



Privacy **Impact** Assessment

Name of Initiative:

WMAI

PIA Number:

2024.03 - 11

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:	COTR/WMAI Curriculum Collaboration
Department:	COTR Con. Ed, Fernie Campus and MAST
Initiative Lead (PIA Drafter) Name and COTR Email Address:	Anita Palmer, Manager Fernie Campus apalmer@cotr.bc.ca
Dean or Director Name, Title, and Email:	Leah Bradish, Continuing Education, Contract Training, and Campus Operations lbradish@cotr.bc.ca
Privacy Officer Assigned:	Keltie Ross
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	Wilderness Medical Associates International (WMAI)
Product Name (if applicable):	Wilderness First Responder (WFR), Wilderness First Aid (WFA) Wilderness Advanced First Aid (WAFA) and WFR Recertification
Third Party Contact Name and Email:	Luke O'Neill luke@wildmed.com
Third Party URL:	wildmed.com

1. In three to five sentences, describe the Initiative including:

College of the Rockies has entered an INTELLECTUAL PROPERTY LICENSE AGREEMENT FOR LICENSED TRAINING COMPANIES to access WMA International's curriculum. This was in response to College of the Rockies, Fernie Campus curriculum requirements for the Mountain Adventure Skills Training Program (MAST).

Under this agreement College of the Rockies instructors have been trained in how to deliver WMA International's First Aid curriculum in a face-to-face format in the East Kootenay. The online (Moodle- based) portion of this course would be delivered through WMA International's online Moodle portal and students will be provided a

login access CODE to login and upload personal information required by WMA International. The students take the face-to-face component on site at COTR under the instruction of our instructors. When they have completed the face-to-face portion of the course, COTR/WMAI instructor uploads the applicable test results and attendance forms to WMAI's Moodle system. WMA International/COTR Instructor can then upload their appropriate certificate to WMAI Moodle for the student to access.

2. In a few sentences, explain the scope of this PIA.

The scope of this PIA is specifically in regard to the collection and input of the student's registration information to the COTR Colleague system by COTR Administration staff, and providing students with their WMAI Moodle access code so they can log in to upload their personal information to WMAI's Moodle system.

The face-to-face practical first aid component is delivered by our WMAI certified instructor (Amy Chris). The College of the Rockies instructor would subsequently inform WMA International when the student successfully completes the practical component with us and can be issued their certificate.

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.
- Registration of Students in COTR Colleague system
 - Email sent to Students that includes a WMAI Moodle login code.
 - Delivery of face-to-face practical first aid instruction.
 - Forwarding class documents to WMAI via their Moodle system.
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.
- COTR Registration Information (images of the form below):

COLLEGE OF THE ROCKIES

Registration Form

Continuing Education & Contract Training

WHAT IS YOUR PREFERRED INTAKE DATE:

Have you previously attended College of the Rockies? Yes No If YES, Student Number (if known)

First Name Last Name Middle Name

Former Last Name SIN DOB YYYY MM DD

Address City/Town Province

Postal Code Email Phone

EMERGENCY CONTACT

Name Phone

GENDER IDENTITY

Woman
 People whose current gender is woman. This includes cisgender and transgender people who are women.

Man
 People whose current gender is man. This includes cisgender and transgender people who are men.

Non-Binary Gender
 People whose current gender is not exclusively a woman or man. This includes people who do not have one gender, have no gender, are gender fluid, or are Two-Spirit.

Prefer Not to Answer/Unknown

WOULD YOU SAY YOU ARE

Cisgender
 People whose sex assigned at birth is the same as their gender.

Transgender
 People whose sex assigned at birth is different from their gender.

Prefer Not to Answer/Unknown

VOLUNTEER DISCLOSURE

Aboriginal Status: Yes No

If yes, check all that apply:

First Nations Metis Inuit Status Non-Status

CITIZENSHIP STATUS

Canadian: Yes No

If NO, what is your country of origin:

Permanent Resident International Student
 Work Visa Live-in Caregiver
 Other: _____
 Refugee

RELEASE OF INFORMATION:

If you wish to authorize someone to act on your behalf with respect to application status, registration, financial information/activities, transcripts or graduation, please complete the Student Information Release Authorization (available from the Registrar's office or online).

