



COLLEGE OF
THE ROCKIES

Privacy Impact Assessment

Name of Initiative:

Slickplan software

PIA Number: 2024.06-

14

INSTRUCTIONS (READ BEFORE STARTING)

Submit a completed privacy impact assessment (PIA) before starting a new College Initiative or significantly changing an existing College Initiative that directly collects Personal Information, or results in the collection of Personal Information by COTR or a COTR service provider.

BC's Freedom of Information and Protection of Privacy Act (FIPPA) defines an "Initiative" as any enactment ("policy/procedure"), system (conceptual or technical), project, program, or activity.

Contact the COTR Privacy Officer (Keltie Ross – PrivacyOfficer@cotr.bc.ca) to receive support determining whether any change in how COTR employees are completing their duties to the College may require a Privacy Impact Assessment.

Read through this form entirely before starting to populate it. Each question is designed to capture specific information for review.

Some information recorded in the PIA may be confidential or proprietary and not intended for distribution. Before you share the draft or completed PIA (internally or externally), please contact COTR'S Privacy Officer, Keltie Ross at PrivacyOfficer@cotr.bc.ca for guidance.



PART 1: GENERAL INFORMATION

Initiative Title:	Slickplan software
Department:	Learning Commons & Library
Initiative Lead (PIA Drafter) Name and COTR Email Address:	Lindsay Newton, Library Technician – Lnewton@cotr.bc.ca
Dean or Director Name, Title, and Email:	Shaun Longstreet, Dean, CITL – Slongstreet@cotr.bc.ca
Privacy Officer Assigned:	Keltie Ross
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	
Product Name (if applicable):	Slickplan
Third Party Contact Name and Email:	
Third Party URL:	https://slickplan.com/

1. In three to five sentences, describe the Initiative including:
 - a) what you are doing,
 - b) an overview of the process,
 - c) who is involved,
 - d) and when and/or how long your Initiative runs.

The Learning Commons & Library are working on an initiative to update and re-map the webpage(s) for these departments at College of the Rockies.

The process to re-map a webpage involves identifying the key landing pages and subsequent subpages on the webpages and then determining a number of factors that will help us bring focus to the new, updated webpage. These factors include

- a) identifying certain pages need to move under different subject headings,**
- b) determining if certain pages should remain part of the webpage details,**
- c) if there is page duplication occurring that can be cleaned up, and**
- d) determining the most efficiency and intuitive options for the webpage design, which will hopefully lead to increased functionality and improve the user experience.**

To effectively look at these details clearly, we will be using a dedicated webpage mapping software product called Slickplan. This product has dedicated tools that help to assist with content mapping and design, including diagram makers, design mockups, and sitemap building capability.

The key people involved are Learning Commons & Library staff – Lindsay Newton, Keltie Ross, and Shaun Longstreet. There will be consultation with staff from Communication & Marketing – Karla Vishloff, and possibly some consultation with IT staff – Miguel Pienado.

This is a short-term initiative, which will hopefully be completed by the Fall of 2024.

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at COTR? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the Initiative will be implemented?

This initiative in the early mapping and development stages is limited to certain individuals in the Learning Commons & Library, Marketing & Communications, and IT departments. The information that they will be seeing and/or working with is NOT personal information (PI). The details are mainly subject headings and keywords that are already or would be public facing on the webpage, along with webpage content that is also public facing. The details are all related to operational/business purposes.

This particular work will cover the first steps in this initiative. Ultimately, the full initiative involves this work related to re-mapping, then sharing the subsequent mapping drafts with other Learning Commons/Library staff and possibly some test groups from the college community to look over and test/comment on the changes/updates developed. Once a final draft is agreed upon, the new webpage mapping/layout would be shared with the wider college community and the general public. The final version would go live.



