Privacy Impact Assessment

StarRez Portal X and StarRez Web

PIA#____________ *(Office of the University Secretariat to assign)*

UNIVERSITY OF NORTHERN BRITISH COLUMBIA

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

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:	UNBC Housing		
PIA Drafter:	Justin Foster		
Email:	Justin.foster@unbc.ca	Phone:	
Department Manager:	**Lisa Haslett**		
Email:	Lisa.Haslett@unbc.ca	Phone:	

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

1. **Description of the Initiative**

   This section provides the basic description of the initiative or explains how software that is being purchased will be used.

2. **Scope of this PIA**

   This section explains the exact part or phase of the initiative the PIA covers if applicable, and the individuals/departments affected by the initiative or software. If areas are purposefully out of scope indicate that here as well.

3. **Related Privacy Impact Assessments**

   This section will identify if any other PIAs have been completed or are in the processes of being conducted that are related to this PIA. The Information Governance Officer may need to complete this question.

4. All Elements of Information or Data

Using concise point form, please list the elements of information or data involved in the initiative, even if no personal information is involved. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area.

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.

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

Please provide a brief description of whether your information can be accessed from outside Canada, for example, by a service provider that is repairing a system, or if your information is being stored outside Canada, for example, in the "cloud". If your data is stored within Canada and accessible only within Canada, please indicate this. The Information Governance Officer or CIO will require proof that you have investigated and understand where active and backup records are stored.

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;	yes/no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	yes/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.	yes/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.	

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/no
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;	yes/no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes/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.	

**** 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.***

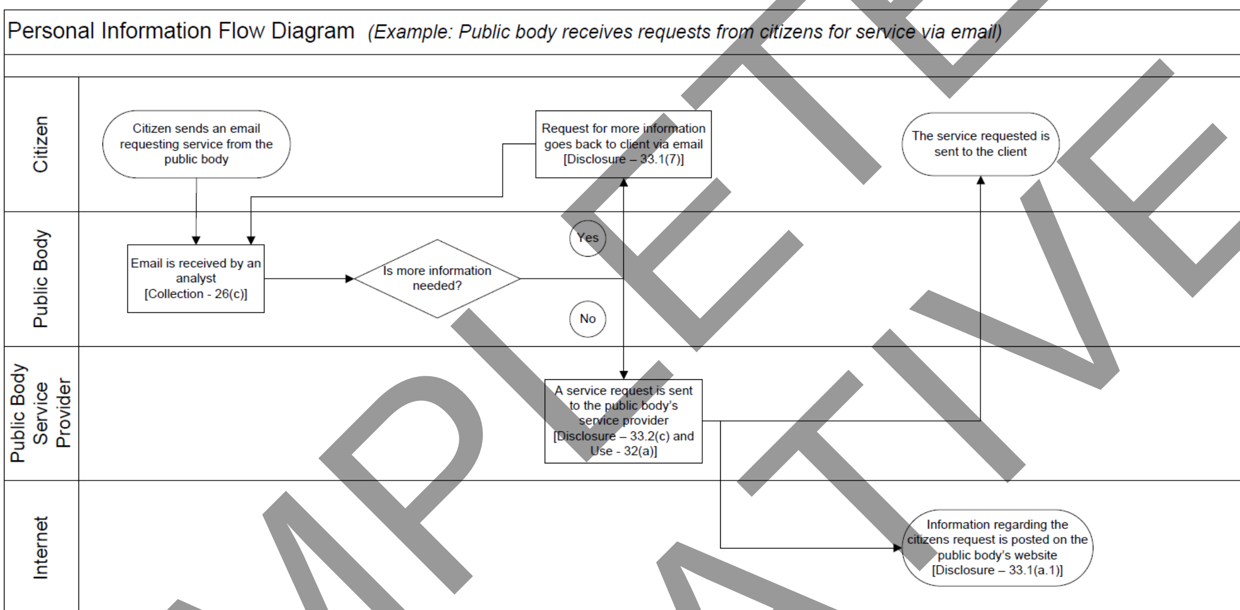
8. Personal Information Flow Diagram and/or Personal Information Flow Table

Please provide a diagram and/or table that shows how your initiative, program or IT solution will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged. ***Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.***

For ease of reference, the collection, use, and disclosure authorities in FIPPA can be found in the appendices. If you do not know what the relevant authorities are, please contact the Information Governance Officer.

