College
of New
Caledonia

CNC

PRIVACY IMPACT ASSESSMENT
Peer Connections – Mentor City Platform

PIA#[21-005]

Why do I need to do a PIA?

Section 69(5) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires you to conduct a PIA. You need a PIA to determine whether your project involves personal information and if so, how you'll protect the information you collect or use in your project. Personal information belongs to the person it's about. As public servants, we must protect any personal information we collect, use, store and share. Doing a PIA can help you protect privacy and build public trust by being clear about what information you're collecting, who has access to it, and where and how it's stored.

Please see the OIPC's 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.

What is personal information?

Personal Information (PI) is recorded information about an identifiable person, and includes information that can be associated with that person. Personal information includes a person's home address, home telephone number, age, sex, race, religion, sexual orientation, marital status, disability, fingerprints and blood type, IP addresses, and identification numbers. Personal information also includes information about a person's health care and educational, financial, criminal and employment history. And it includes anyone else's opinions about that person. Work contact information (such as job title, business telephone number, address, fax number and e-mail) is not personal information, but student contact information is considered personal information.

Part 1 – General

Name of Department:	Student Services		
PIA Drafter:	Hailey Mathiscyk and Rachelle Munchinsky		
Email:	Mathiscykh1@cnc.bc.ca	Phone:	5549
Program/Project Sponsor(s):	**Rafael de la Pena & Gail Little**		
Email:	Littleg2@cnc.bc.ca	Phone:	5604

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

1. Description of the Initiative

Student Services, CNC, is looking to collaborate with Mentor Canada to utilize their partnership with Mentor City which is a comprehensive platform that supports mentorship relationships in educational institutions. This partnership is supported by the federal government and is fully paid for until March 2022, and Mentor Canada is seeking additional funding to extend the financial support for an additional three to five years.

Student Services, with the support of the Strategic Enrolment Management (SEM) Retention and Student Success subcommittee, is seeking to establish a peer mentoring program to better integrate new students into the college community. According to research, connection to a social support system that is reflective of age, culture, and purpose of being at CNC is positively correlated to institutional persistence. A peer mentoring program aligns with SEM objectives of improved retention and student success.

The Peer Connections was launched as a pilot in January 2021, using Moodle, Teams, Excel, and Email to onboard, train, communicate, track, and monitor mentor relationships. The tools in place, while working, are labour intensive. Student Services attended CAUCASS and Mentor Canada presented their partnership with Mentor City, inviting post-secondary institutions to register to acquire the platform. Student Services representatives met with Mentor Canada, who walked us through the platform's capabilities. Mentor City will provide improved functionality to the systems and processes in place right now that are spread-out across multiple tools (email, Moodle etc.) and will allow for enhanced data collection and tracking of mentorship relationships.

Mentor City has a privacy policy here. They state they will not sell, share, or use personal data collected. CNC will access mentor/mentee data to gain insights and evaluate the effectiveness of our mentorship program. The following CNC employee positions will have access to the Mentor City platform and personal information contained therein:

Project Lead – Reginald Ihekwaba

Student Engagement Coordinator – Miley Yang

Manager, Student Services – Gail Little

Director, Student Services – Rafael De La Pena

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2. Scope of this PIA

The scope of this PIA includes the Mentor Canada and Mentor City agreements, online platform, and associated mentor application form and mentee enrolment forms.

3. Related Privacy Impact Assessments

No other PIAs have been completed related to this initiative.

4. Elements of Information or Data

This program is an optional program that students may choose to use. The following information will be collected for tracking and functional purposes of the mentor and mentee relationships: name, email address, photo, country/province/city, time zone, language spoken, gender, professional summary/bio, specialized skills, development areas, LinkedIn/Twitter handles, employment experiences.

Many of the items listed above are optional within the mentor/mentee profiles. Participants enter their information using the Mentor City platform, data is stored on Canadian servers, located in ▮▮▮▮▮▮▮▮▮▮ The platform is web based and has a corresponding App.   15(1)(l)

As mentor and mentee relationships are established the following information will be tracked and available to program administrators for evaluation purposes: mentoring agreements (length of relationship, meeting times, locations, etc.), goals, hours spent, number of meetings, messages sent, notes taken, program evaluations. There is the capability to track message content between mentors and mentees if we choose to enable that feature.

