

PART 1: GENERAL INFORMATION

Initiative title:	Academica Academic Division Review
Department or program area:	Office of the Vice President Academic
Initiative Sponsor (usually administrator overseeing implementation):	Dr. Chad Thompson
Initiative Lead name and title:	Edward Benoit
Initiative Lead phone:	X5691
Initiative Lead email:	benoite@cnc.bc.ca
PIA Contributors (name, title and contact information)	
Privacy Officer:	Elyse Giddens
Privacy Officer phone:	X5479
Privacy Officer email:	giddense@cnc.bc.ca

1.1. General information about the PIA:

<p>Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Related PIAs, if any:</p> <p>N/A</p>

1.2. What is the initiative?

The CNC Academic Division Review Surveys (the “Surveys”) include two surveys; the Student Academic Division Review Survey (“Student Survey”) and the Employee Academic Division Review Survey (“Employee Survey”). The Student Survey provides the institution with survey data from students within the 2022-23 academic year to give an understanding of

the ability of the Academic Division to offer the programs, supports, and services students desire in the modality and location that best suits their needs. The Employee Survey provides the institution with survey data from employees within the 2022-23 academic year to give an understanding of employee perspectives relative to the Academic Division and the ability of the Academic Division to achieve the goals of the strategic and academic plans. The goal of the Surveys is to inform the vision for the future structure and function of the Academic Division, and the role of the regional campuses in supporting student success.

Academica will conduct the Surveys and employee focus groups. CNC will provide student and employee information to Academica to enable them to conduct the surveys and focus groups.

Academica’s collection, use, and disclosure of Personal Information will adhere the Privacy Protection Schedule (Included as Schedule “B” of the ISA). Academica will engage directly with:

- Faculty
- Staff
- Administrators
- Current CNC Students

The surveys and focus groups will run prior to the end of the spring semester.

1.3. What is the scope of the PIA?

This PIA covers the employee and student surveys, the employee focus groups, and the associated data collection, retention and use by Academica.

What are the data or information elements involved @in your initiative?

The data elements to be transferred between the Institution and Contractor are outlined in Schedule “A” of the Information Sharing Agreement (appended).

Survey	Element	Description
Employee Survey	[REDACTED]	[REDACTED]

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Employee Survey	[REDACTED]	[REDACTED]
Student Survey	[REDACTED]	[REDACTED]
Student Survey	[REDACTED]	[REDACTED]
Student Survey	[REDACTED]	[REDACTED]
Student Survey	[REDACTED]	[REDACTED]
Student Survey	[REDACTED]	[REDACTED]

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1.4. Did you list personal information in question 1.4?

Yes, [go to Part 2](#)

No, answer question 1.6 and submit Part 1 the Privacy Officer. You do not need to complete the rest of the PIA template.

1.5. How will you reduce the risk of unintentionally collecting personal information?

N/A

PART 2: COLLECTION, USE AND DISCLOSURE

This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

2.1 Collection, use and disclosure

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FOIPPA authority	Other legal authority
Step 1: CNC will provide personal information of students and employees to Academica via secure method (OneDrive)	<input type="checkbox"/> Collection <input type="checkbox"/> Use <input checked="" type="checkbox"/> Disclosure	33 2(d)	Click or tap here to enter text.
Step 2: Academica will send survey invitations to students and employees, and conduct focus groups	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	32(a)	Click or tap here to enter text.
Step 3: Students and employees will respond to the surveys	<input checked="" type="checkbox"/> Collection <input type="checkbox"/> Use <input type="checkbox"/> Disclosure	26(e)	Click or tap here to enter text.
Step 4: Academica will review survey and focus group responses, analyze and compile	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	32(a)	Click or tap here to enter text.
Step 5: Academica will provide aggregated data and analysis back to CNC, based on the survey and focus group input	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	32(a)	Click or tap here to enter text.
Step 6: CNC will use the data to improve systems, services, and program offerings	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	32(a)	Click or tap here to enter text.

Optional: Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

Click or tap here to enter text.

2.2 Collection Notice

Your personal information is collected under the authority of section 26(e) of the BC Freedom of Information and Protection of Privacy Act (FIPPA). This survey is being conducted by Academica Group on behalf of CNC. Individual responses will be kept confidential and survey respondents

will not be identified in reporting. All data will be stored securely on Canadian servers, and the information obtained from your participation in this study will be used to evaluate CNC's programs and services.

If you have any questions about the survey or the collection of personal information please contact Ed Benoit, Associate Vice President Academic, at benoite@cnc.bc.ca

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

- 3.1 Is any personal information stored outside of Canada?**
 Yes
 No
- 3.2 Does your initiative involve sensitive personal information?**
 Yes, go to [question 3.3](#)
 No, go to [question 3.4](#)
- 3.3 Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?**
 Yes, go to [Part 4](#)
 No, go to [question 3.4](#)
- 3.4 Where are you storing the personal information involved in your initiative?**
Academica stores data on Microsoft 365 SharePoint.
 - After you answer this question go to [Part 5](#).

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section **ONLY** if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization's Privacy Officer.

4.1 Is the sensitive personal information stored by a service provider?

- Yes, fill in the table below (add more rows if necessary) and go to [question 4.3](#)
 No, go to [question 4.2](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

4.2 Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

Click or tap here to enter text.