Depending on the complexity of your initiative, you may choose to provide one general diagram for the initiative, and more specific diagrams for particular components. If multiple organizations will collect, use, or disclose personal information, the diagram should identify how each organization is involved in the initiative.

Example:



Remove examples and replace them with how personal information flows in your initiative under Description/Purpose. Separate each step into a new row and place these steps in chronological order of how the information is used. Add additional lines as needed until you have completely described all collection, use, disclosure, and disposition of the information. The Information Governance Officer will complete the type and FIPPA authority columns.

Personal Information Flow Table			
	Description/Purpose	**Type**	**FIPPA Authority**
1.	*Email received from client requesting service*	*Collection*	*26(c)*
2.	*Waitlist managed in the system under Portal*	*Disclosure*	*33.1(7)*
3.	*Demographic information from importer S3 for demographic reporting*	*Disclosure & Use*	*33.2(c) and 32(a)*
	Uses development to not change information		

	Add dashboards broken down by categories, personal to share vs published (which everyone can see). Share is optional and only the creator can edit. Publish is produced and cannot be edited or deleted except by the creator. Share you can create a version of for customization but it makes a duplicate and doesn't edit the original. Report Panel allows reports to appear on the dashboard. Duplicate and publish allows user to change the dashboard and keep the original dashboard for everyone else.		
	Rooms management: Divides by location, building, floor, room and room space. Assign a student to a particular location, building, floor, room and room space (considered student spaces). Not all room spaces accommodate students (i.e bathroom) (considered shared spaces).		
	In rooms module, there is a directory of all of the rooms consisting of all of the spaces. Dynamic gender suites become suite associated with the gender of the first person placed. Under occupancy details it will say who is living in the space. Work with StarCare for disposition of old information.		
	Occupancy Graph will provide filterable overall visual of all occupants associated with spaces. Entry status is the first letter, color is correlated to entry status, becomes in room and changes to I when the student is living there. In [] has gender indicator and name. Clicking on the student, shows status, term session, entry (link to entry), check in and check-out date (dates connected to term not student activity), and contract dates (billing dates). Actions button allows messaging with student, managing booking, room changes (Assign room). View button opens up the booking to show stay and billing details. Also links to change log. Edit button allows direct changes to the booking. Drag and drop to change booking for someone who hasn't checked in with confirmation screen.		
	Bulk room configuration allows you to associate the room with particular lifestyle choices of students like green community, all female suites, academic intensive, (forgot		

	fourth one). Tools - > Advanced Tools - > Portal.		
	Application → Reserved → In Room → History … Reserved → Cancelled. (Entry Statuses)		
	Entry Entry Status (If in room it is active) or a Booking Entry Status (activity is dependent on individual booking. If no in room booking, entry will show the nearest reserved booking, then the most recent history booking. If student only has a cancelled booking, then entry status will show as cancelled.		
	In campus life module, programming is reviewed in a workflow built into the module designed into proposal, review and evaluation. Can add security to workflows and workflow steps. Assign workflows to individuals. Step Movement allows you to template language, then assign it ot a manager, selected user or specific user. Managers can be set as the RAs to automate workflow to the manager.		
	Proposal → Review → Evaluation (Send it back to Proposal)		
	Program Entry will allow you to track how individual students are managed in a workflow. Each program, concern and contribution has an individual number. Each program shows types, workflow step, title, description, location, term and start/end dates.		
	*Building program date /time start, term session, program type, program sub type, title and description. With custom fields cost would be incorporated. Clicking edit further allows additional information including assigned to, workflow step, date approval, check-in options, comments, location information and comments, program cost, attendee estimates, description of event, goal of event, purpose of event, benefit of event. View on portal allows students to sign up for event from the portal. Portal options are external facing and include web description, active date, amount charge per entry, associated charge item in the database, web image location URL, web comments field. *** Anyone can post events to the portal prior to approval *** Can attachments, attendees, notes, resources, and tasks,*		

