



Privacy Impact Assessment

Initiative Title: Clockwork Implementation

Form adapted from the BC Government template for Non-Ministry Public Bodies. 2019

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:	Information Technology Services		
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In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

The purpose of this initiative is to implement a cloud-based version of the software system ClockWork, created by TechnoPro Computer Solutions, Inc., as the institutional system for managing academic accommodations data and related workflows. ClockWork will be used to mitigate institutional risks, as identified within the Student Affairs risk register, regarding provision of legally mandated academic accommodations (see the BC Human Rights code, section 8.1) for Camosun students with disabilities registered with the Centre for Accessible Learning (CAL).

ClockWork includes both a staff client desktop application as well as an online web-based system for coordinating and communicating of student information, academic accommodations (including accommodated exam bookings) and other related services for students with disabilities.

ClockWork simplifies scheduling appointments, exams, rooms and resources. It eliminates paper-based accommodation and booking forms and enables more accurate reporting for College accommodated exams and services for students with disabilities as required by the College and the Government (i.e., Ministry of Advanced Ed., Skills and Training). ClockWork Enterprise software is considered the “gold standard” for [disability services departments](#) in North America.

Notable features of ClockWork:

- Underscores the mutuality of the academic accommodations process by providing the student, course instructors and CAL staff with immediate access to the same information about the student’s academic accommodations and exams as they change.
- Secure paperless storage for student medical, accommodations, exams and other data.
- All functional roles (CAL staff and course instructors) have access only to the tools and data they need to provide accessible learning services in a coordinated fashion.
- Simple to use and accessible.
- Up to date CAL student data readily available to the Director of Student Affairs, Manager of CAL and assigned CAL staff.
- Reduces duplication of work, manual processing of data and accumulation of paper.
- Student record management and archiving/unarchiving of old records.
- Safe, secure and confidential mass email function.
- Bring web-based modules online one at a time to assist users in getting used to using the system.

2. Scope of this PIA

The scope of this PIA is for a cloud-based implementation of ClockWork that is integrated with Colleague to fulfill the following business needs:

Coordinating and communicating academic accommodations:

- Online pre-intake for students where they are guided through a series of steps prior to attending an intake appointment. Here they can learn about what is needed for registration with CAL, submit info and upload medical docs and a signed consent.
- Online letters of accommodation built by CAL instructors, released online by students every term and accessible online for course instructor(s) for viewing once released by students in their class. If there are multiple instructors teaching a course, they all have access to view the letter for their student.
- Online exam booking system for CAL registered students and exam submission system for course instructors to communicate details to CAL about the 7000 accommodated exams per year.
- Relevant student registration and accommodation data feeds into the online exam booking options.
- Electronic confirmation of exam bookings and dates, times and locations through online student portal.
- Automated email notices to course instructors about accommodation letters and upcoming exam bookings for students and instructors.

Student choice, independence and learning:

- Independent and easy access through the online system to communicate needs to instructors, request bookings for exams and verify upcoming schedules for CAL appointments and exams from a computer or mobile device.
- Disability barriers don't necessarily manifest in every class as some classes are designed to be universally accessible. In ClockWork, students choose their specific accommodations from the list established by CAL instructors per course and per exam, saving resources not required for use by other students.
- Online appointment booking self-serve option for students reducing dependence on contacting front desk staff to request appointments.
- Automated notices, reminders and deadlines for exam booking features.

Facilitating student and staff appointments

- Front desk calendaring and scheduling with 2-way outlook data sync feature for 15 CAL employees.
- Robust visual calendars for individuals and groups by function and type. Multiple calendar overlays are available to many calendars efficiently.

- Appointment and availability types can be customized for efficiency and tracking CAL workflow with students.

Exam and other resource scheduling:

- Tools for coordinating a complex schedule of requests, rooms, seats, assets and technology required to provide specific accommodations and invigilators to supervise exams.
- Exam seating algorithm automatically seats students in correct time, seating location and order based on accommodations, availability of resources and other requirements.
- Exam coordinator can override any seating arrangement and is required to do so daily based on complexity of exam schedule.
- Software can be manipulated to easily handle overflow rooms and seats also.
- Seats can be assigned to groups and group calendars can be easily viewed
- Template mail merge documents. For example, exams coversheets documents printable and attachable for every exam which pull data from the exam scheduling and accommodations system. These assist invigilators to understand invigilation and accommodation details for each exam and each student.

Managing an equipment inventory system, including tracking and scheduling, for:

- Software and hardware provided in exams and to students.
- Equipment loaned to students through the provincial institutional loan system of assistive technology.
- Loans of equipment purchased by the Camosun CAL directly to students or course or lab instructors.
- Ergonomic chairs and other seating equipment coordinated by the CAL across the campuses.

