

**PART 1: GENERAL INFORMATION**

<b>Initiative title:</b>	Raisers Edge NXT
<b>Department or program area:</b>	Communication Services
<b>Initiative Sponsor (usually administrator overseeing implementation):</b>	Mark Karjaluo
<b>Primary User's name and title:</b>	Jodi Baker, Donor Relations & Alumni Officer
<b>Primary User's phone:</b>	Quesnel Local 7601
<b>Primary User's email:</b>	bakerj10@cnc.bc.ca
<b>PIA Contributors (name, title and contact information)</b>	<span style="background-color: black; color: black;">[REDACTED]</span> Nicole Ellington, Accountant, <a href="mailto:ellingtonn@cnc.bc.ca">ellingtonn@cnc.bc.ca</a>
<b>Privacy Officer:</b>	Elyse Giddens
<b>Privacy Officer phone:</b>	Local 5479
<b>Privacy Officer email:</b>	foipp@cnc.bc.ca

22(3)(d)

**1.1. General information about the PIA:**

<p><b>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.</b></p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><b>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.</b></p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><b>Related PIAs, if any:</b></p> <p>N/A</p>

## 1.2. What is the initiative?

The initiative being assessed in this PIA is Raiser's Edge NXT. Raiser's Edge NXT is a cloud-based software developed by Blackbaud and used for fundraising, donor relations and alumni management. It is used by CNC's Communications Services and Financial Services.

Currently CNC is using Raiser Edge 7 which has met the end of its operational life; Blackbaud will no longer be offering support moving forward. This software is critical for financial reporting (tracking incoming donations, issuing tax receipts), sending thank you letters), donor management and reporting, stewardship, and more.

Implementation of Raiser's Edge NXT will greatly improve efficiency and processes affecting Donor Relations, Finance, and Financial Aid and Student Awards by providing a single platform for all donor information, historical interactions and contributions, and valuable relationship information.

Raiser's Edge NXT is projected to launch at CNC on March 17, 2023. Current users with access to Raiser's Edge NXT are:

- Donor Relations and Alumni Officer – Jodi Baker
- Financial Supervisor - Nicole Ellington
- Systems Administrator II – Jordan Martens (Raiser's Edge NXT system Admin)
- Controller – Sue Ovington (Raiser's Edge NXT System admin)
- Communications Administrative Assistant – TBA

## 1.3. What is the scope of the PIA?

This PIA covers the transition from Raiser Edge 7 to Raiser's Edge NXT that CNC will use to collect and track all donor and potential donor information.

#### 1.4. What are the data or information elements involved in your initiative?

Raiser's Edge NXT will store:

- Donor personal information including:
  - name;
  - address;
  - email address; and
- All financial contribution as they relate to donors and CNC fund associated with a contribution including:
  - Dollar amount contributed;
  - How the contribution was paid including the form of payment (EFT, cash, credit card or cheque number);
  - Intention of use (gift-in-kind, financial donation for student award, financial donation for program specific, endowment contribution etc.).
- All award names associated with donors, and their associated award numbers and fund IDs
- If donor is a business: All business contact information:
  - primary contact name and phone number
  - business address; and
  - email address
- Historical information
  - contact logs
    - emails can be sent from Raiser's Edge NXT
    - you can also log that a phone call was made or mail was sent.
  - past and current gift and naming agreements
  - education partnerships

