# Privacy Impact Assessment for Non-Ministry Public Bodies

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Use this privacy impact assessment (PIA) template if you work for or a service provider to a non-ministry public body in B.C. and are starting a new initiative or significantly changing an existing initiative.

## Before you start

- If you are in a non-ministry public body, you may use this template to document a PIA. This template leads you through a complete PIA, but you are welcome to use another template or method for documenting your PIA
- An initiative is an enactment, system, project, program or activity
- Find information on the PIA review process and question-by-question guidance

- If you have any questions, email Privacy.Helpline@gov.bc.ca or phone 250 356-1851

## PART 1: GENERAL INFORMATION

PIA file number:

| | |
|---|---|
| **Initiative title:** | COTR/CL COLLABORATIVE EMR COURSE |
| **Organization:** | College of the Rockies, Columbia Learning |
| **Branch or unit:** | Continuing Education College of the Rockies |
| **Your name and title:** | Keltie Ross, Manager – Learning Commons |
| **Your work phone:** | 250-489-2757 x3293 |
| **Your email:** | Kross5@cotr.bc.ca |
| **Initiative Lead name and title:** | Leah Bradish, Continuing Education, Contract Training, and Campus Operations |
| **Initiative Lead phone:** | 250-489-8286 |
| **Initiative Lead email:** | lbradish@cotr.bc.ca |
| **Privacy Officer:** | Keltie Ross |
| **Privacy Officer phone:** | 250-489-2757 x3293 |
| **Privacy Officer email:** | Kross5@cotr.bc.ca |

General information about the PIA:

| |
|---|
| **Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.** |
| YES |
| **Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.** |
| YES |
| **Related PIAs, if any:** |
| |

## 1. What is the initiative?

**Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.**

*College of the Rockies has entered an Affiliate Partnership with Columbia Learning in order to access Columbia Learning's Emergency Medical Responder (EMR) curriculum. This was in response to EMA Licensing Board scope changes for qualifying EMRs in the province of BC.*

*Under this affiliate agreement College of the Rockies instructors will be trained in how to deliver Columbia's EMR curriculum in a face-to-face format in the East Kootenay. The online (Moodle-based) portion of this course would be delivered through Columbia Learning's online Moodle portal but will require us to share student names and emails with Columbia Learning for the purposes of gaining access to the Columbia Learning online portion of the course. Once a student completes the 13 hours of online instruction, they take the face-to-face component on site at COTR under the instruction of our instructors. When they have completed the 40 hours of face-to-face, we inform Columbia Learning and they issue a certificate with an QR code that the student presents to EMALB examiners for a regularly scheduled EMALB test to become licensed as an EMR in BC. As Columbia Learning has had their curriculum approved by EMALB the student must show up to the Licensing exam with the Columbia Certificate and QR code to be tested.*

## 2. What is the scope of the PIA?

**Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?**

*The scope of this PIA specifically is in regard to the sharing of the student's name and email with Columbia Learning so that Columbia Learning can register them into the 13 hours of online content, share with COTR that the student has completed that section and can now join in a*

*face-to-face offering. College of the Rockies would subsequently inform Columbia Learning when the student successfully completes the 40 hours face-to-face with us and can be issued a Columbia Learning certificate and QR code for presentation at EMALB Licensing exams.*

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

**Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.**

- *Student name*
- *Student email*
- *Completion status*

### 3.1 Did you list personal information in question 3?

**Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.**

Type "yes" or "no" to indicate your response.

*YES*

- If yes, go to Part 2
- If no, answer question 4 and submit questions 1 to 4 to your Privacy Officer. You do not need to complete the rest of the PIA template.

