



COLLEGE OF
THE ROCKIES

Privacy Impact Assessment

Name of Initiative:

Workleap / Sharegate

PIA

Number: 2024.02-08

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: | Workleap/Sharegate migration |
| Department: | COTR IT |
| Initiative Lead (PIA Drafter) Name and COTR Email Address: | Ravi Ranasinghe |
| Dean or Director Name, Title, and Email: | Nathan Skretting |
| Privacy Officer Assigned: | Keltie Ross |
| If initiative involves a third-party (i.e. vendor, consultant, partner), provide | |
| Third Party Name: | Workleap |
| Product Name (if applicable): | Sharegate |
| Third Party Contact Name and Email: | |
| Third Party URL: | |

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.

- a) **The COTR IT Department is currently preparing to migrate the college On-Prem SharePoint Server to SharePoint Online (MS Cloud / Office 365)**

- b) **Workflow of this project will involve but is not limited to:**
 - **Take inventory of our SharePoint data by performing an audit of what's currently on SharePoint environment.**
 - **Clean up our SharePoint environment from data that's redundant, unused, or no longer up to date.**
 - **Plan and structure our information architecture for COTR to get the new environment ready.**
 - **Communicate the benefits behind the move to users so that they understand ahead of time.**
 - **Review and Work on ShareGate Tool (How to Guide).**
 - **Kick-off migration with the ShareGate tool to ensure success.**

- **Generate a post-migration checklist that makes sense to our reality and help keep tabs of all things we need to consider our post migration.**

c) **Those involved in this project will be.**

**Ranasinghe, Ravi (System Analyst - Information Technology Services)
Skretting, Nathan (Chief Information Officer Information Technology Services)
Ross, Keltie (Manager, Learning Commons Library)**

d) **The start Date is not yet decided but planned for late Summer 2024, until completed.**

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?

Scope of PIA

The scope of this PIA is the migration of the on-premises SharePoint environment to SharePoint online / M365 products and services, using the ShareGate Migration tool. The ShareGate Migration tool will be used by COTR IT Services and no other individuals or departments at COTR. This initiative is specific to the IT department, and only IT Services will be working on updating our SharePoint environment. We do not believe there will be any exceptions implemented. This PIA covers the full initiative of migrating our on-premises SharePoint environment to SharePoint Online and isn't part of a larger project in the IT Services department.

Scope Information

Using ShareGate tool:

- **Taking stock of what's in our current SharePoint environment with a solid audit**
- **Focus on what needs to be migrated. Remove data that's redundant, unused, or no longer up to date.**
- **Understand the benefits behind the move ahead of time and End-user training and communication.**
- **Note issues that arise during the upgrade and resolve them as needed.**
- **Ensure the migration was successful and that everything is where it should be and complete A post-migration check.**

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.

- **Migration to SharePoint Online using ShareGate tool.**
- **All our SharePoint environment will be on the cloud.**
- **End user Training for SharePoint Online.**

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 IT Services does not collect any type of data with this initiative, and the ShareGate Migration Tool does not collect any type of data. While this initiative does deal with COTR data, the ShareGate Migration tool is only used to migrate/copy our on-premises SharePoint data to the SharePoint Online environment.

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 ShareGate Migration tool is installed locally in our COTR environment, so COTR data is never in contact with ShareGate sites or servers, and the communication is strictly between our on-

premises SharePoint environment and our SharePoint Online environment. When using the ShareGate Migration tool, the connection to the SharePoint site uses HTTPS, so the data transitioning through the tool will be encrypted. Furthermore, IT Services can limit access to the ShareGate Migration tool to only those involved with the migration initiative.

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: **SharePoint**

Third party system integrated: ShareGate **Migration Tool**

COTR IT system:

Third party system integrated:

COTR IT system:

Third party system integrated:

COTR IT system:

Third party system integrated:

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 **May 27, 2024**.

The details provided in this PIA for this IT Department initiative can be delivered in compliance with FIPPA legislation.

- IT staff responsible for this initiative have clearly outlined that this task does not involve the collection of personal information (PI) during the setup, execution, or completion of the steps required for the system migration that will utilize the software in question.
- The IT Department has also provided a clear and robust questionnaire that was filled out by the software vendor, ensuring that they follow COTR privacy policies and follow best practices related to privacy guidelines.

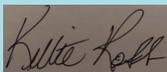
Should there be a change in scope to this part of the initiative, further assessment and/or a PIA update may be required as new related or expanded service is considered, or the privacy policies for the College change in the future.

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 3 Privacy Officer Comments above.

| Name and Title | Signature | Date signed |
|----------------|--|--------------|
| Keltie Ross |  | May 28, 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 |
|-----------------|--|--------------|
| Ravi Ranasinghe |  | May 28, 2024 |

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 |
|------------------|-----------|-------------|
| Nathan Skretting | | |



Privacy Impact Assessment

Name of Initiative:

PIA Number:

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 Chief Information Officer | | 28 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 |
|----------------|-----------|-------------|
| | | |