

Part 1 - General

Name of Department:	VIU Board of Governors		
PIA Drafter:	Carol Mahedy, Administrative Coordinator, Board of Governors		
Email:	Carol.mahedy@viu.ca	Phone:	250-740-6198
Program Manager:	Bill Boyte, General Counsel – University Secretariat		
Email:	William.Boyte@viu.ca	Phone:	250-740-6564

1. Description of the Initiative

Under the oversight of VIU University Counsel, a PIA is being conducted to determine if BoardEffect software can be used by VIU to support the Board of Governors meeting preparation processes, collaboration, and review of board materials. BoardEffect provides secure access to all relevant board governance information through a cloud-based platform accessed by a web-browser interface by both internal and external users. As part of the PIA process, a Security Threat Risk Assessment (STRA) is being conducted by VIU Technology department to assess the service at a technical level.

2. Scope of this PIA

The scope of this PIA is limited to the implementation and use of the BoardEffect product in its standard configuration by internal and external users authorized to use this service on behalf of VIU. This PIA will identify personal information privacy risks and mitigation strategies.

3. Related Privacy Impact Assessments

There are no directly related PIAs completed within VIU.

4. Elements of Information or Data

The information collected using BoardEffect depends on whether the individual is an assigned user or administrator. The Office of the General Counsel-University Secretariat will act as administrator and will make BoardEffect available to new board members as required.

Information Type	Information Collected
Personal Information	Name, title, employer, organization
Contact details	Phone number, email address
Account information	User ID, answers to security questions
Commercial information	Information about usage of Diligent services (such as support requests, recordings of or information from phone calls with Diligent sales support teams, or information provided to Diligent to resolve support requests)

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 unsigned to fippa@viu.ca. A privacy advisor will be assigned to your file and will guide you through the completion of your PIA.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

BoardEffect is a Diligent Corporation brand. BoardEffect uses Diligent owned infrastructure and backup data centres located within Canada.

6. Data-linking Initiative*

This is not considered a data-linking initiative as contemplated in s.36.1 of FIPPA.

<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. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.</p>	
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;	N/A
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.	N/A
<p>If you have answered "yes" to all three questions, please contact a PCT Privacy Advisor to discuss the requirements of a data-linking initiative.</p>	

7. Common or Integrated Program or Activity*

This initiative is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.

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.	
This initiative involves a program or activity that provides a service (or services);	YES
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
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	Personal Information	Type	FIPPA Authority
1.	Administrator sends invitations to participate in BoardEffect directly to external board members	External board members’ personal email addresses and work addresses, if applicable.	Use	32
2.	Administrator sends invitations to participate in BoardEffect directly to internal board members and Senior Management Team members	No personal information involved, because email addresses of employees are not personal information.	N/A	N/A
3.	Board members and SMT members accepts invitation; login name is stored on BoardEffect server.	Login name (assuming it is personally identifiable).	Collection	26(c)
4.	Metadata stored on BoardEffect server	Metadata of participant (assuming login name was personally identifiable).	Collection	26(c)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Role-based access.	Low	High
2.	User's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure line.	Low	High

10. Collection Notice

Privacy Notification:

Your personal information is collected under the Authority of Section 26(c) of the Freedom of Information and Protection of Privacy Act (FIPPA). This information will be used for accessing BoardEffect. Questions about the collection of this information may be directed to fipppa@viu.ca

Part 3 – Security of Personal Information

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

VIU requires data centres to comply with a detailed set of security requirements. BoardEffect is hosted on external cloud-based commercial infrastructure sites. BoardEffect is hosted in Canada with data centre infrastructure meeting or exceeding VIU standard.

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

- Two-factor Authentication
- Federated ID Integration
- Biometric Support
- Encryption in-transit & at-rest
- Role-Based Access Control
- Penetration Tests
- Data Leakage Protection

13. 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.

N/A

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

N/A

Part 4 – Accuracy/Correction/Retention of Personal Information

15. 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 ministry notify them of the update, correction or annotation?

Login information updated by user (assuming it is personally identifiable)

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

No

17. If you answered "yes" to question 16, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

N/A

18. If you answered "yes" to question 16, do you have approved records retention and 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?

N/A

Part 5 – Further Information

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

This initiative does not involve the systematic disclosure of personal information.

20. Access for Research or Statistical Purposes

This initiative does not involve disclosure of personal information for research purposes.

21. Other Applicable Legislation

N/A

22. Other

N/A