	Evaluation of event comes in after the event.		
	Tasks can be created, with description, start date, due date, complete date, type of task, status of completion, priorities, set reminder, assigned to, comments. Tasks appear as a submenu of program. Task appears on the drop down menu in the ribbon.		
	When progressing workflow, reason for progression and comment fields appear along with who to assign next step to.		
	When registering for program, you must save and continue to actually be registered for the program. Requires instructions to students. Can redirect students to another website after. Can do manual check-in for events.		
	Can generate tasks from Admin Tool for global tasking.		
	Generate reports. If this takes time it shows up in documents to be downloaded.		
	Configured fields allow control over which sections appears to student. Choose table name (field type), field name (specific field). Make it required, default value, conditional values,		
	Maintenance: Start in Admin to set up maintenance table (setup table). Generate maintenance categories and maintenance items. Can make some categories not view on portal. Maintenance tab is under Rooms module. Unique ID for every maintenance job. Locate the specific room in the room space box. Edit further = date reported, status, reported by, job sent, view on portal, occupant name, occupant consent for entry of room, location of maintenance need, priority, account code, start/end date, technician, repair description, complete. Close room space if the space is unlivable. Can make custom fields. Can charge for damages. Can add attachments administratively. Job Actions can break down maintenance job into actions. Can generate maintenance reports. On portal side: My job (room) Shared job (shared space in suite). Must click on		

	room to select it. Date reported and status cannot be edited. Student select category, and item and desecription. Options to allow student to edit their job, email on job change, read only after job completed, options to not show comments field. (To play with these). In StarRez Web, it shows who in the StarRez Portal did the maintenance request and room space in details. Occupant hyperlinks to the entry (student detail page).		
	Persons of concern: Start in Admin, concern types, reported by relationships, notes, identity information, identity known/unknown. Create steps collection, investigation, resolution as examples. In person of concern put in description, personal involved, concern type, concern subtype. Edit further: room location, location comments, report number, assigned to, comments, and resolution, reported by (name, email, phone, relationship, contact person?) Option for involvement type and comments. (no). Can add attachment, note, participants (persons), tasks.		
	Can send an email that stays contained to the participants of the concern.		
	Persons of Concern in Portal X: Concern date, room location, location comments, description, concern type, concern subtype, comments, reported by name, reported by email, reported by phone, reported by relationship, contact the person? Participants: Name, demographic, weight, height, hair colour, eye colour, age, gender. Not assigned to anyone by default. Change who it is assigned to.		
	Can put security on either whole Campus Life or under Concerns section specifically.		
	Contribution/Interaction is divided into contribution type, contribution subtype (in Admin). In contributions/interactionsn: date, report number, description, type, subtype, who is attached to. Edit further and ribbon fields (same as other student life)		
	Custom Fields: Admin → System → Custom Field Select field type: String (textbox), String Long (long textbox), Date, Date/Time, Boolean, Integer, Money. Description		

	(what to call it). Code is useless, Comments (what is the field for) Custom field order, group, section (how to organize the custom fields. Can put security on sections of custom fields only. Group are subcategories in fields. Field order is the order they appear within a field/group. Left at 0 it is alphabetical.		

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.	[redacted]			
2.				
3.				
4.				

10. Collection Notice

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.*

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.

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).**

For example: locked cabinets, securely stored laptops, or key card access to the building.

12. Please describe the technical security measures related to the initiative (if applicable).

For example: use of firewalls, document encryption, or user access profiles assigned on a need-to-know basis.

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?

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

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.

Change log accessed from the Entry menu. Then log activity breaks down impact to the student's account for each activity and who has done what. Applications are considered the most recent application and receive date is the creation of the application from the moment of term selection.

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?

If you do not yet have a schedule, please document how these records will be kept until the schedule is in place. Please describe retention schedules that apply where retention exceeds the one year requirement of FIPPA. Please contact the Information Governance Officer if you require assistance.

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.	

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.	

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.

A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual.

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.

Avoid putting personal information into the Banner section of StarRez Web.

Part 7 – Program Area Signatures

Name of Individual leading the Program/Project *(Normally the individual who completed the PIA)*	Signature	Date
Department Head	Signature	Date
Director or Dean Overseeing the Program/Project	Signature	Date
Contact Responsible for Systems Maintenance and/or Security *(if applicable)*	Signature	Date
Information Governance Officer (Privacy Officer)	Signature	Date
Head of Public Body or Designate	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.