Privacy Impact Assessment for Non-Ministry Public Bodies

KeyboardingOnline.com

PIA#0001

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:	Office Administration
PIA Drafter:	Joan Kaun
Email:	kaun@cotr.bc.ca

		Phone:	250-489-2751 Local 3402
Program Manager:	**Kevin Szol**		
Email:	szol@cotr.bc.ca	Phone:	**250-489-2751 Local 3330**

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

1. **Description of the Initiative**

   College of the Rockies will be using online software as a learning tool for students. KeyboardingOnline.com teaches students to touch type and is available to students wherever they have Internet access. The software does not require students to purchase a separate textbook as all the lessons are online.

2. Scope of this PIA

Students will be required to purchase an access code, rather than a textbook, and provide their name to the US site.

3. Related Privacy Impact Assessments

None.

4. Elements of Information or Data

Students will be required to purchase an access code and provide their name to the site. The data is stored in the USA. Students will not be entering any other personal information.

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.

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**

   Data will be stored in the USA.

6. **Data-linking Initiative***

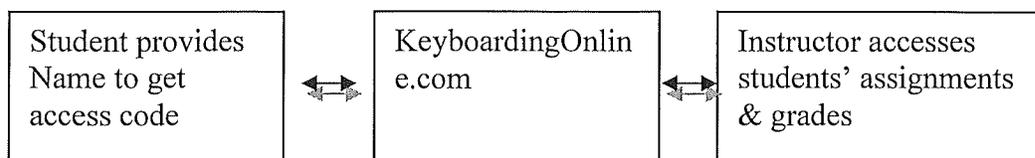| In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you 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;	N/A
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.	N/A
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	

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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.	N/A
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.

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

Student provides Name to get access code	⬅➡	KeyboardingOnline.com	⬅➡	Instructor accesses students' assignments & grades

9. Risk Mitigation Table

No risks

10. Collection Notice

"Your name will be required in order to access this site and to assign your letter grade. This information will be stored in the US on KeboardingOnline.com server.

No other personal information will be gathered by KeyboardingOnline.com.

If you want to proceed complete the consent form (The consent form will be hyperlinked from all College of the Rockies Office Administration course sites using KeyboardingOnline.com)

Or

If you don't wish to consent check with your instructor, the instructor will assign a fictitious name in order for you to complete the course work."

This message will be posted in all course sites using KeyboardingOnline.com.

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).

Computers and student files are stored in instructors' locked offices.

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

Instructor access is password protected.

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

Yes, College IT policies 8.1 A4.

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.**

    Role-based access.

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

    Only COTR program Instructors have access to students enrolled in the program and its password secured.

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?

    Updates are not required. Student's access codes are only good for one year, after which time all information is removed.

    If necessary students records are updated/corrected on students request.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.
    Yes. Grades will be assigned to individuals based on their keyboarding results.

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.

    The only personal information is the student's name. Students will be required to purchase an access code and provide their name. The access code will be valid for only one year and student will be able to update their personal name if there is a change, otherwise they will not be able to access the site under a changed name. The student will also be required to inform the instructor about the change.

    COTR program instructors will have access to the names and keyboarding assignments/results. The instructor password is only available to program instructors and is kept in their offices.

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?

    The grades will be recorded in the College's Student Information System. Grades are kept indefinitely. The student access code for Keyboardingonline.com is only valid for one year. After that time, the date and name will be removed.

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

    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).	

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

    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).	

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.

    No.

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

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 College of the Rockies will have to complete a PIA Update and submit it to Privacy Office(r).

	Sept. 2016	
Privacy Officer/Privacy Office Representative	Signature	Date

Part 7 – Program Area Signatures

Kevin Szol

Program/Department Manager	Signature	Date

Jonathan Butt

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

Dr. Stan Chung, VP Education & Applied Research

Head of Public Body, or designate	Signature	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.