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.

Applicant's Initials _____

(initial here in lieu of signature)

Date _____

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?
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: **N/A**

Third party system integrated: **N/A**

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: COLLECTION

FIPPA sets out rules for public bodies and their employees to collect Personal Information. Unauthorized collection is prohibited. This section will help you identify the legal authority for **collecting** Personal Information and confirm that all Personal Information elements collected are necessary for the purpose of the initiative.

10. Whose Personal Information is collected in this initiative? Check all that apply.

- | | |
|----------------------------------------------------------|-------------------------------------------------------|
| <input checked="" type="checkbox"/> Students | <input type="checkbox"/> Former employees |
| <input checked="" type="checkbox"/> Prospective students | <input type="checkbox"/> Service provider employees |
| <input checked="" type="checkbox"/> Former students | <input type="checkbox"/> Donors or other constituents |
| <input type="checkbox"/> Alumni | <input type="checkbox"/> Volunteers |
| <input type="checkbox"/> Employees | <input type="checkbox"/> Other community members |

11. How frequently will the Initiative collect Personal Information?

- Single instance of collection within one semester or quarter
- Ongoing collection up to a single year
- Ongoing collection over more than one year

12. How many individuals' Personal Information will be collected?

- 1 - 50 51 – 500 Over 500

13. If the Initiative involves a Third Party, are you able to test the product to see what personal information it collects?

- Yes No N/A (No Third-Party product involved)

NOTE: COTR cannot test the Moodle system used by WMAI, but the college also uses Moodle, and understands how the information is input and used within that particular software.

14. Why is the Personal Information being collected? (check all that apply)
- The Personal Information is necessary and directly related to college operations. The collection of this Personal Information is directly related to the college's documented strategic directives, goals, or mandate letter directions.
 - The Personal Information is necessary and directly related to requirements explicitly stated in college bylaws, policy, and procedure.
 - The Personal Information is collected because collection is required or authorized under local, provincial, or federal law. Be prepared to directly cite the section of a particular law that applies if asked.
 - The Personal Information is collected for determining suitability for an honour or award including a scholarship, prize, or bursary.
 - The Personal Information is being collected for a quality assurance or improvement Initiative that has been approved by the college Executive.

15. How will you reduce the risk of collecting unnecessary Personal Information? (Check all that apply.)
- The Initiative will only collect specific information deemed necessary for and directly related to the initiative
 - The Initiative will use forms with primarily closed-ended questions and minimal open-ended questions
 - The Initiative will use forms with drop-down menus
 - The Initiative will have documented data gathering and aggregation processes for open ended submissions or fields
 - The Department needs Privacy Officer review and support because none of the above apply

16. FIPPA Collection Notice: When collecting Personal Information, FIPPA requires that you provide a collection notice (except in limited circumstances). Please fill in the template collection notice below and remove bold and square brackets.

The College of the Rockies ("COTR") collects your Personal Information in accordance with section 26 of the Freedom of Information and Protection of Privacy Act ("FIPPA"), R.S.B.C. 1996, c.165 for the purposes of Registration into a Continuing Education course. If you have any questions about the processing of your Personal Information, please contact Anita Palmer, Manager, Fernie Campus at apalmer@cotr.bc.ca.

PLEASE NOTE: the general application form at COTR for class registration includes a robust privacy/collection notice that refers to FIPPA, as well as the BC College and Institute Act. The notice above would be applied on any other forms that students participating in a WMAI course might need to fill out.

Please ask the Privacy Officer for assistance drafting your collection notice if your Initiative requires indirect collection of Personal Information (i.e. if a service provider collects Personal Information from students or employees on behalf of COTR). The Privacy Officer may recommend changes to the FIPPA Collection Notice that you draft above.

The Privacy Officer may also provide additional options for the FIPPA Collection Notice that would be required when collecting personal information. Please speak with them directly for this portion of the form before final submission.

PART 3: USE

FIPPA sets out requirements and restrictions related to use of Personal Information. This section will help you identify the legal authority for **using** Personal Information and ensure that the use of Personal Information is limited to the original purpose for collection.

