

Table of Contents

PART 1: GENERAL INFORMATION	1
PART 2: COLLECTION, USE AND DISCLOSURE	5
PART 3: STORING PERSONAL INFORMATION	6
PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA	7
PART 5: SECURITY OF PERSONAL INFORMATION	10
PART 6: ACCURACY, CORRECTION AND RETENTION	12
PART 7: AGREEMENTS AND INFORMATION BANKS	13
PART 8: ADDITIONAL RISKS	14
PART 9: SIGNATURES	15

PART 1: GENERAL INFORMATION

PIA file number: 21-007

Initiative title:	Vocantas Scaller
Organization:	College of New Caledonia
Branch or unit:	Student Services
Your name and title:	Jo-Ann Bellamy, Hooper Access and Privacy Consulting Ltd.
Your work phone:	Jo-Ann Bellamy: 250-208-3431
Your email:	jbellamy@hooperconsulting.ca
Initiative Lead name and title:	Gail Little Interim Manager Student Success & Retention
Initiative Lead phone:	250-562-2131 x5604
Initiative Lead email:	Littleg2@cnc.bc.ca

Privacy Officer:	
Privacy Officer phone:	
Privacy Officer email:	

General information about the PIA:

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.
No.
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.
No.
Related PIAs, if any:
N/A

1. What is the initiative?

The Student Services Department wants to engage Vocantas to run an outreach campaign using an interactive voice response system (Vocantas Scaller) to obtain student feedback on their support needs at CNC, e.g., career, academic, advising, counselling, etc. The caller ID shows as College of New Caledonia.

Vocantas Scaller uses a recorded human voice to ask a series of yes/no questions to identify where students may benefit from additional support from CNC. Based on the information collected on the calls, CNC can follow up individually with students to discuss support services that they have indicated they would benefit from. The outreach campaign aims to ensure students are aware of the services and resources available to them to support them in being successful at CNC. This program will also help CNC better understand student needs and improve the effectiveness of the programs and services available for students.

CNC will send out a general notice to all students via social media about the campaign. Students will be advised that CNC will be calling students to get their feedback on what supports they would benefit from. If students answer and engage in the calls, they will be providing their implied consent.

CNC will provide Vocantas, via the Vocantas web portal or secure email, with student ID numbers and phone numbers that Vocantas will use for the outreach campaign. Vocantas will use the results from the communications (e.g., the responses) to provide a summary report (e.g., 100 students were contacted, 50 said yes, 50 said no, etc.). Vocantas may also provide CNC with a list of the phone numbers they were unable to reach. All data is securely purged following the completion of the campaign.

A sample script for the recorded phone call that students will receive is as follows:

Hello, this is an interactive call from the College of New Caledonia.

Are you the student currently enrolled in [program name]?

You have reached an important point in your semester here at CNC. We'd like you to answer a few questions to help us discover areas where we can provide you support to help you succeed at CNC.

At this point in the semester, would you benefit from additional support in any of the following areas? Please indicate by answering yes or no where support would be helpful to you:

- a) Academic Advising*
- b) Testing and Tutoring*
- c) Financial Aid*
- d) Health and Wellness*
- e) Accessibility*
- f) Recreation*
- g) Career Readiness*

Thank you for interacting with us today, if you have answered yes to additional support, the CNC student success department will be in touch with you in the next few days.

We wish you every success in your studies. You are welcome to contact us at any time to take advantage of the many support services available to you during your time at CNC. We are here to help, and you can reach us through the website at [CNC website URL]

Goodbye.

2. What is the scope of the PIA?

This PIA will assess the collection, use, disclosure, security, and storage of students' personal information collected and used in the Vocantas Scaller outreach campaign.

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

The following information would be sent to Vocantas so they can communicate with students:

- Student Unique Identifier number
- Student contact information (phone number, cell number, email)
- Name of program student enrolled in

The following information would be collected by Vocantas during the automated phone calls with students:

- Students yes/no answers to whether they would benefit from additional support in any of the following areas:
 - a) *Academic Advising*
 - b) *Testing and Tutoring*
 - c) *Financial Aid*
 - d) *Health and Wellness*
 - e) *Accessibility*
 - f) *Recreation*
 - g) *Career Readiness*

3.1 Did you list personal information in question 3?

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?

