PRIVACY IMPACT ASSESSMENT (PIA)
CLOSURE SUMMARY

Initiative	SimKlar Paramedic Education Tracker
PIA Reference #	2023-____
PIA Completion Date	October ____, 2023
Project Sponsor	Michelle Finlay – Program Manager, Primary Care Paramedic Program, Health Sciences Division
Unit	Health Sciences Division

The purpose of a PIA is to determine whether an initiative complies with the *Freedom of Information and Protection of Privacy Act* ("**FIPPA**") and JIBC's policies and procedures. This document is to advise that the PIA review of this initiative has been completed. The following outlines the scope, issues, legal basis and conclusions associated with this PIA.

Initiative Description & Scope

Health Sciences Division would like to pilot SimKlar software in the PCP program. SimKlar software is simple and clear, and supports management of paramedic simulations, competency and attendance tracking and rating simulation and skill stations. SimKlar would replace using CompTracker, which is outdated, more expensive and less feature-rich than SimKlar.

Information Reviewed

Our review is based on the following information provided by the project team:

a) Completed PIA Risk Classification Tool, the summary of which is at Schedule A.
b) Completed PIA Questionnaire, completed by Michelle Finlay, which is attached at Schedule B.
c) An email thread explaining the nature of the proposed tool, which is attached at Schedule C.

Risk Classification

Based on the information in the PIA Risk Classification Tool, the proposed tool has a risk classification level of "**Medium**", with a score of 9. Please see Schedule A for more information.

Legal Basis - Privacy

According to the PIA Questionnaire and the privacy policy of the proposed tool, the proposed tool will involve collection, use and disclosure of personal contact information limited to email addresses and names, as well as anything else that the user elects to provide electronically through the software.

Such information is permitted to be collected pursuant to section 26(c) of FIPPA, which states that a public body may collect personal information if the information relates directly to and is necessary for a program or activity of a public body. Pursuant to section 27(2) of FIPPA, a public body must ensure that an individual from whom it collects personal information is told: (a) the purpose for collecting it; (b) the legal authority for collecting it; and (c) the contact information of an officer or employee of the public body who can answer the individual's questions about the collection. It is unclear if users are currently presented with a collection notice that meets this requirement.

Pursuant to section 32(a) of FIPPA, a public body may use personal information in its custody or under its control for the purpose for which the information was obtained, or compiled, or for a use consistent with that purpose.

Pursuant to section 33(2)(d) of FIPPA, a public body may disclose personal information for the purpose for which the information was obtained or compiled, or for a use consistent with that purpose.

Pursuant to section 34 of FIPPA, a use or disclosure of personal information is consistent with the purpose for which the information was obtained or compiled if the use: (a) has a reasonable and direct connection to that purpose; and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Section 33.1 of FIPPA requires additional analysis be conducted when personal information will be stored outside of Canada. According to the PIA Questionnaire, the proposed tool involves storage of personal information inside of Canada.

The personal information collected, used and disclosed in connection with this proposed use is supported under FIPPA, provided that individuals are provided a collection notice in accordance with section 27(2) of FIPPA.

Legal Basis - Security

Pursuant to section 30 of FIPPA, a public body must protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized collection, use, disclosure or disposal. The privacy policy of the proposed tool states that data is stored [redacted] PII that is transferred is encrypted using SSL and passwords are stored as a one-way hash. No further analysis is required with respect to security.

S.15(1)(l)

Conclusions

Based on the information provided, our review has concluded that there are no significant privacy or security risks introduced by the use of this proposed tool.

Responsibilities

Health Sciences Division are responsible for ensuring that individuals are informed that we will be collecting personal information about them. Here is a sample form of collection notice that could be used:

> "Your personal information is collected under the authority of section 26(c) of the *Freedom of Information and Protection of Privacy Act*. This information may be used by JIBC as for **[insert purpose of collection.]**. If you have any questions about the collection of this information, please contact privacy@jibc.ca."

If you have any questions or concerns about that, please contact the General Counsel.

Furthermore, Health Sciences Division are responsible for Informing the General Counsel of any material omissions or inaccuracies in the information relied upon in this PIA, and submitting to the General Counsel a new PIA request if there are any significant changes to this initiative.

If you have any questions or concerns about this PIA, please contact the General Counsel.

SCHEDULE A
PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE

Please see attached.

	IMPACT		Score
1	How many individual records will be stored, accessed or used?	1-1000	2
2	What is the most sensitive type of Personal Information in these records?	Student Information Prospects	3

S.15(1)(l)

	PROBABILITY		Score
3	Where will the information be stored?	[redacted]	3
4	How many users will have access to the information?	1-10	1

PIA Priority Rating Table					
Impact	Probability				
	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

Colour Coding Key
LOW
MEDIUM
HIGH
VERY HIGH

Classification for this Project
9
MEDIUM

Justice Institute
BRITISH COLUMBIA

LEARNING THAT TAKES YOU BEYOND

Legend

CLASSIFICATION	
Risk_No.	Risk_Rank
1	LOW
2	LOW
3	LOW
4	LOW
5	MEDIUM
6	MEDIUM
7	MEDIUM
8	MEDIUM
9	MEDIUM
10	MEDIUM
11	MEDIUM
12	MEDIUM
13	MEDIUM
14	MEDIUM
15	MEDIUM
16	HIGH
17	HIGH
18	HIGH
19	HIGH
20	HIGH
21	VERY HIGH
22	VERY HIGH
23	VERY HIGH
24	VERY HIGH
25	VERY HIGH

