

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/foippra>.

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:	Geoffrey R. Weller Library		
PIA Drafter:	Vaunda Dumont		
Email:	vaunda.dumont@unbc.ca	Phone:	250-960-5226
Department Manager:	Annelise Dowd		
Email:	annelise.dowd@unbc.ca	Phone:	250-960-5419

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

1. Description of the Initiative

WhentoWork is a scheduling software suite allowing employees to enter work time preferences, allowing managers to quickly create the best schedule based on those preferences, allowing managers to publish schedules and notify employees, and allowing managers to approve schedule changes as needed.

2. Scope of this PIA

Applies to all Circulation staff and student assistants.

3. Related Privacy Impact Assessments

Uses principles from E-Schedule.ca (PIA 16-004)

4. All Elements of Information or Data

Employee first name, UNBC email address, scheduled shifts, scheduling preferences, employee salary/hourly wage, proposed shift trading, approval or denial of employee requests.

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.

COMPLETED INITIATIVE

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 information is stored outside of Canada in the home office in Tustin, CA and possibly co-managed in locations outside of Canada around the world. Informed consent form will address this.

6. Data-linking Initiative*

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

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
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
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

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

Personal Information Flow Table		
Description/Purpose	Type	FIPPA Authority
1. Geoffrey R. Weller Library sets administrative options and account access restrictions.	Protection	30
2. Manager, Circulation Services adds basic information including first name, email address and salary.	Disclosure	33.1 (a.1)
3. Employees get an invite to generate their own password to access their individual instance of WhentoWork.	Use	32(a), 32(b)
4. Employee enters scheduling preferences. The manager can choose which employees are allowed to use this feature. CUPE employees have predetermined schedules. Students	Collection	26(c), 26(d)

	<i>will be able to indicate when they have classes or other obligations.</i>		
5.	<i>Employees may make requests for scheduled time off for vacations which they enter into My Time Off.</i>	Collection	26(c), 26(d)
6.	<i>The manager generates a schedule using auto-fill with manual adjustments made as needed to the schedule. The manager publishes the completed schedule for employees to view.</i>	Use	32(a), 32(b)
7.	<i>Employees access their schedule to see which shifts they are scheduled for.</i>	Use	32(a), 32(b)
8.	<i>Employees can swap shifts through internal messaging system or a trade board for those who want to give up a shift without necessarily trading shift for shift. Employees may accept traded shifts which updates their schedules.</i>	Use	32(a), 32(b)
9.	<i>Employee schedules are stored on WhenToWork to allow managers to review labour needs between the previous and current years. Schedules remain on WhentoWork servers until UNBC no longer receives service. The manager manually deletes scheduling information after three years.</i>	Storage / Disposition	30.1(a), 30.1(b), 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.			



10. Collection Notice

University of Northern British Columbia
Geoffrey R. Weller Library
Consent for the Disclosure of Personal Information
to WhenToWork, Inc. using WhenToWork Mobile and Web App

I hereby consent to the University of Northern British Columbia, Geoffrey R Weller Library disclosing personal information pertaining to my own employee contact information, work schedule and wages to WhentoWork in order to facilitate more efficient shift scheduling and assessment of wage costs for wage budget projecting. The Geoffrey R. Weller Library asks that I consent to WhentoWork collecting my name, work email address, scheduling information, and wage information and store this personal information on their servers on behalf of the Geoffrey R. Weller Library under section 26 (c) where scheduling shifts is a necessary part of operating the Geoffrey R. Weller Library, and section 26 (e) where the assessment of wage costs and wage budget projecting are important parts of planning and evaluating the delivery of library services.

The end date for the authorization to hold my personal information will be _____ [at the fiscal year end of two years after first week of scheduled shifts have been completed formatted as YYYY-04-DD]. I will sign a new form at that time to refresh my consent.

I understand that I may only provide WhentoWork with prescribed information to use on the WhentoWork program including business contact information and my own UNBC employee wages or salary. I will not provide additional information to WhentoWork including but not limited to: personal cell phone numbers, photos of myself, personal interests, identification as a student, academic history, and professional information beyond work contact information. WhentoWork is located and operated in the United States of America. I will consult the Supervisor – Circulation Services if I am unsure about whether I can put specific information onto my WhentoWork profile.

I understand that I must consent to the disclosure of my personal information to WhentoWork before I am able to use the WhentoWork program. If I have any questions regarding the storage, use, disclosure or accuracy of the information stored on the WhentoWork program, I can contact the Supervisor – Circulation Services at Vaunda.dumont@unbc.ca or 250 960 5226.

By signing below, I consent with the conditions in the above Consent Notice.

Full Name (Please Print): _____

Signature: _____

Date: _____

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?

Individual information may be updated by employees trading or giving up shifts. All changes are reviewed and approved by the manager.

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

Yes

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 manager reviews schedules before posting and reviews requested changes including trading and giving up shifts, or vacation requests before approving changes to already published schedules.

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?

Basic employee information will be stored on WhenToWork servers until UNBC no longer has a contractual relationship with WhenToWork. Employee schedules will be manually deleted by the Manager, Circulation Services, after three full years of being in the system.

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.

N/A

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

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.

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 FIPPA. Under this same section, this information is required to be published in a public directory.

No

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.

Most of the data managed in the system can be disclosed inside or outside of Canada if it is restricted to only the intended data. The informed consent form will cover expecting employees to understand which data is appropriate to manage in the system and that if they are managing additional data in the system they are consenting to transmit it outside of Canada.

Part 7 – Program Area Signatures

Vaunda Dumont

Name of Individual leading the Program/Project
(Normally the individual who completed the PIA)

Signature

Date

May 14/19

Annelise Dowd

Department Head

Signature

Date

May 14/19

N/A

Contact Responsible for Systems Maintenance and/or Security
(if applicable)

Signature

Date

N/A

N/A

Adam Cullum

Information Governance Officer
(Privacy Officer)

Signature

Date

May 14/2019

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.