



Privacy Impact Assessment (PIA) for Borealis

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PART 1: GENERAL INFORMATION

PIA file number: 2024-017

Initiative title:	Borealis for Research Data Management
VCC Department / Program Area:	VCC Library
Link to VCC initiative website:	https://libguides.vcc.ca/RDMStrategy/VCC
Link to vendor website:	https://borealisdata.ca/
Link to vendor privacy policy:	https://borealisdata.ca/termsfuse/ https://borealisdata.ca/privacy/
Your name and title:	Alicia Copp, Coordinator of Research, Scholarly Communication and Library Instruction
Your work phone and email:	604-443-8641 acopp@vcc.ca
Initiative Lead name and title:	(same)
Initiative Lead phone and email:	

General information about the PIA:

Is this initiative a data-linking program under FIPPA? See the definition in Schedule 1 of FIPPA . If this PIA addresses a data-linking program, the Privacy Officer must submit this PIA to the Office of the Information and Privacy Commissioner .	No
Is this initiative a common or integrated program or activity? See the definition of Schedule 1 of FIPPA . Under section FIPPA 69 (5.4) , the Privacy Officer must submit this PIA to the Office of the Information and Privacy Commissioner.	No

Does this initiative involve a regular or systematic exchange of personal information between organizations? If yes, this initiative may require an Information Sharing Agreement .	No
Related PIAs, if any:	

1. What is the initiative?

The Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council of Canada (NSERC), and the Social Sciences and Humanities Research Council of Canada (SSHRC) as federal funding agencies, expect funded work to be conducted at the highest level of excellence. As such, research should be conducted ethically, make good use of public resources, produce replicable results where applicable, and wherever possible make data and results accessible.

Going forward, researchers will be required to submit Data Management Plans with funding applications which should adopt best practices and address: how data is collected and stored, what existing data may be used and what new data will be created, if the data will be shared, and how and where data will be deposited. Grant recipients will be required to deposit all digital research data, metadata and code that is directly tied to the results of agency funded research by the time of publication.

Vancouver Community College (VCC) has created an institutional Research Data Management Strategy (RDM Strategy) to meet the criteria set by Tri-Council agencies to remain eligible for research funding. As part of this plan, VCC has committed to providing long-term data storage solutions to researchers, which will allow them to publicly share datasets. The most widely used two nationally-supported RDM platforms are the Federated Research Data Repository (FRDR) and Borealis, the Canadian Dataverse Repository. FRDR is a bilingual publishing platform for sharing and preserving Canadian research data in any discipline. The repository is purpose-built for large datasets and provides a curation service to assist researchers with deposit. VCC Researchers currently have access to this by independently creating accounts. Borealis is a bilingual, multidisciplinary, Canadian research data repository, supported by academic libraries and research institutions across Canada. Borealis supports open discovery, management, sharing, and preservation of Canadian research data via institutionally-hosted and supported collections. By recently re-joining the Council of Prairie and Pacific University Libraries (COPPUL), VCC is now eligible to subscribe to Borealis. We initiated this process to bring our institution into alignment with other institutions such as the University of the Fraser Valley (UFV) and Vancouver Island University (VIU).

Researchers at VCC would have the option of planning for, and utilizing Borealis for research data deposit. This requires a long-term commitment but as a stable nationally supported data repository utilized by post-secondary institutions across Canada, this is a reasonable expectation. Researchers that require Research Ethics Review (REB), those who apply for internal grants (VCC Research Fund, for example), and those participating in Tri-Council agency grant applications, will be encouraged to consider Borealis or FRDR, if either platform meet their discipline needs. The VCC Library will provide ongoing support, via the Coordinator of Research, Scholarly Communication, and Library Instruction.

2. What is the scope of the PIA?

The scope of this PIA is sufficient to cover the use of Borealis at VCC.

3. What are the data or information elements involved in your initiative?

It is not possible to predict the source of the research data that may be deposited, or the sources of the data researchers will choose to utilize. Under FIPPA, research data is exempt, but a short discussion below addresses this. Borealis is designed to provide Canadian researchers with a place to store, share, and publish all kinds of research data. It is also designed to allow researchers from around the world to discover, view, and download research data from Canadian researchers. In order, to publish data, users must have an account via a participating institution. The Borealis Terms of Use prohibit certain kinds of data, and directly states the following in terms of sensitive and confidential data:

Content does not contain information that could directly or indirectly identify a subject, except where the release of such identifying information has no potential for constituting an unwarranted invasion of privacy and/or breach of confidentiality. You further confirm that all personally-identifiable information in your Content has at least **one** of the following conditions:

- The information has been previously released to the public.
- The information describes public figures, where it relates to their public roles and other non-sensitive subjects.
- A sufficient length of time has passed since the collection of the information so that it can be considered historic.
- All identified subjects have given explicit informed consent allowing the public release of their information.
- All information was collected with an explicit statement concerning its public nature, such as information collected for governmental regulatory purposes.
- **For federal records** (i.e., Content created by a Canadian federal government agency or under a federal contract) **only**, all identified subjects are deceased and no federal statute explicitly restricts the release of that information.

