Privacy Impact Assessment

eScheduling Inc. eSchedule

PIA #*16-004* *(Office of the University Secretary to assign)*

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

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 University Secretary 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 Heather Sanford (University Secretary) at heather.sanford@unbc.ca or (250) 960-5878 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:	Library - Circulation
PIA Drafter:	Vaunda Dumont, Supervisor-Circulation Services
Email:	vaunda.dumont@unbc.ca — Phone: **25226**
Program Manager:	**James MacDonald, Digital Initiatives Librarian**
Email:	james.macdonald@unbc.ca — Phone: **26601**

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

1. **Description of the Initiative**

   We are currently using Microsoft Outlook calendars to compile staff schedules and we would like to use a more efficient method. We would like to purchase staff scheduling software with the capability to schedule shifts, allow staff to swap shifts, be able to track when leave forms are pending/completed, when vacation days are scheduled, and compile money spent based on hours scheduled, to assist us in budget predictions.

2. **Scope of this PIA**

   The PIA will cover the testing and utilization of eSchedule Inc. scheduling software in the Geoffrey R. Weller Library.

3. **Related Privacy Impact Assessments**

   N/A.

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4. All Elements of Information or Data

Information or data involved in the initiative: staff names, work email address or student email address for student assistant staff members, availability and hourly wages for each hourly staff member. Students will not be identified as students when information is sent to eSchedule Inc.

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

eSchedule Inc. http://www.eschedule.ca/privacy-policy/ *is a Calgary, Alberta based company, servers are located in Montreal, Quebec and Calgary Alberta, and all information is stored and accessed inside Canada.*

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;	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 University Secretary to discuss the requirements of a data-linking initiative.	N/A

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7. Common or Integrated Program or Activity*

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.	
1. This initiative involves a program or activity that provides a service (or services);	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;	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**	**FOIPPA Authority**
1. *Staff information including name, availability/non-availability times, work email address, hourly salary for part-time and student assistants are entered into each staff profile on the eScheduling's Web application.*	*Collection & Disclosure*	*26(c), 26(e) 32(b), 33.2(a)*
2. *Scheduled shifts by staff name are added to the schedule on the eScheduling's Web application.*	*Collection & Disclosure*	*26(c) 32(b) 33.2(a)*
3. *Staff are notified when a new schedule is published or when changes are made to the schedule.*	*Use*	*33.2(a)*
4. *Staff can submit shift trades or coverage for shifts via the Web application.*	*Disclosure & Use*	*32(b) 33.2(a)*
5. *Staff can request vacation times which will become part of*	*Disclosure &*	*33.2(a)*

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	how overall availability is tracked in the schedule.	Use	
6.	Supervisor(s) can analyze wage amounts spent on days, weeks, months and year using aggregate labour cost reports.	Use	33.2(a)

9. Risk Mitigation Table

Risk Mitigation Table			
Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.			
2.			
3.			
4.			
5.			
6.			

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10. Collection Notice

University of Northern British Columbia

Geoffrey R. Weller Library

Consent for the Disclosure of Personal
Information to eScheduling Inc.'s eSchedule program

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 eScheduling Inc. and their partner Sherweb in order to facilitate more efficient shift scheduling and assessment of wage costs for wage budget projecting.

The University of Northern British Columbia, Geoffrey R. Weller Library asks that you allow eScheduling Inc. to collect your 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 scheduled shifts have been completed formatted as YYYY-04-DD]

I understand that I may only provide eScheduling Inc. with prescribed information to use on the eSchedule program provided to you by the Supervisor – Circulation Services. **I will not** provide additional information to eScheduling Inc. including but not limited to: cell phone numbers, photos of myself, personal interests, identification as a student, academic history, and professional information beyond work contact information. I will consult the Supervisor – Circulation Services if I am unsure about whether I can put specific information onto my eSchedule profile.

I understand that I must consent to the disclosure of my personal information to eScheduling Inc. before I am able to use the eSchedule program. If I have any questions regarding the storage, use, disclosure or accuracy of the information stored on the eSchedule 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 with the above Collection Notice.

Full Name: _____
(Please Print)

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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 University Secretary, the Chief Information Officer or the IT Security Officer when filling out this section.

11. Please describe the <u>physical</u> security measures related to the initiative (if applicable).

██

12. Please describe the <u>technical</u> 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.

████████████████████████████████

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?

    All data is interacted with through the eSchedule program.

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

    Yes, scheduling software will be used to determine their work schedule.

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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 supervisor will be the only person controlling the schedule and they will be required to approve schedule changes.

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 of the vendor's data is backed up and maintained for 2 years.

Part 5 – Further Information

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

    Schedules will be regularly posted and updated but eScheduling Inc. will not be using the specific information themselves. A Privacy Protection Schedule will be attached detailing the terms of storing UNBC information.

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the University Secretary.	N/A

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

    No.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the University Secretary, 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.

    No.

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

Part 6 – University Secretary Comments

This PIA is based on a review of the material provided to the University Secretary 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.

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Part 7 – Program Area Signatures

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

Signature

Date: May 16/16

James MacDonald
Program/Department Manager or Project Sponsor

Date: May 18/2016

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

N/A
Signature

N/A
Date

HEATHER SANFORD
Head of Public Body, or designate (at UNBC, this is the University Secretary)

Signature

Date: May. 16. 2016

Please send a copy of this PIA with the respective signatures to Heather Sanford, University Secretary for comment, review, approval & filing.

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