic institution of study, program of study, graduating year, graduate submission (photo, video and message provided by the graduating student), student email address.

Besides student email addresses, all of this information would usually be presented in the Convocation ceremony which is open to the public and contains information that would be disclosed inside and outside of Canada without specific conditions under section 33.1(1)(a.1) (student degree information is one of the types of information considered not invasive to release under this subsection) and 33.1(1)(q) (information that is received in a public ceremony)

UNBC will require and receive a statement from StageClip that the personal email addresses of students will not be used for future marketing opportunities and that StageClip will only use the personal email addresses to provide direct service to the students under the agreement made with UNBC.

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 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.

UNBC's Convocation Office will get commitment in writing from StageClip that they will not engage in further communication with students beyond the minimum required to complete the service provider's duty to the university unless the student initiates the contact with StageClip to request further service. StageClip will agree to avoid using student personal email addresses for marketing purposes beyond the scope of the service they providing UNBC in the service agreement.

ACTIVATED
INITIATED

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

Part 7 – Program Area Signatures

<p>Zarrah Holvick</p> <hr/> <p>Name of Individual leading the Program/Project <i>(Normally the individual who completed the PIA)</i></p>	<p>Effectively Signed As Per Approval Email (COVID 19 Measure)</p> <hr/> <p>Signature</p>	<p>March 31 2020</p> <hr/> <p>Date</p>
<p>Christine Dillabaugh</p> <hr/> <p>Department Head</p>	<p>Effectively Signed As Per Approval Email (COVID 19 Measure)</p> <hr/> <p>Signature</p>	<p>March 31 2020</p> <hr/> <p>Date</p>
<p>Adam Cullum</p> <hr/> <p>Information Governance Officer (Privacy Officer)</p>	<p>Effectively Signed As Per Approval Email (COVID 19 Measure)</p> <hr/> <p>Signature</p>	<p>March 31 2020</p> <hr/> <p>Date</p>

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.

Adam Cullum

From: Zarah Holvick
Sent: Tuesday, March 31, 2020 3:42 PM
To: Adam Cullum
Subject: FW: PIA - StageClip
Attachments: 20200331 DRAFT PIA 20-005 StageClip Virtual Convocation v2.docx

Importance: High

Sorry, this is what I sent her, in case you need to track the actual document.

Zarah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: Zarah Holvick
Sent: Tuesday, March 31, 2020 3:08 PM
To: Christine Dillabaugh
Cc: UNBC Convocation
Subject: PIA - StageClip
Importance: High

Hi Christine,

This is pre-emptive I know, but just so we can get the ball rolling.

Please confirm you approve of the PIA, and your response email will constitute as a signature (i.e. considering the document signed as is).

Then Adam and I can move forward with Sandra in purchasing, once a decision is made on if we are moving to virtual ceremony or not.

Thanks,
Zarah

Zarah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

Adam Cullum

From: UNBC Convocation
Sent: Tuesday, March 31, 2020 4:03 PM
To: Adam Cullum
Subject: RE: PIA - StageClip

We are waiting for final decision and approval on virtual ceremony, correct.

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: Adam Cullum
Sent: Tuesday, March 31, 2020 3:57 PM
To: UNBC Convocation
Subject: RE: PIA - StageClip

If you have FAST web requisition access, usually you can start your own webreq, but it looks like Sandra is doing that for you. Generally you just can't finish it until it is forwarded to Contracts and Supply Chain Management for processing. This helps me because it will support how I word my message to Sandra when we are ready to proceed.

To make sure I understand correctly then, are we just waiting on final approval for online convocation from the university and then we proceed or do you have that approval?

Adam.

From: UNBC Convocation
Sent: Tuesday, March 31, 2020 3:53 PM
To: Adam Cullum <Adam.Cullum@unbc.ca>; UNBC Convocation <convocation@unbc.ca>
Subject: RE: PIA - StageClip

Here is what she provided me:

Hi Zarrah,

Thank you for your patience.

I have reviewed the agreement and have the following requests:

1. The name should be revised to correctly reflect University of Northern British Columbia, abbreviated names should not be used on an agreement;
2. S. 12, this should be revised to reflect the privacy requirements sent to them being added as an schedule to the agreement;

As the cost is over \$2500, we will require three (3) quotes or a soled source justification for StageClip.

If we decide to proceed in this manner, please provide me with the contact person and I will deal with requesting the changes noted above. **I would also ask for the privacy document provided to them.**

I assume by the last sentence she needs the PIA in order to continue with the req (and I need to provide her the single source as well).