4.3 Does the contract you rely on include privacy-related terms?

- No
 Yes
- If yes, describe the contractual measures related to your initiative.
Click or tap here to enter text.

4.4 What controls are in place to prevent unauthorized access to sensitive personal information?

Click or tap here to enter text.

4.5 Provide details about how you will track access to sensitive personal information.

Click or tap here to enter text.

4.6 Describe the privacy risks for disclosure outside of Canada.

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

- This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information	Level of privacy risk (consider the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, describe.
Click or tap here to enter text.	Click or tap here to enter text.	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	Click or tap here to enter text.	Click or tap here to enter text.

Outcome of Part 4

The outcome of Part 4 will be a risk-based decision made by the head of the public body on whether to proceed with the initiative, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 4.6. The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5 you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

5.1 Does your initiative involve digital tools, databases or information systems?

No

Yes

- If yes, complete the Security Checklist below. This checklist will help determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of FOIPPA section 30. If a service provider or vendor is involved in the initiative, have them complete the "Third Party" section of Appendix A.

5.2 What physical security safeguards are in place to protect Personal Information in this initiative? Identify the elements of physical security that protect where the records for your initiative are stored (Check all that apply. Specify, "Other" if applicable)

Safeguard	At CNC	At Third Party
[REDACTED]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[REDACTED]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[REDACTED]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[REDACTED]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[REDACTED]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[REDACTED]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[REDACTED]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

15(1)(l)

[REDACTED]	■	■	
[REDACTED]	■	■	
[REDACTED]	■	■	
[REDACTED]	■	■	15(1)(l)
[REDACTED]	■	■	
[REDACTED]		■	15(1)(l)

5.3 Controlling and tracking access

Describe any additional strategies used to control and track access, if not indicated above.

[Click or tap here to enter text.](#)

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6 you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

6.1 How will you make sure that the personal information is accurate and complete?

The personal information CNC will provide to Academica will come directly from CNC’s ERP software. Additional information will be collected directly from the participants.

6.2 Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

6.2.1 Do you have a process in place to correct personal information?

Yes

No

6.2.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes

No

N/A

6.2.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes

No

N/A

6.3 Does your initiative use personal information to make decisions that directly affect an individual?

Yes, go to 6.4

No, go to Part 7

6.4 Do you have an information schedule in place related to personal information used to make a decision?

FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. In addition, the Information Management Act requires that you dispose of government information only in accordance with an approved information schedule.

Yes

No

- If no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.
Click or tap here to enter text.

PART 7: AGREEMENTS AND INFORMATION BANKS

Provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank. If your initiative includes or will be part of a regular and systematic exchange of personal information with partners in or outside of government, you may require an [information sharing agreement \(ISA\)](#).

7.1 Does your initiative involve an information sharing agreement?

- No
 Yes

- If yes, complete the Information Sharing Agreement Supplement below and attach the ISA to this PIA.

Description of ISA: The ISA outlines the information sharing that will facilitate two surveys; the Student Academic Division Review Survey ("Student Survey") and the Employee Academic Division Review Survey ("Employee Survey"). The Student Survey provides the institution with survey data from students within the 2022-23 academic year. The Employee Survey provides the institution with survey data from employees within the 2022-23 academic. The data elements that will be provided to Academica are outlined in Schedule A of the ISA ADR 2023-04-06.1.
Name of main ministry or agency involved: Academica Group Inc.
Any other ministries, agencies, public bodies, or organizations involved: Click or tap here to enter text.
Business contact title and phone number for person responsible for maintaining the ISA: Jennifer Castley Director, Institutional Research & Enrolment Management
ISA start date: April 6, 2023
ISA end date: Click or tap here to enter text.

7.2 Will your initiative result in a personal information bank?

- No
 Yes

- If yes, complete the table below.

Describe the type of information in the bank:
Name of main organization involved: Click or tap here to enter text.
Any other ministries, agencies, public bodies or organizations involved: Click or tap here to enter text.
Business contact title and phone number for person responsible for managing the PIB: Click or tap here to enter text.

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

8.1 Risk Response

Possible risk	Mitigation strategies
Contractor fails to protect data.	Contractual terms will outline privacy protection commitments.
Contract terms may not protect information.	CNC has reviewed contract terms and deemed them to be in compliance with FIPPA.
Privacy breach may go undetected.	Contract terms, tracking and procedures require that privacy breaches are identified, reported, and investigated.
CNC is not informed in the event of a privacy breach.	Contractual terms will outline privacy protection and breach commitments.
Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.

PART 9: SIGNATURES

This PIA accurately documents the data elements 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 or program area will engage with their Privacy Office and if necessary, complete a PIA update.

Privacy Office Comments:

Click or tap here to enter text.

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative	Elyse Giddens		May 24, 2023

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Program Area Signatures

Role	Name	Electronic signature	Date signed
Initiative lead	Ed Benoit		May 24, 2023
Initiative Sponsor Usually administrator overseeing implementation	Dr. Chad Thompson		May 24, 2023
IT Services Representative Only required if they have been involved in the PIA	Jordan Ingham		May 24, 2023

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