

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

Solution]

PIA#14-006 (Privacy Office to complete)

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 (Privacy Officer) 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:	Office of the Registrar – Convocation Office		
PIA Drafter:	Zarrah Holvick		
Email:	Zarrah.holvick@unbc.ca	Phone:	250-960-6304
Program Manager:	Troy Hanschen		
Email:	troy.hanschen@unbc.ca	Phone:	250-960-6301

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

1. Description of the Initiative

In order to keep the university competitive, and continue to offer 'green' initiatives which fit within the mission of the institution, an E-ticketing system is to be put in place for the upcoming Installation and Convocation. This project will assist in creating an effective administrative process for RSVPs, allowing for more efficient processes and reporting, and provide better customer service to graduands and guests.

The Convocation Office will be the major administrative stakeholders in this project, and will utilize ITS expertise in order to develop a system, in conjunction with University Tickets, to validate/authenticate graduating students' registration, which may include integration with Banner or regular automated reports.

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2. Scope of this PIA

This PIA covers the all three phases, which will fit within an eight week period of initialization, development, and completion. Phase one is the initial consultation, research, and decision making on requirements. Phase two is the development of the product using ITS and University Tickets resources. The final phase is the roll out of the product, and additional staff training.

3. Related Privacy Impact Assessments

There are no additional PIAs related to this project.

4. All Elements of Information or Data

The elements of information that will be involved in this project are: name (first and last), student ID (if applicable), email, event(s) attending, and ticket allocation. The groups that will be using this service will be graduating students, internal guests, external guests, and administrators of the software.

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

All the information gathered from the online registration process will be stored on the Amazon web service Cloud. University Tickets is a company based in the United States, and therefore, the storage of person data, and access to that data, is outside Canada.

UNBC servers can be accessed through the local Banner system. Ellucian support of the Banner system may be required, and therefore, there is potential for outside access to the system (and thus the information).

Payments will not be utilized for this project, but the potential is available of integrating with Moneris as the vendor. Moneris is a Canadian company with Canadian servers and are PCI-compliant.

6. Data-linking Initiative*

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.

1. Personal information from one database is linked or combined with personal information from another database;	YES
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 Privacy Officer to discuss the requirements of a data-linking initiative.	n/a

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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
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.	N/A
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

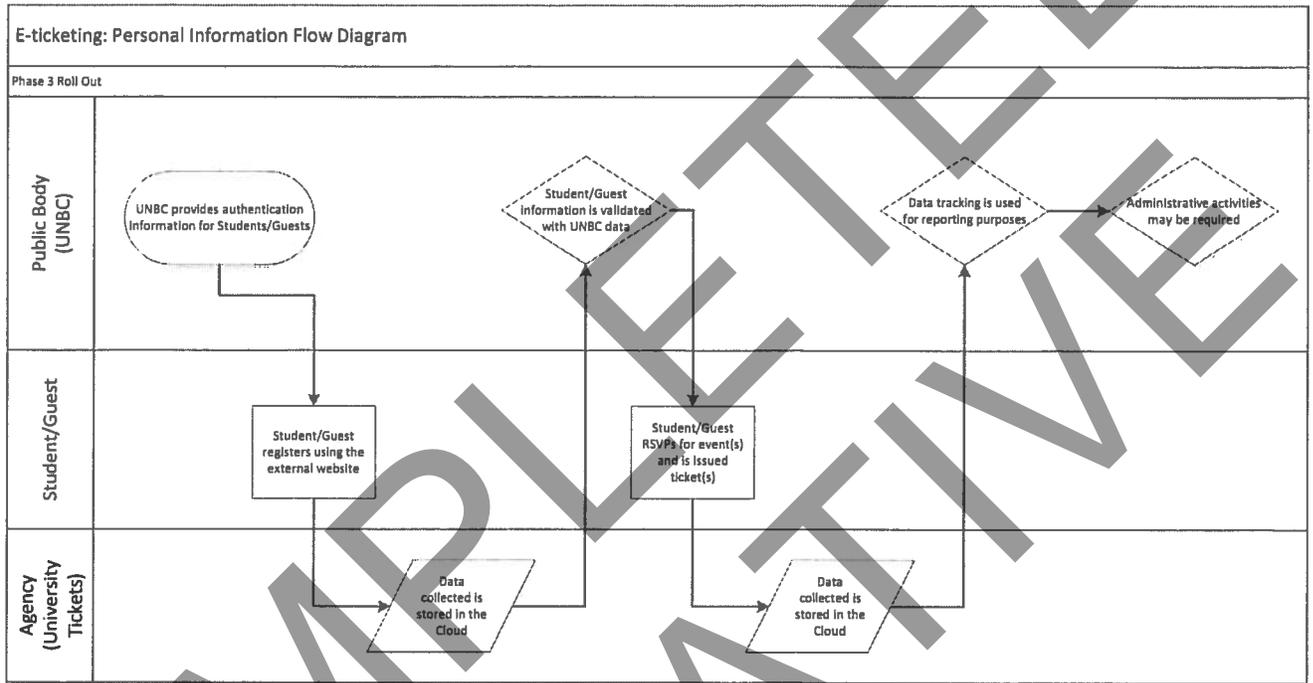
*** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC) as well. Contact the Privacy Officer to determine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