3. Is this an administrative/operational, teaching and learning, or research Initiative? Select all that apply.

- Administrative/Operational Research (**Contact COTR Privacy Officer before continuing this PIA**)
- Teaching and Learning

4. Has a PIA previously been completed for this Initiative?

- Yes No Not sure

5. What activities will occur within the Initiative? Use the bullet points below to make action statements. Replace the example action statement. Add or delete bullets as necessary.

- **Identify key issues with the current mapping of the existing webpage(s)**
- **Begin to input the new details and mapping ideas for the webpage into the Slickplan software.**
- **Edit the webpage mapping as issues and links that need to be changed are identified.**
- **Manipulate the draft mapping as necessary when working on the planning and different stages of the drafting.**
- **Share the details with Marketing & Communications and IT to determine if what we are mapping is feasible and they can assist with making the changes needed.**

6. In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your Initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.

- **Webpage service headings**
- **Webpage service subheadings**
- **Webpage service descriptions and links**
- **Webpage icons/images to convey services**



7. Did you list Personal Information in question 6? [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.
- Yes No
8. If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information?

The work that is being conducted for this initiative in no way uses or requires personal information (PI) as described in the BC FOIPPA legislation. The information that is being used in this initiative is for public use and is currently located on a public-facing webpage. If there are any names or email addresses that are used within the content of the mapped pages that are developed they are details that are directly related to the positions/jobs of the individuals and would be considered business/operational information.

9. Does the Initiative involve integration between COTR IT systems and Third-Party systems?
- Yes No N/A

If yes, list below: (put N/A on the first row if you answered No or N/A above. Add or delete rows)

COTR IT system:	Third party system integrated:
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If there is Personal Information involved in this Initiative, continue to complete the remaining sections of the PIA.

If there is NOT any Personal Information involved in this Initiative, please submit questions 1-9 to the Privacy Officer along with the completed signatures page.



PART 2: PRIVACY OFFICE(R) COMMENTS

If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).

This PIA is based on a review of the material provided to the COTR Privacy Office(r) as of **June 7, 2024**.

The details provided in this PIA, indicates that the application to be developed and uploaded onto the COTR website can be delivered in compliance with FIPPA legislation.

Should there be a change in scope to this part of the initiative, further assessment and/or a PIA update may be required as new related or expanded service is considered, or the privacy policies for the College change in the future.

Any substantive changes made to the scope of this PIA would need to be included in a PIA update and submitted to the Privacy Office(r).

- https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_03#section26

Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Officer as at the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Keltie Ross		June 7, 2024

PART 3: APPROVAL SIGNATURES

Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices 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 Department will inform the COTR Privacy Officer, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

Declaration of Initiative Lead: I confirm that I understand the privacy impacts of this College Initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the Initiative. If there are any changes to the Initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the COTR Privacy Officer and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and COTR Privacy Officer recommendations relative to this Initiative.

Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
Lindsay Newton		June 10/24

Declaration of Dean / Director / One-Over-One Signatory: I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and COTR Privacy Officer recommendations relative to this Initiative.

Signature of Dean / Director

Name and Title	Signature	Date signed
Shaun Longstreet – Dean, CITL		June 11, 2024



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Declaration of Information Security: I confirm that I am satisfied that the Information Security safeguards employed in this college Initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or COTR business information described in this PIA.

Signature of Information Security (Required only when college Initiative involves Information Security considerations)

Name and Title	Signature	Date signed
Nathan Skretting - CIO		11 July 2024

Declaration of Information Technology: I confirm that I understand and approve of the proposed use-case of COTR IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with COTR's IT systems for the College Initiative described in this PIA, where applicable.

Signature of Information Technology (Required when College Initiative involves use of COTR IT systems or integration of Third-Party technology with COTR IT systems.)

Name and Title	Signature	Date signed

Declaration of Head of Public Body or Designate: I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College Initiative. I am satisfied with the completion of this PIA under FIPPA.

Signature of Head of Public Body or Designate Under FIPPA (Required only if Personal Information is involved in the Initiative as indicated in Question 7).

Name and Title	Signature	Date signed