> 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

5. **Storage or Access outside Canada**

   All information and data are stored on Canadian servers, located in ▇▇▇▇▇▇▇▇▇   15(1)(l)

   The platform is also accessible through the web to students who are enrolled at CNC and located overseas. Student Services wants students who are starting their studies overseas (because of travel restrictions) to have the ability to access the website and app so they get connected still from abroad. Consent to use the web app will be sought when students initially sign up and obtain a login.

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;	NO
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 your privacy office(r) to discuss the requirements of a data-linking initiative.	

   ### What is a data linking initiative?

   As per FIPPA, **"data linking"** means the linking or combining of personal information in one database with personal information in one or more other databases if the purpose of the linking or combining is different from (a) the purpose for which the information in each database was originally obtained or compiled, and (b) every purpose that is consistent with each purpose referred to in paragraph (a).

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A **"data-linking initiative"** means a new or newly revised enactment, system, project, program or activity that has, as a component, data linking between (a)two or more public bodies, or (b)one or more public bodies and one or more agencies.

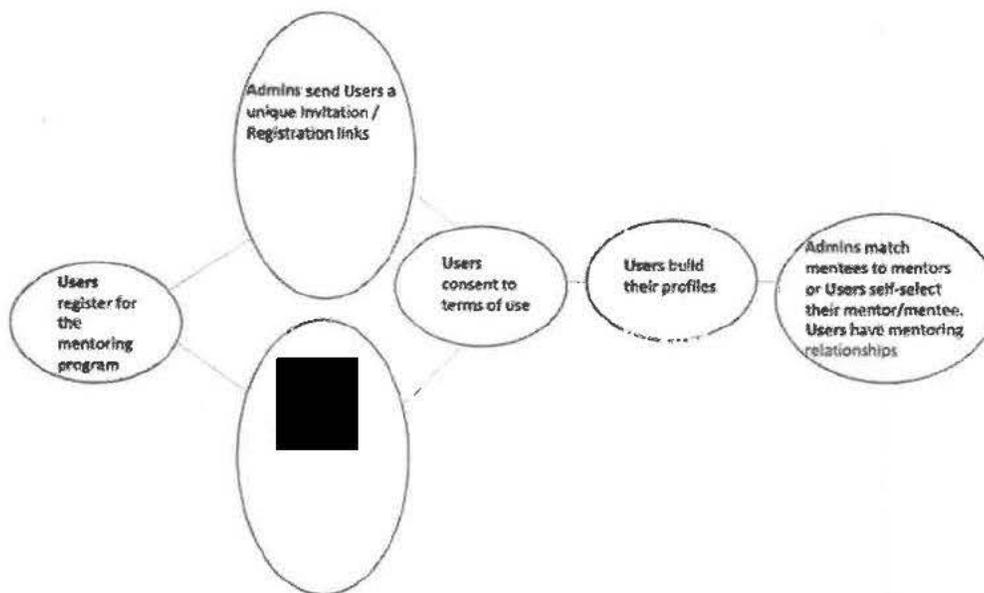## 7. Common or Integrated Program or Activity*

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.

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.	N/A
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

Please note: 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. 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.

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

MentorCity Information Flow Diagram

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	Description/Purpose	Type	FOIPPA Authority
	Personal Information Flow Table		
1.	Mentors and Mentees self-identify as interested participants and provide information to the program administrators via CNC hosted secure webform	*Collection*	*26(c)*
2.	Program admins document mentor and mentee names and information to excel tracking sheet, stored in International Education secure folders, accessible only to program admins and supervisors.	*Use*	*32(b)*
3.	Program Admins upload names and mentor/mentee info to online Mentor City platform ███████████ ████ and send invitation/registration links to mentors/mentees	*Use*	*32(b)*
4.	Mentors/Mentees receive invitation/registration link and enter their personal information into Mentor City	*Collection*	*26(c)*

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5.	Mentors and Mentees can view profiles of others on the platform and self-select their mentor/mentee	*Use*	*32(b)*