#### 1.5. 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.

#### 1.6. 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

Process Steps	Collection, use or disclosure	FOIPPA authority
<b>Step 1:</b> Prospective donors fill out the Donor Information Form and email it back to CNC.	<input checked="" type="checkbox"/> Collection <input type="checkbox"/> Use <input type="checkbox"/> Disclosure	s. 26(c)
<b>Step 2:</b> Donor Relation Office will enter information from the "Donor Information Form" into Raiser's Edge and attach the form as an attachment in Raiser's Edge and MS Teams.	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	s. 32(b)
<b>Step 3:</b> Additional information [what types of information] may be added when contact is made with donors.	<input checked="" type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	s. 26(c) and s. 32(b)
<b>Step 4:</b> Donor Relations Officer will fill out a Donation Acceptance Form (DAF) form and scan the cheque/EFT then post them to Teams.	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input checked="" type="checkbox"/> Disclosure	s. 32(b) and s. 33(2)(c)
<b>Step 5:</b> The Accountant Supervisor will pull information from DAF and cheque/EFT to enter into Raiser's Edge.	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	s. 32(b)
<b>Step 6:</b> Information is used to generate communications such as tax receipts, solicitation, thank you letters, invites, Christmas cards.	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	s. 32(b)
<b>Step 7:</b> The President's Office or Board may review/request the information for necessary reporting purposes.	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input checked="" type="checkbox"/> Disclosure	s. 32(b) and s. 33(2)(c)
<b>Step 8:</b> Awards guide may be posted on the website including award description and the donor's name.	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input checked="" type="checkbox"/> Disclosure	s. 32(b) and s. 33(2)(c)
<b>Step 9:</b> The award description is added as an addendum to the gift agreement.	<input type="checkbox"/> Collection <input checked="" type="checkbox"/> Use <input type="checkbox"/> Disclosure	s. 32(b)

## 2.2 Collection Notice

CNC collects your personal information through Raiser's Edge NXT under section 26(c) of British Columbia's Freedom of Information and Protection of Privacy Act. Your personal information will be used for donor relations, thank you letters, tax receipts, future solicitation, and reporting. Direct any questions about the collection, use or disclosure of this personal information, to the Donor Relations Coordinator at [donors@cnc.bc.ca](mailto:donors@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  
 No, go to [question 3.4](#)

### 3.4 Where are you storing the personal information involved in your initiative?

- Microsoft Azure (which manages information internationally in a variety of locations based on the function of the product)
- 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)?
Blackbaud using Microsoft Platform	Raiser’s Edge NXT on Azure infrastructure	Stored internationally (email functionality in Raiser’s Edge may contain any personal information elements. Payment services functionality contains name, type of payment card, and record of donation transaction.

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

Any information collected within the email functionality and the payment services functionality will be disclosed for storage in the Azure US East servers housing those parts of the functionality for Raiser’s Edge NXT.

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

- No (Privacy Office note: There are confidentiality terms but there are not privacy terms. The Privacy Protection Schedule was not linked to the body of the agreement to leverage enforcement.)  
 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?**

[Redacted]

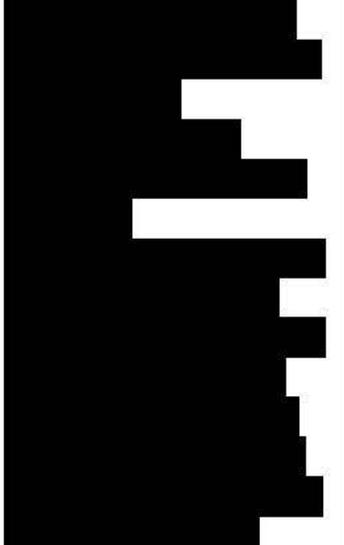
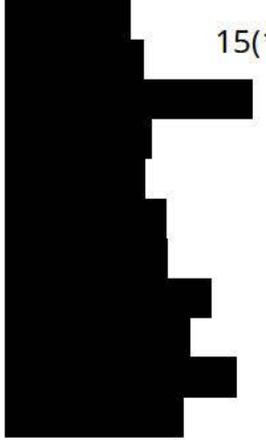
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**4.5 Provide details about how you will track access to sensitive personal information.**

[Redacted]

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**4.6 Describe the privacy risks for disclosure outside of Canada.**