17. What is the intended use of the Personal Information collected? (check all that apply)

- The Personal Information will be used for the purposes checked off in Question 14
- The Personal Information will be used for secondary purposes, and I have a consent notice attached as an appendix to this PIA that meets the requirements found in FIPPA regulations. I will work with the COTR Privacy Officer to determine if secondary use is appropriate and compliant with FIPPA.
- The Personal Information will be used for a purpose for which the information may be disclosed to the public body under [section 33](#). The COTR Privacy Officer will attach the relevant section number to this selection if it applies.

18. How will you ensure that parties using the Personal Information will use it only for the purposes stated in 17 above? Check all that apply.

- Documented department information management practices and training
- Documented use restrictions communicated from your department to another COTR department
- Written contract between COTR and a Third Party including explicit conditions
- The Department needs Privacy Officer review and support because none of the above apply

19. Does your Initiative use Personal Information to make decisions that directly affect an individual?

- Yes
- No

20. What is the intended impact of the decisions that are being made that directly affect an individual? (check all that apply).
- Directly affects academic status or grades
 - Directly affects how an individual accesses their courses, campus activities, or student supports
 - Directly affects employment status, employee remuneration, or contract opportunities, and pay
 - Directly affects how employees and service providers will complete their work
 - Directly affects how employees access campus activities and support services
 - Directly affects the College's capacity to protect individuals from harm
 - Directly affects the College's capacity to interact with and support external parties
 - N/A – The decisions are not intended to have a direct impact on individuals
21. Who will be using the Personal Information collected by this Initiative? (Check all that apply and provide details.)

Your department:	College of the Rockies Fernie Campus, Administration
Other departments at COTR	College of the Rockies Cranbrook Campus Registration/Admissions department.
WMAI	WMAI Moodle system/administration department.

PART 4: STORAGE

22.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23. Is any Personal Information involved in your Initiative stored outside of Canada?

Yes No

24. Where is the Personal Information stored? Please identify applicable geographic locations for primary storage and backups. If Personal Information is stored in more than one primary location, the COTR Privacy Officer can expand the response field in this question.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



NOTE: materials saved to Microsoft 365 are stored in the Cloud, specifically Microsoft Cloud. Location is variable.

25. Does your Initiative involve Sensitive Personal Information? (Any Personal Information can be Sensitive Personal Information in different contexts. Please contact the COTR Privacy Officer to discuss.)

- Yes No

26. Is any of the Sensitive Personal Information stored outside of Canada?

- Yes No

NOTE: the only PI stored outside of Canada with WMAI is the students name and email address, and certification levels and issue dates.

27. Where is the Sensitive Personal Information stored? Please identify applicable geographic locations for primary storage and backups. Type N/A in the cells on the first row if **Sensitive Personal Information** is not stored outside of Canada as indicated in Question 26.

Name of Third Party	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Name of cloud infrastructure and/or platform provider(s) (if applicable)
	N/A	N/A

PART 5: DISCLOSURE

FIPPA sets out requirements and restrictions related to disclosure of Personal Information. This section will help identify the legal authority for **disclosing** Personal Information, and consider risks related to that disclosure. **Fill out this section if Question 26 was answered “Yes”**

Complete this section if you are disclosing Sensitive Personal Information to be stored outside of Canada. You may need help from the COTR Privacy Officer.

28. Is any Personal Information being disclosed outside of Canada under FIPPA section 33(2)(f)? This section allows for information to be made available to the public under an enactment that authorizes or requires the information to be made public.
- Yes No
29. Is any of the Personal Information being disclosed outside of Canada under FIPPA section 33(2)(p)? This section allows disclosure for the purposes of (i) a payment to be made to or by COTR, (ii) authorizing, administering, processing, verifying, or cancelling a payment, or (iii) resolving an issue regarding a payment.
- Yes No
- The payment processor is out of scope of this PIA

30. Describe the privacy risks for disclosure of Personal Information (PI) outside of Canada.

Use the table to indicate the privacy risks. For each privacy risk you identify, describe the potential impact to individuals or COTR, and 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, physical, technical, administrative measures) you outline elsewhere in this PIA. Privacy risks below are examples only; add new rows if necessary.