9. Risk Mitigation Table

Risk Mitigation Table			
Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1. CNC Employees could access personal information and use or disclose it for personal purposes	Employees receive training on confidentiality of student information and will be reminded of this requirement with the Mentor City data. Access will be restricted to only those who require access to support the program.	low	high
2. Mentors and Mentees will have access to disclosed personal information within the platform (profile information)	Mentors and mentees agree to the Terms of Use and Privacy Policy when they are provided access to the platform and create their profiles. Mentors and mentees can opt out of sharing their information by deactivating their account.	Low	Medium
3. Mentor City employees could access personal information and use or disclose it for personal purposes	Mentor City employees and contractors have formal agreements in place which ensure that personal data is treated as highly confidential. Personal data will only be viewed when it's necessary to resolve technical issues.	Low	High
4. Personal information is accessed during transmission	Mentor City uses ██████ for encryption in transit as well as encryption at rest. ██████ ██████ are utilized over public networks for encrypting	Low	High

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		sensitive information to ensure the privacy and integrity of the data passing over the public network. A ███████████ ███████ server is utilized for encrypted file transfers and is monitored and administered by Mentor City's IT department. ███████████████████ are utilized by staff to establish encrypted communication sessions to the corporate network. All connections to the server utilize ██████████ ████████████████████			15(1)(l) 15(1)(l) 15(1)(l)
5.	Mentor/Mentee accounts are accessed by unauthorized third party	Passwords, login credentials are used and guidance for MC users is provided and includes requirements to use secure passwords and not to share login credentials with others.	Low	High	

10. Collection Notice

This information is collected by the College of New Caledonia under section 26(c) of the *BC Freedom of Information and Protection of Privacy Act* and will be used for account creation, administration, and account management, and to determine appropriate mentoring matches for the Mentor City program. The College of New Caledonia may also use your personal data to gain insights about your needs and to evaluate the effectiveness of the mentoring program. Should you have any questions about the collection of this personal information please contact Gail Little, Manager of Student Success and Retention at littleg2@cnc.bc.ca or 250-562-2131.

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Part 3 – Security of Personal Information

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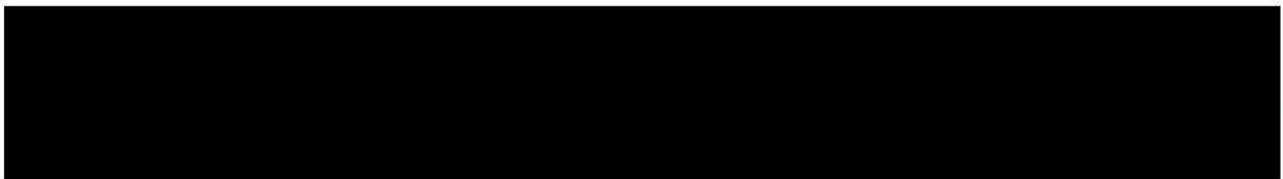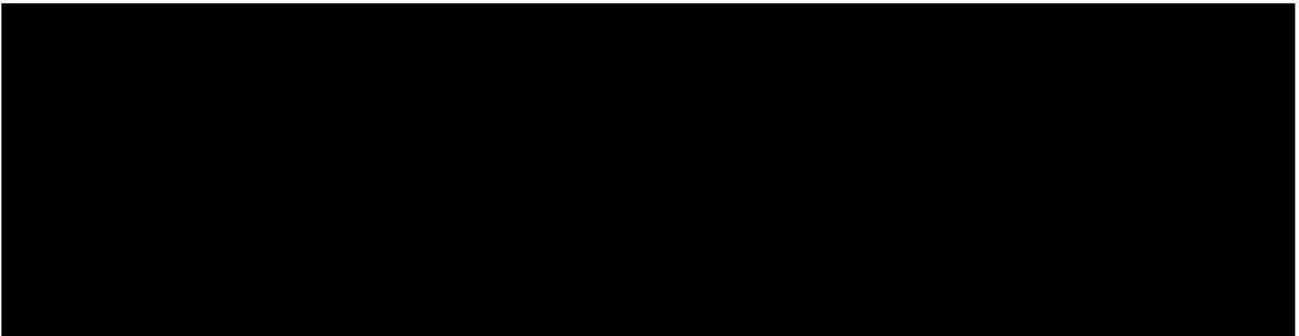
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Mentor City

