



Privacy Impact Assessment for Non-Ministry Public Bodies

SirsiDynix SaaS Implementation

PIA#2019 004

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:	Library		
PIA Drafter:	Christine-Louise Dujmovich, Librarian, Reference & Electronic Resources		
Email:	cdujmovich@jibc.ca	Phone:	604-528-5597
Program Manager:	April Haddad, Director, Library Services		
Email:	ahaddad@jibc.ca	Phone:	604-528-5594

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

1. Description of the Initiative

This section should provide a general description of the initiative and the context in which it functions. This could include the purpose of the initiative, its benefits, the larger process (if any) that it is part of, how it functions, the parties involved, etc. For example, the public body may want to overhaul its citizen engagement processes to better align with emerging self-service trends, or a program is moving forward because it is a priority project of the head of the public body.

This initiative involves the upgrading and migration of our current Integrated Library System (ILS) to the SaaS (Software as a Service) platform hosted in Montreal by SirsiDynix. Our current ILS is stored locally on a server that needs to be replaced (end-of-life). In addition we need to move from ISAM to Oracle Platform as ISAM soon will no longer be supported by SirsiDynix.



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This initiative will provide JIBC Library with the technology needed to sustain and improve our services going forward. The SaaS hosting service offered by SirsiDynix removes the need to have local servers. Server management and support services are provided by SirsiDynix 24x7 which eliminates the need for local IT support. JIBC will be able to improve library service with the addition of a more modern system and updated staff client software.

JIBC ILS is used by all Library staff for the following services: acquisitions, cataloguing, circulation, producing reports, handling patron holds/requests, managing course reserves, and managing the serial (journals) collection (receiving and claiming journal issues).

If JIBC does not approve this initiative, the institution will have to continue to invest in hardware and local support services to maintain the library system. The current ISAM database environment will need to be replaced and JIBC users will not benefit from a more modern search experience and staff client software. Local IT support will continue to be relied upon.

2. Scope of this PIA

This section should explain, where applicable, exactly what part or phase of the initiative the PIA covers and, where necessary for clarity, what it does not cover. For example, if a public body is overhauling its citizen engagement process to better align with emerging self-service trends and is launching new website features, this particular PIA may only be about the public body's new blog. This blog would then be the "scope" of the PIA. This section may also describe what phase of the initiative this PIA covers.

The scope of the Freedom of Information and Protection of Privacy Act ("FOIPPA") applies to any records in the custody or control of a public body. The part of the initiative that this PIA covers is specifically to determine FOIPPA risk and compliance in migrating to SaaS. JIBC Library will only maintain custody and control over those records created as a part of a functioning library. These are the same records that are currently created, user records and bibliographic records.

3. Related Privacy Impact Assessments

This section should identify, where applicable, PIAs for other parts of the initiative or any PIAs that were previously completed for this initiative. To follow on from the above example, this section may cite a PIA that has already been completed on the public body's website or on the video site that the new blog will sometimes link to.

School District 57, Prince George, BC, completed a PIA for SaaS December 11th, 2017. SaaS is now operational in PG School District. We have reviewed this PIA.

4. Elements of Information or Data

Please list the elements of information or data involved in the initiative. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area, like stumpage totals, fish license numbers, visitor centre stats, or hiring data.

There are two areas of data.

1. JIBC Library completes the following fields of the user account record:



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First name, Preferred name, Middle name, Last name, Group ID (mnemonic to identify Department users are associated with) and Profile name (identifies if user is faculty, field user, certificate student, etc.), Office address (work address for all professional users, including active personnel from: police, sheriff, fire, paramedic, BC corrections) or Home address for students not in career programs (e.g. in programs within the Centre for Leadership, Centre for Conflict Resolution, Law Enforcement Studies, etc.). Phone number and email address are also recorded. This is to enable the JIBC Library to contact users who have overdue items and to send overdue notices generated by the system, directly to the user.

Students can access their personal library account once library staff has provided them with their User ID and PIN (auto-generated by SirsiDynix). Students can change their PIN. This account allows users to modify their information and/or to request/renew items. We do not use student numbers assigned by Student Services.

On a monthly basis, we remove all accounts for expired users. Upon graduation of some programs (e.g. BLES, LESD, etc.) we receive graduation lists and delete these graduates. Instructors and staff members are deleted upon leaving JIBC employment.

2. Library data:

Consisting of bibliographic metadata for information resources (texts, periodicals, etc.), as per SirsiDynix.

