



Privacy Impact Assessment for Non-Ministry Public Bodies

[Implementation of CASPer Assessment Tool for Paramedic Program Candidate Selection]

PIA 2019 008

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:	Justice Institute of British Columbia – Health Sciences Division		
PIA Drafter:	Kathy Harms		
Email:	kharms@jibc.ca	Phone:	604-528-5768
Program Manager:	Michelle Finlay		
Email:	mfinlay@jibc.ca	Phone:	604-819-9393

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

1. Description of the Initiative

The Primary Care Paramedic program is initiating an additional prerequisite for admission to the program. The students will take a test called CASPer and submit the results to JIBC. CASPer collects information from the student to verify the identity of the individual taking the test.

Justice Institute of British Columbia (JIBC) – Health Sciences Division (HSD) paramedic programs are academically, physically and emotionally demanding on students due to the condensed nature of the programs, and the immersive nature of the practice education experiences with real patients. The



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program is committed to balancing accessibility with learner (and patient) safety, and has researched selection tools commonly used in selecting health science students into healthcare programs in British Columbia (British Columbia Institute of Technology (BCIT), University of British Columbia (UBC) College of the Rockies, Selkirk College, and more) as well as colleges and universities across Canada.

Previously the Primary Care Paramedic (PCP) program conducted detailed behavioural interviews as part of the selection process, but found the process to time consuming to sustain given the volume of applicants and geographic locations throughout BC. The result has been that some students end up in the program who are clearly not suited to the field. Currently, the Advanced Care Paramedic (ACP) program conducts interviews as part of their candidate selection process, but due to a sharp increase in the number of applicants to the program over the last year, the interview process is will be eliminated for the same reasons as stated above. Our research into best practices in admissions processes for health programs led us to explore the on-line system called CASPer. Numerous other health sciences program at a variety of Bc post-secondary institutions are using the CASPer tool as a component of the selection process for their health programs.

The CASPer admissions screening tool is an effective online, video-based situational judgement test designed to evaluate key personal and professional characteristics that make for successful students and graduates. Their website notes that "traditional evaluations of personal characteristics (e.g. standard interviews, reference letters, and personal essays) have shown to be ineffective in discerning good applicants. CASPer is run and developed by Altus Assessments Inc. and is used by academic programs throughout BC, Canada and internationally to help assess applicants non-academic attributes or people skills.

After several meetings with Altus representatives, in-depth conversations between JIBC Registrar, HSD, other Post-Secondary Institutes in BC (who currently utilize CASPer as part of their selection process) and attending a CASPer demonstration webinar, JIBC decided that incorporating CASPer assessment into our paramedic programs selection process would be beneficial. Specifically, the score on this test increases fairness in applicant evaluation by providing a reliable measure of traits like professionalism, ethics, communication, and empathy.

2. Scope of this PIA

The scope of this PIA includes the use of the student selection tool, CASPer, from the vender Altus Assessments

3. Related Privacy Impact Assessments

There are no related Privacy Impact Statements



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There is policy and procedures in place for the handling of Student Admission Records:

3206-001 Creation, Maintenance and Retention of Student Records

It specifically notes applicant documents as:

An applicant record is created as an active record when an applicant requests orally, in writing or electronically to be enrolled in a program, course or other student service. An applicant record is a temporary record and is retained as an active record until superseded or obsolete. It may be stored as an electronic file, paper file or both.

2. An applicant record may include but is not limited to such items as completed application forms, transcripts from other educational institutions, applicant exam results, criminal record investigation results, reference letters, telephone reference notes, medical records and releases, assessment centre notes, psychological assessments and interview notes.

Other related policies are:

- [3206 – Student Records Policy](#)
- [3206-003 - Protection of Privacy of Student Information Procedures](#)
- [3106 - Freedom of Information & Protection of Privacy Policy](#)

4. Elements of Information or Data

CASPer collects identifying information. This is not shared with JIBC or anyone else. The information is: student name, and birthdate, scan of photo identification (driver's license, passport, etc), and a scan of the applicant's face to validate against the identification. CASPer also scores the student's performance on the test. With the consent of the student the score on the assessment is shared with JIBC.

