



# Privacy Impact Assessment for Non-Ministry Public Bodies

*LabStats*  
PIA#UFV-XX

## 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:	Office of the CIO		
PIA Drafter:	Adam Eason		
Email:	adam.eason@ufv.ca	Phone:	604-557-5273
Program Manager:	Adam Eason		
Email:	adam.eason@ufv.ca	Phone:	604-557-5273

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

### 1. Description of the Initiative

LabStats provides a hosted SaaS (software as a service) platform that collects information on PC utilization in order to provide better information and insights into the effectiveness and efficiency of computer lab workstations. A client program is installed on each workstation and it reports workstation usage information to the LabStats host via the Internet.

UFV will use LabStats to provide data about the following:

1. When, where, and how long students are using computer lab hardware;



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- 2. Whether hardware resources are being underutilized;
- 3. When, where, and for how long students are using software applications (including locally installed software and web-based applications).

## 2. Scope of this PIA

This PIA applies to the implementation of LabStats software on all student facing computer workstations at UFV across all sites. It does not include installation of LabStats on Staff or Faculty workstations.

## 3. Related Privacy Impact Assessments

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UFV has completed a PIA for Office 365 which includes an analysis of Azure.

## 4. Elements of Information or Data

Type of Data Collected	PI	Comment (if any)
Hardware	N	Labstats collects information about specified computers such as <b>S. 15(1)(l), s. 17</b>
Applications	N	LabStats collects information about software installed on and/or ran from specified computers, and currently includes information such as <b>S. 15(1)(l), s. 17</b>
Application Usage	Y	LabStats collects information of specified software which is installed on and/or ran from specified computers, such as <b>S. 15(1)(l), s. 17</b>



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User Accounts	Y	LabStats collects information of [REDACTED] s. 15(1)(l), s. 17
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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

Customers residing in Canada will utilize the Microsoft Azure datacenter located in Ontario, Canada and data will remain in country.

### 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
<b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b>	



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## 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>	
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
<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 Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<i>Student logs in to a work station using their student id as login credential</i>	<i>Collection</i>	<i>s. 26(c)</i>
2.	<i>Information about PC utilization (i.e. s. 15(1)(l), s. 17 [redacted] is collected and transmitted to LabStats’ server</i>	<i>Collection Disclosure</i>	<i>s. 26(c) s. 33.1 (e.1)(i)</i>
3.	<i>Information about PC utilization is stored in Labstats’ online portal where it can be viewed by UFV ITS staff</i>	<i>Use</i>	<i>s.32</i>

## 9. Risk Mitigation Table



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Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Unauthorized System access</i>	<i>Access is limited to labstats employees and UFV employees with access to the Labstats interface. UFV will monitor access logs</i>	<i>Low</i>	<i>Medium</i>
2.	<i>Client's personal information is compromised when transferred to the service provider</i>	<i>Transmission is encrypted and over a secure line</i>	<i>Low</i>	<i>Medium</i>
3.	<i>That PI data may be stored or accessed outside Canada</i>	<i>Labstats is contractually committed to storing all UFV data in Canadian data centre</i>	<i>Low</i>	<i>Low</i>

## 10. Collection Notice

*If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:*

- 1. The purpose for which the information is being collected*
- 2. The legal authority for collecting it, and*
- 3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*

*Please include your proposed wording for a collection notice and where it will be located for individuals to read before collection takes place. You can also attach a screen shot or a copy of your form where the collection notice would be located. For further help with collection notices please see the "Collection Notice Tip Sheet" located on the [CIO's website](#).*

s. 13

Consent is obtained upon student registration regarding the use of PII in the course of conducting university business. We believe this application is inclusive of university business.

## **Part 3 – Security of Personal Information**



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

a. LabStats utilizes the s. 15(1)(l), s. 17, s. 21

[Redacted]

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

a. LabStats utilizes the s. 15(1)(l), s. 17, s. 21

[Redacted]

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

a. s. 15(1)(l), s. 17, s. 21

[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.

a. s. 15(1)(l), s. 17, s. 21

[Redacted]

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

a. s. 15(1)(l), s. 17, s. 21

[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?



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- a. Student number is used as the workstation login name. There is no need to correct this data as it is collected uniquely each instance of a login. If the login name is incorrect, login to the workstation will fail. Information will not be disclosed to others.

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

- a. 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.**

- a. N\A

**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?**

- a. N\A

## **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) with the federal government in order to provide services to your clients.*

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



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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 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.**

A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particular assigned to an individual.

(a) its title and location;

a. s. 13

(b) a description of the kind of personal information and the categories of individuals whose personal information is included;

a. Student ID (Workstation Login Name);

b. Information about application and hardware usage. While not personal information in and of itself it becomes personal information when matched against a student ID number.

(c) the authority for collecting the personal information;

a. FIPPA Section 26(c)

i. the information relates directly to and is necessary for a program or activity of the public body,

(d) the purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed;

a. The purpose of collecting the information is to assess university computer lab workstation utilization for the purposes of operating in an efficient and effective manner

(e) the categories of persons who use the personal information or to whom it is disclosed;

a. Designated employees of the university



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(f) information required under subsection (7)

a. Not applicable

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



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## **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).*

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Privacy Officer/Privacy Office  
Representative

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Signature

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Date



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## Part 7 – Program Area Signatures

Adam Eason

Program/Department Manager

Signature

Date

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

Signature

Date

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.*