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

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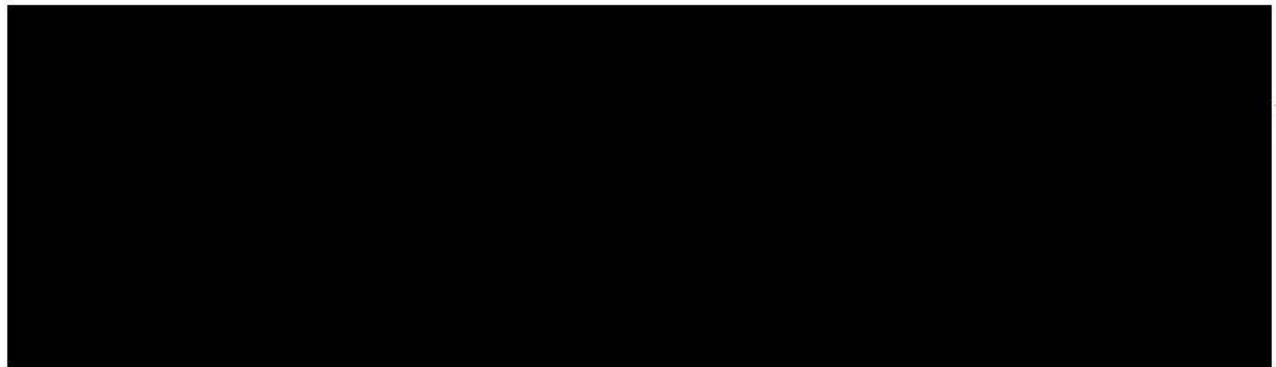
The following are types of network security perimeter devices used by Canadian Web Hosting on its network to defend Internet-accessible systems:
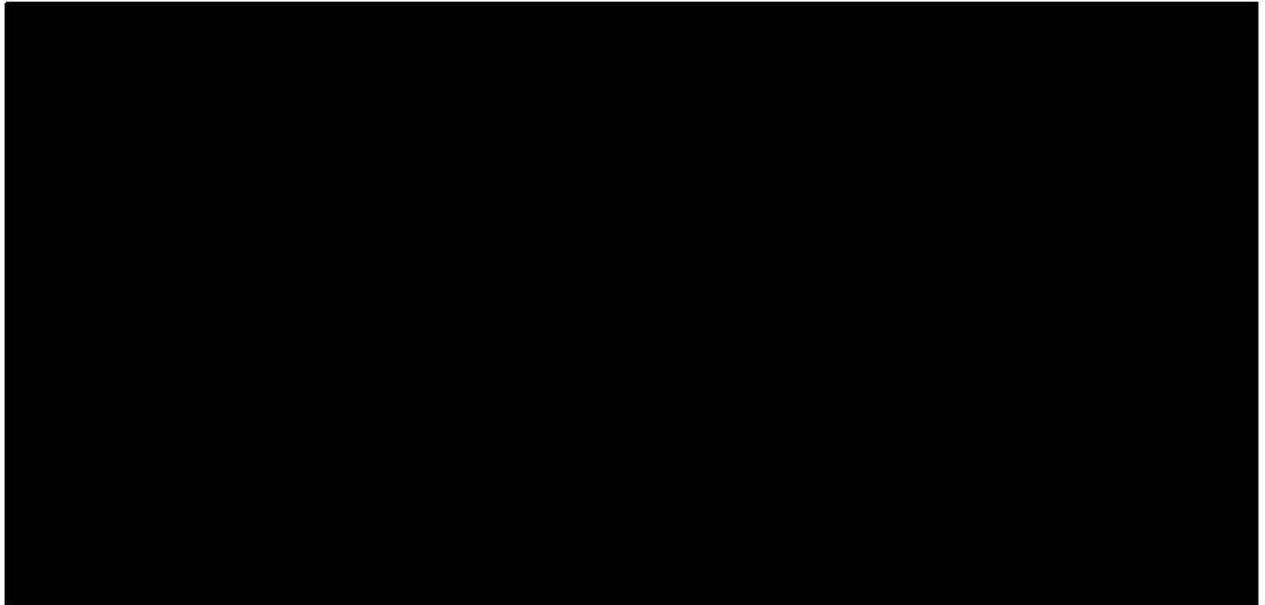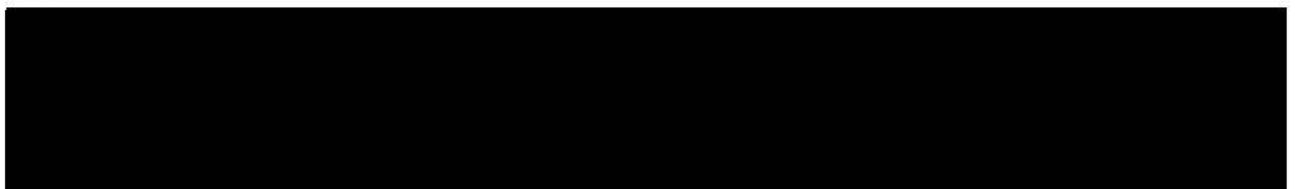
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Encryption:

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13. Does your department rely on any security processes or protocols?

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Refer to Security overview from Mentor City – appended.

https://www.mentorcity.com/en/legal/privacy-policy

https://www.mentorcity.com/en/legal/user-agreement

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.**

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███ 15(1)(l)

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

CNC

███ 15(1)(l)

Mentor City

███ 15(1)(l)

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?**

Individuals enter their own personal information and can update their profiles by logging in with their username and password.

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Admin can add to profiles if needed and edit mentor/mentee profiles if required.

17. **Does your initiative use personal information to make decisions that directly affect an individual(s)?**

No decisions are made that affect individuals beyond identifying suitable mentoring relationships.

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.**

N/A

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?**

N/A

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(r).*

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

No, data will be used to help guide CNC's use of the program, but no personal information will be included in the usage data.

> *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).*

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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.**
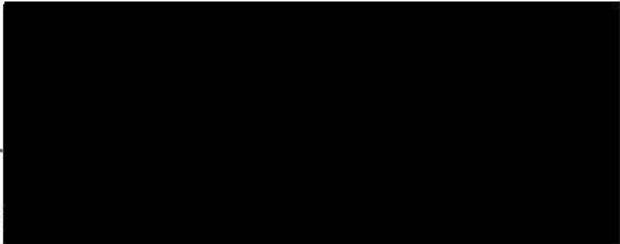
   No

   A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other assigned to an individual.

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).

22(1)

Bev Hooper, Privacy Consultant
Hooper Access and Privacy Consulting
Ltd.

Jan 19/22
Date

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Part 7 – Signatures

Once the PIA has been approved with or without conditions, the individual leading the program or project will collect the appropriate signatures. A copy of the PIA will be distributed to all signatories to attach to a requisition or file with a contract, as required.

Please fill in the name, position, and date in the bolded areas indicated then each individual signs confirming that they agree with the corresponding statement above the signature line. If the individual leading the program/project is a Dean or Director, then that individual will still require a different signature from a supervisor to provide the oversight commitment.

Program/Project Lead: Gail Little

Position: Interim Manager, Student Success and Retention

I confirm the information management practices in this initiative have been documented as accurately as possible and to the best of my knowledge. I commit to communicating appropriate information management practices to all individuals participating in this initiative. I commit to following the documented practices on this PIA and arranging a PIA amendment if I am aware information management practices in this initiative change.

Signature: ███████████████ **Date:** February 3, 2022   22(1)

Program/Project Sponsor or Supervisor: Rafael de la Pena

Position: Director, Student Services

I am accountable for overseeing the staff involved in this initiative to ensure they adhere to information management practices presented in this PIA.

Signature: ███████████████ **Date:** February 3, 2022   22(1)

Privacy Officer: David Loewen

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Position: <u>Director, Policy, Planning and Strategy</u>

I confirm that this initiative to the best of my knowledge as described in this PIA has information
management practices that comply with British Columbia's Freedom of Information and Protection of
Privacy Act.

Signature: _____   **Date:** _____M-.3/ɔɔ._____ 22(1)

The Privacy Impact Assessment does not commit CNC to financially or operationally approve this
initiative. This signed form does not guarantee that all other appropriate assessments have been
completed for this initiative.

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.

CNC PIA Form – updated July 16, 2021