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



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5. Storage or Access outside Canada

While JIBC does not store any information in its custody and control outside of Canada Altus does store their data on American servers. Given that we are requiring students to complete the Altus test we felt that it was important to get some advice from the privacy commissioner on how best to handle this issue. On January 30, 2019 we had a telephone consult with David Malcom of the privacy commission. David was able to provide the FOIPPA clause that is relevant for our purpose which stipulates that the student must provide informed consent when their personal information is stored outside of Canada.

Clause 30.1 (a) if the individual the information is about has identified the information and has consented, in the prescribed manner, to it being stored in or accessed from , as applicable, another jurisdiction;

The recommendation from David is to include information about where the information is stored to our students who then consent as they write the CASPer test.

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;	no
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.	no



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If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.

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.	N/A
<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.



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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<p><i>Altus Assessments collects an applicant's name, student name and birthdate.</i></p> <p><i>Information to validate identity: scan of photo identification (driver's license, passport, etc), and a scan of the applicant's face to validate against the identification.</i></p> <p><i>The information is necessary for a program or activity, and, since we're not collecting the info directly from the individual, indirect collection (from CASPer) has been authorized by the individual themselves</i></p>	Collection	26(c), 27(1)(a,i) 30.(1)(a)
2.	<p><i>JIBC uses the score on the assessment as part of the admissions process. We will be using it for the purpose for which that information was obtained (to assess admissibility for the paramedic programs). The JIBC is only given the student's name and score from Altus and no other information.</i></p>	Use	26(a)(c)(d,i,ii)

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.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Altus Assessment Employees could access personal</i>	<i>Excerpt from Altus Assessment</i>	<i>Low</i>	<i>High</i>



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<p><i>information and use or disclose it for personal purposes (accidental or deliberate)</i></p>	<p>Privacy Policy:</p> <p>“Altus endeavors to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information. This also applies to our disposal or destruction of personal information.</p> <p>Altus further protects personal information by restricting access to it to those employees with a need to know that information in order for us to provide our services or information.</p> <p>If any employee of Altus misuses personal information, this will be considered a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses personal information that was provided for the purpose of providing services to or for Altus, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between Altus and that individual or organization.”</p>		
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2.	<i>Deliberate data breach into Altus Assessment database</i>	<p>“Altus’ privacy policy is based on the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information (CAN/CSA-Q830-96) and the Federal “Personal Information Protection and Electronic Documents Act” (PIPEDA). And;</p> <p>In some cases, the individuals or organizations that perform services on behalf of Altus may use or store personal information outside of Canada. Personal information stored outside Canada may be subject to different laws than those in Canada and may be accessible to law enforcement agencies outside of Canada where permitted by law. Altus is committed to the protection of privacy and will evaluate the privacy implications associated with disclosing personal information to a third party service provider in a given jurisdiction before establishing a relationship in which personal information will be disclosed.”</p>	<i>Low</i>	<i>High</i>
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3.				
4.				

10. Collection Notice

We are not collecting the information, Altus Assessments is collecting the information. We will include an FAQ for potential applicants on our website explaining the process.

Statement from ALTUS Assessments Privacy Policy (attached as Appendix A):

“Consent

The JIBC will post information about CASPer on the Health Sciences web site.

On CASPer web site, they provide the following:

Unless permitted by law, no personal information is collected without first obtaining the consent of the individual concerned to the collection, use and dissemination of that information. However, we may seek consent to use and disclose personal information after it has been collected in those cases where Altus wishes to use the information for a purpose not identified in this policy or for which the individual concerned has not previously consented.

The provision of personal information to Altus means that the person concerned agrees and consents that we may collect, use and disclose their personal information in accordance with this policy. In addition, where appropriate, specific authorizations or consents may be obtained from time to time.

In most cases and subject to legal and contractual restrictions, an individual is free to refuse or withdraw his or her consent at any time upon reasonable, advance notice. It should be noted that in certain circumstances, services can only be offered if a person provides personal information to Altus. Consequently, if an individual chooses not provide us with any required personal information, we may not be able to offer the services requested.”



