

# Privacy Impact Assessment

Use this privacy impact assessment (PIA) template if you are starting a new initiative or significantly changing an existing initiative.

## Before you start

- An initiative is an enactment, system, project, program or activity
- Find information on the [PIA review process](#) and [question-by-question guidance](#).
- If you have any questions, contact the CNC Privacy Office at [foipp@cnc.bc.ca](mailto:foipp@cnc.bc.ca)

## PART 1: GENERAL INFORMATION

PIA file number: 22-005

<b>Initiative title:</b>	Virtual Learning Strategy Project
<b>Organization:</b>	College of New Caledonia
<b>Branch or unit:</b>	Trades and Technologies
<b>Your name and title:</b>	Rebecca Reid, Acting Manager Policy Planning & Strategy (CNC) Lydia Husoy, Programs Planner (CNC) Wendy MacCharles, Program Integration Manager (VLS)
<b>Your work phone:</b>	250-562-2131 ext. 5283 250-561-5843
<b>Your email:</b>	<a href="mailto:reidr@cnc.bc.ca">reidr@cnc.bc.ca</a> <a href="mailto:husoyl@cnc.bc.a">husoyl@cnc.bc.a</a> <a href="mailto:wendy.maccharles@gnb.ca">wendy.maccharles@gnb.ca</a>
<b>Initiative Lead name and title:</b>	Frank Rossi, Dean of Trades and Technologies
<b>Initiative Lead phone:</b>	250-562-2131 ext. 5495

<b>Initiative Lead email:</b>	rossif@cnc.bc.ca
<b>Privacy Officer:</b>	
<b>Privacy Officer phone:</b>	
<b>Privacy Officer email:</b>	

General information about the PIA:

<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>
No
<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>
No
<b>Related PIAs, if any:</b>

## 1. What is the initiative?

**Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.**

The School of Trades and Technologies will partner with the Government of New Brunswick (NB), on the Virtual Learning Strategy (VLS) pilot project (<https://www.vls-canada.com>). The project is a model of training support, developed and owned by the Government of NB, for individuals in pre-apprenticeship (foundation level) trades programs with essential skills gaps and/or learning disabilities.

The project will run as a pilot from September 2022 – July 2025 with the goal of NB offering VLS services and resources to CNC on a fee-for-service basis following the pilot project. A representative from each partner will be appointed to a committee to oversee the implementation of the project.

During the pilot project, CNC will provide CNC foundation level carpentry students with the opportunity to complete the VLS Essential Skills for Success Assessment (ESSA) after attending an in-class presentation from a VLS Learning Strategist. Interested students will take the ESSA on their own time. If they don't have access to a computer, their instructor will assist them with booking a CNC computer lab.

Results from ESSA will be emailed to each individual student. Students who score below 70% on the overall assessment, or on specific areas of the assessment, will be eligible to receive support through the VLS program. All CNC foundation level carpentry students will be encouraged to take the ESSA, however student participation in the program is voluntary. Students may choose not to take the assessment or may take the assessment but choose not to participate further in the VLS program. A maximum of 35 students from CNC may receive VLS supports during the pilot project.

NB will provide eligible CNC foundation level carpentry students with access to a Virtual Learning Strategist from the VLS program who will connect directly with the student to deliver services and provide access to the appropriate VLS tools, materials and resources based on the student's needs, these include:

- [Learning Disability Online Risk Indicator \(LDORI\) screening tool](#)
- Digital Literacy Assessment
- Psycho-educational assessment through a Registered Psychologist
- Online tutoring for foundational skills such as reading, writing or math

- Access to tablets and learning apps, assistive technologies
- Customized work plans
- Learning materials and supports such as identifying learning styles, study skills instruction, test-taking skills, and time management and organizational strategies

Personal information gathered through the VLS project will not be disclosed back to CNC except in the following situations:

- Each instructor will receive an aggregate, anonymous synopsis of the results for their class. The instructor will also receive some general study material that students can access both before and after the assessment.
- Support for student requests for academic accommodations (limited to the student's name and requested accommodation, no diagnosis or other information provided)
- Referrals for supports at CNC
- Aggregate and anonymous data to report on VLS program outcomes

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

**Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?**

This PIA covers the VLS pilot project ending July 21, 2025. Any services after this date are out of the scope of this PIA. CNC foundation level carpentry students at the Prince George, Quesnel, Burns Lake, Vanderhoof and Fort St James campuses will be the only students involved in the pilot project.