Coordinating requests for course materials in alternative/accessible formats:

- Online request system feeds an alt-format management module CAL staff would use to process a large volume of [CAPER BC](#) and in-house provided materials for students with print based impairments.
- Automated notice and reminder emails for students for timely requests to be made.

Coordinating service providers:

- Online system for service providers to submit availability to CAL staff and tools for matching them with students and course schedules. Providers are typically sign language interpreters, transcribers and visual access assistants.
- Online tutor registry function allows students to select and match with tutors (this module would be implemented in future years).

Managing the CAL Student record:

- The CAL student record is housed within ClockWork through customizable forms meeting CAL's workflow and data management needs. Forms can be built and customized by CAL staff using a simple forms editor.
- Upload from and copy and paste functionality for files and Outlook email directly into the student record.
- Student contact, meetings, exams, staff case notes, email directly from ClockWork, etc. are captured as a chronology of events/actions in the student record as points of contact and can be accessed by staff with permissions.
- General notes and private case notes functions are provided to protect student privacy.
- Record shows student course enrolment and schedule and instructor(s) contact information and in a calendar view and accommodations data in a term/course view.
- Letters of accommodation can be generated by staff from within the student record if necessary.
- "Generate template document" function for a variety of document types for students (i.e. confirmation of registration with CAL letter, a "to whom it may concern" letter with auto filling text) etc.

Generating stats and reports:

- Statistical data can be accessed through the reporting module in ClockWork.
- CAL staff can build reports using an easy to use reports editor with cross referencing a variety of data fields within ClockWork records.

Emailing students and instructors:

- Confidential mass email (BCC) function supports sending template notices and reminders to groups of students and course instructors based on dates, function, etc.
- Mass email can be run on an automated basis, triggered by specific events (i.e. upcoming exams on a specific date) or conditions within the system.
- Students can be emailed on a one-off basis directly through ClockWork by CAL staff using customized email templates. Email becomes part of the student's record immediately when sent through ClockWork.

Syncing data with Colleague:

- ClockWork pulls data from the student/course information system (Colleague) once every night. For confidentiality, it typically does not feed information back to that system.
- The Registrar may request in future to access a data point identifying students registered with CAL who have permission to:

- study at a reduced course load as an academic accommodation and still be considered a full-time student for academic purposes. Students with this accommodation are eligible to participate in college programming that requires full-time status (e.g. scholarships and awards such as Honour roll, work study, etc.).
- access priority registration to facilitate accommodations that relates to time of day enrolment or where specific accommodations require a great deal of lead time for planning and coordination such as sign language interpreting, real time captioning or making arrangements for text in alternative formats.

3. Related Privacy Impact Assessments

No related PIAs have been completed for ClockWork at Camosun College.

4. Elements of Information or Data

Colleague integration to enable viewing of student biographic data, course schedules and registration, and program information within the Clockwork application.

Personal information gathered from student in pre-intake form. (This information is collected as a first step within in ClockWork. This data is not stored within Colleague. This data will become visible within ClockWork this data, see below, is synced with Colleague in a CAL business process):

Biographic info

C#
 Student legal name
 Student preferred name
 Date of Birth
 Pronoun
 Gender (On government issued ID Card)
 ADDRESS, CITY, PROVINCE, POSTAL CODE, PHONE
 Email used for college business:
 If of Indigenous ancestry?
 If yes, if has connected with Eyē? Sqâ'lewen?
 If international student?

Educational info

If currently registered in Camosun courses?
 Educational program taking or will take at Camosun?
 If a South Island Partnership (SIP) student?
 If needing educational upgrading?

If needing a college placement assessment test?
Current or planned Course Load

Disability info

Nature of disability attaching medical documentation
Disability-related functional impacts you experience in an academic setting
Academic Accommodations history

Financial Information

If a BC Resident?

If receiving financial assistance from any of the following:

- Student Loans/grants
- Province of BC Persons with disabilities Funding (PWD)
- Band funding
- Former Youth In Care
- Opportunities Fund
- Veterans Affairs
- Workforce development Funding
- Adult Upgrading Grant (AUG)
- Canada Pension Plan funding
- Other: _____

If applied for a student loan or part-time studies grant?

PT or FT student aid application number for grants purposes

Once a manual student data sync is completed by CAL staff on the student's "pre-intake" record, the following biographic and course data will feed from Colleague into their record within ClockWork.

- Camosun student number
- Student first and last name
- Gender
- Birthdate (used for identity confirmation)
- Email (required by the ClockWork system to send emails to the student)
- ~~Phone numbers~~
- ~~SIN (used to process grants which require the SIN number)~~
- Academic info
 - Latest course registration term (helps us know when they were last enrolled in classes at Camosun since many come back to us after a year or so)
 - Current or Latest Academic Program name (helps with academic accommodations decision making)

- ~~○ Latest full-time/part-time status (helps with grants process advising)~~
- Student status (helps to know if they are considered active, academic probation or graduated)

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

- No data will be accessed outside of Canada. The vendor is located in Canada and will do any troubleshooting or repairs from within Canada.
- ClockWork for Camosun is a cloud-based and web-hosted product.
- Data is stored on Canadian Microsoft Azure servers located in Toronto. The geo-redundant data center is located in Quebec City.