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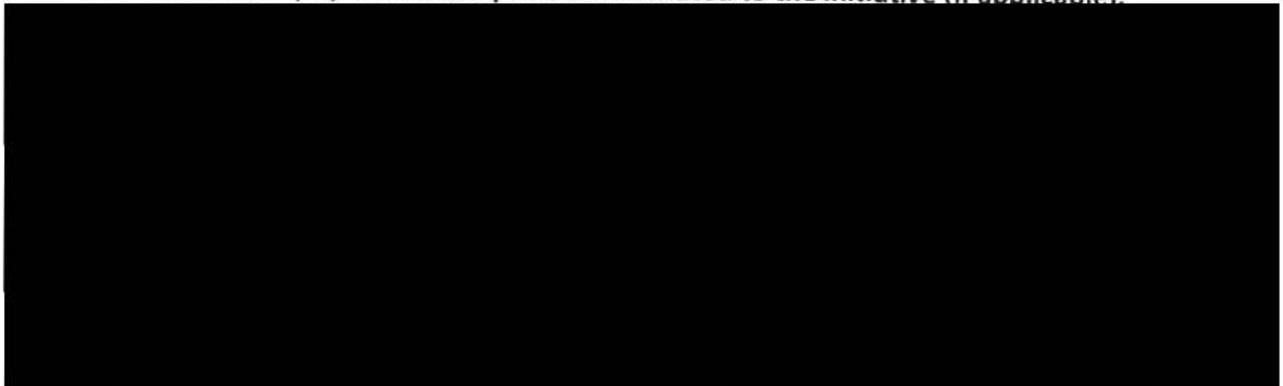
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Part 3 - Security of Personal Information

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.

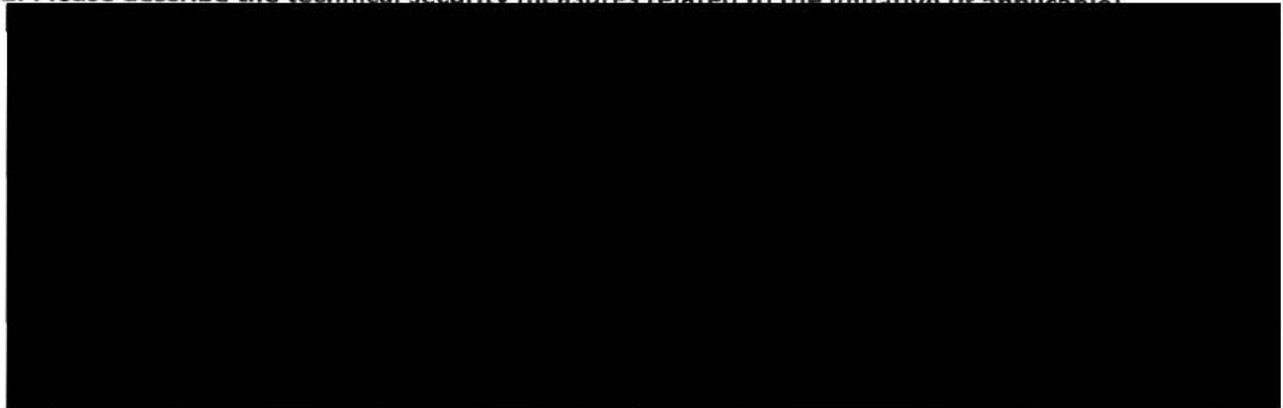
S.15(1)(l)

11. Please describe the physical security measures related to the initiative (if applicable).



For example: locked cabinets, securely stored laptops, or key card access to the building.

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



For example: use of firewalls, document encryption, or user access profiles assigned on a need-to-know basis.

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



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Excerpt from the Altus Assessments Privacy Policy (attached as Appendix A):

"Protection of personal information

Altus endeavors to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information. This also applies to our disposal or destruction of personal information.

Altus further protects personal information by restricting access to it to those employees with a need to know that information in order for us to provide our services or information.

If any employee of Altus misuses personal information, this will be considered a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses personal information that was provided for the purpose of providing services to or for Altus, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between Altus and that individual or organization."

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.