## 4. How will you reduce the risk of unintentionally collecting personal information?

**Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.**

## PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

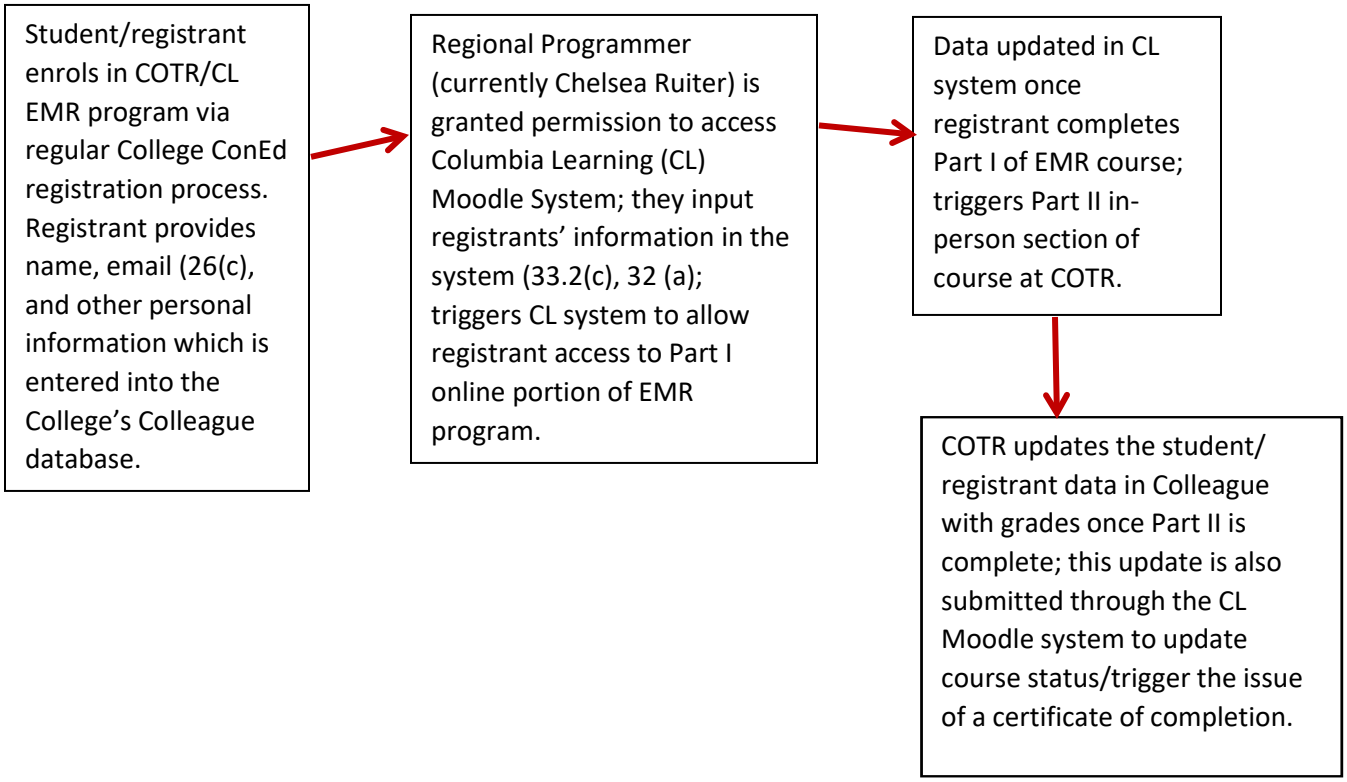
### 5. Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

| **Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.** | **Collection, use or disclosure** | **FOIPPA authority** | **Other legal authority** |
|---|---|---|---|
| Step 1: Student enrolls in EMR course via COTR registration portal (Moodle, FOIPPA compliant, based and run in Canada). | Collection | 26(c) | |
| Step 2: One COTR staff member (Chelsea Ruiter) will be granted direct access to the Columbia Learning (CL) Moodle system, which is based and run in Canada, and FOIPPA compliant; the COTR staff member will input the students/registrant's data into the CL system. | Disclosure & Use | 33.2 (c) and 32(a) | |
| Step 3: CL will assign grades to students in their Moodle system once the Part I/online portion is completed. COTR instructor and admins can view this grade. This allows students to begin the Part II in-person portion of the course at COTR. | Disclosure & Use | 33.2 (c) and 32(a) | |
| Step 4: COTR updates the student/registrant data in Colleague with grades once Part II is | Disclosure & Use | 33.2 (c) and 32(a) | |

| Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative. | Collection, use or disclosure | FOIPPA authority | Other legal authority |
|---|---|---|---|
| complete; this update is also submitted through the CL Moodle system to update course status/ trigger the issue of a certificate of completion. | | | |

