UNBC UNIVERSITY OF NORTHERN BRITISH COLUMBIA

Privacy Impact Assessment

evisions Argos Baseline Transcript Reporting

PIA# *19-009* (*Office of the University Secretariat to assign*)

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

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:	Office of the Registrar
PIA Drafter:	Kimberly Read
Email:	Kimberly.Read@unbc.ca	Phone:	**250 960 6301**
Department Manager:	**Bert Annear**
Email:	Bert.Annear@unbc.ca	Phone:	**250 960 6801**

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

1. **Description of the Initiative**

   evisions Argos delivers flexible, powerful, easy-to-use reporting tools designed by higher education experts to help post secondary institutions the insights to make timely, better-informed decisions based on student, departmental and institutional data in real time. Interactive reports and dashboards illustrate that data, providing insights at a glance and improving visibility throughout the institution.

   This initiative is part of a re-implementation of the base-line evisions Argos product without the custom coding from Oracle that UNBC was using to manage the system. By making this product base-line evisions can provide ongoing customer support by completing upgrades, patching and repairs on our behalf.

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2. Scope of this PIA

This PIA will address the privacy risks and recommended practices regarding evisions direct access to UNBC systems and data in the custody of control of UNBC by evsions technicians to upgrade and conduct future maintenance of Argos. Argos is an in-house reporting software linking to Ellucian Banner to provide transcript and other student reports. This PIA doesn't address all use of Argos, but focuses specifically on the transcript solution.

3. Related Privacy Impact Assessments

A PIA was conducted on evisions in 2012 but the PIA in the records is incomplete and will not reflect practices moving forward.

4. All Elements of Information or Data

Names, student numbers, grades, students' association with UNBC, credit hours, academic standing, Personal Education Number (PEN), day and month of birth, credentials received, transfer credit, honours title, transcript comments (leave of absence status, withdraw with/without permission status). All of this listed information is run from Argos as a report to produce the student transcripts for testing and live use.

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.

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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**

Storage of all transcript data is managed on UNBC systems. evisions will access UNBC data stores directly from a remote access point by using UNBC's virtual desktop interface (VDI). evisions technical staff will be conducting their work on our systems from Irvine, California. The use of the VDI will allow UNBC data to remain on UNBC systems, limiting disclosure outside of Canada to only temporary screen image data. Temporary access of this nature, will be designed to be compliant with 33.1(1)(p) of the Act by providing direct, minimal and scheduled access to UNBC information using UNBC resources.

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.	N/A

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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

* 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.	*UNBC ITS will schedule with evisions the specific dates and times evisions technical support staff will be accessing UNBC systems to ensure the access to UNBC transcript information provided is direct, minimal and limited to when tests of the base-line transcript reporting in Argos are being conducted.*	*Protection*	*30*

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2.	E-Visions accesses UNBC systems in order to remove the current tool conducting transcript reporting in Argos and replace it with a base-line solution. E-Visions continues to access UNBC systems and the data contained within to complete repairs, updates and quality assurance tests on the transcript reporting functionality in Argos.	Collection, Use, Disclosure	26(c), 32(c), 33.1(1)(p)
3.	UNBC Office of the Registrar staff will troubleshoot and track any complications related to the installation and delivery of the base-line transcript reporting function in Argos and report those to evisions technical support staff to allow them to continue to install, update and repair transcript reports.	Use	32(c)
4.	UNBC Office of the Registrar reviews any changes that evisions informs them of in BEynd project management software. Conduct in BEynd between evisions and UNBC will be conducted as per the UNBC Cloud Information Management Guidelines (attached to PIA). No student or business sensitive information is managed in BEynd system.	Disclosure	33.1(1)(p)
5.	UNBC Office of the Registrar staff continue to troubleshoot transcript reporting functionality in Argos, and E-Visions continues to complete updates and repairs as necessary to ensure transcript reporting functionality is ready for live use by UNBC.	Collection, Use, Disclosure	26(c), 32(c), 33.1(1)(p)
6.	All work conducted by evisions and all troubleshooting conducted by the Office of the Registrar are compiled, logged, and managed by the Office of the Registrar.	Storage	30.1

9. **Risk Mitigation Table**

	Risk	Mitigation Strategy	Likelihood	Impact
Risk Mitigation Table				
1.	████████████████	████████████████	██████	██████

2.	███

10. Collection Notice

N/A

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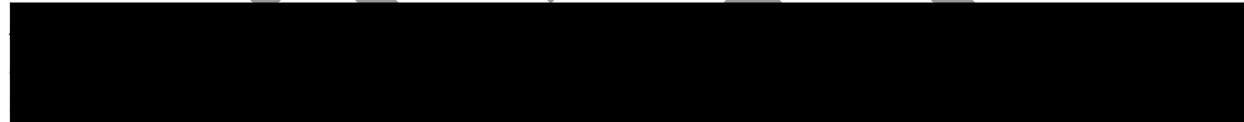
Part 3 – Security of Personal Information

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 <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?

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This initiative will not create new personal information. The initiative only manages the reporting functionality to ensure that transcripts are produced accurately. The service provider will not manipulate the individual data that is found in Banner.

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

    This initiative does not make decisions that directly affect individuals, but this initiative will allow the UNBC Office of the Registrar to make decisions about the students by utilizing accurate and up to date data.

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.**

    Testing the transcript reporting functionality will ensure transcripts produced will contain accurate information.

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?**

    Audit logs and work logs will be retained by the Office of the Registrar for fifteen years. All transcript information produced through testing the reporting functionality will be disposed of after implementation is complete. If materials need to be retained for training purposes, all records retained for this purpose will have the personal information digitally redacted and the document sanitized through Adobe Acrobat Pro DC.

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 Information Governance Officer.	N/A

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

    N/A

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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 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.

While the reporting structure contained in this software does not generate a PIB, when transcripts are produced they draw data from the PIB of student information located in Banner.

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.

Compliance with the Act depends on UNBC providing evisions technical support staff with direct access to UNBC's Argos databases in VDI for the minimal period of time required for them to conduct work. These estimates need to be done before initiating the project and continue to be re-evaluated as the project progresses. Major changes to access schedules need to be recorded and retained.

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Part 7 – Program Area Signatures

Kimberly Read

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

Date 8/27/19

Bert Annear

Overseeing the Program/Project   Signature   Date 27 Aug 2019

Trevor Fuson

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

Date Aug 27 2019

Adam Cullum

Information Governance Officer (Privacy Officer)   Signature   Date Aug 27/19

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.