Excerpt from the Altus Assessments Privacy Policy (attached as Appendix A):

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

Excerpt from the Altus Assessments Privacy Policy (attached as Appendix A):



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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?**

Excerpt from Altus Assessments Privacy Policy (attached as Appendix A):

“Altus endeavors to ensure that any personal information provided and in its possession is as accurate, current and complete as necessary for the purposes for which we use that information. Altus provides the opportunity for individuals to update their personal information to ensure accuracy and currency. Individuals are responsible for ensuring that their personal information is accurate and have access to change it at any time. Altus will use its best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records.”

- 17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.** JIBC does not collect personal information, we will only consider the final CASPer score provided to us by Altus Assessments. The CASPer scores will be used as part of an overall selection ranking for applicants to our paramedic programs.
- 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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Excerpt from Altus Assessments Privacy Policy "Altus endeavors to ensure that any personal information provided and in its possession is as accurate, current and complete as necessary for the purposes for which we use that information. Altus provides the opportunity for individuals to update their personal information to ensure accuracy and currency. Individuals are responsible for ensuring that their personal information is accurate and have access to change it at any time. Altus will use its best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records."

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?

JIBC has a Creation, Maintenance and Retention of Student Records Policy.

Also, here is the excerpt from the Altus Assessment Privacy Policy:

We keep your personal information only as long as it is required for the reasons it was collected. This period may extend beyond the end of an individual's relationship with us but it will be only for so long as it is necessary for us to have sufficient information to conduct research, respond to issues that may arise at a later date, and for any other reason consistent with the purposes for which the information was collected.

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.



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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.

Additional Documents:

1. Sample letter to students from Altus Website (used by other BC Schools)
2. List of School using CASPer Assessment tool (BC Schools highlighted)



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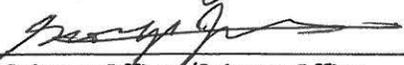
Part 6 – Privacy Office(r) Comments

The JIBC is planning to collect prospective student's score's on an external assessor's examination.

Although this examination is external to the JIBC, we looked at their privacy capabilities and they are strong. The same test is used by a number of BC institutions for admission to their programs. The external testing company collects identifying information to ensure that the person taking the test is the person applying.

There are policies and procedures in place to control and manage prospective student's application information and this new information would follow those well established practices. The new information consists of the prospective student's score on the examination.

George Jones



Privacy Officer/Privacy Office
Representative



Signature

2019 July 8

Date



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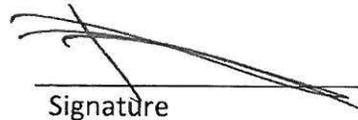
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Part 7 - Program Area Signatures

Kathy Harms

Program/Department Manager


Signature

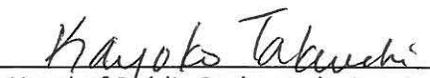
April 8, 2019

Date

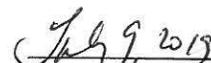
Contact Responsible for Systems Maintenance and/or Security
(Signature not required unless they have been involved in this PIA.)

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.

The CASPer Test - Computer-Based Assessment for Sampling Personal Characteristics

All applicants to the <Insert program name>, at <Academic Institution Name> are required to complete an online assessment (CASPer), to assist with our selection process. Successful completion of CASPer is mandatory in order to maintain admission eligibility.

CASPer is an online test which assesses for non-cognitive skills and interpersonal characteristics that we believe are important for successful students and graduates of our program, and will complement the other tools that we use for applicant screening. In implementing CASPer, we are trying to further enhance fairness and objectivity in our selection process.

In order to take CASPer, you will be responsible for securing access to a computer with audio capabilities, a webcam, and a reliable internet connection on your selected test date. CASPer can be taken practically anywhere that you can satisfy the aforementioned requirements. No exceptions will be provided for applicants unable to take CASPer online due to being located at sites where internet is not dependable due to technical or political factors.

Please go to www.takeCASPer.com to sign up and reserve a test using your <student identifier> and a piece of government-issued photo ID. You will be provided with a limited number of testing dates and times. Please note that these are the only testing dates available for your CASPer test. There will be no additional tests scheduled. Please use an email address that you check regularly; there may be updates to the test schedule.

Please direct any inquiries on the test to support@takecasper.com. Alternatively, you may use the chat bubble in the bottom right hand corner of your screen on the takecasper.com website.

