

Privacy Impact Assessment

[Campus One Card System]

PIA#15-001 (Privacy Office to assign)

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the Privacy Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FOIPPA generally, please contact Shelley McKenzie (Manager of Access, Privacy and Records) at shelley.mckenzie@unbc.ca or (250) 960-6310 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 their privacy office(r) 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:	Ancillary Services		
PIA Drafter:	Lori Beaulieu, Project Manager, Ancillary Services		
Email:	Lori.beaulieu@unbc.ca	Phone:	960-5278
Program Manager:	Aaron Leblanc, Director Ancillary Services		
Email:	Aaron.leblanc@unbc.ca	Phone:	960-6431

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

1. Description of the Initiative

The University is undertaking to provide automated identification services of a 'smart card' that can be used for all monetary and non-monetary transactions and activities associated with day-to-day life on campus. The primary focus of this initiative is convenience and enhanced user experience.

The One Card system will be capable of supporting a variety of applications including but not limited to: declining balance applications such as laundry, photocopying, printing, meal plans/food service, vending, and third party point of sale systems (i.e., bookstore and print shop); integration/coexistence with building access control systems. This system will be used for identity verification applications, as well as declining balance transactions.

2. Scope of this PIA

This PIA covers the full extent of the Campus One Card project, which is expected to be rolled out in phases over two or three years. **Phase One** of the project will include: Identification, Foodservices, Access

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(Residence 1, Northern Sports Centre), Library, Bookstore, Printing and Laundry. **Phase Two** will include Parking, second residence, and access to other campus buildings, off campus partners. **Phase Three** will include Self-Serve Kiosks, Identification at remote campuses and Bus Access.

SMc: Scope of the PIA for Fall 2015 will likely be different than what's stated here. However, the PIA will address all phases – whether currently planned for or in future development.

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

For all student/staff activities, the OneCARD database will only be referencing the existing data which is stored in Banner, not collecting any new information. The Campus One Card system will be able to see student/staff name, student/staff ID number only (in terms of personal information), meal plan status, any transactional details related to their purchases and any other card uses such as accessing the Northern Sports Center or other UNBC systems. For Guest cards issued for conference attendees, the Campus One Card will not be collecting any new information that was not collected during the registration process that is currently accepted practice nor will there be any financial transactions (money deposited) to that card. The information collected by Conference & Event Services may or may not be used to print cards that will allow the guest access to the cafeteria (for example), which will have been included in the registration fee.

The One Card database simply verifies/credentials against existing UNBC systems (such as AFX or ellucian Banner). Data fields may include: name, address, phone, email, DOB, expiration dates, Student vs. Staff, Gender, Vehicle info, housing room allocation and more.

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 your privacy office(r). They will guide you through the completion of your 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

The system will be housed on a UNBC server exclusively, not on an external cloud. UNBC employees will be the day-to-day users of the system.

However, the Vendor will be able to access the system on line for activities such as diagnostics and software upgrades on a request by request basis. However, Vendor data security obligations will be consistent with our service agreement which will state that they cannot download or store any data from our server. *Documentation of that agreement will be provided when the final contract is signed.* UNBC ITS will be granting exclusive limited-time access to Vendor employees who may need access (see below). Should the vendor need to provide support to UNBC at any time, access to the OneCard system will be granted temporarily, only for the purpose of technical support or upgrades. This will comply with S. 33(1)(p) of the Act.

6. Data-linking Initiative*

<p>In FOIPPA, "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.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	<u>yes/no</u>
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	<u>yes/no</u>
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.	<u>yes/no</u>
<p>If you have answered "yes" to all three questions, please contact the Privacy Officer to discuss the requirements of a data-linking initiative.</p>	



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7. Common or Integrated Program or Activity*

<p>In FOIPPA, “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/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 same public body
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes/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>	

