



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *JIBC PayMyTuition*

PIA 2020-003

### 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:	Finance		
PIA Drafter:	Kirsten Chan		
Email:	kchan@jibc.ca	Phone:	604-528-5514
Program Manager:	Kirsten Chan		
Email:	kchan@jibc.ca	Phone:	

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

### **1. Description of the Initiative**

*PayMyTuition is a system that enables students to pay online when they are outside Canada, in their own currency. The company that runs the service has created integrations into Colleague so that reconciliation is easier. The plan is to implement this system for payments and refunds, with the needed financial controls and processes.*

### **2. Scope of this PIA**

*This PIA covers implementation and use of PayMyTuition, within JIBC.*



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### 3. Related Privacy Impact Assessments

*No other PIAs are currently related to this project..*

### 4. Elements of Information or Data

*Data elements involved in the initiative include:*

- *Student number, birthdate will be able to be checked by PayMyTuition, on a single student transaction basis, so that PayMyTuition can identify the purpose of the payment to JIBC and to help identify the payer, if they are a student.*
- *PayMyTuition will collect other identifying information they are required to, by legislation, to confirm identity of the payer. This information is not shared with the 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

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

5. Storage or Access outside Canada

S.15(1)(l)



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;	Yes
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
<b>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</b>	no



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### 7. Common or Integrated Program or Activity\*

<p>In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
1. This initiative involves a program or activity that provides a service (or services);	Yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	no

*\* 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.	<i>PayMyTuition accesses JIBC Colleague Student Information System to check validity of student's identity, using student id and birthdate.</i>	<i>Collection and Use</i>	<i>33.1 (1) I ii&amp;ii 33.1 (1) I.1</i>
2.	<i>Payment information, identified by student id and birthday, is collected by PayMyTuition and sent to JIBC. It is displayed to JIBC employees.</i>	<i>Collection and use.</i>	<i>33.1 (1) I ii&amp;ii 33.1 (1) I.1</i>

### 9. Risk Mitigation Table

*Examples can be removed and additional lines added as needed.*

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access personal information and use or disclose it for personal purposes</i>	<i>Access to personal information screens limited by organizational hierarchy and use functions</i>	<i>Low</i>	<i>Medium</i>
2.	<i>Employee or Student personal information is compromised when transferred to or from the service provider</i>	<i>Transmission is encrypted</i>	<i>Low</i>	<i>Medium</i>
3.	<i>Software Remote Help Support technician may view a screen containing student number or birthdate of an individual</i>	<i>Remote support would be monitored by JIBC staff to ensure adequate control is in effect.</i>	<i>Low</i>	<i>Medium</i>



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### 10. Collection Notice

#### **Part 3 – Security of Personal Information**

*If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.*

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

[REDACTED]

S.15(1)(l)

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

[REDACTED]

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

*The JIBC has security policies in effect.*

#### 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.

*Role based security is setup in Colleague and PayMyTuition so that only individual employees with a need to access the information have access to it.*

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

*Audit logs are kept of requests for changes to access to Colleague.*



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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?

*The authorized individuals in the Finance or Student Services Departments update student information, when required.*

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

*Yes, if a student's fees aren't paid, the student may not be able to attend the course they registered for.*

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.

*System procedures are in place to address potential inaccuracies in Student information.*

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?

*Yes*

### **Part 5 – Further Information**

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

*Information is only disclosed in an aggregated form for auditing and reporting purposes that are legally required. This occurs periodically. These disclosures would not identify an individual, but auditors may need to look at data at a transactional level that would identify an individual.*

**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).**



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**21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.**

*no*

*Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).*

**22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.**

*No*

Please ensure Parts 6 and 7 are attached to your submitted PIA.



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## **Part 6 – Privacy Office(r) Comments**

*This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r). This PIA accurately reflects this new system, which is required to collect payments from students who reside outside Canada.*

*George Jones*

Privacy Officer/Privacy Office  
Representative

*George Jones*

Signature

*2020 Feb 25*

Date



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### Part 7 - Program Area Signatures

Jina Lee

Program/Department Manager

Signature

2/25/20

Date

Mike Proud

Head of Public Body, or designate

Signature

Feb 26/20

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.*