Privacy risk	Impact to individuals or COTR	Risk response
Unauthorized collection of PI by COTR employees	Increases the scope of PI exposure in the event of unauthorized access.	Collection limited to what is explicitly necessary for course registration; privacy/collection notification on application forms clearly outlines what PI is needed/why it's collected (Section 26 of FIPPA)
Unauthorized use of PI by COTR employees	Exposure of PI elements to unauthorized individuals who do not require access may constitute a breach.	Access to sensitive PI is limited to few/specific individuals that have registration system access. Ensure employees are informed as to the terms under which data is collected (data collection statement), so disclosure is limited only to authorized use.
Unauthorized disclosure of PI by COTR employees	Data breach - exposure of PI to parties which should not have access to records.	Employees are informed as to the terms under which data is collected (data collection statement), so disclosure is limited. Institute data loss prevention controls.
Unauthorized collection of PI by Third Party/ies	Increases the scope of PI exposure in the event of unauthorized access.	Contractual measures in place; third party has agreed to terms in ISA. Collection limited to what is explicitly necessary for third party; privacy/collection clearly outlines what PI is needed/why it's collected. (Section 26 of FIPPA)
Unauthorized use of PI by Third Party/ies	Exposure of PI elements to unauthorized individuals who do not require access may constitute a breach.	Contractual measures in place; third party has agreed to terms in ISA including terms on retention and disposal of PI. Third Party has published policy indicating controls to mitigate unauthorized use which includes notification of CoTR if unauthorized access occurs.
Unauthorized disclosure of PI by Third Party/ies	Data breach - exposure of PI to parties which should not have access to records.	Contractual measures in place; third party has agreed to terms in ISA. Third Party has published policy indicating controls to mitigate unauthorized disclosure which includes notification of CoTR if unauthorized disclosure occurs.

34.

[Redacted]

[Redacted]

[Redacted]	[Redacted]	[Redacted]
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
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[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>

[Redacted]

35.

[Redacted]

[Redacted]

36.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

38.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

PART 7: ACCURACY AND CORRECTION

FIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's Personal Information is accurate and complete. FIPPA also gives an individual the right to request correction of errors or omissions to their Personal Information.

In this section, please demonstrate how you will make a reasonable effort to ensure the Personal Information you have on file is accurate and complete.

40. How will COTR ensure that the Personal Information is accurate and complete? (Check all that apply)
- Individuals input their own Personal Information
 - Individuals update their own Personal Information
 - Employee verifies that information is accurate and complete before processing
 - Documented processes to ensure accurate and complete data entry and maintenance
 - The Third Party manages the accuracy and completeness of Personal Information under the direction of COTR
 - Software or service uses automated processes to enter and manage Personal Information
 - Other: *(fill in details)*
 - Other: *(fill in details)*
41. Is there a documented process in place to correct Personal Information?
- Yes No
42. Sometimes it is not possible to correct the Personal Information. FIPPA requires a process to make a note on the record about the request for correction if it isn't possible to correct the record itself. Is there a documented process in place to annotate the record?
- Yes No N/A (Corrections possible)
- 

43. If there is a request for correction from an individual and COTR or the Third Party disclosed that individual's Personal Information in the last year, FIPPA requires that COTR or the Third Party provide the applicable other public body or Third Party about the request for correction. Will COTR or the Third Party ensure that these notifications are done when necessary?

- COTR will forward correction notifications
- Third Party will forward correction notifications
- COTR and Third Party will split responsibility based on who was authorized to disclose Personal Information to third parties before a correction request was made.

PART 8: RETENTION AND DISPOSITION

FIPPA requires that public bodies keep Personal Information for a minimum of one year after it is used to make a decision. Personal Information needs to be disposed of to limit privacy risk after legal retention timelines.

44. How long will COTR need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

Record Type: student registration Retention Period (in years/months): 7 years

45.

