



INITIAL PRIVACY ASSESSMENT (IPA)

An IPA should be completed by the Project Manager/Department Head in order to assess every new or existing project or initiative, in order to determine whether personal information, if any, is collected, used, accessed, or disclosed in the course of the initiative. Please fill out the form below and submit it to the Privacy Officer by clicking the “Submit” button on page 4. Once the form is reviewed, you will be notified by the Privacy Officer whether a full Privacy Impact Assessment (PIA) is required.

Project Name:	CDO Newcomer Services
IPA Completion Date:	[To be completed by 13 May 2024 the Privacy Officer]

A. GENERAL INFORMATION

1. Program area:

Department/Faculty:	Education, Health & Human Development
Office/School:	School of Academic Access & Prep

2. Contacts:

Project Manager / IPA Drafter:	Andrea Dunne	Title:	Project Manager/Program Developer
Email:	andreadunne@capilano.ca	Phone:	

The assessment of whether a PIA is necessary for the project/initiative is based on a review of the materials provided within this IPA. If, at any point during the project lifecycle, substantive changes are proposed or modifications made to the scope of the project and/or the conditions detailed in this IPA, as they relate to personal information, please contact the Privacy Officer at privacy@capilano.ca for possible re-evaluation of the project’s PIA requirements.



B. PROJECT INFORMATION

1. Key characteristics:

		Yes	No	N/A
a.	Does this project involve a new program, process, service, technology, information system, or application?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Does this project involve an existing program, process, service, technology, information system, or application?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Does this project involve a change or upgrade to an existing program, process, service, technology, information system or application?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Does this project or system involve the collection, use, processing, storing, and/or disclosure of personal information ? <i>(See Appendix A, at the end of this form, for examples.)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes:				
e.	Will personal information be stored and accessed only in Canada?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	If it's an existing initiative, and if personal information is collected, could you provide us with the Collection Notice <i>(See Appendix B, at the end of this form, for a Collection Notice wording)</i> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	Does the project involve external service providers (e.g., software solution providers, system integrators, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2. Description:

Please provide a general description of the project or system. Please describe the main objectives (including a description of the business needs, and how it will meet those needs). Identify any interconnections with other projects or systems, and the nature of the information in the project or system and how it will be used.

Community Development & Outreach (CDO) has been the recipient of funding to deliver settlement services in the Sea to Sky & Sunshine Coast for more than 10 years. The program is funded by Immigration, Refugees, Citizenship Canada (IRCC) and BC Newcomer Services Program through Dept. of Municipal Affairs. Business needs include compliance with contractual obligations, to both report client data to the funder and to protect the data we collect. Additionally, we collect personal information to stay in contact with the service users. In this program, we also enroll eligible students into CAC courses and share this information with the Registrar's Office. For IRCC, we must collect 'Protected B' information in the form of a Unique Client Identifier and Date of Birth. For BCNSP, we must collect identity factors that form part of a quarterly report, but it's not considered 'Protected B' by the Province because we don't disclose client personal information to the funder alongside the identity factors. Another element we have to consider is a streamlined registration/intake process as service users are often ELL speakers. We have a registration form (attached) that we would like to have assessed.



3. Collection, use, processing, storing, and/or disclosure of personal information:

*If you answered “yes” to question 1(d) above, please identify **the types** of personal information (if any) will be collected, used, processed, stored, accessed and/or disclosed as part of this project, and how that personal information is necessary to fulfill the identified objectives of the project.*

We have a single registration form to collect information for both funders: Name, Email, Address, Phone Number, Date of Birth, Gender, Emergency Contact, Current Immigration Status, Unique Client Identifier, ID type to confirm identity, Country of Citizenship, Primary Language, Year arrived in Canada, Age Range, Educational Level (may not be needed any longer), Employment Status. Some questions are marked *required, some are optional.

4. Third party service providers:

Please provide a brief description of known third party service providers/contractors who will be engaged to develop, deliver, support, or maintain the project, and/or who may collect, use, store, disclose, secure, or dispose of personal information on behalf of Capilano University.

We work with 2 partners through one of our funding contracts who are also required to collect data to complete reports for their communities. ISS of BC (Squamish), Lift Community Services (Powell River & Qathet Region).

5. Storage and access outside Canada:

Please provide a brief description of whether personal information will be accessed from outside Canada. For example, by a service provider that is repairing a system, or if information (including backups) will be stored outside Canada (such as the “Cloud”).

Not to my knowledge, however the data is stored on the cloud, we use CapU Microsoft365 Apps for that.



C. PROGRAM AREA APPROVALS

By signing below, you acknowledge that you have read this IPA and confirm that the information provided herein accurately documents the scope and conditions of the project as they relate to “personal information” at the time of signing. If at any point during the project, substantive changes are proposed or modifications made that may impact the scope and conditions of the project as they relate to “personal information,” contact the Privacy Officer at privacy@capilano.ca for possible re-evaluation of the project’s PIA requirements.

Name **Andrea Dunne**

Title **Instructor/Program Manager** **May 3, 2024**

Signature

Date

Submit

D. PRIVACY OFFICER RECOMMENDATIONS

To be completed by the Privacy Officer:

A *Privacy Impact Assessment* is not required for this project.

Completion of a *Privacy Impact Assessment* is required for this project.

Name **Jacquetta Goy**

Title **Director, Risk Management** **13 May 2024**

Signature

Date



APPENDIX A – EXAMPLES OF PERSONAL INFORMATION

British Columbia's *Freedom of Information and Protection of Privacy Act* defines "personal information" as "recorded information about an identifiable individual." Information is about an "identifiable individual" if it permits or leads to possible identification of the individual, whether based on that information alone, or when combined with other information from other available sources, including sources publicly available.

The following is a non-exhaustive list of examples of **personal information**:

- name, home address, personal phone number and personal email address;
- age, date of birth, height, weight, eye colour, fingerprint, blood type, sexual orientation, marital status, absence or presence of dependents, ethnic origin, political or religious affiliations;
- ID numbers, such as social insurance number, health card number, driver's license number;
- health (physical and mental), family or individual health history, prescriptions, and medical information;
- employee files, employment history, education history, evaluations and ratings, resumes, references, interview records, disciplinary actions, investigations, severance payments, background check results;
- financial information such as credit or debit card number, bank account number, loan applications;
- photographic or video (e.g., CCTV) images, audio recordings;
- home IP address; and
- any unique identifying number, symbol, or other particular assigned to the individual, such as student number or employee ID number.

Business contact information (job title, business phone number, business email address, and business mailing address) is not considered "personal information."



APPENDIX B – COLLECTION NOTICE

“Your personal information is collected under the authority of section 26(c) of the Freedom of Information and Protection of Privacy Act (FIPPA), as the information relates directly to and is necessary for an operating program or activity of the University. Questions about the collection of this information may be directed to Privacy Officer at privacy@capilanou.ca”