A bit of chicken and egg no?
Zarrah

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: Adam Cullum
Sent: Tuesday, March 31, 2020 3:48 PM
To: UNBC Convocation <convocation@unbc.ca>
Subject: RE: PIA - StageClip

No problem! I didn't know if you had started one and then it just couldn't be processed completely until the PIA was attached to it. If one hasn't even been started yet, I will definitely hold off.

Adam.

From: UNBC Convocation
Sent: Tuesday, March 31, 2020 3:47 PM
To: Adam Cullum <Adam.Cullum@unbc.ca>
Subject: RE: PIA - StageClip

No, she is waiting on the PIA to do that.

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: Adam Cullum
Sent: Tuesday, March 31, 2020 3:46 PM
To: UNBC Convocation <convocation@unbc.ca>
Subject: RE: PIA - StageClip

I'll set everything up so that once you have the go ahead I can send it over to her right away. I'll wait for budgetary approval before I send the PIA over to Sandra. Do you have a web req already started?

Adam.

From: UNBC Convocation
Sent: Tuesday, March 31, 2020 3:45 PM
To: Adam Cullum <Adam.Cullum@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: RE: PIA - StageClip

Sounds good, but should we wait until the decision, or do also want to send pre-emptively?

Thanks,
Zarrah

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: Adam Cullum
Sent: Tuesday, March 31, 2020 3:44 PM
To: Zarrah Holvick <Zarrah.Holvick@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: RE: PIA - StageClip

Thanks Zarrah!

I'll generate the message to Sandra and copy you and Christine,

Adam Cullum, BA, CRA (Certified Records Analyst)
Information Governance Officer
Office of the University Secretariat
Room ADMN 2021
University of Northern British Columbia
3333 University Way
Prince George, BC V2N 4Z9
Telephone: 250 960 5139

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From: Zarrah Holvick
Sent: Tuesday, March 31, 2020 3:42 PM
To: Adam Cullum <Adam.Cullum@unbc.ca>
Subject: FW: PIA - StageClip
Importance: High

Sorry, this is what I sent her, in case you need to track the actual document.

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: Zarrah Holvick
Sent: Tuesday, March 31, 2020 3:08 PM
To: Christine Dillabaugh <Christine.Dillabaugh@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: PIA - StageClip
Importance: High

Hi Christine,

This is pre-emptive I know, but just so we can get the ball rolling.

Please confirm you approve of the PIA, and your response email will constitute as a signature (i.e. considering the document signed as is).

Then Adam and I can move forward with Sandra in purchasing, once a decision is made on if we are moving to virtual ceremony or not.

Thanks,
Zarrah

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

Adam Cullum

From: Adam Cullum
Sent: Tuesday, March 31, 2020 11:47 AM
To: Sandra Shelke
Subject: FW: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Hi Sandra,

FYI... I want to give you the heads up that there will be a social distancing version of the PIA signing process that I will have to implement for the service that Zarrah is proposing. I'll package the emails with the PIA when I send it to you so that we can consider their statements with the date/time stamp of the email as a signature in this limited case. Or if I end up with the web req in my queue, I can just put the package in there myself if you want to forward it to me when Zarrah and Christine have made a decision.

Thank you for your patience with this process. I hope you are doing well and that you are healthy and happy,

Adam Cullum, BA, CRA (Certified Records Analyst)
Information Governance Officer
Office of the University Secretariat
Room ADMN 2021
University of Northern British Columbia
3333 University Way
Prince George, BC V2N 4Z9
Telephone: 250 960 5139

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From: Zarrah Holvick
Sent: Tuesday, March 31, 2020 9:34 AM
To: UNBC Access Privacy and Records Office
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Hi Adam,

Yes of course, no problem.

Be in touch soon,
Zarrah

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: UNBC Access Privacy and Records Office
Sent: Tuesday, March 31, 2020 9:31 AM
To: Zarah Holvick
Cc: UNBC Convocation ; Christine Dillabaugh
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review
Importance: High

Hi Zarah,

Before you send it to Sandra we'll need it "signed". In this case I'll need an email with the document attached from you and Christine indicating you are "considering the document signed as is" which I will then send the last email to Sandra indicating the PIA is complete and we are ready to move forward.

Thank you for your patience with my customized approach to this PIA.

Adam Cullum, BA, CRA (Certified Records Analyst)

Information Governance Officer

Office of the University Secretariat

Room ADMN 2021

University of Northern British Columbia

3333 University Way

Prince George, BC V2N 4Z9

Telephone: 250 960 5139

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From: Zarah Holvick
Sent: Monday, March 30, 2020 4:05 PM
To: UNBC Access Privacy and Records Office <privacy@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Thanks Adam,

It looks good to me! Really appreciate your quick turn around on this.

I'll make sure to send along to Sandra when things are finalized.