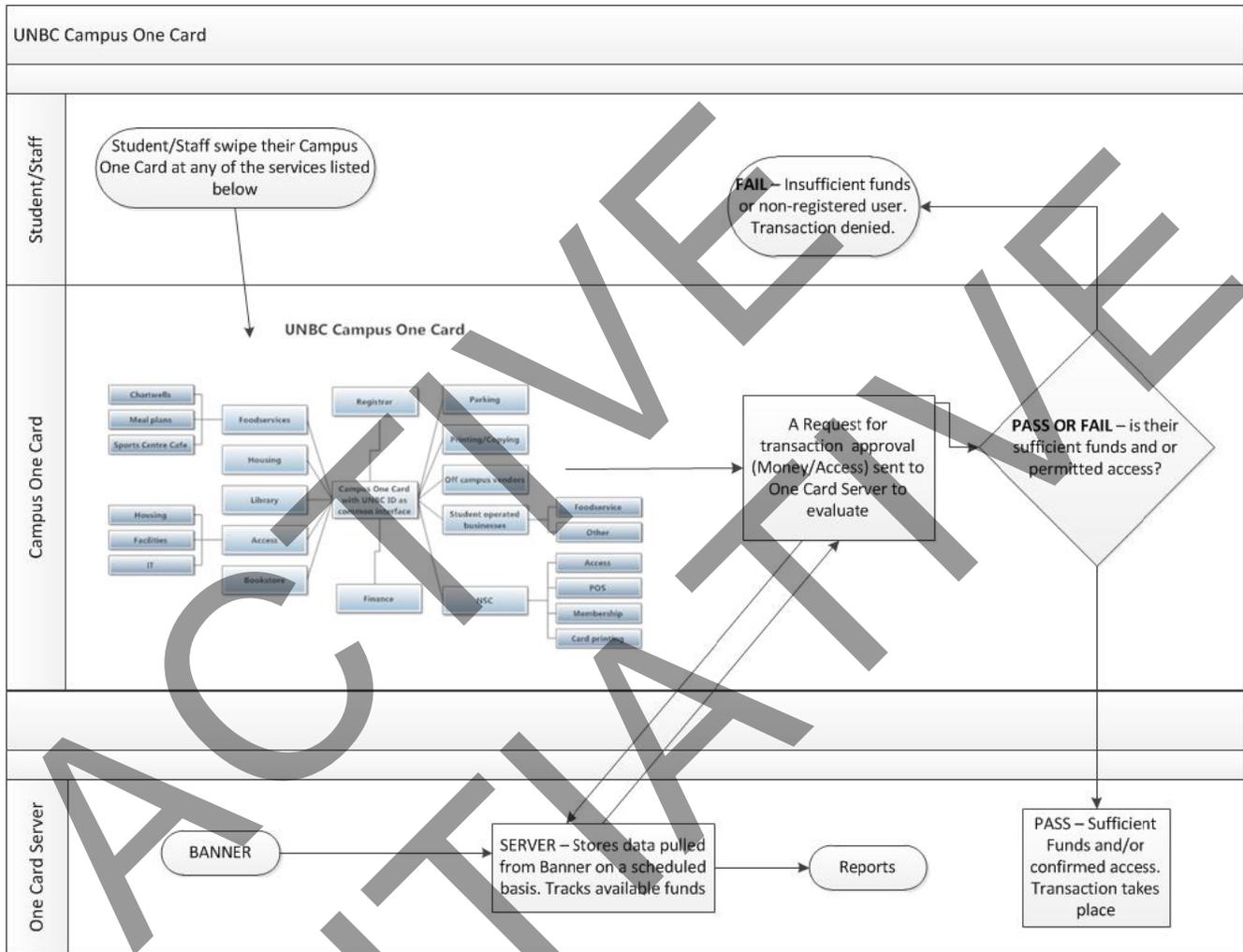
** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC) as well. Contact the Privacy Officer to determine 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

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Examples can be removed and additional lines added as needed.

CAMPUS ONE CARD - Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Transactional request from Card Holder (e.g. Door access, declining balance transactions etc) – sent to Campus One Card Server	Verification	
2.	Transaction evaluated Transaction is either Pass/Fail	Verification	
3.	Reports generated to track card activity	Reporting	

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	[Redacted Content]			
2.				
3.				

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10. Collection Notice

As the One Card system simply uses (verifies against) existing UNBC systems, no specific collection or consent notice will be required. Any existing notice/language at the first point of contact with the University will cover the use of their personal information that includes various One Card services or purposes.

For any 'generic' guest cards that are disseminated via the self-serve kiosks they would be loaded with a predetermined monetary value with no personal information collected, and may be used in instances such as printing or cafeteria/bookstore purchases.

For any 'guest cards' issued for event attendance, the personal information collected at the registration site would be limited to first and last name and is stored within the CES/NSC system in the manner it was collected. It would not be stored in the OneCARD database beyond the period of the event.

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Ancillary Services will develop a posted notice at the point of ID card creation & pickup that informs users/individuals accordingly. Sample notice is provided below:

COLLECTION, PRIVACY AND INFORMATION RELEASE STATEMENT

Individuals receiving a UNBC Identification Card are advised that information is collected by The University of Northern British Columbia under Section 26 of the British Columbia *Freedom of Information and Protection of Privacy Act* and will be used in strict confidence for a variety of purposes including provision of services (at UNBC and with current or future partners or systems), communication, planning, statistical analysis and other internal administrative uses.

