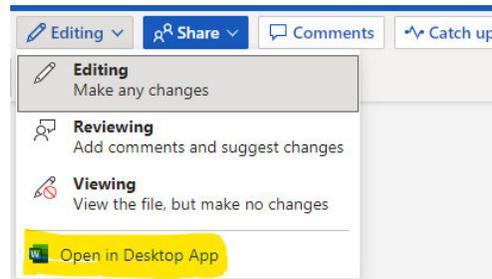


INSTRUCTIONS (READ BEFORE STARTING)

Use the Microsoft Word desktop app rather than the SharePoint online version of Word. Access the Desktop App from the Editing button drop down on the main ribbon beside Help on the upper right side of your screen. Checkbox functionality does not work reliably on the web-based versions of Word.



Submit a completed privacy impact assessment (PIA) before starting a new College Initiative or significantly changing an existing College Initiative that directly collects Personal Information, or results in the collection of Personal Information by CNC or a CNC service provider.

BC's Freedom of Information and Protection of Privacy Act (FIPPA) defines an "Initiative" as any enactment ("policy/procedure"), system (conceptual or technical), project, program, or activity.

Contact the Privacy Office at foipp@cnc.bc.ca to receive support determining whether any change in how College employees are completing their duties to the College may require a Privacy Impact Assessment.

Read through this form entirely before starting to populate it. Each question is designed to capture specific information for review.

Some information recorded in the PIA may be confidential or proprietary and not intended for distribution. Before you share the draft or completed PIA (internally or externally), please contact CNC's privacy office at foipp@cnc.bc.ca for guidance.

PART 1: GENERAL INFORMATION

Initiative Title:	Hey Orca Social Media Scheduler
Department:	Communication Services
Initiative Lead (PIA Drafter) Name and CNC Email Address:	Taren Johnson johnson@cnc.bc.ca
Dean or Director Name, Title, and Email:	Stephanie Deol Associate Director, Brand
Privacy Officer Assigned:	
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	Hey Orca
Product Name (if applicable):	Hey Orca Social Media Scheduler
Third Party Contact Name and Email:	██████████ ██████████ 22(3)(d)
Third Party URL:	https://heyorca.com

1. In three to five sentences, describe the Initiative including:
 - a) what you are doing,
 - b) an overview of the process,
 - c) who is involved,
 - d) and when and/or how long your Initiative runs.

We are looking to replace our social media scheduler, SproutSocial, with HeyOrca. Social media schedulers connect to our various social media accounts which allows for us to manage the many accounts we have in one place. The users will be the administrators of our regional campus accounts, as well as some of our more main social media accounts i.e. Library and ARC. This would be an ongoing use of this product.

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at CNC? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the Initiative will be implemented?

This will be limited to the administrators of the social media accounts connected. Only public facing sections of official CNC social media accounts are connected through HeyOrca.

3. Is this an administrative/operational, teaching and learning, or research Initiative? Select all that apply.

<input checked="" type="checkbox"/> Administrative/Operational	<input type="checkbox"/> Research (Contact Privacy Office before continuing this PIA)
<input type="checkbox"/> Teaching and Learning	

4. Has a PIA previously been completed for this Initiative?

- Yes No Not sure

5. What activities will occur within the Initiative? Use the bullet points below to make action statements. Replace the example action statement. Add or delete bullets as necessary.

- Social media content will be scheduled through Hey Orca to be posted onto our Facebook, Instagram and LinkedIn accounts.

6. In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your Initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.

- We would not be collecting or storing any personal data inside of Hey Orca. It will give us analytics of our reach (how many screens did a social media post show up on), engagement (clicks, likes, comments, shares) and demographics of users (aggregate gender, location, without necessarily being tied to each other demographic data type) interacting with our posts.
- If we receive a message from a user we will get their name on said platform, not through HeyOrca

7. Did you list Personal Information in question 6? [Personal Information](#) is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

- Yes No

8. If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information.

The only instance of us receiving any kind of personal information is through messages or comments to our social accounts. We would know the person's username as it is presented on their social media accounts. Once a message or comment has been resolved it is moved to the completed folder in Meta and is no longer visible on the messages in Hey Orca.

Sometimes we have International students send photos of their ID or documents for applying at CNC. We then remind these students to never share their personal information or documents on social media accounts and deleted said photos and messages from our accounts.



9. Does the Initiative involve integration between CNC IT systems and Third-Party systems?

Yes No N/A

If yes, list below: (put N/A on the first row if you answered No or N/A above. Add or delete rows)

CNC IT system: N/A

Third party system integrated: N/A

If there is Personal Information involved in this Initiative, continue to complete the remaining sections of the PIA. If there is not any Personal Information involved in this Initiative, please submit questions 1-9 to the Privacy Officer along with the completed signatures page.

PART 13: PRIVACY OFFICE(R) COMMENTS

This PIA is based on a review of the material provided to the Privacy Office(r) as of **October 16, 2023**. If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).

If Personal Information will be collected or stored directly into HeyOrca in the future, the PIA will need to be updated to show the information flow and privacy protection measures of information that will be managed for a substantial period of time on the HeyOrca platform.

Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Office as at the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Adam Cullum – Manager, Privacy and Records	As per email chain	October 16, 2023

PART 14: APPROVAL SIGNATURES

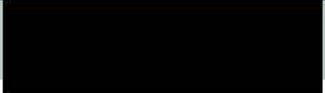
Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices 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 will inform the Privacy Office, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

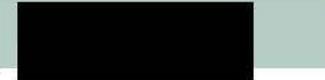
Declaration of Initiative Lead: I confirm that I understand the privacy impacts of this College Initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the Initiative. If there are any changes to the Initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the Privacy Office and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and CNC Privacy Office recommendations relative to this Initiative.

Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed	
Taren Johnson - User Interface & Experience Designer: Portal Lead		2024-03-20	22(1)

Declaration of Dean / Director / One-Over-One Signatory: I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and CNC Privacy Office recommendations relative to this Initiative.

Signature of Dean / Director

Name and Title	Signature	Date signed	
Stephanie Deol – Associate Director, Marketing and Brand Creative		2024-03-20	22(1)

Declaration of Information Security: I confirm that I am satisfied that the Information Security safeguards employed in this college Initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or CNC business information described in this PIA.

Signature of Information Security (Required only when college Initiative involves Information Security considerations)

Name and Title	Signature	Date signed
N/A (No personal information stored)	N/A	N/A

Declaration of Information Technology: I confirm that I understand and approve of the proposed use-case of CNC IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with CNC's IT systems for the College Initiative described in this PIA, where applicable.

Signature of Information Technology (Required when College Initiative involves use of CNC IT systems or integration of Third-Party technology with CNC IT systems.)

Name and Title	Signature	Date signed
N/A	N/A	N/A

Declaration of Head of Public Body or Designate: I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College Initiative. I am satisfied with the completion of this PIA under FIPPA.

Signature of Head of Public Body or Designate Under FIPPA (Required only if Personal Information is involved in the Initiative as indicated in Question 7.)

Name and Title	Signature	Date signed
N/A (No personal information managed directly in initiative)	N/A	N/A