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



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	UNBC provides authentication data to University Tickets	Disclosure	22(4)(i)(ii), 33.1(a.1), (b), (e.1)(i)
2.	Personal information is collected to verify eligibility	Collection	26(c), (d), (e); 27(1)(a)(i), (b), (c)(i)
3.	University Tickets stores the data	Disclosure & Use	As above
4.	University Tickets validates eligibility	Use	As above
5.	Student/Guest granted access to RSVP	Collection	As above
6.	University Tickets stores the data	Disclosure &	As above

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		Use	
7.	UNBC utilized data storage to pull reports	Use	As above
8.	UNBC Access Admin. modify RSVP data, if required	Disclosure & Use	As above

9. Risk Mitigation Table

Risk Mitigation Table			
Risk	Mitigation Strategy	Likelihood	Impact
1.			
2.			
3.			
4.			

10. Collection Notice

The following is the proposed wording for each category of collection:

- University Tickets is a third party provider of e-ticketing services, under contract by the University of Northern British Columbia. Collection of personal information will be stored on a U.S. based Cloud server. University Tickets shall not use or disclose personal information except as required by law, to comply with services under the agreement with the University of Northern British Columbia, or as otherwise authorized by the customer. If you do not wish your personal information to be stored outside Canada, please contact the Convocation Office to arrange an

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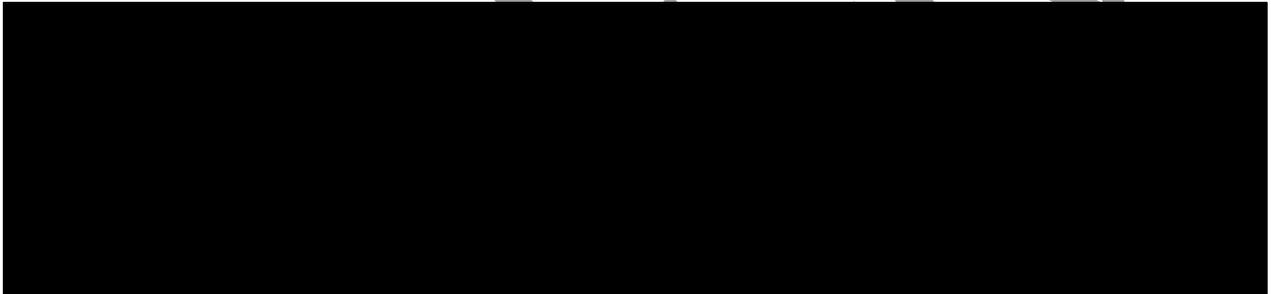
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- alternative method of acquiring tickets and/or RSVP for event(s). Convocation Office; University of Northern British Columbia; 3333 University Way Prince George BC, V2N 4Z9; 250-960-6304 or (fax) 250-960-5281; convocation@unbc.ca
2. The University of Northern British Columbia will use the information provided in your registration for tracking and reporting purposes. All such activities comply with the BC *Freedom of Information and Protection of Privacy Act*, and with the policies and procedures of the university.