The CASPer test is comprised of 12 sections of video and written scenarios. Following each scenario, you will be required to answer a set of probing questions under a time contract. The test typically takes between 75-90 minutes to complete. Each response is graded by a different rater, giving a very robust and reliable view of personal and professional characteristics important to our program. No studying is required for CASPer, although you may want to familiarize yourself with the test structure at takeCASPer.com, and ensure you have a quiet environment to take the test.

CASPer test results are valid for one admissions cycle. Applicants who have already taken the test in previous years will therefore be expected to re-take it.



[Home](#) >> Schools and Programs

Schools and Programs

Select a school to see what programs CASPer offers tests for.

Australia / New Zealand

[Australian Catholic University](#) +

[Deakin University](#) +

[Federation University](#) +

[La Trobe University](#) +

[Massey University](#) +

[Monash University](#) +

[The University of Queensland](#) +

RMIT University +

Swinburne University +

University of Wollongong +

Victoria University +

Canada ←

BC Schools notated

British Columbia Institute of Technology + ←

Canadian Resident Matching Service +

Cape Breton University +

College of the Rockies + ←

Conestoga College +

Dalhousie University +

Dalhousie University +

George Brown College +

Le Service canadien de jumelage des résidents (CaRMS) +

McGill University +

McMaster University +

Mohawk College +

Nipissing University +

North Island College + 

Ottawa University +

Selkirk College + 

St. Francis Xavier University +

Trent University +

Université de Montréal +

Université de Sherbrooke +

Université de Sherbrooke, Candidats internationaux seulement +

Université Laval +

Université McGill +

University of Alberta +

University of British Columbia + 

University of British Columbia IMG + 

University of Manitoba +

Université de Montréal +

Ontario Tech University +

University of Ottawa +

University of Toronto +

University of Waterloo +

Vancouver Island University + 

Western University +

Wilfrid Laurier University +

York University +

United States of America

Albany Medical College +

Arkansas College of Osteopathic Medicine +

Central Michigan University +

Christian Brothers University +

College of Saint Mary +

Colorado Mesa University +

Colorado Mountain College +

Concordia University Wisconsin +

Des Moines University +

Drexel University +

East Carolina University +

East Tennessee State University +

Eastern Virginia Medical School +

Florida Atlantic University +

Florida State University +

Gannon University +

Georgia Southern University +

Hardin-Simmons University +

Hofstra University +

Howard University +

Idaho State University +

Kettering College +

Liberty University College of Osteopathic Medicine +

Marshall University +

Augusta University +

Medical College of Wisconsin +

Medical University of South Carolina +

Mercer University +

Michigan State University +

Midwestern University +

Mississippi State University +

New York Medical College +

NYU School of Medicine +

Northeast Ohio Medical University +

Oklahoma State University College of Osteopathic Medicine +

Old Dominion University +

Pacific Northwest University of Health Sciences +

Pfeiffer University +

Phoenix Children's Hospital +

Rocky Mountain University of Health Professions +

Rosalind Franklin University +

Rutgers University +

Salus University +

South University +

State University of New York +

Stony Brook University +

Temple University +

Texas A&M University +

Texas Tech University Health Sciences Center +

Touro College of Osteopathic Medicine +

Touro College Master of Science +

Tulane University +

University of Colorado Denver +

University of Evansville +

University of Florida +

Indiana University +

University of Illinois at Chicago +

University of Miami +

University of Michigan +

University of Mississippi +

University of Nevada, Reno School of Medicine +

University of North Carolina +

University of North Dakota +

University of Oklahoma +

University of Rochester +

University of Texas Health Science Center +

University of Texas Medical Branch +

University of Utah +

University of Vermont +

University of Washington +

Utah Valley University +

Virginia Commonwealth University +

West Liberty University +

West Virginia University +

Western University of Health Sciences College of Osteopathic Medicine of the Pacific +

Yale University Physician Assistant Online Program +

Ensure you are well-informed with all news and announcements regarding CASPer by following us on Twitter, Facebook and Instagram.

The CASPer test is a registered mark of, and delivered by, [Altus Assessments](#).

Contact [Altus Assessments](#) for more information about bringing CASPer to your program's admissions process.

[Twitter](#) [Facebook](#) [Privacy Policy](#) [Terms of Use](#) [Security Tip Line](#)