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

**Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.**

PHASE 1 – STUDENT ASSESSMENT

CNC Carpentry Foundation Students who choose to take the initial VLS Essential Skills for Success Assessment in order to be considered for the VLS program provide the following information:

<b>TYPE OF PERSONAL INFORMATION</b>	
Contact Information:	
<ul style="list-style-type: none"> <li>- Name</li> <li>- CNC student ID</li> <li>- Email address</li> </ul>	
Assessment Information:	
<ul style="list-style-type: none"> <li>- Answers to questions and score on Essential Skills for Success Assessment</li> </ul>	

PHASE 2 – Virtual Learning Strategy Program Enrollment Form Pre-employment Project

CNC Carpentry Foundation Students who qualify for and choose to receive learning supports through the VLS program provide the following information:

<b>TYPE OF PERSONAL INFORMATION</b>	
Contact Information:	
<ul style="list-style-type: none"> <li>- Name</li> <li>- CNC student ID</li> <li>- Email address</li> </ul>	<ul style="list-style-type: none"> <li>- Phone number</li> <li>- Mailing address</li> <li>- Birthdate</li> </ul>
Demographic Information:	
<ul style="list-style-type: none"> <li>- Gender</li> </ul>	

<ul style="list-style-type: none"> <li>- Indigenous or visible minority (optional)</li> <li>- Languages spoken (optional)</li> </ul>
<p>Educational Information:</p> <ul style="list-style-type: none"> <li>- Gap assessments</li> <li>- Customized work and learning plans</li> <li>- Grades (for carpentry foundation course at CNC)</li> <li>- Requests and decisions related to learning accommodations</li> </ul>
<p>Health Information:</p> <ul style="list-style-type: none"> <li>- Information related to diagnosed learning disabilities</li> <li>- Psychoeducational assessment results</li> </ul>

### 3.1 Did you list personal information in question 3?

**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

- If yes, go to [Part 2](#)
- If no, answer [question 4](#) and submit questions 1 to 4 to your Privacy Officer. You do not need to complete the rest of the PIA template.

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

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

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.

### 5. 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
<p>The VLS Team will host an online presentation to each Carpentry Foundation class during class hours. During the presentation students will be provided with a paper consent form to complete if they are interested in taking the VLS Essential Skills for Success Assessment and potentially participating in the larger VLS program. The student will complete the form and provide it to their CNC instructor.</p>	Collection/Disclosure	s. 27 and s. 33	
<p>The CNC instructor will provide the completed forms to the CNC Trades Office where the Project Planner will</p>	Disclosure	s. 33	

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
scan the forms, password protect the file, and email it to the VLS coordinator. Paper forms will be shredded.			
The VLS will register each student on the VLS portal and email each student their login (student ID# with prefix added and a link to complete the Essential Skills for Success Assessment online through the VLS portal.	Use	s. 32	
Students will complete the Assessment and submit through the portal.	Collection	s. 27	
A Virtual Learning Strategist will review the results (to determine whether students qualify for support) and notify students of their eligibility via email.	Use	s. 32	
Students who qualify for the program will complete and return the enrollment form to the VLS by email.	Collection	s. 27	
Aggregated class assessment results will be shared with the instructor and/or department head.	Disclosure	s. 33	

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
A Virtual Learning Strategist will meet with each student who enrolls to create a learning plan which might include additional tutoring, screening and/or assessment, and a need for learning and/or testing accommodations.	Use	s. 32	
If formal assessment is required, the Virtual Learning Strategist will refer the student to a psychologist, with the student's consent.	Use/Disclosure	s. 32, s. 33	
If learning and testing accommodations are required, the Virtual Learning Strategist will help the student to register for support from CNC student services, with the student's consent.	Use/Disclosure	s. 32, s. 33	

## 6. Collection Notice

**If you are collecting personal information directly from an individual the information is about, FOIPPA requires that you provide a collection notice (except in limited circumstances).**

The following will be included on the forms completed as part of steps 1 and 4 above:

Step 1 - E-Consent Form:

*The information on this form is collected by the Government of New Brunswick's Virtual Learning Strategy Program in partnership with the College of New Caledonia under sub-section 26(c) of the Freedom of Information and Protection of Privacy Act. It will be used to assess qualification for the Virtual Learning Strategy program. Should you have any questions about the collection and use of your personal information please contact (insert VLS contact position or name and email address/phone number here).*

Step 2 - E-Enrollment Form:

*The information on this form is collected by the Government of New Brunswick's Virtual Learning Strategy Program under sub-section 26(c) of the Freedom of Information and Protection of Privacy Act and will be the purpose of meeting the data requirements for admission, registration, research and statistical analysis of the Virtual Learning Strategy program. Should you have any questions about the collection of this personal information please contact (insert VLS contact position or name and email address/phone number here).*

### **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.

#### **7. Is any personal information stored outside of Canada?**

No. All portal and program data is stored in Canada on Government of New Brunswick servers.

#### **8. Does your initiative involve sensitive personal information?**

Yes

- If yes, go to [question 9](#)
- If no, go to [question 10](#)

**9. Is the sensitive personal information being disclosed outside of Canada under [FOIPPA section 33\(2\)\(f\)](#)?**

No

- If yes, go to [question 10](#)
- If no, go to [Part 5](#)

**10. Where are you storing the personal information involved in your initiative?**

After you answer this question go to [Part 4](#)

**PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA**

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization’s Privacy Officer. More help is available in the [Guidance on Disclosures Outside of Canada](#).