At present the research output at VCC is limited and the kinds of data generated are generally not sensitive in nature and most often involve data generated through surveys, focus groups, or interviews with students, employees or the public. Datasets however would be prepared before deposit and stripped of any identifying information, where human subjects are involved, in accordance with REB guidance. And all research affiliated with VCC, involving human subjects, must obtain REB approval before initiation. Data sets are generally not required to be deposited until the time of publication. This follows the analysis of the data, and the necessary time given to participants to withdraw from the study, or access their personal data, prior to the process of de-identification.

From Borealis: “Borealis respects your privacy. All information provided by you while using the service (such as your name, email address, and institutional affiliation) can only be accessed by Borealis staff and by designated library staff from your own institution. This data is collected for the purposes of registration, enabling and administering access to the service, management of the repository and institutional collections, and for statistical reporting. Borealis staff and library staff from your institution are required to act in accordance with applicable provincial privacy legislation.”

Borealis collects the following information:



- When you register for an account with Borealis, we collect your first and last names, email address, institutional affiliation (if any), and (optionally) position or job title.
- [Dataset guestbooks](#) are an optional feature that can be used to collect data about who is downloading the files from datasets. If the guestbook feature is activated for a particular dataset, then any information voluntarily provided in the guestbook is made available to the Dataverse collection administrator.
- When you access this web site, our web server software records the IP address of your computer and any activity in web server logs.
- When you perform actions in the system, such as accessing a dataset or editing permissions, they are recorded in the database, along with the username if the user is logged in. If the user is not logged in, information about the user is not included.
- We also use Matomo Analytics to aggregate traffic and usage data on how our users are using Borealis.

See the following questions for how VCC will prevent the collection of personal information.

Borealis only records and processes data necessary for a specific purpose.

- Account information is processed for the purposes of registration, allowing access to the Scholars Portal systems, management of the repository and institutional collections, and for statistical reporting to funding agencies and your local institution.
- Data collected using the optional Guestbook feature is used for the purposes of managing access to files by the Dataverse collection administrator at their discretion.
- We use your IP address and files you access to help diagnose problems with our servers and to administer our website, such as identifying which parts of our site are most heavily used. We also use this information to tailor site content to user needs and to generate aggregate statistical reports.
- We use actions recorded in the database for troubleshooting user errors.
- Matomo Analytics is used to improve the functionality of Borealis.

We do not share any data we collect from or develop about our users to any third parties for any purpose unless required by law. Any reports we may share externally would use unidentifiable, aggregated data.

3.1 Did you list personal information in question 3?

No – although Borealis has the capability to collect limited personal information, VCC will not be providing personal information through this initiative.

- Use of Borealis is limited to VCC employees (faculty/staff) in this initiative, and any registration/account information collected is contact information.
- VCC will disable the Guestbook feature, whereby users of the Borealis share their contact information when accessing and downloading datasets.

4. If you answered “no” to question 3.1: How will VCC reduce the risk of unintentionally collecting personal information?

VCC employees will use VCC contact information when registering and using Borealis. VCC employees should use Borealis through VCC network to prevent association through IP address.

PART 9: SIGNATURES

Privacy Office Comments

This PIA will be revised to consider personal information if students are given access to registering with Borealis in the future, or any other changes in the initiative result in the platform collecting or using personal information.

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer	Surinder Aulakh	Surinder Aulakh <small>Digitally signed by Surinder Aulakh Date: 2024.11.20 06:24:18 -08'00'</small>	11/20/24

Program Area Signatures

The PIA must be signed by a role that is able to hold accountability for a PIA, proportionate to the sensitivity of personal information and/or the risks of the initiative. This signature confirms that this PIA accurately documents data elements and information flow at the time of signing. If there are any changes to the overall initiative, including the way personal information is collected, used, stored, or disclosed, the program area will contact Privacy and, if necessary, complete a PIA update.

Role	Name/Position	Electronic signature	Date signed
Role designated accountable for the initiative	Alicia Copp, Coordinator of Research, Scholarly Communications and Library Instruction	A Copp	11/22/24