N/A

PART 2: COLLECTION, USE AND DISCLOSURE

5. Collection, use and 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 collects student contact information when they register as a student at the College and identify their program.	Collection	26(d)	
Step 2: CNC will send a notice to all students via social media advising them of the campaign.	Use	32(a)	
Step 3: CNC will provide Vocantas with student ID, phone numbers and program they are registered in.	Disclosure	33(2)(c)	
Step 4: Vocantas will contact students via the automated voice system using their contact information.	Use	32(a)	
Step 5: If a students select "yes" to a question, CNC will contact that student to discuss the support(s) the student has indicated they would benefit from.	Use	32(a)	
Step 6: Vocantas will provide CNC with a summary report of the number of calls, etc. (no personal information is included in this report)	N/A	N/A	

6. Collection Notice

Following is the notification from CNC's Registration for Admission form which is currently being updated to include an additional purpose of "the ongoing administration of the student experience":

The information on this form and all required admissions and registration documentation is collected for the purpose of meeting the data requirements for admission, registration, research, alumni and development, statistical analysis, locker and U-Pass administration, and the student health plan. It is collected under the authority of the College and Institute Act and your privacy is protected under the Freedom of Information and Privacy Act limiting how your information may be used or disclosed. If you have any questions about the collection and use of your information contact the Freedom of Information Coordinator, College of New Caledonia at 250 561 5828.

PART 3: STORING PERSONAL INFORMATION

7. Is any personal information stored outside of Canada?

No.

8. Does your initiative involve sensitive personal information?

No.

- 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)?

N/A

- If yes, go to [question 10](#)
- If no, go to [Part 4](#)

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

The personal information originally collected by CNC is stored on CNC's ERP system, Colleague. The personal information provided to Vocantas will be stored in a SOC2 Type 2 DC data centre in [REDACTED]

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After you answer this question go to [Part 5](#).

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada.

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

N/A

- 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)?
N/A		

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

N/A

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

N/A

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

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

N/A

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

N/A

17. 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 (low, medium, high)	Level of privacy risk (low, medium, high, considering 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, please describe.
N/A					

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.

18. 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

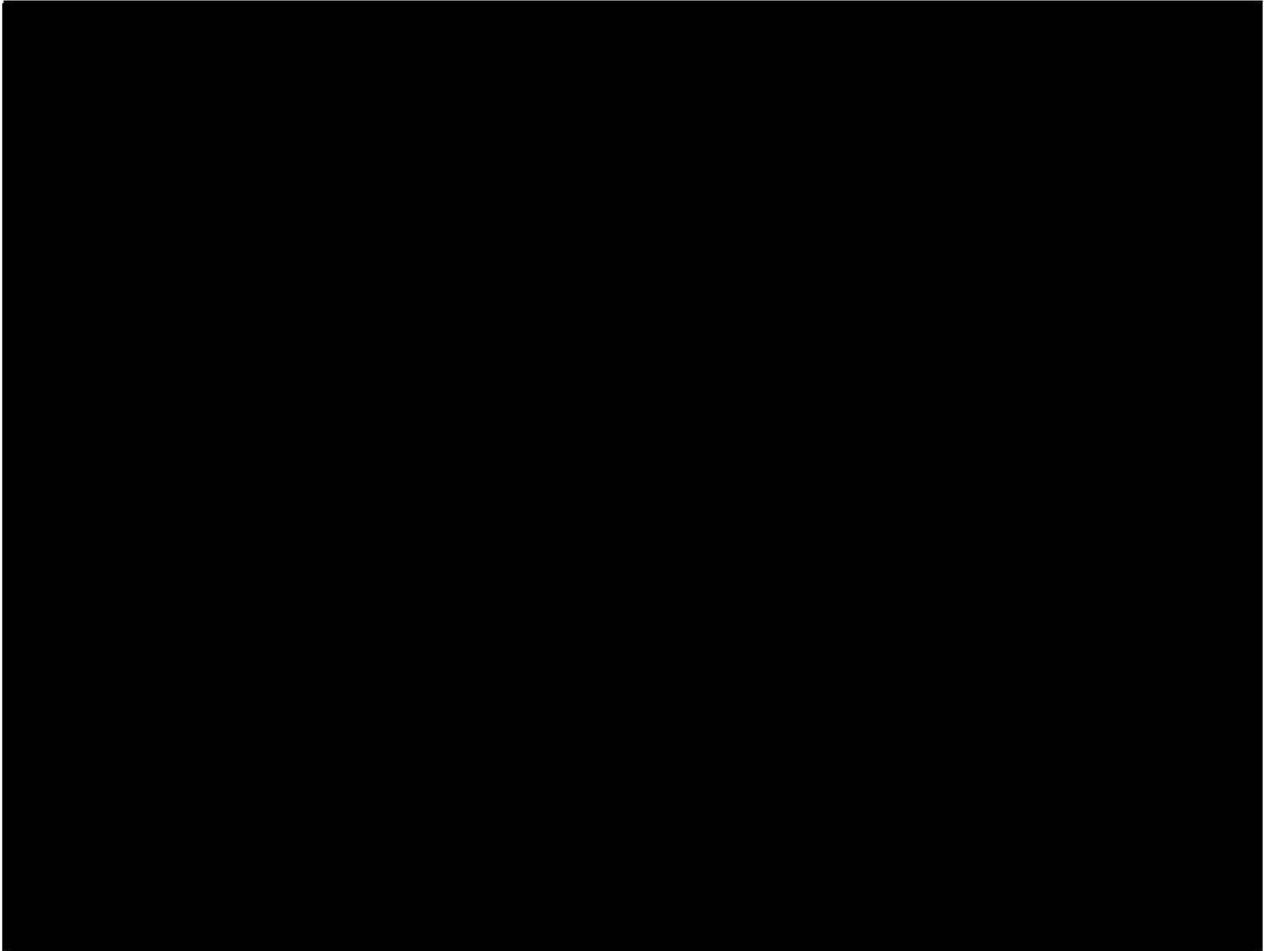
18.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Vocantas is SOC2 Type 2 certified and therefore has appropriate security measures in place.