The use of information provided on this form complies with the BC *Freedom of Information and Protection of Privacy Act*, and with the policies and procedures of the University of Northern British Columbia. All individuals are advised that the information they provide will be protected and used in compliance with the BC *Freedom of Information and Protection of Privacy Act* (RSBC 1996).

Your personal information will be stored on a secure server located in Canada and accessed by UNBC employees on a need-to-know or role-based access basis in order to perform their duties as a public body employee. **SMC: Exclusive contractors providing goods or services to UNBC may also be authorized to access this information in order to perform their duties.**

Should you have any questions about the collection, use or disclosure of this personal information, please contact UNBC's Manager of Access, Privacy & Records or visit: <http://www.unbc.ca/foippa>.

Manager of Access, Privacy & Records
University of Northern British Columbia
3333 University Way
Prince George, BC V2N 4Z9 CANADA
records@unbc.ca
(250) 960-6310



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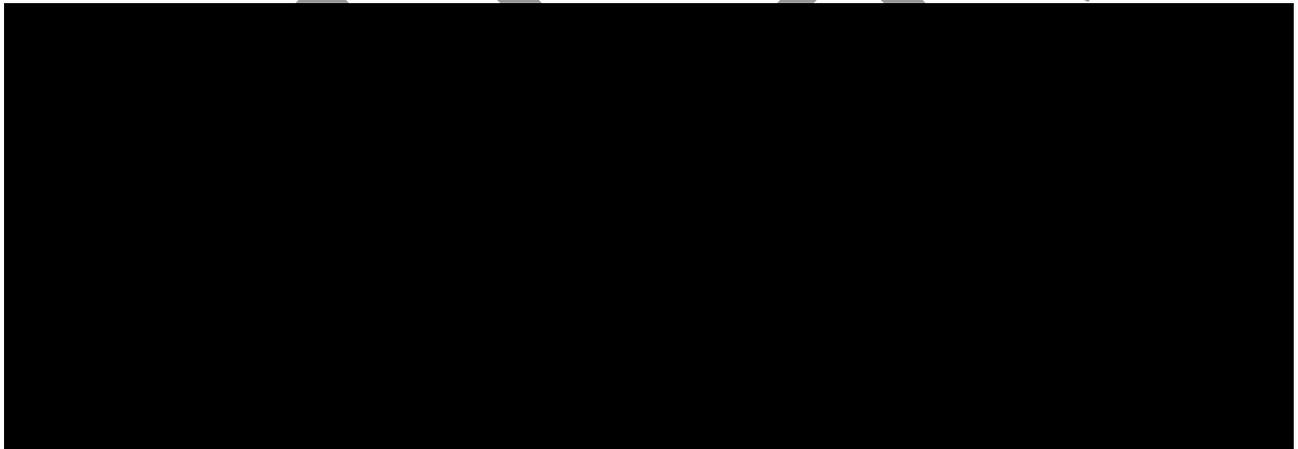
Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with the UNBC Manager of Access, Privacy and Records, the Chief Information Officer or the IT Security Officer when filling out this section.

11. Please describe the physical security measures related to the initiative (if applicable).



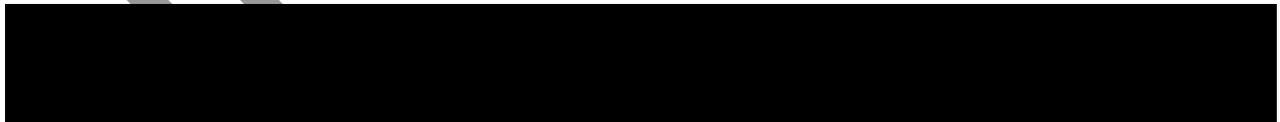
12. Please describe the technical security measures related to the initiative (if applicable).



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.



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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?**

Banner will send an initial file to populate the One Card system. Thereafter, using a regularly scheduled data pull, the One Card will amend any files for which the data in Banner has been amended. The limited personal data (student name and ID number) will not be disclosed to others. The same process will be used for existing or future UNBC systems that One Card will verify against (e.g. AFX, RecTrac, EMS, etc.).

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

Yes – access to facilities, financial transactions and refunds, print job release, etc...

