

Privacy Impact Assessment

TeamSynced

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

PIA# 17-005 (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 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:	Athletics		
PIA Drafter:	Todd Jordan		
Email:	Todd.Jordan@unbc.ca	Phone:	250 960 5882
Department Manager:	Loralyn Murdoch (Director Athletics/Recreation)		
Email:	Loralyn.Murdoch@unbc.ca	Phone:	250 960 6368

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

1. Description of the Initiative

TeamSynced is an application to simplify team scheduling and communication. Features of the application include:

- *individual and group messaging between team members and coaching staff*
- *file sharing from coach to players and coaches allowing scouting reports on opponents, workout programs, and other complete documents*

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- Access to a shared calendar showing course times, practice times, work out times, scheduled study times to allow the team to coordinate schedules.
- Self-check-ins. The athletes will have the choice of checking in for various events on their phone including workouts, class, and study time. The application will verify the athlete's location by GPS if the GPS on the phone is turned on.

2. Scope of this PIA

Currently the Initiative covers the use of TeamSynced by men's basketball team players, coaches, and Athletics department staff. In the future TeamSynced could be used to manage other Timberwolves teams.

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

- Name and affiliation with UNBC
- Personal schedule information
- Profile photos users have the option to upload to the application
- Phone number
- Email address
- Location information upon GPS check-ins (Only if initiated by the user)
- Team files and documents
- In app messages between team members
- Program has the ability to store birthdates, student numbers, and addresses but we will not be submitting this information to the system.

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

TeamSynced is hosted in the cloud with AWS (Amazon Web Services) across several availability zones in the US-East region which is in the United States. Informed consent will be received by each athlete before the service can be used. Location tracking services through GPS will require an informed opt-in. Students cannot be required to use this particular feature because of the invasive privacy practices currently practiced in the United States.

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.	

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
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

*** 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

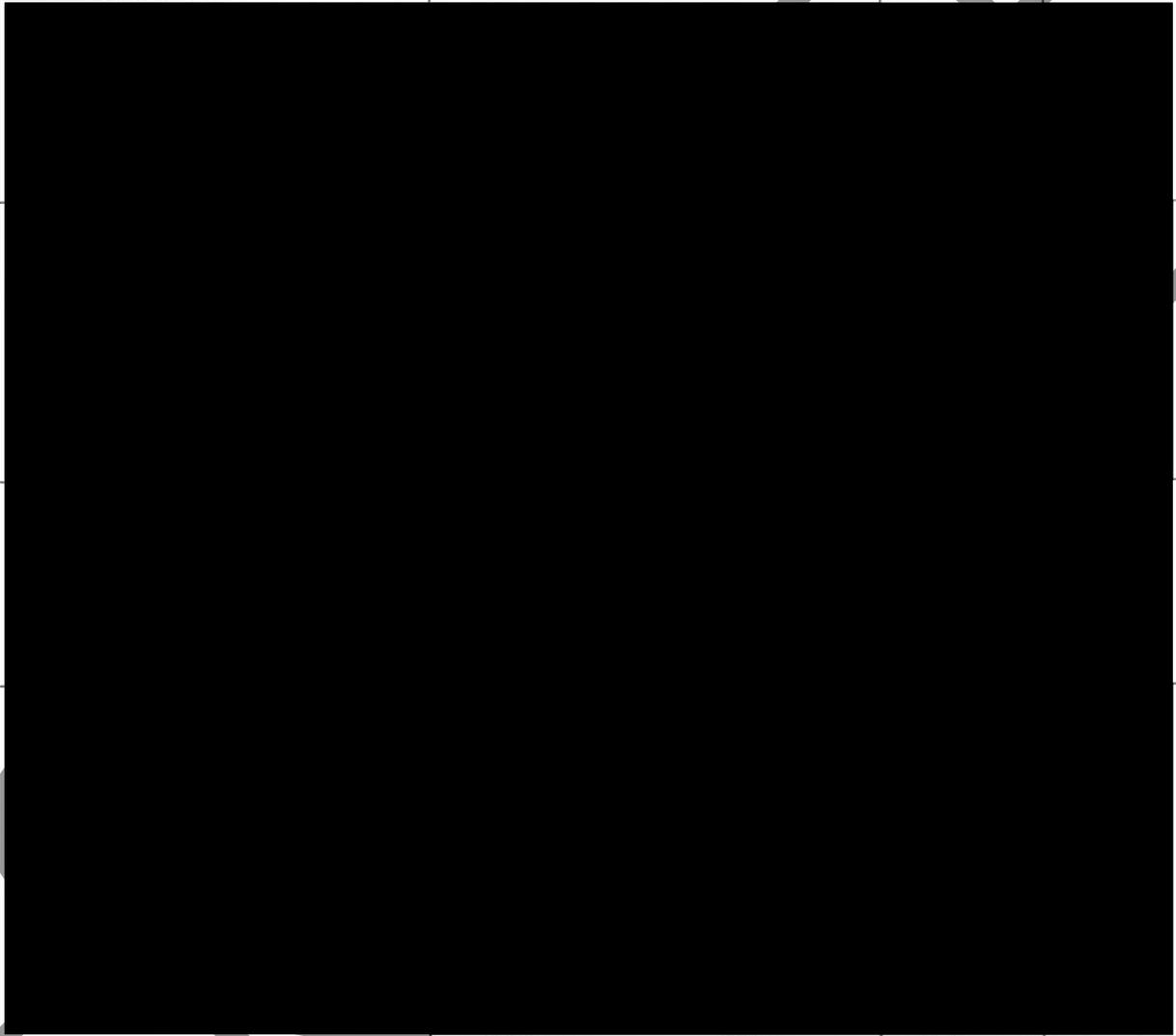
Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	The Head Coach enters the UNBC players and coaches names, emails and cell phone number into the TeamSynced hosted service by coach in order for the application to invite users to join the group within the app.	Collection	26(d)
2.	Users (UNBC players and coaches) enter their own schedule	Collection	26(d)

