Threshold Analysis

# Threshold Analysis Overview

A threshold analysis will help you determine if you need to go through a full privacy impact assessment. This phase collects preliminary information, including a description of the process or system (or the changes in a process or system). One of the most important questions in a threshold analysis is if the process will collect, store, use, or disclose patron data, including data about a person and data that stems from a person’s activities. The answers to the questions below cover a variety of different “triggers” for a PIA, including patron data processing, legal regulation compliance, and involvement of third parties in data processing.

Parts of this document were adapted from:

Office of the Privacy Commissioner. 2007. “Privacy Impact Assessment Handbook.” <https://www.privacy.org.nz/assets/Uploads/Privacy-Impact-Assessment-Handbook-June2007.pdf>.

Information Commissioner’s Office (UK). 2014. “Conducting privacy impact assessments code of practice.” Version 1.0. <https://iapp.org/media/pdf/resource_center/ICO_pia-code-of-practice.pdf>.

# Threshold Analysis Template

**Name of system/process**:

**Name of person conducting analysis**:

**Description of the system/process (or changes to the system/process):**

**People and organizations (including third parties) involved in the system/process (or changes to the system/process):**

## Questions

1. Is the system/process:

[ ] New?

[ ] Changed from a previous version of the system/process?

[ ] Not changed or new, but has not been previously evaluated for a PIA?

[ ] Scheduled for a PIA (as determined by a previous PIA report or other recommendation)?

2. Does the system/process (or changes to the system/process) collect, store, use, share, or otherwise process patron data? [ ] Yes [ ] No

Patron data can include:

Data about a person, such as

* Name
* Physical/email address
* Phone number
* Date of birth
* Patron record number
* Library barcode
* Biometric information, including facial images, voice recordings, and fingerprints

Data about a person’s activities, such as

* Search/circulation histories
* Computer/wifi sessions
* Reference questions
* Electronic resource access
* IP Address
* Device information, including UUID and MAC
* Program attendance

3. What are the purposes for collecting, disclosing, or otherwise processing this patron data? How does the change to the system/process change the original purposes of the data collection, disclosure, or processing?

4. Does any of the patron data collected, stored, disclosed, or otherwise processed by the system/process (or changes to the system/process) fall under federal, state, or local government regulations and/or organizational policies? [ ] Yes [ ] No

If so, which legal regulations and/or organizational policies apply?

6. Does the system/process (or changes to the system/process) use data already collected from or about patrons for a purpose it is not currently used for, or in a way it is not currently used? [ ] Yes [ ] No

7. Does the system/process (or changes to the system/process) introduce technology which might be perceived as being privacy intrusive? (example - biometrics or facial recognition) [ ] Yes [ ] No

8. Will the system/process (or changes to the system/process) result in making decisions or taking action against patrons in ways which can have a significant impact on them? [ ] Yes [ ] No

9. Is the data about patrons of a kind particularly likely to raise privacy concerns or expectations?
 [ ] Yes [ ] No

10. Will the system/process (or changes to the system/process) require obtaining additional patron data in ways which they may find intrusive? For example, working with third party sources to obtain patron data that patrons did not directly provide to the library. [ ] Yes [ ] No

11. What technologies or technical infrastructure is involved in the system/process (or changes to the system/process)?

## Assessment Outcome

**A PIA is recommended when a process or system (or changes to a process/system):**

* Collects, stores, discloses, or otherwise process patron data.
* Uses data for a reason or purpose outside of the original reason/purpose of collection, storage, disclosure, or processing of that data.
* Uses certain types of technologies, particularly technologies that track patrons or have the ability to collect, store, and process patron data.
* Has vendor or other third-party involvement in collection, storage, disclosure, or otherwise processing of patron data.

[ ]  **A PIA is recommended – proceed with PIA process**

[ ]  **A PIA is not needed – no further action required at this time**