- 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.**

The personal information is as accurate and complete as when it is captured in Banner by finance/administration/registrar staff, by the Conference and Events Services staff or other employees/users of existing and future UNBC systems that One Card may verify against. This generally includes a list of variables that are pre-identified and require completion prior to the entry being completed. Individuals using One Card can contact the responsible department to update or change their personal information/data or report errors and request changes. Some systems will provide individual users with the ability to change their own data (e.g. Banner Self-Service).

- 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?**

It depends. Certain UNBC departments/systems have specific records retention & disposition schedules. Others are in the process of being drafted by the UNBC Records Management Coordinator.

One Card data (general/anonymous/no identifiers) will be retained indefinitely to allow for reporting, troubleshooting, planning and statistical purposes by various UNBC departments.

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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 Privacy Officer.

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No. *no personally identifiable information will be accessed for this purpose.* There will be a variety of standard business analysis and reporting completed by the Ancillary division but it will be done as snapshots of activity (how many people had lunch, transactional details related to their purchases etc) but it will be compiled based on ID Card number, not based on personally identifiable information

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Manager of Access, Privacy & Records, 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 FOIPPA. Under this same section, this information is required to be published in a public directory.

No, using existing UNBC PIBs (systems that house personal information already or will in the future).

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

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Part 6 – Privacy Officer Comments

This PIA is based on a review of the material provided to the Manager of Access, Privacy and Records 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.

Related to Part 2 number 5, the Access, Privacy & Records Office will receive confirmation from the Vendor (via contract or other service agreement) that their access into the UNBC server will be temporary in nature and only for the purposes related to upgrades or troubleshooting.

As the actual cards produced will be used for official UNBC/government identity purposes, cards will be pre-printed with a corresponding expiry date, not to extend beyond 5 years. *The majority of cards will have an expiry of 5 years from the date of issuance. Certain contractors, affiliates and guest expiry dates will be more specific to match the length of their affiliation with UNBC.*

One Card phases will be adjusted over the course of the next 2 years. For Fall 2015, only the Tap & Go Print function of the One Card system will be active. As of September 1, 2015 any new or replacement official ID cards will be issued using this new One Card system.

NOTE: UNBC consent language should be updated in each area (e.g. point of UNBC employee new hire, new applicants, guest bookings, contracts etc..) to reference an ID or One Card system and that their personal information provided will be used to authorize against this system. In the interim, UNBC will post the Collection, Privacy and Information Release Statement at the point of One Card creation/pick-up along with the One Card website and other yet-to-be-determined locations.

SMc - June 25, 2015

Additional notations added in RED font reflect access and use of personal information by exclusive UNBC authorized contractors. In addition, the scope of the project phases will vary and may not be as originally indicated in section 2 of this PIA.

SMc – June 30, 2015



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Part 7 - Program Area Signatures

See next pages for Final Signatures

Lori Beaulieu, Project Manager, Ancillary	Signature	Date
Sarah Elliot, Manager Security & Risk Management <i>on Behalf of</i> Aaron LeBlanc, Director Ancillary & Project Sponsor	Signature	Date
Kevin Stewart Application Services Manager, Information Technology	Signature	Date
Shelley McKenzie, Manager of Access, Privacy & Records	Signature	Date

Please send a copy of this PIA with the respective signatures to the Manager of Access, Privacy & Records for approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Access, Privacy & Records Office.

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

Part 7 - Program Area Signatures

Lori Beaulieu,
Project Manager, Ancillary

Signature

Date

June 25/15

Sarah Elliot, Manager Security &
Risk Management on Behalf of
Aaron LeBlanc, Director Ancillary &
Project Sponsor

Signature

Date

Kevin Stewart
Application Services Manager,
Information Technology

Signature

Date

June 26/15

Shelley McKenzie, Manager of
Access, Privacy & Records

Signature

Date

Please send a copy of this PIA with the respective signatures to the Manager of Access, Privacy & Records for approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Access, Privacy & Records Office.

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

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Part 7 - Program Area Signatures

See Attached for Part 1 of signatures

<i>See attached</i> Lori Beaulieu, Project Manager, Ancillary	Signature 	Date 30 June 2015
Sarah Elliot, Manager Security & Risk Management on Behalf of Aaron LeBlanc, Director Ancillary & Project Sponsor	Signature 	Date
<i>See attached</i> Kevin Stewart Application Services Manager, Information Technology	Signature 	Date
Shelley McKenzie, Manager of Access, Privacy & Records	Signature 	Date 30 June 2015

Please send a copy of this PIA with the respective signatures to the Manager of Access, Privacy & Records for approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Access, Privacy & Records Office.