	<i>information into the application and create new user generated passwords to access the TeamSynced hosted service once they receive the invite.</i>		
3.	<i>Users may decide to check into events which geo-locates the user through the use of their phone's GPS. This information is posted into the check-ins section of the hosted service</i>	Collection	26(d)
4.	<i>Administrators including coaches and appropriate UNBC Athletics Staff can access player scheduling and check in information.</i>	Disclosure	33.1(b)
5.	<i>The head coach uses this information in part to schedule the practice and training times for athletes.</i>	Use	32(b)
6.	<i>The UNBC Athletics staff will use this information to determine who is available for various events such as community service initiatives and media interviews.</i>	Use	32(b)
7.	<i>All users can send and receive messages from within the hosted service to others associated with their team.</i>	Collection/Disclosure	26(d), 33.1(b)
8.	<i>The head coach can inform athletes of the changes in practice and training times</i>	Use	32(b)
9.	<i>The head coach will dispose of the information collected on TeamSynced around April 15th of the year the current season the service applies to. If information is taken from TeamSynced to make a decision about an individual student-athlete, the information will be kept on UNBC servers for a year after it is extracted from TeamSynced.</i>	Disposition	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.				
3.				
4.				

10. Collection Notice

University of Northern British Columbia
Athletics and Recreation Department
Informed Consent Form for the Management of Personal Information
Regarding the Use of TeamSynced Scheduling and Message Service

I hereby consent to allowing TeamSynced to collect and store my personal information on their hosted service for the purpose of UNBC Athletics staff communicating with me, and conveniently scheduling practice and training sessions around my schedule.

The University of Northern British Columbia collects, transmits and stores information on the TeamSynced hosted service as under section 26(d) of the Freedom of Information and Protection of Privacy Act ("the Act") for the prescribed purpose of providing a convenience tool for student athletes and coaches to interact easily with each other increasing the efficiency of scheduling practice and training sessions and communicating urgent updates to student athletes.

I will be responsible for the management of my personal information in TeamSynced because the service provides me the option of making updates and changes. If I am unable to make updates as I need to, I will contact the Head coach and request updates be made on the hosted service. For any information about me that I am not able to control or manage, the end date that my information regarding the current season will be stored on TeamSynced will be April 15th of the year following my signing of this notice. The Head Coach will ensure that my personal information is removed from TeamSynced.

I also have been informed and understand that TeamSynced stores my information on Amazon Web Servers that operate in the United States of America. I understand that my consent is required under section 30.1(a) of the Act in order to use this service because by using this service I am willingly allowing my personal information to be collected, transferred and stored in the United States.