- If yes, you may want to append the security assessment to this PIA. Go to [question 20](#)
- If no, go to [question 19](#)

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

CNC



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Vocantas

Vocantas is SOC2, Type 2 certified and as such has appropriate technical and physical security measures in place as well as policies and procedures.

20. 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	
We only allow employees in certain roles access to information	Yes
Employees that need standing or recurring access to personal information must be approved by executive lead	Yes
We use audit logs to see who accesses a file and when	
Describe any additional controls:	Vocantas is SOC2, Type 2 certified and as such has the appropriate access controls in place.

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.

21. 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.

Students can contact CNC to have their personal information updated.

22. 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.

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

Yes. Students can contact CNC to correct their personal information.

22.2 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?

N/A. Students can have their personal information corrected by contacting CNC.

22.3 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?

N/A for this initiative however CNC will ensure that other third parties are notified should the need occur.

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

No. The student provides feedback to CNC regarding further supports they may benefit from.

- If yes, go to [question 25](#)
- If no, skip ahead to [Part 7](#)

24. 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.

N/A

- 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.

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.

25. Does your initiative involve an [information sharing agreement](#)?

No.

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

26. 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.

27. 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: Employees of CNC access personal information and use or disclose it for unauthorized purposes	Employees receive training on confidentiality of student information and will be reminded of this requirement with the Vocantas Scaller data. Access will be restricted to only those who require access to support the program.

Possible risk	Response
Risk 2: Employees of Vocantas access personal information and use or disclose it for unauthorized purposes	Only authorized staff at Vocantas have access to the required systems and information. Vocantas is SOC2, Type 2 certified. Vocantas has privacy and security policies in place.
Risk 3: Student personal information is compromised during transmission to Vocantas.	Data will be provided by CNC to Vocantas either via upload into the Vocantas web portal or via email in a password protected file [REDACTED]
Risk 4: Students' personal information is compromised when provided by Vocantas to CNC via the web portal	Vocantas has SOC 2, Type 2 certification and thus has appropriate security measures in place for the transmission of personal information.

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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

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	Signature	Date signed
Privacy Consultant	Bev Hooper, Hooper Access and Privacy Consulting Ltd.	[REDACTED]	Jan 10/22 22(1)

Role	Name	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.

Program Area Comments:

Role	Name	Signature	Date signed	
Initiative lead	Gail Little Interim Manager Student Success & Retention		Feb. 3, 2022	22(1)
Program/Department Manager	Rafael de la Pena Director, Student Services		Feb 3, 2022	22(1)
Head of public body, or designate	David Loewen Director, Policy, Planning and Strategy		Mar 3, 2022	22(1)