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.
Sensitive personal information about an individual may be transmitted through the email functionality of Raiser's Edge NXT which may subject that data to unauthorized disclosure of personal information outside of Canada.	Individuals may have their integrity, reputation, or security disproportionately compromised due to political consequences of intersectional experiences.	<input type="checkbox"/> Low <input checked="" type="checkbox"/> Medium <input type="checkbox"/> High	<input type="checkbox"/> Low <input checked="" type="checkbox"/> Medium <input checked="" type="checkbox"/> High		 <p>15(1)(l)</p> <p>15(1)(l)</p>

## 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]	[REDACTED]	[REDACTED]

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**What technical security safeguards are in place to protect Personal Information in this initiative? Describe the elements of technical security that protect where the records for your initiative are stored (e.g. secure passwords, encryption, firewalls, etc.)**

Safeguard	At CNC	At Third Party
[REDACTED]	[REDACTED]	[REDACTED]

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## 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?**

When Donor relations contacts a donor, they will ask them to provide their up-to-date contact information and confirm this against the information stored in Raiser's Edge NXT.

**6.2 Requests for correction**

**FIPPA 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.**

- 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.

[REDACTED]

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## 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.

<b>Description of ISA:</b> Click or tap here to enter text.
<b>Name of main ministry or agency involved:</b> Click or tap here to enter text.
<b>Any other ministries, agencies, public bodies, or organizations involved:</b> Click or tap here to enter text.
<b>Business contact title and phone number for person responsible for maintaining the ISA:</b> Click or tap here to enter text.
<b>ISA start date:</b> Click or tap here to enter text.
<b>ISA end date:</b> 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.

<b>Describe the type of information in the bank:</b> Information related to donor relations at CNC. (Constituent Files)
<b>Name of main organization involved:</b> Communication Services - College of New Caledonia
<b>Any other ministries, agencies, public bodies or organizations involved:</b> No
<b>Business contact title and phone number for person responsible for managing the PIB:</b> Mark Karjaluoto – Executive Director, Marketing and Communications 236-601-0933 ext 5388 karjaluotom@cnc.bc.ca

## 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
Unauthorized individuals at CNC access the stored personal information.	Access will be restricted based on least privilege and need-to-know principles. Employees receive training regarding the confidentiality of donor information.
Contractor fails to protect data.	Contractual terms will outline privacy protection commitments.
Privacy breach may go undetected.	Contract terms, tracking and procedures will ensure 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.
Privacy Risks associated with processing of information.	Program admin and users will be subject to procedures to ensure info is protected in CUD, safeguards and storage, and deleted according to the privacy protection schedule.
Anyone who has been provided access could potentially use the contact information for non-business reasons.	Employees who no longer need access to the information either through position change or leaving CNC will have their Raiser's Edge NXT account deactivated so that they can't access the information.  Everyone who is provided access to the tool will sign a confidentiality agreement.
Lack of program admin duties and procedures may expose information to privacy risk.	[REDACTED]

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## 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:

The Collection Notice needs to be provided to constituents to review before any of their personal information, or their contacts' personal information is put into Raiser's Edge NXT. When linking individuals through their association as contacts to each other, be aware that FIPPA rules for appropriate collection apply to a constituent's contacts, and that contact needs to be treated as a new constituent.

Information Management Guidelines on the appropriate use of Raiser's Edge NXT need to be developed to mitigate the potential harms identified in this PIA. Those Information Management Guidelines would be prepared within one year of the time this PIA is signed, but as soon as possible.

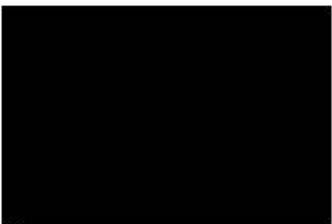
### Privacy Office Signatures

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

Role	Name	Electronic signature	Date signed
Privacy Officer / Privacy Office Representative	Elyse Giddens		2023-09-08

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### Program Area Signatures

Role	Name	Electronic signature	Date signed
Primary User	Jodi Baker		2023-09-05
Initiative Sponsor Usually administrator overseeing implementation	Mark Karjaluo		2023-08-30
IT Services Representative Only required if they have been involved in the PIA	Jordan Ingham		

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