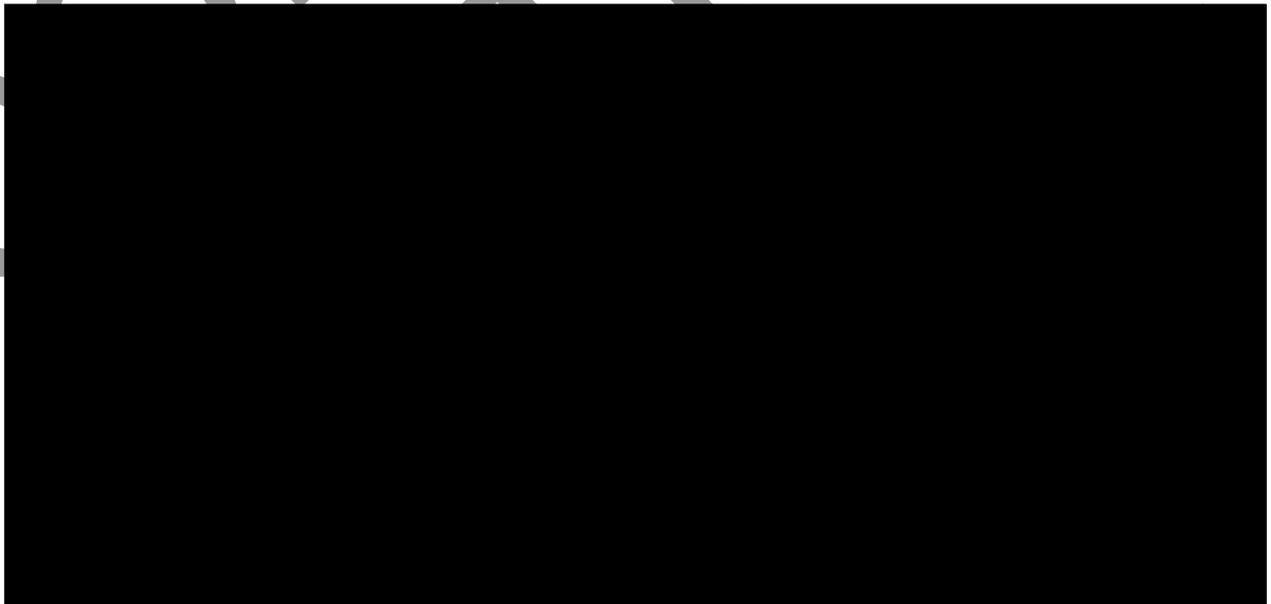
Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with the Privacy Officer, CIO or IT Security Officer when filling out this section.

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

A large black rectangular redaction box covering the response to question 11.

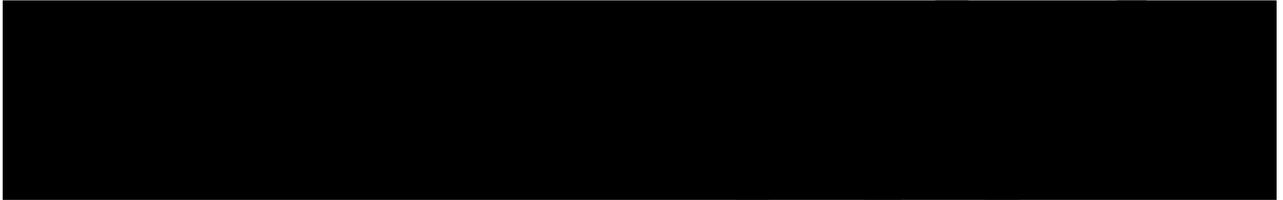
12. Please describe the technical security measures related to the initiative (if applicable).

A large black rectangular redaction box covering the response to question 12.

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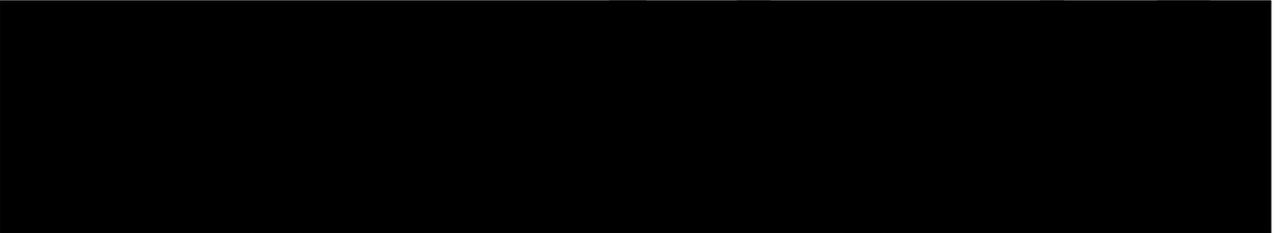
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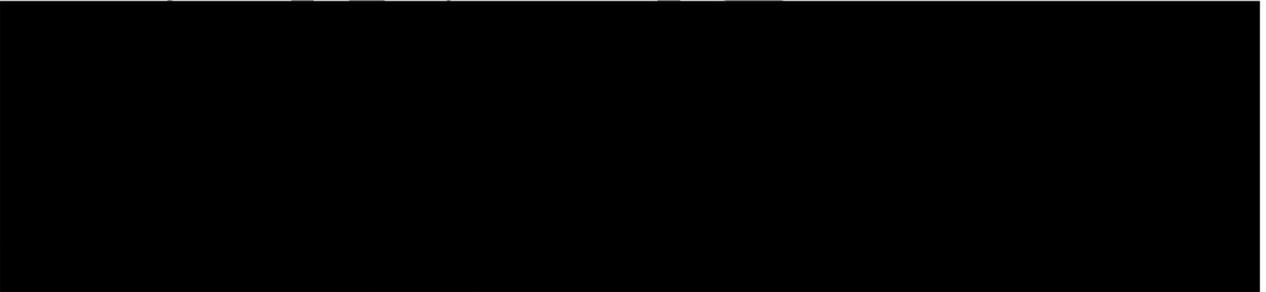
13. Does your department rely on any security policies? If so, indicate here:



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.