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
If you have answered "yes" to all three questions, please contact privacy@camosun.bc.ca to discuss the requirements of a data-linking initiative.	

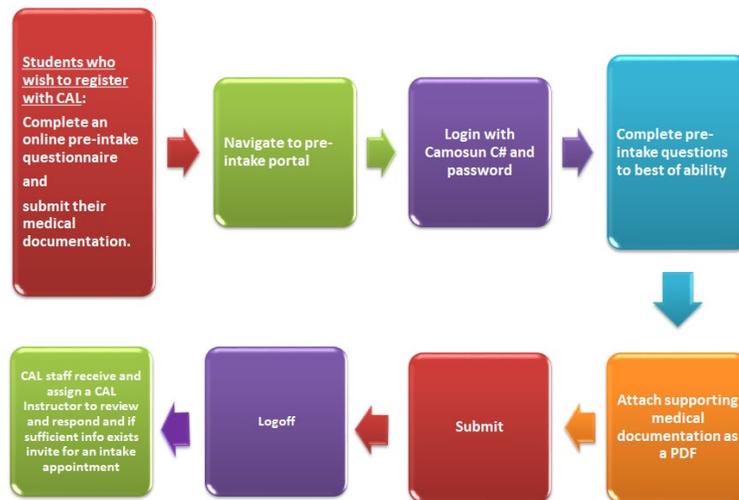
7. Common or Integrated Program or Activity*

<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>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	<p>Yes</p>
<p>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;</p>	<p>Yes</p>
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPPA regulation.</p>	<p>No</p>
<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.***

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

Business Process Flow Diagram: Students Registering with CAL using ClockWork



Business Process Flow Diagram: Students sharing letters of accommodation, making appointments, confirm booked examinations.



Business Process Flow Diagram: Instructors reviewing shared letter of accommodation and examination details.



Data Sync Flow Technical Diagram: Diagrams provided by Techno Pro.

Section 15(1)(l), Section 21

Section 15(1)(I), Section 21

Section 15(1)(I), Section 21



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Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Request from clients wanting to register with CAL.	Collection	26 (c)
2.	Disclosure of Information - Responding to a student requesting information on their CAL ClockWork record.	Disclosure	33.1 (7)
3.	Letter of accommodation sent to a Camosun instructor.	Disclosure & Use	33.1 (1) (e.1), 33.2 (c), and 32 (a)

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.

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>Oath of Employment; review of Standards of Conduct Policy; access and permissions management.</i>	<i>Low</i>	<i>High</i>
2.	<i>Client's personal information is compromised when transferred to the service provider.</i>	Section 15(1)(l)	<i>Low</i>	<i>High</i>
3.	<i>Cloud-based system use for sensitive information</i>	<i>Regular vendor reviews to assess data security; regular reviews of related Camosun/Colleague infrastructure; access and permissions management</i>	<i>Low</i>	<i>High</i>

10. Collection Notice

Website Privacy and Security

We are committed to ensuring the privacy and accuracy of your confidential information. We have the utmost respect for your privacy and will not share your personal information with anyone without your explicit permission.

Information we collect about you

We will only collect and process your personal data for the purposes of providing the services delivered by this website. In addition, some information is automatically collected and stored in the server logs, such as your IP address. Providing personal data is voluntary. There will be a minimum of data that we need to collect from you for the services that you sign up to. We will let you know what data we require, if you wish to use our services, by indicating in the relevant fields of the webforms. Please see Camosun’s [Protection of Privacy Policy](#) for more information.

Statistics

The Website is regularly monitored in order to supply you with the best service and to meet your expectations. For this purpose, we consult the statistics relating to use of our website and develop the website on the basis of this data. Your information may also be used in our reports. User statistics are anonymous.

Security

The website uses a secure server to protect your information data. Secure server software is used to encrypt the information exchanged between your web browser and our website. This measure ensures the security of all your transactions when you use the sites. We follow strict security procedures when filing and using the information you supply and may request proof of your identity before supplying you with information. We take all reasonable steps to ensure the secrecy of your personal data and passwords.

You are fully responsible for maintaining the confidentiality of your login and your password and abstaining from communicating it to any other person and you are solely liable for activities that occur under your login and password. We disclaim all liabilities for inaccuracy of your personal data and in case of theft, loss, misuse, communication, fraudulent use of your login and password arising from your failure to comply with the above.