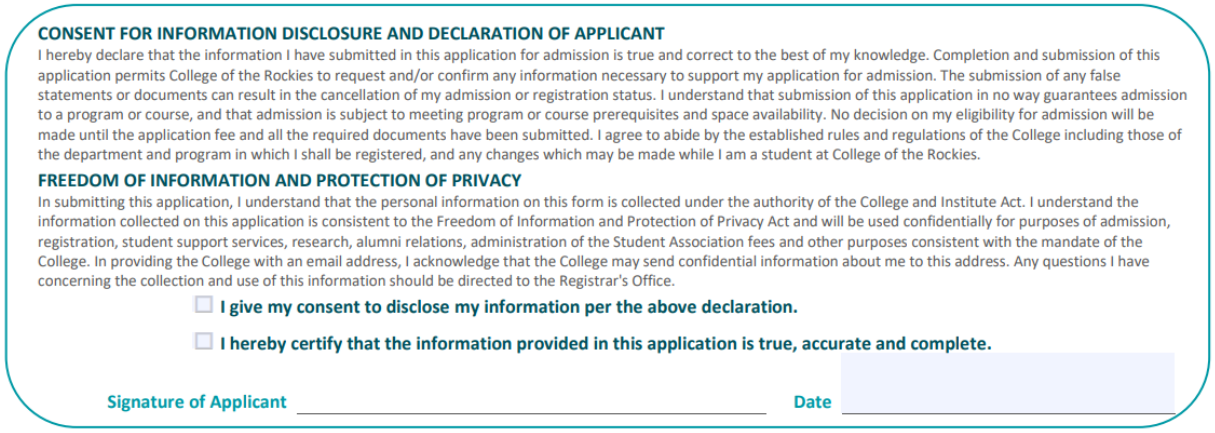
**Optional**: Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.




## 6. Collection Notice

**If you are collecting personal information directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).**

Review the sample collection notice and write your collection notice below. You can also attach the notice as an appendix.



**CONSENT FOR INFORMATION DISCLOSURE AND DECLARATION OF APPLICANT**

I hereby declare that the information I have submitted in this application for admission is true and correct to the best of my knowledge. Completion and submission of this application permits College of the Rockies to request and/or confirm any information necessary to support my application for admission. The submission of any false statements or documents can result in the cancellation of my admission or registration status. I understand that submission of this application in no way guarantees admission to a program or course, and that admission is subject to meeting program or course prerequisites and space availability. No decision on my eligibility for admission will be made until the application fee and all the required documents have been submitted. I agree to abide by the established rules and regulations of the College including those of the department and program in which I shall be registered, and any changes which may be made while I am a student at College of the Rockies.

**FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY**

In submitting this application, I understand that the personal information on this form is collected under the authority of the College and Institute Act. I understand the information collected on this application is consistent to the Freedom of Information and Protection of Privacy Act and will be used confidentially for purposes of admission, registration, student support services, research, alumni relations, administration of the Student Association fees and other purposes consistent with the mandate of the College. In providing the College with an email address, I acknowledge that the College may send confidential information about me to this address. Any questions I have concerning the collection and use of this information should be directed to the Registrar's Office.

☐ **I give my consent to disclose my information per the above declaration.**

☐ **I hereby certify that the information provided in this application is true, accurate and complete.**

**Signature of Applicant** _____ **Date** _____

# PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

## 7. Is any personal information stored outside of Canada?

Type "yes" or "no" to indicate your response.