1- NUMBER OF RECORDS	
Records	Rec_Rank
1-1000	1
1,001-10,000	2
10,001-100,000	3
100,001-1,000,000	4
1,000,000+	5

2- INFORMATION TYPE	
PI_Risk	PI_Type
N/A - No Personal Information	0
Student Information	3
Donor, Alumni & Other Third Party Information	3
Credit Card Information	5
Employee Information	7
Health Information	7

4- LOCATION OF INFORMATION	
Location	Loc_Rank
[redacted]	1
[redacted]	2
[redacted]	3
[redacted]	5

S.15(1)(l)

5- NUMBER OF USERS	
Users	Use_Rank
1-10	1
11-100	2
101-1,000	3
1,001-10,000	4
10,001+	5

SCHEDULE B
PIA QUESTIONNAIRE

PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE
for
SimKlar

1. Purpose of the Privacy Impact Assessment Questionnaire

This form is used by JIBC to provide a high-level overview of the potential privacy risks of a current or proposed policy, system, project, program or activity. The results of these screening questions help judge the level of potential risk, the extent to which risk mitigation strategies may be needed and when completion of a privacy impact assessment is required under the *Freedom of Information and Protection of Privacy Act* (British Columbia) (the "**Act**").

2. Privacy Questions

Questions	Answers
Does the program involve personally identifiable information (PII) (as defined by the Act)? [Y/N]	Y
Will the program involve the collection or creation of new information about individuals? [Y/N]	Y
Will personal information about individuals be disclosed to organizations, programs, processes or people who have not previously had routine access to the information? [Y/N]	N
Will personal information about individuals be used for a purpose it is not currently used for, or in a way it is not currently used? [Y/N]	N
Will the program require contacting individuals in ways that they may find intrusive? [Y/N]	N Preceptors will receive emails notifying them about outstanding competency checks, attendances and ratings. They can select to no longer receive emails.
Does the program have a collection notice or use policy? [Y/N]	They have a security policy

3. Technology Questions

Questions	Answers
Does this program involve the implementation of a new electronic system or use of a new application or software to support the creation, collection, updating or storing, backing-up or disposition of personal information? [Y/N]	Y
Does this program require any modifications to existing information technology (IT) systems (e.g., integration with or consolidation of other IT systems)? [Y/N]	N

Will a new or modified electronic system change the existing business workflow? [Y/N]	
Does the program involve the use of new technology that might be perceived as being privacy intrusive? [Y/N]	N

4. Impact Questions

Questions	**Answers**
What are the purpose of collection, use and/or disclosure of the personal information? [Internal/External/Both]	Internal
Will personal information about the same individual that was previously maintained separately now be aggregated and stored together? [Y/N]	N
How would you describe the information classification level of the personal information? (Select all that apply) • Highly Confidential • Confidential • Public	Confidential
What are the type(s) of personal information? (Select all that apply) • Bio/demographic information • Academic/education Information • Employment information • Medical/health Information • Financial Information • Criminal information • Images • Opinions about individuals • Individuals' personal views and opinions • Business contact information • Personal contact information • Other	Academic/education Information Personal contact information (email) **[DD Comment: Likely business contact information of employees only.]**
What are the type(s) of individuals? (Select all that apply) • Prospects • Applicants • Students • Employees	Students Employees 3rd parties (preceptors)

• Donors/alumni/other 3rd parties • Volunteers • Service providers • Other	
How many records documenting individuals will be stored, accessed, used or disclosed? [1-1000], [1001-5000], [5,001-50,000], [50,001-100,000], [100,000+]	Unclear what is considered a 'record' here. Is each competency check and rating considered a "record"? **[DD Comment: 1-1000 is a safe assumption.]**
How many JIBC employees, volunteers and service provider employees will be able to access, collect, use or disclose the information? [1-10], [11-50], [51-100], [101-250], [251-500], [501-1,000], [1,000+]	11-50?
Is any of the information owned by another organization? [Y/N]	N

5. Probability Questions

Questions	Answers
Where will the information be stored? (Select all that apply) • On campus – JIBC servers • On campus – other • Off-campus – inside Canada • Off-campus – outside Canada	[redacted] S.15(1)(l)
Is any of the information accessed from outside of Canada? [Y/N]	N
Will personal information be transmitted? (Select only one) • Personal information is used in a closed system (i.e., no connections to the Internet, Intranet or any other system and the circulation of hardcopy documents is controlled) • Personal information is used in a system that has connections to at least one other system • Personal information is transferred to a portable device (i.e., USB key, diskette, laptop computer), transferred to a different medium or is printed • Personal information is transmitted using wireless technologies	Used in a system that has connections to the internet.

Will a third party (e.g., vendor or service provider) have access to the information? [Y/N]	Optionally the program may provide access to the vendor for troubleshooting purposes. and/or anonymized data to an accreditation auditor.
Will the program result in different record keeping systems converging? [Y/N]	N

SCHEDULE C
SUPPORTING EMAIL TRAIL

Please see attached.