Privacy Impact Assessment for Non-Ministry Public Bodies
LibCaL SaaS
PIA#*[assigned by your privacy office(r)]*

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 office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our PIA Guidelines for question-specific guidance on completing a PIA.

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/Branch:	Library and Learning Centre		
PIA Drafter:	James Fournie		
Email:	Jfournie@vcc.ca	Phone:	
Program Manager:	**Tannis Morgan**		
Email:	tmorgan@vcc.ca	Phone:	

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

1. **Description of the Initiative**

   This initiative is to implement appointment/booking based services at VCC Library. These services would allow students to book equipment, library spaces, or appointments with librarians. This emerges out of the context of COVID-19 with the requirements of social distancing and contact tracing. Moving forward, allowing time/schedule-based booking of library services will optimize the use of library spaces and resources and enhance the ability to plan resource allocation more effectively.

2. Scope of this PIA

This PIA covers booking equipment, booking spaces/computers in the library, booking equipment in the library, booking appointments with librarians or other library and learning centre staff, and registering for library and learning centre events and workshops. Phase 2 of this PIA will include enabling SAML authentication

3. Related Privacy Impact Assessments
None

4. Elements of Information or Data

Student name, student email address (contains student #) are collected to facilitate contact with the student. Student's program area is requested to improve the quality of service – to determine usage of our services by program, or to adequately prepare on subject matter for the booking.

In the case of booked appointments, students are also asked to describe in general terms the nature of the appointment so staff may prepare for the appointment, and other information relevant to the appointment such as if an ASL interpreter is required for the appointment.

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.

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**

Data will be scored in Canada datacentres. The information could presumably be accessed by Springshare employees, who may be located outside of Canada. However, as per Springshare's GDPR compliance policy, data does not flow across borders (eg there is no transfer of data to/from the Canadian servers and Springshare servers located in other countries).

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 your privacy office(r) to discuss the requirements of a data-linking initiative.	

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);	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.	Not applicable
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

* 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). Contact your public body's privacy office(r) to determine how to proceed with this notification and consultation.

For future reference, public bodies are required to notify the OIPC of a" data-linking initiative" or a "common or integrated program or activity" in the early stages of developing the initiative, program or activity. Contact your public body's privacy office(r) to determine how to proceed with this notification.

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

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	*Student completes LibCal form to book an appointment or book equipment or spaces*	*Collection*	*26(c)*
2.	*Email is sent to Library staff, as well as back to the student with the information of what they booked*	*Disclosure*	*33.1(7)*
3.	*Library Staff may access data on the LibCal site in order to provide services. "Privacy Scrub" setting will be requested from Springshare so information will be deleted after 1 year*	*Disclosure & Use*	*33.1(1e) and 32(a)*

9. **Risk Mitigation Table**

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	*Employees could access personal information contained in appointment and e-mail and use or disclose it for personal purposes*	*Employment conditions dictate appropriate use of information accessible by staff.*	*Low*	*Medium*
2.	*Student's personal information is compromised when transferred to the service provider*	*Transmission is encrypted and over a secure line*	*Low*	*Medium*
3.	*Inherent risks in sending personal information to a student via email*	*System uses VCC student e-mail which is hosted in Canada and uses VCC's e-mail system protections. E-mails contain personal information of only one individual.*	*Low*	*Medium*

10. Collection Notice

The following notice will be provided to students when accessing this service:

Vancouver Community College Notification for Disclosure of Personal Information

As part of Vancouver Community College's (VCC) use of the LibCal application, your personal information will be collected and used by VCC and LibCal to provide LibCal and Zoom services.

If you have any questions please do not hesitate to contact our Privacy Officer at: Tel: (604) 871-7000 ext. 8645, Email: saulakh@vcc.ca or via regular mail at: 1155 E Broadway, Vancouver BC, V5T 4V5.

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 your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

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

Physical security measures are handled by AWS. Further information available on their SOC: https://aws.amazon.com/compliance/soc-faqs/

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

Springshare uses WAF to protect web application. Changes are limited to a small number of system administrators and have audit logs.

13. **Does your branch/department rely on any security policies?**

Springshare does not disclose security policies. VCC Library adheres to VCC IT security policies.

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.**

    Access is restricted to VCC library staff.

15. **Please describe how you track who has access to the personal information.**

    VCC library staff must login to Springshare with a Springshare account, accounts are listed in application interface, and Springshare accounts are removed after a user no longer requires access.

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?**

    Each time the student uses the service, student users provide current data.

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

    No

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.**

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?**

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 your privacy office(r).	

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 your privacy office(r).	

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

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

Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) 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 Privacy Office(r).

Privacy Officer/Privacy Office Representative	Signature	Date

Part 7 – Program Area Signatures

_____   _____   _____
Program/Department Manager   Signature   Date

_____   _____   _____
Contact Responsible for Systems   Signature   Date
Maintenance and/or Security
(Signature not required unless they
have been involved in this PIA.)

_____   _____   _____
Head of Public Body, or designate   Signature   Date

A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.