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?

Students have access to update their own information on University Tickets, and with the Convocation Office. Accuracy of data will be based on the current student record, or current contact information for guests, and any information that is collected at time of registration.

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Confidential lists of student status are required for the verification process, but all effort will be taken to only include pertinent information. Students/guests will be notified of the process of personal information collection, and asked for consent prior to continuing with registration process.

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

Students will not be able to register for tickets unless they are eligible to graduate, so the use of student status will directly affect their ability to utilize the service provided.

Guests' information will inform which events they are invited to, which events they are allowed to register for, and ultimately affect the events they are able to attend.

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.

Students/guests will log into the University Ticket website based on eligibility lists provided by the Convocation Office. These lists will need to be sent on a regular basis to keep the data up to date.

A confirmation email will be sent to the registrant, with the ticket (if applicable). The ticket will indicate the event and event information. It will be the responsibility of the student/guest to make sure that the information they provided is accurate.

The University will make every reasonable effort to ensure that the personal information it uses is accurate and complete. Upon request by an individual to whom information relates, the University will correct or annotate the information with a correction when documentary evidence, satisfactory to the University, is provided to substantiate the correction.

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?

Currently, the University retains, for a minimum of 13 months, an individual's personal information which directly relates to the Convocation attendance, such as the Convocation and Parchment Information forms. Guest information (i.e. invitees who are not students), and University Ticket reports will be kept indefinitely, in order to assist in planning future events which may not occur in several years, such as Installation of President.

Part 5 – Further Information

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

Office of the Registrar has a regular exchange of personal information from students (both collection and disclosure) to provide services to students. These are internal administrative processes which related to graduation, such as lists generated of graduating students.

The University Tickets' registration page will need to include information on their privacy policy, as the company is outside Canada, and similarly will have to include a consent or opt out option. UNBC's policies will also need to be communicated in this platform, as well as in communications to students and guests, such as invitations, Convocation brochures and newsletters, and other front line communications.

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.

Privacy Protection Schedule to be signed by contractor

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

Access to personal information for research, statistical, archival or historical purposes will be allowed under conditions specified in Sections 35 and 36 of the FOIPPA Act. These include the written agreement of the researcher to comply with all relevant sections of the Act and with the University's policies and procedures relating to the protection of personal information.

Except from Collection Notification:

In addition to internal administrative uses, student information may also be used in strict confidence in University research and planning. Certain student information is provided on a confidential basis to Partner Institutions, to Statistics Canada as governed by the Canada Statistics Act, and the BC Government.

Guests, who are not students, do not fall under this section, and therefore, their information will not be utilized for academic research or statistical purposes related to any publications or usage outside the university. However, reports and information which include guest information may be utilized by the Convocation Office to plan future events, such as tracking VIP attendance to confirm or remove invitations to the same event next year.

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Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Privacy Officer, the UNBC Research Office or UNBC Archives.

n/a

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.

The University Tickets server will house information as a form of "PIB". Besides student ID (if applicable) and email, the information provided to the company, which is related to validation of registrants, is information that can be found publically in the Convocation program. The data collected on the website during registration, such as ceremony attendance, is also found publically. However, additional information will be outside the purview of publically issued data.

(a) its title and location:

- a. physical program and program information in electronic files (G:/ Drive)
- b. physical tickets

(b) a description:

- a. The current graduate's full name, credential(s) and hometown are included
- b. The name of attendee (if provided), location of event, and event title.

(c) authority:

- a. The Office of the Registrar – Convocation Office, reports on attendance data, but may also obtain this information through other completed forms and staff communications to students and guests.
- b. The Office of the Registrar – Convocation Office will administrate tickets if need be, and provide students and guests with information on current registration activities.

(d) purpose to gather and disclose:

- a. The data collection is to confirm attendance, allow for reporting and tracking of that attendance, and allow for organization of multiple event invitations and locations.

(e) to whom it is disclosed:

- a. The program information is disclosed to graduates and attendees at the ceremonies, internal departments who use data for reporting, and archives.
- b. The physical tickets are the responsibility of the attendee, and therefore its disclosure cannot be controlled by the university.

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

Part 6 – Manager Access/Privacy/Records Comments

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

No additional comments. Corrected document where required to strengthen privacy language and ensure no data-linking or common/integrated program.

COMPLETED
INITIATIVE

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Part 7 – Program Area Signatures



Troy Hanschen
(Registrar)



Dec 8/14.
Date



Kevin Stewart
(Enterprise Applications Manager)



Signature

Dec. 6/14
Date

Shelley McKenzie
(Manager Access/Privacy/Records)



Signature

6 January 2015
Date

Please send a copy of this PIA with the respective signatures to Shelley McKenzie for comment, review, approval & filing.

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

COMPLETED
MULTI-STATE