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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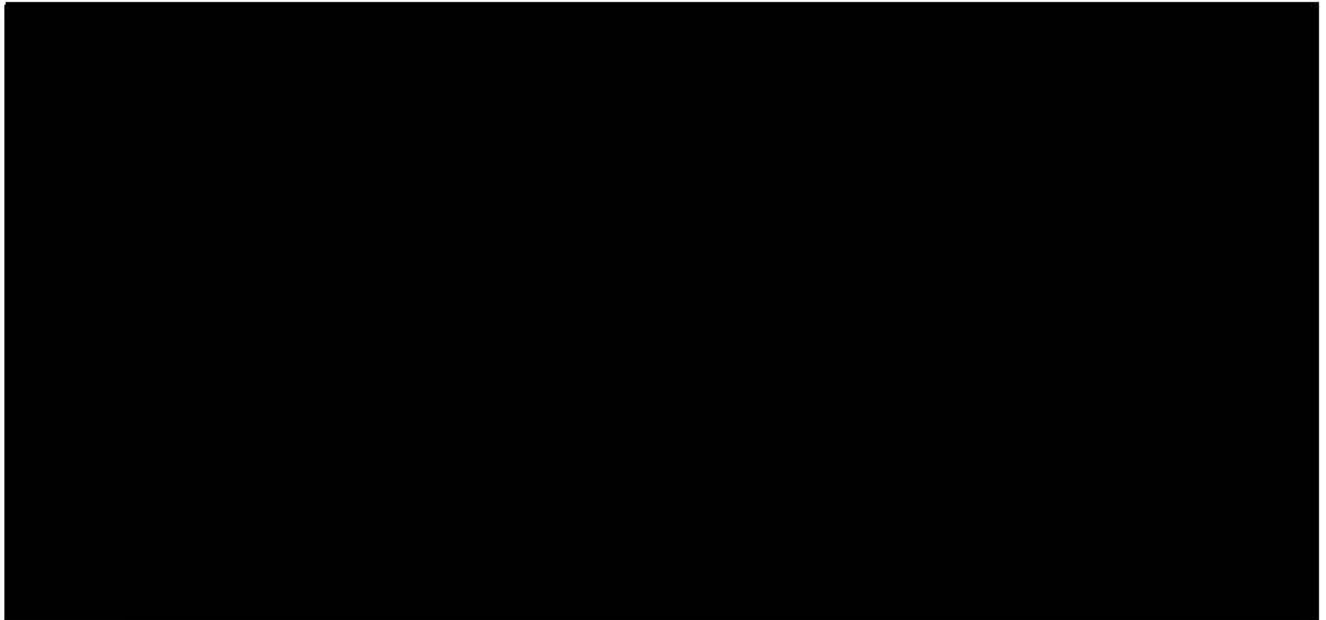
Part 2 – Protection of Personal Information

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

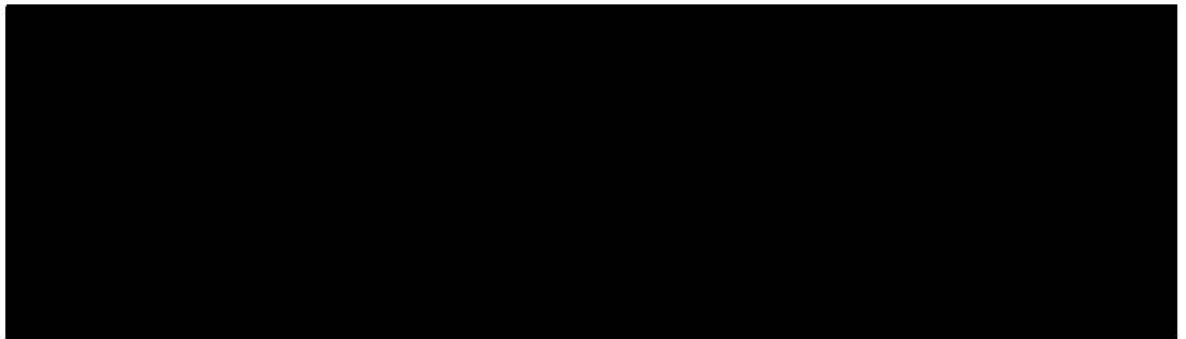
5. Storage or Access outside Canada

Please provide a brief description of whether your information can be accessed from outside Canada, for example, by a service provider that is repairing a system, or if your information is being stored outside Canada, for example, in the "cloud". If your data is stored within Canada and accessible only within Canada, please indicate this.

All data will reside in Canada. Access to this data is determined by user roles:



S.15(1)(l)



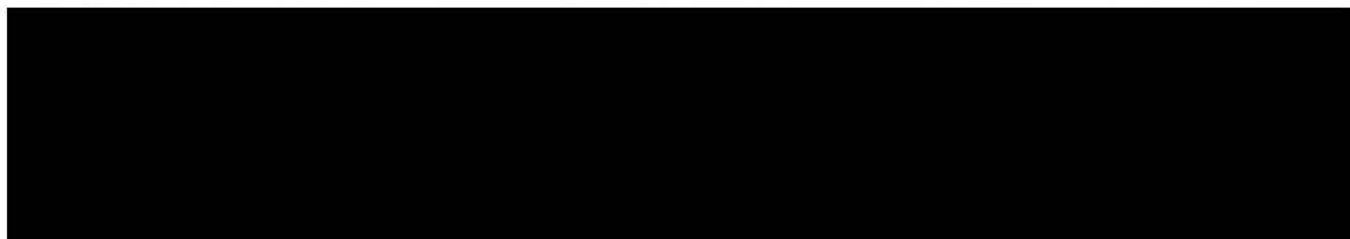
Account permissions are formed in such a way as to limit a user's experience to only that Personally Identifiable Information (PII) that belongs to them.