*NO*

## 8. Where are you storing the personal information involved in your initiative?

*COTR has confirmed that the Moodle system used by Columbia Learning is FOIPPA-compliant as Columbia Learning is governed by the Private Training institutes Branch of the Ministry of Advanced Education and Skills Training in BC. We also confirmed that Columbia's Moodle server is a Canadian server hosted by Amazon AWS E2 service. All information and learning material will be hosted within a secure Moodle environment. Columbia Learning will provide a College of the Rockies staff member (Chelsea Ruiter) direct access to the Columbia Moodle system for the purposes of registering COTR students with Columbia Learning.*

## 9. Does your initiative involve sensitive personal information?

Type "yes" or "no" to indicate your response.

*NO*

- If yes, go to question 10
- If no, go to Part 5

### 10. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

Type "yes" or "no" to indicate your response.

- If yes, go to Part 5
- If no, go to Part 4

## PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization's Privacy Officer. More help is available in the Guidance on Disclosures Outside of Canada.

### 11. Is the sensitive personal information stored by a service provider?

Type "yes" or "no" to indicate your response.

- If yes, fill in the table below (add more rows if necessary) and go to question 13
- If no, go to question 12

| Name of service provider | Name of cloud infrastructure and/or platform provider(s) (if applicable) | Where is the sensitive personal information stored (including backups)? |
|---|---|---|
| | | |
| | | |

### 12. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

### 13. Does the contract you rely on include privacy-related terms?

Type “yes” or “no” to indicate your response.

- If yes, describe the contractual measures related to your initiative.

### 15. What controls are in place to prevent unauthorized access to sensitive personal information?

### 16. Provide details about how you will track access to sensitive personal information.

## 17. Describe the privacy risks for disclosure outside of Canada.

**Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.**

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

| **Privacy risk** | **Impact to individuals** | **Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)** | **Level of privacy risk (low, medium, high, considering the impact and likelihood)** | **Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)** | **Is there any outstanding risk? If yes, please describe.** |
|---|---|---|---|---|---|
| | | | | | |
| | | | | | |

**Outcome of Part 4**

The outcome of Part 4 will be **a risk-based decision made by the head of the public body on whether to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 17. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

## PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

### 18. Does your initiative involve digital tools, databases or information systems?

Type "yes" or "no" to indicate your response.

*YES*

- If yes, work with your Privacy Officer to determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of FOIPPA section 30

### 18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Type "yes" or "no" to indicate your response.

*NO*

- If yes, you may want to append the security assessment to this PIA. Go to question 20
- If no, go to question 19

## 19. What technical and physical security do you have in place to protect personal information?

Describe where the digital records for your initiative are stored (e.g., on your organization's LAN, on your computer desktop, etc.) and the technical security measures in place to protect those records. Technical security measures include secure passwords, encryption, firewalls, etc. Physical security measures include restricted access to filing cabinets or server locations, locked doors, security guards, etc.

If you have completed a security assessment, you may want to append it to the PIA.

*We have confirmed that the Moodle system used by Columbia Learning (CL) is FOIPPA-compliant as Columbia Learning is governed by the Private Training institutes Branch of the Ministry of Advanced Education and Skills Training in BC. We have also confirmed that Columbia's Moodle server is a Canadian server hosted by Amazon AWS E2 service. All information and learning material will be hosted within a secure Moodle environment. Columbia Learning will provide a College of the Rockies staff member (Chelsea Ruiter) direct access to the CL Moodle system for the purposes of registering our students with them.*

## 20. Controlling and tracking access

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

| **Strategy** | |
|---|---|
| We only allow employees in certain roles access to information | ✓ |
| Employees that need standing or recurring access to personal information must be approved by executive lead | ✓ |
| We use audit logs to see who accesses a file and when | |
| **Describe any additional controls:** | *At COTR, only Colleague system users with approved security classes can access personal information.* |

| Strategy | |
|---|---|
| | *At Columbia Learning (CL), there are two administrators that support affiliates; they have daily access, as it's required to enter/update information as it is submitted by the COTR. Three members of CL's Management team have access as well, but typically only access files to resolve issues flagged by students or training affiliates rather going into the system on a daily basis. Instructors have access to view their assigned course only. They cannot view institution or program-level student data, or Moodle information.* |

## PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

### 21. How will you make sure that the personal information is accurate and complete?

**FOIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.**

*Personal Information is collected with consent by applicant/student and able to be updated with authorized consent.*

### 22. Requests for correction

**FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.**

#### 22.1 Do you have a process in place to correct personal information?

Type "yes" or "no" to indicate your response.