Cheers,
Zarah

Zarah Holvick, BA, MA

Ceremonies and Protocol Officer

Office of University Advancement

University of Northern British Columbia

250-960-6304

www.unbc.ca/convocation

From: UNBC Access Privacy and Records Office
Sent: Monday, March 30, 2020 4:00 PM
To: Zarrah Holvick <Zarrah.Holvick@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Here is the revised version. Let me know if this works for you.

From: Zarrah Holvick
Sent: Monday, March 30, 2020 3:52 PM
To: UNBC Access Privacy and Records Office <privacy@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Perfect thanks!

Have been told we'll have answer this week (about what we're doing), then I can move ahead or not depending on what is decided.

Regards,
Zarrah

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

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www.unbc.ca/convocation

From: UNBC Access Privacy and Records Office
Sent: Monday, March 30, 2020 3:51 PM
To: Zarrah Holvick <Zarrah.Holvick@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Hi Zarrah,

It would be data collected, but I'll specify that the student provides it willingly. I'll adjust the signee info to include Christine instead.

Adam Cullum, BA, CRA (Certified Records Analyst)
Information Governance Officer
Office of the University Secretariat
Room ADMN 2021
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From: Zarrah Holvick
Sent: Monday, March 30, 2020 2:00 PM
To: UNBC Access Privacy and Records Office <privacy@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Hi Adam,

Technically Christine Dillabaugh is the Manager of the Convocation staff so you may need to change that on the PIA.

Also, the student would be asked to provide a message, photo and video. Does this fall under the data collected, or is that separate as it is provided by the student directly?

Thanks,
Zarrah

Zarrah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: UNBC Access Privacy and Records Office
Sent: Monday, March 30, 2020 10:07 AM
To: Zarrah Holvick <Zarrah.Holvick@unbc.ca>
Subject: Draft of PIA 20-005 StageClip Virtual Convocation for your review
Importance: High

Hi Zarrah,

Here is the draft copy of the PIA for the StageClip Virtual Convocation services.

Please review/edit/indicate what I have missed.

Adam Cullum, BA, CRA (Certified Records Analyst)
Information Governance Officer
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Adam Cullum

From: Zarah Holvick
Sent: Tuesday, March 31, 2020 3:41 PM
To: Adam Cullum; UNBC Access Privacy and Records Office
Cc: UNBC Convocation
Subject: FW: PIA - StageClip

Email approved

Zarah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

250-960-6304
www.unbc.ca/convocation

From: Christine Dillabaugh
Sent: Tuesday, March 31, 2020 3:37 PM
To: Zarah Holvick
Subject: RE: PIA - StageClip

I approve. Thanks!
Christine Dillabaugh

From: Zarah Holvick
Sent: Tuesday, March 31, 2020 3:08 PM
To: Christine Dillabaugh <Christine.Dillabaugh@unbc.ca>
Cc: UNBC Convocation <convocation@unbc.ca>
Subject: PIA - StageClip
Importance: High

Hi Christine,

This is pre-emptive I know, but just so we can get the ball rolling.

Please confirm you approve of the PIA, and your response email will constitute as a signature (i.e. considering the document signed as is).

Then Adam and I can move forward with Sandra in purchasing, once a decision is made on if we are moving to virtual ceremony or not.

Thanks,
Zarah

Zarah Holvick, BA, MA
Ceremonies and Protocol Officer
Office of University Advancement
University of Northern British Columbia

Adam Cullum

From: Christine Dillabaugh
Sent: Tuesday, March 31, 2020 1:18 PM
To: UNBC Access Privacy and Records Office
Subject: Re: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Hi Zarrah,
Consider the document signed.
thanks,
Christine Dillabaugh

From: UNBC Access Privacy and Records Office
Sent: March 31, 2020 9:31 AM
To: Zarrah Holvick
Cc: UNBC Convocation; Christine Dillabaugh
Subject: RE: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Hi Zarrah,
Before you send it to Sandra we'll need it "signed". In this case I'll need an email with the document attached from you and Christine indicating you are "considering the document signed as is" which I will then send the last email to Sandra indicating the PIA is complete and we are ready to move forward.

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Cheers,

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Zarrah Holvick, BA, MA

Ceremonies and Protocol Officer

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Zarrah

Zarrah Holvick, BA, MA

Ceremonies and Protocol Officer
Office of University Advancement
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www.unbc.ca/convocation

From: UNBC Access Privacy and Records Office

Sent: Monday, March 30, 2020 10:07 AM

To: Zarrah Holvick <Zarrah.Holvick@unbc.ca>

Subject: Draft of PIA 20-005 StageClip Virtual Convocation for your review

Importance: High

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Adam Cullum, BA, CRA (Certified Records Analyst)

Information Governance Officer

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