**11. Is the sensitive personal information stored by a service provider?**

N/A - All personal information stored in Canada

- If yes, fill in the table below (add more rows if necessary) and go to [question 13](#)
- If no, go to [question 12](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

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

N/A – All personal information stored in Canada

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

N/A – All personal information stored in Canada

- If yes, describe the contractual measures related to your initiative.

**14. What controls are in place to prevent unauthorized access to sensitive personal information?**

N/A – All personal information stored in Canada

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

N/A – All personal information stored in Canada

**16. 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.

N/A – All personal information stored in Canada

#### 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 17. 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.

### 17. Does your initiative involve digital tools, databases, or information systems?

Yes

- If yes, work with your Privacy Officer to determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of [FOIPPA section 30](#)

17.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

[REDACTED]

15(1)(l)

- If yes, you may want to append the security assessment to this PIA. Go to [question 20](#)

- If no, go to [question 19](#)

**18. What technical and physical security do you have in place to protect personal information?**

Describe where the digital records for your initiative are stored (e.g. on your organization's LAN, on your computer desktop, etc.) and the technical security measures in place to protect those records.

Technical security measures include:

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

[REDACTED]

15(1)(l)

**19. Controlling and tracking access**

Please check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	
<ul style="list-style-type: none"> <li>[REDACTED]</li> </ul>	X
<ul style="list-style-type: none"> <li>[REDACTED]</li> </ul>	
<ul style="list-style-type: none"> <li>[REDACTED]</li> </ul>	X
<p>Describe any additional controls:</p>	<ul style="list-style-type: none"> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>Privacy Training               <ul style="list-style-type: none"> <li>VSL must ensure that each individual who will provide services under the Agreement that involve the access, collection or creation of personal information will complete, at the Contractor's expense, the NB service provider</li> </ul> </li> </ul>

15(1)(l)

15(1)(l)

15(1)(l)

15(1)(l)

Strategy	
	<p>privacy training prior to that individual providing those services</p> <ul style="list-style-type: none"> <li>○ The requirement above will only apply to individuals who have not previously completed the applicable privacy training</li> </ul>

## 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.

### 20. How will you make sure that the personal information is accurate and complete?

**FOIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual’s personal information is accurate and complete.**

A student may contact their learning strategist or the VLS administrator at [VLS@gnb.ca](mailto:VLS@gnb.ca) to request corrections.

### 21. 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.**

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

Yes

#### 21.2 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

- 21.3** 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

- 22.** Does your initiative use personal information to make decisions that directly affect an individual?

Yes

- If yes, go to [question 23](#)
- If no, skip ahead to [Part 7](#)

- 23.** 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. The VLS project will retain student records for a minimum of one year after the end of their participation in the project.

## PART 7: AGREEMENTS AND INFORMATION BANKS

Please provide information about whether your initiative will involve an information sharing agreement, research agreement or personal information bank.

- 24.** Does your initiative involve an [information sharing agreement](#)?

No

- If yes, please complete the Information Sharing Agreement Supplement and attach it to your PIA

**25. Will your initiative result in a personal information bank?**

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

No

- If yes, please complete the table below.

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the PIB

**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.

**26. Risk response**

**Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.**

Possible risk	Response
Risk 1: VLS project fails to protect data.	MOU and Letter of Agreement will outline privacy protection commitments.
Risk 2: MOU terms may not protect information.	CNC has signed a letter of agreement with the Government of New Brunswick Post-Secondary Education, Training and Labour outlining expectations for protecting CNC student personal information and attaching a privacy protection schedule.
Risk 3: Privacy breach may go undetected.	Schedule A attached to the letter of agreement requires procedures to ensure privacy breaches are identified, reported, and investigated.
Risk 4: CNC is not informed in the event of a privacy breach.	Schedule A attached to the letter of agreement outlines privacy protection and breach notification commitments.
Risk 5: Potential misuse of information by users.	Training is provided to users; users are subject to confidentiality terms.
Risk 6: Privacy Risks associated with processing of information.	Program admin and users will be subject to procedures to ensure info is protected, safeguards and storage, and deleted according to the MOU privacy protection schedule.
Risk 7: Misuse of student data by VLS staff	VLS staff sign confidentiality agreements and receive privacy training. Personal information is only disclosed to employees who require access.
Risk 9: Unauthorized individuals at VLS 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 student information.

## PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

### Privacy Office Comments

The following recommendations are made for this pilot project:

- [REDACTED]
- [REDACTED]
- [REDACTED] 13(1),  
15(1)(l)
- [REDACTED]

### 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			

### Program Area 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 program area will engage with their Privacy Office and if necessary, complete a PIA update.

Role	Name	Electronic signature	Date signed	
<b>Initiative lead</b>	Frank Rossi		September 29, 2022	22(1)
<b>Program/Department Manager</b>	Frank Rossi		September 29, 2022	22(1)
<b>Contact Responsible for Systems Maintenance and/or Security</b> Only required if they have been involved in the PIA				
<b>Head of public body, or designate</b> Only required if personal information is involved	Elyse Giddens		October 4, 2022	22(1)