[Redacted content]

46. How will you ensure that the records containing Personal Information are disposed of in accordance with the retention schedule noted in questions above? (Check all that apply)

- Schedule records review and disposition dates in Outlook calendars
- Build conditions for disposal into department Standard Operating Procedures
- Send direct written communication to staff or service providers.
- Other (explain):

47. What methods will be used to dispose of Personal Information following retention period? (Check all that apply.)

- COTR business unit shredding on campus
- COTR contracted shredding service provider
- COTR deletion of electronic record(s)
- Service Provider shredding/deletion of record(s) under COTR contract
- Service Provider shredding/deletion of record(s) under COTR written instruction
- Other (explain):
- Other (explain):

PART 9: INFORMATION FLOW

48. Complete the Information Flow Table

Use column 1 to describe the way Personal Information moves through your Initiative step by step. Describe the steps as if you were explaining it to someone who does not know about your Initiative.

Use column 2 to identify whether the action in column 1 is a collection, use, or disclosure of Personal Information.

The Privacy Officer will complete column 3 to identify the legal authority you have for the collection, use, or disclosure.

Information Management Steps	Collection, use, or disclosure	FIPPA and other legal authorities
Step 1: Student enrolls in Wilderness First Aid course via COTR registration portal (Colleague, FOIPPA compliant, based and run in Canada).	Collection	26(c)
Step 2: One COTR staff member (Lisa Plummer) will be issued WMAI International Moodle system access code. The WMAI Moodle system is based out of and run in the USA. The system is FOIPPA/FIPPA compliant and operates 100% in the cloud with the Amazon Web Services (AWS) server located in a secure facility in Oregon hosting Moodle data. In addition, the only student information WMAI stores is the name and email address of the student, the type of certification earned, date of the course, and the expiration date of any certification earned. WMAI stores no physical files at their Headquarters in Portland, Maine, nor do they have any data stored on a physical hard drive on site. The COTR staff member will email the WMAI code for their Moodle system to the registered student. The student then uploads their own personal information on the WMAI Moodle site.	Disclosure and Use	33.2 (c) and 32(a)
Step 3: Student participates in and completes in-person practical portion of the course at a COTR campus.	Disclosure and Use	33.2 (c) and 32 (a)
Step 4: WMAI/COTR instructor uploads required paperwork to WMAI Moodle system. COTR/WMAI instructor uploads the appropriate certificate to each student's Moodle account for them to access.	Disclosure and Use	33.2 (c) and 32 (a)

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.

PART 10: TRAINING

49. Identify which of the following activities all employees and Third Party (as applicable), will be trained on when collecting and managing the Personal Information for the College Initiative.
- Collection: Limit the collection to only what is explicitly necessary
 - Use: Use the Personal Information only for the purpose for which it was originally collected
 - Access: Only authorized employees (and, where applicable, service providers) may access the Personal Information
 - Disclosure: Not to disclose the Personal Information inside or outside COTR unless authorized under FIPPA
 - Storage: To store the Personal Information only in COTR-provided or approved storage locations and not to store unnecessarily in multiple locations
 - Retention: to keep the Personal Information for a minimum of one year – with longer retention periods only when necessary
 - Disposal: To dispose, when applicable, in a secure method that renders the Personal Information permanently irretrievable

PART 12: 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 **(DATE/YEAR). -April 24, 2024.**

The details provided in this PIA, indicates that this initiative can be delivered in compliance with FIPPA legislation.

- Both Fernie Campus staff and WMAI representatives have clearly outlined the personal information (PI) collected by both organizations, and shared the workflow applied to ensure the secure sharing of any data related to students that are part of this initiative, whether as a new student or returning student being re-certified.
- WMAI has provided key additional details (privacy policy, registration process, server company/location) to establish that they are in compliance with BC FIPPA legislation and the reasons for collecting and keeping PI related to their programs.

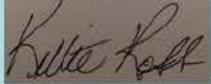
Should there be a change in scope to this part of the initiative, further assessment and/or a PIA update may be required as new related or expanded service is considered, or the privacy policies for the College change in the future.

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		April 15, 2024

PART 13: 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
Anita Palmer, Manager, Fernie Campus		24/04/15

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
Leah Bradish, Director, Continuing Education, Contract Training, and Campus Operations lbradish@cotr.bc.ca		15 Apr 2024

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		7 May 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
Paul Vogt, COTR President		May 17, 2024