*YES - Students are able to submit a change to their student profile to Enrolment Services.*

**22.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?**

Type "yes" or "no" to indicate your response.

*YES - a notation is added to the student profile within the student record system (Colleague).*

**22.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?**

Type "yes" or "no" to indicate your response.

*YES - if a FOIPPA request is submitted a notation is added to the student's account and if a correction is made the other public bodies/third party would be notified if the changes were made within 12 months of the FOIPPA request.*

## 23. Does your initiative use personal information to make decisions that directly affect an individual?

Type "yes" or "no" to indicate your response.

*YES*

- If yes, go to question 24
- If no, skip ahead to Part 7

## 24. Do you have an information schedule in place related to personal information used to make a decision?

**FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.**

Type "yes" or "no" to indicate your response.

*YES - Student Academic records are retained for 7 years.*

- If no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.

## PART 7: PERSONAL INFORMATION BANKS

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

### 25. Will your initiative result in a personal information bank?

Type "yes" or "no" to indicate your response.

*Yes*

- If yes, please complete the table below.

| **Describe the type of information in the bank** |
|---|
| Columbia Learning issues students who successfully complete the online and face-to-face components of the EMR course a QR code. The QR code contains the URL for the verification site (columbialearning.ca/verify) and a unique letter/number code found on the student's certificate (ie. HS657398A). No personal details are encoded in the QR, apart from the random letter/number code that was printed on the certificate. This allows the Ministry of Health – Emergency Medical Assistants Licensing Branch (EMALB), or any employer, to verify that the printed e-certificate the student holds is valid, and not expired or revoked. Nothing is transmitted to EMALB or elsewhere. Instead, entering the certificate code (manually or by scanning the QR code) links to a page on the Moodle instance where the student's name, course, status, and completion date are posted. |
| **Name of main organization involved** |
| Columbia Learning, in association with College of the Rockies. |
| **Any other ministries, agencies, public bodies or organizations involved** |
| Ministry of Health – EMA Licensing Branch |
| **Business contact title and phone number for person responsible for managing the Personal Information Bank** |

| |
|---|
| Ryan Curr, Columbia Learning Privacy Officer, 1-604-425-0763 |

## PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

### 26. Risk response

**Describe any additional risks that arise from collecting, using, storing, accessing, or disclosing personal information in your initiative that have not been addressed by the questions on the template.**

Add new rows if necessary.

| Possible risk | Response |
|---|---|
| Risk 1: N/A | N/A |

## PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

### Privacy Office Comments

*In consultation with the Initiative Lead, COTR Head of Student Services, and colleagues at Columbia Learning that are responsible for program development and Student Services, we have verified all necessary measures are in place to ensure personal information of the students that enrol in the EMR program will be safe, securely stored, and only used for the purposes outlined for this EMR course, and within the rules outlined in FOIPPA.*

## 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 / Privacy Office Representative** | Keltie Ross | Keltie Ross | October 26, 2023 |

## Program Area Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

### Program Area Comments:

| Role | Name | Electronic signature | Date signed |
|---|---|---|---|
| **Initiative lead** | Leah Bradish | | 03 Nov 2023 |
| **Program/Department Manager** | Deb Carty | | Nov 9, 2023 |
| **Contact Responsible for Systems Maintenance and/or Security** Only required if they have been involved in the PIA | Jason Columbo | | Nov. 8, 2023 |
| **Head of public body, or designate** (if required) | Robin Hicks | | Nov. 9, 2023 |