I understand that logging in with a web browser is an option rather than using my personal phone to log in. If I download the app for this device on my personal phone or tablet, I understand that I am responsible for removing the app from my phone when I no longer want to use it. I am responsible for the permissions that I give the app and the impact that has on my privacy.

I understand that by refusing to sign this waiver, I will not be able to use TeamSynced for the purpose of communicating with my Timberwolves team and for scheduling training and practice sessions. I will be responsible for communicating my schedule to my coach by an alternative means.

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Please sign below indicating that you are providing informed consent for UNBC Athletics to use this service to communicate with you and to manage your schedule.

Full Name: _____
(Please Print)

Student Number: _____

Signature: _____

University of Northern British Columbia
Athletics and Recreation Department
Informed Consent Form for the Use of Check-In Portion of TeamSynced Service

I hereby understand that I have the option to use the Check-in feature within TeamSynced to geo-locate and time stamp when I have arrived at particular locations. I am not required to use this service and I need to consent to using this feature before I make my first check-in. Under Executive Order: Enhancing Public Safety in the Interior of the United States, the United States of America have stripped privacy rights of non-Americans. By using the check-in feature within TeamSynced to geo-locate and time stamp your personal activities, your personal habits may be collected and used by American government officials. If this information is indirectly collected by the American government, they may be able to use it to track your personal habits and activities.

By signing below you agree to allow UNBC Athletics and TeamSynced to collect, store and access information that geo-locates you at a given time understanding the conditions above. You must inform Athletics in writing if after you sign this agreement you revoke your consent for this option.

Full Name: _____
(Please Print)

Student Number: _____

Signature: _____

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?**

Users have access to update their own information.

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

Yes. The head coach uses the information as well as other information (gym availability, etc) to propose schedule practice and training times. Student-athletes will have the option to use the check-in system as an accountability tool to ensure they are fulfilling their commitments regarding the expectations of student-athletes and receiving scholarships. Other check-in alternatives will be available for those athletes that do not choose to use this check-in system.

- 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.**

Team meetings will be scheduled during course scheduling periods in which student-athletes will enter their schedules into the application and coaches will be checking to verify the information has been correctly entered. Individual meetings are held regularly with student-athletes. Any irregularities or missing schedule information noticed within the application will be discussed with the student-athlete.

The Head Coach will be regularly monitoring check-in results for those students that opt-in to use this feature. The Head Coach will follow up with student-athletes to confirm whether missed check-ins are due to the athlete missing the event or forgetting to check-in.

- 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?**

All scheduling and check-in information is stored and kept accessible to the Head Coach within in the system unless the student-athlete deletes their own information or cancels their account. The Head Coach will check Athletes profiles will be deleted from the application once they leave the team. Any information taken from TeamSynced to make a decision will be kept for a year.

Part 5 - Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

No

<p><i>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.</i></p>	<p>N/A</p>
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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No

<p><i>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.</i></p>	<p>N/A</p>
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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.

Yes a PIB will result in the process of using this service. This PIB will be managed through TeamSynced hosted service. The Head Coach will be able to access player personal information by name.

Please ensure Parts 6 and 7 are attached to your submitted PIA.

Part 6 – Comments, Conditions & Concerns

Due to the waiver of privacy rights on non-American citizens in section 14 of the US Executive Order: Enhancing Public Safety in the Interior of the United States, UNBC cannot require any individual to use a service such as the check-in portion of TeamSynced creating information that tracks individuals and transmits the data to the United States. Students will have the opportunity to opt-in to this portion of the service separately but cannot be pressured to use the service. This element of the service cannot be used to make a decision about whether the student is able to participate in Athletics activities.

Students will be able to revoke their consent of using the check-in feature at any time by making the request in writing and referencing the form. This does not mean the student needs to produce a copy of their signed consent to revoke this consent.

To use any part of the service, the Athletics department will be required to provide the students the opportunity to review the conditions of the collection notice, ask questions, and respond with informed consent before any personal information about the students is entered.

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Part 7 – Program Area Signatures

Todd Jordan		July 10, 2017
Name of Individual leading the Program/Project <i>(Normally the individual who completed the PIA)</i>	Signature	Date
Loralyn Murdoch		July 11/17
Director or Dean Overseeing the Program/Project	Signature	Date
Adam Cullum		July 13/17
Information Governance Officer (Privacy Officer)	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.

COMPLETED
INITIATIVE