



Privacy Impact Assessment for Non-Ministry Public Bodies

LockerGM-Lite

PIA# 2022-002

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:	Student Life & Athletics		
PIA Drafter:	Brian Millis		
Email:	Bmillis2@cotr.bc.ca	Phone:	250-489-2751 ext. 3572
Program Manager:	Cori Andrichuk		
Email:	candrichuk@cotr.bc.ca	Phone:	250-489-2751 ext. 3201

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

1. Description of the Initiative

Locker management system which offers easy to use software which would help the college manage our locker inventory. It will be a better way for the College to deal with the hundreds of lockers we manage every semester. Also, will help students who have to waste countless time in lineups to rent their locker. It will help remove the hassle of managing locker inventory.

2. Scope of this PIA

LockerGm Lite Software and use of Student web-based portal for students to set up their accounts.



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3. Related Privacy Impact Assessments

N/A

4. Elements of Information or Data

Elements of information used:

Name (first and last)

Email

Student Number

Phone Number

Program

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

See attached email from the vendor confirming data is stored in Canada

6. Data-linking Initiative*

<p>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.</p>	
<p>1. Personal information from one database is linked or combined with personal information from another database:</p>	no
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	no
<p>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.</p>	no
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	



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7. Common or Integrated Program or Activity*

<p>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.</p>	
1. This initiative involves a program or activity that provides a service (or services);	yes
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
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	

**** 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

Workflow provided by vendor:



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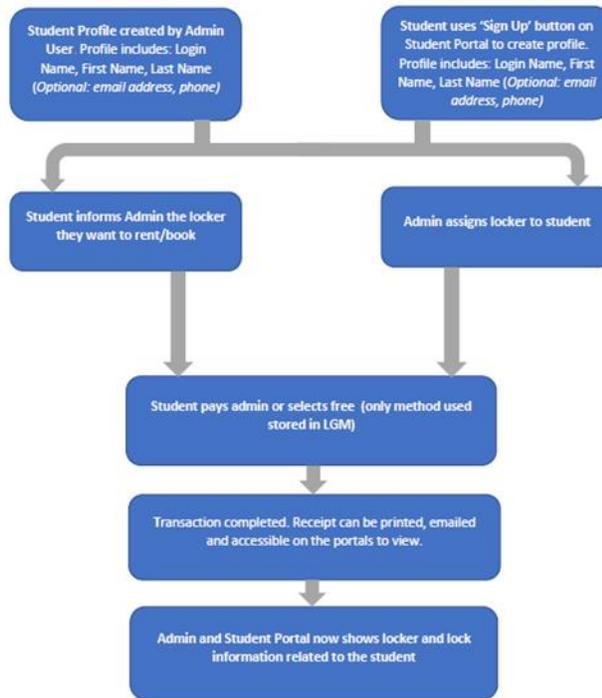
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Workflow for creation of student information

LockerGM Lite Version



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Student Uses 'Sign Up' button on Student Portal to create profile- Profile includes Login Name, First name, last name, Email, Student Number, and phone number. Selection of locker during profile set up.	Collection	26 (c)
2.	Student Informs gym staff of locker registration	Use	32 (a)
3.	Student Pays gym staff/Completed	Collection Use	26 (c) 32 (a)



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4.	<i>Student then receives locker combination</i>	<i>Use</i>	<i>32 (a)</i>
5.	<i>Admin and student portal now shows locker and locker registered to student</i>	<i>Disclosure</i>	<i>33.1 (b)</i>

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.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Student Life will protect all private information given in order to rent a locker, such as name, phone number and e-mail address, but maintains the right to share that information with Campus Security or any authorized law enforcement agency- Student Life staff only have access.	<i>Low</i>	<i>High</i>
2.	Request may not actually be from Student (i.e., their email address may be compromised)	Check student cards and cross reference information	<i>Low</i>	<i>High</i>
3.	Students' personal information is compromised when transferred to the service provider	Send only locker numbers and combinations when initial setup is done.	<i>Low</i>	<i>High</i>

10. Collection Notice

Collecting first and last name, email address, student number and program. Information will be used to cross reference students use of locker upon collection of payment in the Student Life office or if students need access to their locker.

Collection notice will be on student landing page before setting up account



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“Student Life will be collecting your information for purpose of identifying students’ lockers upon payment at the Student Life office. Student Life will not ask you for any other personal information other than what is requested.”

*Student Life and Athletics
2700 College Way
Cranbrook B.C
1-250-489-8252*

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).

Current full-time staff will only have access to LockerGM log-in information and password will be changed yearly.

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

We wouldn’t be implementing any technical measures since the system is housed elsewhere in Canada and we aren’t implementing the SSO portion of the product at this time

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

The College has a Use of Technology Policy (8.1) which outlines how technology may be used for college work. Included in that is a prohibition on the sharing of passwords

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.

Current full-time staff will only have access to LockerGM, via username/password and the password will be changed yearly.

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

Personal account information will only be available to each individual user. Admin access will be restricted to a single named Admin account with single user access



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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?

Access via Student portal/landing page for LockerGM

Students can sign in and update their profile.

Staff can login to the system and update students' profile at their request.

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.

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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?

Part 5 – Further Information

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

No

<p><i>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).</i></p>	<input type="checkbox"/>
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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.



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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).

Based on the information provide, and my understanding of how this tool will be used, I have no privacy concerns that have not been addressed.

If, upon implementation and use, it is discovered that personally identifiable information is being collected, used or disclosed in any other way than outlined within this Privacy Impact Assessment, a revised assessment will be required.

Brenda Mathenia, MSI, MUP, BSc
Privacy Officer
College of the Rockies

Brenda Mathenia

Privacy Officer/Privacy Office
Representative

Brenda Mathenia

Signature

3 June 2022

Date



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Part 7 – Program Area Signatures

Cori Andrichuk

Program/Department Manager

Signature

June 6, 2022

Date

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

Signature

Date

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.