<p>Camosun College Lansdowne Centre for Accessible Learning Alan Batey Library & Learning Commons 152 3100 Foul Bay Rd Victoria BC V8P 5J2 250-370-3312 (Lansdowne)</p>	<p>Camosun College Interurban Centre for Accessible Learning Liz Ashton Campus Centre, Rm 201 4461 Interurban Rd Victoria BC V9E 2C1 250-370-4049 (Interurban)</p>
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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 Camosun’s [privacy office](#) and/or Chief Information Officer 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).

Not applicable as this is a cloud-based system.

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

Section 15(1)(I)

- Data is stored on Canadian Microsoft Azure servers.

13. Does your branch/department rely on any security policies? If so, indicate here:

Use of the system is governed by the following Camosun policies:

<i>Policy Name</i>	<i>Description & Link</i>	<i>Main Contact</i>
<i>Systems and Networks Administration</i>	<i>Details the rights of the college to manage the software and systems connected to the Camosun network and related infrastructure.</i> <i>http://camosun.ca/about/policies/operations/o-1-college-systems-and-resources/o-1.2.pdf</i>	<i>VP Administration</i>
<i>Standards of Conduct</i>	<i>Details the acceptable use of technology for Camosun staff.</i>	<i>Executive Director, Human Resources</i>

	http://camosun.ca/about/policies/operations/o-5-human-resources/o-5.11.pdf	
<i>Acceptable Technology Use</i>	<p><i>Details the acceptable use of technology for Camosun students.</i></p> <p>http://camosun.ca/about/policies/operations/o-1-college-systems-and-resources/o-1.1.pdf</p>	<i>VP Administration</i>
<i>Protection of Privacy Policy</i>	<p><i>Details the college's commitment to following British Columbia Freedom of Information and Protection of Privacy Act.</i></p> <p>http://camosun.ca/about/policies/operations/o-6-information-management/o-6.1.pdf</p>	<i>VP Administration</i>

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.

All ClockWork access is based on group and individual permissions maintained by the ClockWork functional lead and administrator (Darryl Gorrie, Manager, Centre for Accessible Learning) or alternate (Evan Hilchey, Director of Student Affairs).

No other roles at the college are provided with Administrator access due to the sensitive nature of the content stored in the system (i.e., case notes, and medical documentation). Access to that and other content in the student ClockWork record for regular users of ClockWork is limited to a need to know basis and permissions are removed when a staff is no longer in a role needing access.

Only CAL staff with specific permissions can archive/delete or restore a student record in ClockWork.

CAL staff user accounts are specific to the ClockWork system and is independent of Camosun access and identity management systems.

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

In addition to the group and individual permissions, ClockWork has audit trails, appointment history tracking and log files on the administration. A per user permissions summary can be run by the administrator on all staff in the system. Audits on this information will occur once per quarter.

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?**

CAL staff can make case notes and can add or update information in a variety of customizable forms that comprise part of the student ClockWork record. Case notes can be amended but not changed.

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

Yes, data submitted by the student is used as evidence upon which to assign legally required academic accommodations.

- 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.**

Medical documentation is vetted by CAL Instructors to ensure it is provided by a professional qualified to diagnose in the area of the student's disability, that it is recent (typically completed within the past 3-5 years) and contains information about the nature and functional impact(s) of the disability.

- 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?**

ClockWork student record data is kept active while the student is enrolled in College programs. When the student ceases to become a student at Camosun and 15 months lapse with no contact, the student record is archived and no longer available for staff to use/query, etc.

If the student returns, the data can be unarchived and made active again.

Digital database data is not "deletable", as deleting the data may corrupt the referential integrity of the database.



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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 privacy@camosun.bc.ca*

n/a

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 the privacy office privacy@camosun.bc.ca*

n/a

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.

Yes. A Personal Information Bank will be created for ClockWork and will speak to the following information:

- Medical and other related information reported by students.
- Academic history information
- Case notes created within CAL
- Accommodation and related scheduled resources and events

Additionally, within the PIB the following will be included:

- the authority for collecting the personal information;

- the purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed;
- the categories of persons who use the personal information or to whom it is disclosed;

Privacy Officer/Privacy Office
Representative

Signature

Date

Part 6 - Privacy Office 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).

Part 7 - Program Area Signatures

Privacy Officer/Privacy Office Representative	Signature	Date
Program/Department Manager	Signature	Date
Chief Information Officer <i>(if applicable)</i>	Signature	Date
Vice President, Camosun College, or Designate	Signature	Date

If you have any questions, please contact your public body's privacy office at privacy@camosun.bc.ca or call the OCIO's Privacy and Access Helpline at 250 356-1851.

Please send a copy of this PIA with the respective signatures to privacy@camosun.bc.ca for filing.
A final copy of this PIA (with all signatures) will be kept on record with the Privacy Office.