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



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7. Common or Integrated Program or Activity*

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.

1. This initiative involves a program or activity that provides a service (or services);	No
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
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.*

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.



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8. Personal Information Flow Diagram and/or Personal Information Flow Table

Please provide a diagram and/or table that shows how your initiative will collect, use, and/or disclose personal information (see examples below). Your diagram and/or table must also include the authorities for the collection, use, and disclosure of personal information, as laid out in FOIPPA. It should also outline the flows of personal information wherever it is transmitted or exchanged.

Both a flow diagram and a table must be included if the PIA is related to a common or integrated program or activity or a data-linking initiative.

For ease of reference, the collection, use, and disclosure authorities in FOIPPA can be found in the appendices. If you do not know what the relevant authorities are, please contact your privacy office(r).

Depending on the complexity of your initiative, you may choose to provide one general diagram for the initiative, and more specific diagrams for particular components. If multiple organizations will collect, use, or disclose personal information, the diagram should identify how each organization is involved in the initiative.

Personal Information Flow Table

	Description/Purpose	Type	FOIPPA Authority
1.	Personal information obtained when user account is created.	Collection	26(c)
2.	Checkout/renew materials for users, using their personal information.	Collection	26(c)
3.	Create HOLDS for users, who request items already in use.	Collection	26(c)
4.	Users emailed overdue notices by system.	Collection	26(c)



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9. Risk Mitigation Table

Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	SaaS is down and may not be available to Library staff and users.	ILS not available to staff and users. SaaS has redundancy built into the Cloud.	Low	Low
2.	SaaS has a security breach.	Their services are ISO 27001: 2013 compliant and as part of their federation service, they check security certificates and run regular penetration tests to mitigate against cybersecurity attacks.	Low	Medium
3.	User's personal information is compromised.	Transmission is encrypted and over a secure line.	Low	Low



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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](#).

Upon registering for a course students are informed of the following:

The personal information on this form and other personal information which forms part of your student record is collected under the legal authority of the Colleges and Institute Act, [RSBC 1996] c.52, and the Freedom of Information and Protection Privacy Act [RSBC 1996] c.165. The information is used for administrative and statistical research purposes of the Institute and/or the ministries or agencies of the Government of British Columbia and the Government of Canada. The information will be protected and disclosed in compliance with those acts. Except as noted in the preceding, the personal information collected on the form and other personal information which forms part of a student's record will not be disclosed to any other person without consent. For further information please see www.jibc.ca/privacy or contact the Office of the Registrar.

In addition, we will post a notice on our website and in the Library:

To provide our borrowers with circulation services, JIBC Library obtains and stores borrower's information (e.g. first name, last name, work or personal address, phone number and email address) in our Integrated Library System (ILS). This system is located in Montreal, PQ. This information is used by our library only and used for borrowing, placing holds, renewing library material and notifying borrowers when items are due or ready to be picked-up. For questions and additional information contact April Haddad, Director, Library Services (604-528-5594 or ahaddad@jibc.ca)

Library staff are held to a Code of Ethics (***IFLA Code of Ethics for Librarians and other Information Workers***) located at <https://www.ifla.org/publications/node/11092#privacy>. Section 3 defines the standard we hold ourselves to:

3. Privacy, secrecy and transparency:

Librarians and other information workers respect personal privacy, and the protection of personal data, necessarily shared between individuals and institutions. The relationship between the library and the user is one of confidentiality and librarians and other information workers will take appropriate measures to ensure that user data is not shared beyond the original transaction. Librarians and other information workers support and participate in transparency so that the workings of government, administration and business are opened to the scrutiny of the general public. They also recognise that it is in the public interest that misconduct, corruption and crime be exposed by what constitute breaches of confidentiality by so-called 'whistleblowers'.



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Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

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

[Redacted]

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

[Redacted]

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

S.15(1)(l)

JIBC Policy 2502 Information Security

JIBC Policy 2503 Information and Educational Technology Acceptable Use

JIBC Policy 3106 Freedom of Information and Protection of Privacy

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.

[Redacted]

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

Audit trail/report available to JIBC Library system administrator showing access and information accessed through login credentials.



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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?

JIBC Library staff have the ability to update/correct user records, when advised by users. By means of their personal user account, users have access to update their own information.

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

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.

Not applicable

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?

Not applicable

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).

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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

For example: your public body will be disclosing information to PhD students so that they can conduct research.

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).

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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.

No

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



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PIA#[assigned by your privacy office(r)]

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).

George Jones
Privacy Officer/Privacy Office
Representative


Signature

2019 Mar 1
Date



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PIA#[assigned by your privacy office(r)]

Part 7 – Program Area Signatures

April Haddad
Program/Department Manager

April Haddad
Signature

Mar. 1, 2019
Date

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

George Jones
Signature

2019 Mar 1
Date

KAYOL TACEVICI
Head of Public Body, or designate

KAYOL TACEVICI
Signature

3/29/2019
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.