

Part 1 – General

Name of Department/Branch:	Langara College Information Technology Department		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
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1. Description of the Initiative

The Information Technology Department (IT) has used an on-premises version of the Jira Software product (Jira) for several years to manage the life-cycle of development work from gathering requirements through to design, development, and testing. More recently, the Workday ERP support team started to use Jira to manage Workday-related development work and issues management. In general no personal information about students, employees, or alumni will be stored or accessed in Jira. However, at the testing stage of development work or during issue submission and resolution an identification number, name, or other personal identifier may be used and stored.

According to IT’s draft Project Charter, Jira currently resides on an on premises server that needs to be upgraded. Additionally, the vendor (Atlassian) will end support for its on-premises server licenses in February, 2024. The Jira application itself has been improved and is available in a cloud-based version. Moving to the cloud provides the following benefits:

- allows IT and the Workday team to take advantage of new features;
- reduces IT and Workday development and issue resolution efforts;
- reduces cost of ownership;
- improves system and information security by requiring single sign-on and two-factor authentication; and
- fits in with the College’s strategic direction to use cloud-based services and products whenever possible.

IT and Workday will use the Jira Software product under a service agreement between Langara College and Atlassian Inc., a company with a business office in San Francisco, California. Atlassian hosts its software and stores live and backup data in one or more Amazon Web Services (AWS) data centres **s.15(1)(l); s.21(1)**

2. Scope of this PIA

This PIA covers the use and disclosure of the personal information of students, employees, and alumni that may be included as an incidental part of the description of an issue or a request for development work submitted through the Jira Software product. Personal information is stored in Jira as a result of being included in the request.

3. Related Privacy Impact Assessments

None.

4. Elements of Information or Data

There are no required elements of personal information or data. Personal information or data is included in a request or description only when necessary to test development work or resolve issues. Typically, personal information disclosed consists of non-sensitive identifiers such as:

- First name
- Last name
- Student, Employee or Alumni Identification Number
- Email address

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Yes. According to Atlassian Inc.’s end-user license agreement, the software provider will host its software and store live and backup data, including personal information, in one or more AWS data centres **s.15(1)(l); s.21(1)** . Therefore, Langara-related data, including personal information, will be stored in or accessed from one or more AWS data centres located outside of Canada. The software provider may access and use the personal information only for the purposes specified in the agreement, such as resolving technical issues or responding to service-related issues.

In using AWS, the security and compliance responsibilities are shared between Atlassian Inc. and AWS. Atlassian controls how it architects and secures the Jira Software application and the data put on the infrastructure, while AWS is responsible for providing services on a highly secure and controlled platform and providing a wide array of additional security features.

6. Data-linking Initiative*

<p>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.</p>	
<p>1. Personal information from one database is linked or combined with personal information from another database;</p>	No
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	No
<p>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.</p>	No
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	

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>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	<p>Yes</p>
<p>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;</p>	<p>No</p>
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	<p>No</p>
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<ul style="list-style-type: none"> Personal information included in Jira Software, such as name, email address and Langara identification number, was collected directly from or assigned to students, employees, or alumni during the application or onboarding process. 	Collection	26(c)
2.	<ul style="list-style-type: none"> IT and Workday staff may use personal information about students, employees, and alumni to resolve issues or during the testing phase of development work. 	Use	32(a)
3.	<ul style="list-style-type: none"> Employees in Langara College departments that provide services to students, employees, or alumni may disclose personal information to IT or Workday staff when the information is included in descriptions of development requests or issue-related submissions. 	Disclosure	33.2(a)

9. Risk Mitigation

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	College employees could access personal information and use or disclose it for purposes other than the reason it was collected.	Access to Jira Software is restricted to authorized IT and Workday employees who may use personal information for development work and to resolve issues.	Low	Medium
2.	Software provider's employees could access personal information and use or disclose it for purposes other than the reason it was collected.	s.15(1)(l); s.21(1)	Low	Medium
3.	Personal information could be compromised during transmission between the College and AWS data centres.	s.15(1)(l); s.21(1)	Low	Medium
4.	Personal information stored in AWS data centres could be compromised.	s.15(1)(l); s.21(1)	Low	Medium

10. Use and Disclosure Notice

Langara College's Information Technology and Workday teams may use and disclose personal information that was previously collected from students, employees, and alumni under the authority of the *Freedom of Information and Protection of Privacy Act*, section 26(c). They will use this information for the purpose of validating or testing fixes to system issues or during development work. Information is stored in a cloud-based software system located outside of Canada. For questions about the use and disclosure of your personal information, contact the [IT Service Desk](#).

Part 3 – Security of Personal Information

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

According to Atlassian's
s.15(1)(l); s.21(1) **s.15(1)(l); s.21(1)**

According to information provided by AWS to BCNET for its AWS Privacy Impact Assessment completed in 2017:

s.15(1)(l); s.21(1)

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

13. According to Atlassian's
s.15(1)(l); s.21(1) **s.15(1)(l); s.21(1)**

s.15(1)(l); s.21(1)

According to information provided by AWS to BCNET for its AWS Privacy Impact Assessment

s.15(1)(l); s.21(1)

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

Langara College has a policy and associated procedures that govern the collection, use, access, storage, disclosure, and disposal of personal information as well as a computer and computing use policy.

15. 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.

s.15(1)(l)

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

s. 15(1)(I)

Part 4 – Accuracy/Correction/Retention of Personal Information

17. 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?

Personal information used and disclosed in Jira is generally incidental to the development and issue resolution activities being performed, so there is no need for individuals to update or correct their information.

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

No.

19. 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.

Not applicable.

20. If you answered "yes" to question 18, 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?

Not applicable.

Part 5 – Further Information

21. 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).

22. 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).

23. 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.

Part 6 – Privacy Officer Comments

This PIA is based on a review of material obtained by the Manager, Records Management and Privacy from Information Technology and Atlassian Inc. as of the date below. If in future any substantive changes are made to the scope of this PIA, Information Technology will contact the Manager, Records Management and Privacy who will complete a PIA Update.

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

Jan. 10, 2022
Date

Part 7 – Program Area Signatures

Terri Rear, Associate Director, Project Portfolio
Management, Information Technology

Date

Justin Yau, Deputy Chief Information Officer

Date