PIA01503 —UBCO Food Service Shift Scheduling

1.1 Executive Summary

7Shifts is a cloud-based platform developed in 2014. IT seeks to help restaurant managers schedule, evaluate, and communicate with their workforce. UBCO Food Services is implementing a scheduling software to improve efficiency in managing staff shifts across campus. A minimal amount of personal information (typically business contact information) will be collected to enable scheduling.

1.2 Project Description and Scope

UBCO Food Services would like to use an online scheduling application to help with managing their employee shifts. The head chef has used 7Shifts (https://www.7shifts.com) in the past and would prefer to use this again at UBCO. The scheduling application, operated via secure cloud services, focuses on enhancing staff shift management. Integration with internal systems will adhere to UBC's data governance and privacy standards.

RISK CLASSIFICATION

The inherent privacy risk classification level of this PIA submission is 4 – **High**.
The residual risk classification level of this PIA submission at closure is 2 – **Low**.

1.3 Risk Mitigation Table

Privacy Risks					
Description	**Reference #**	**Inherent Likelihood**	**Inherent Impact**	**Response**	**Residual Risk**
Over collection of personal information	RK0020645	4 - High	4 - Major	Mitigate	2 - Low
Mitigation Plan: Appropriate risk mitigation measures are in place, focusing on minimizing the collection of personal information and ensuring data is handled according to UBC's privacy standards. Detailed mitigation strategies are developed to address general risks associated with data handling and are available upon request under appropriate confidentiality requirements.					
PI stored / accessible outside of Canada	RK0020646	4 - High	4 - Major	Mitigate	2 - Low
Mitigation Plan: Users will be encouraged to supply only their name and email at registration, no other PI. Consent will be obtained for personal information collected at registration. Informed consent must be in place to ensure employees know their personal information will be stored outside of Canada.					

1.4 Information Reviewed

Document review comments: Project documents, including privacy policies and service agreements, were reviewed to assess compliance with relevant privacy legislations.

1.5 Analysis and Findings

The review confirms that the project aligns with necessary privacy and security standards. Ongoing efforts will ensure that all practices remain compliant with university policies and legal requirements.

The following are the key factors in that determination:
- Personal information is collected, stored, and accessed within Canada, and disclosed outside of Canada with appropriate consent;
- Access to REMO will be limited to authorized individuals with valid login credentials and appropriate access authorities;
- Information is kept secure during transmission and at rest.

Accordingly, 7Shifts can be used as proposed subject to the conditions outlined in the following section.

1.6 Conditions of Approval
- The project should limit the collection of personal information to what is necessary for operational functionality. A strategy will be implemented to continuously inform users about their data rights in compliance with privacy standards.
- A new PIA is required for integration with Workday.

1.7 Review and Distribution
The Minister of Citizens' Services Direction 2-21, *Privacy Impact Assessment Directions* requires that all PIAs "designate the appropriate level of position that holds accountability for a PIA, proportionate to the sensitivity of the personal information and/or the risks of the initiative" (s. D8).

Accountability is maintained by the role or position, regardless of who fills the role.

Under UBC Policy SC14, Administrative Heads of Unit are responsible for:
- ensuring that UBC Electronic Information and Systems are secured with adequate controls, with particular care concerning User identification and validation measures;
- ensuring, as appropriate or required, that UBC Electronic Information within their area of responsibility is maintained, transmitted, and stored in a secure and consistent manner that adheres to all relevant University policies and standards;
- authorizing access for individuals to UBC Electronic Information and Systems within their area of responsibility;
- renewing, retiring, and revoking User authorizations within their area of responsibility.

Holding accountability for the privacy risks of this initiative includes:
- reviewing the mitigation strategies listed in the relevant risk tables and ensuring those strategies are maintained throughout the life of the initiative;
- ensuring accountability is transferred to any individual who assumes this role;
- if there are any changes to the initiative, including to the way personal information is collected, used, stored or disclosed, ensuring the PIA team is engaged, and if necessary, completing a PIA update; and
- understanding what your privacy obligations are, and if not, following up with the PIA team.

Assessment Acceptance
Erin Trifunov

Distribution
Requestor: Erin Trifunov **Project Manager**: Erin Trifunov **Owner**: Erin Trifunov **Risk Advisor**: Christian Stockman

PIA Request Submission	Report Completion
2020-06-02	2021-04-13