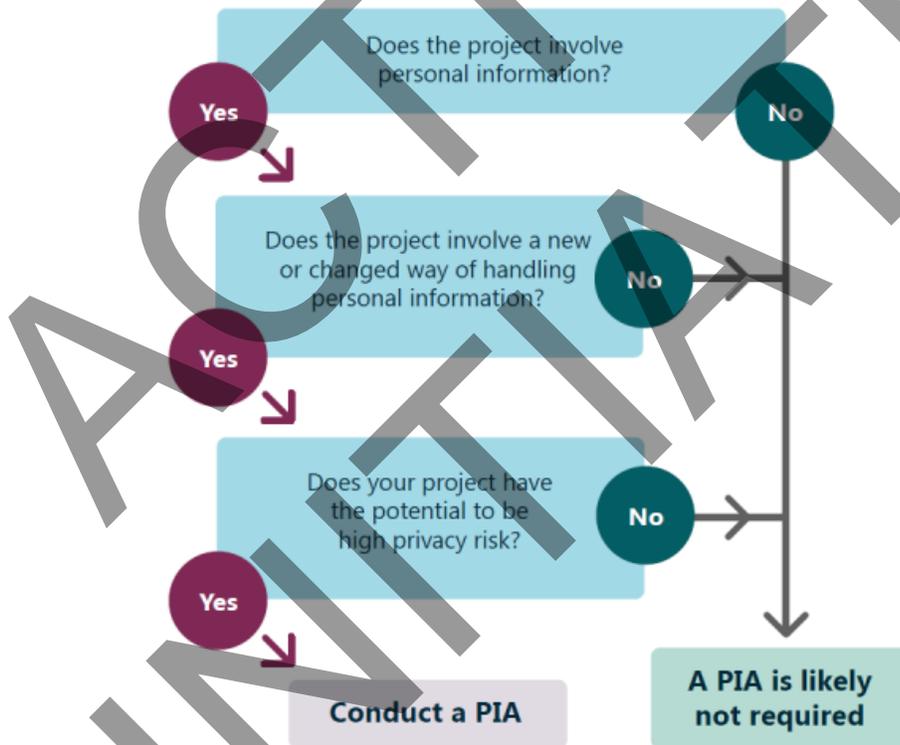


## PIA Determination and Template

PIA#: 22-11 CRI Headstart Retention PIA

**Here are a few examples of situations where you should consider a PIA:**

- You collect, use or disclose new personal information that you did not collect, use or disclose before.
- You give access to personal information to new parties.
- You implement a new service delivery or management technology that stores, transmits, or retrieves personal information.
- You implement a new or different electronic record system, or make changes to an existing one, such as adding portable devices with wireless network connections.
- You enter into an agreement with a new business partner or vendor who will have access to health information in your custody or control.
- You create a new organization that will collect, use or disclose personal information.



Please fill out PART A to determine your need for a full PIA.

## PIA Determination and Template

### PART A

#### 1. Introduction

General Description

**a) Name of Program or Service**

The University of Northern British Columbia (UNBC) hired Customer Relationship Index (CRI), a consulting firm specializing in higher education research across Canada, to conduct a retention & readiness survey of first-year entering students.

**b) Name of Department, Branch and Program Area**

**c) Name of Program or Service Representative**

**d) Key Program or Service Dates**

This will be a three year program beginning in the fall of 2022.

**e) Description of the New Program or Service or the Change**

**i. Purposes, Goals and Objectives**

**ii. List of All Stakeholders Impacted / Involved**

Stakeholder	Role

**iii. The Need**

The analysis of the survey results will create a predictive model that will allow UNBC to identify entering students who are at higher risk of quitting before the end of first year.

**iv. Governance Model**

Accountability – who is ultimately accountable for the program or system

**v. Relevant Existing Policies**

## PIA Determination and Template

**PIA#: 22-11 CRI Headstart Retention PIA**  
vi. **Related PIAs**

**PIA docs from CRI to Appendix**

vii. **Relevant contracts**

**f) The Intended Scope (Project and PIA)**

- i. Scope of PIA
- ii. HeadStart retention and readiness survey to be delivered to entering first-year students at UNBC. Web Survey results include anonymized unique identifiers. Contractor analyses results and provides UNBC with the anonymized collected data in the form of a dashboard that can have personal details added in specific fields by UNBC after analysis is complete.

**g) Definitions**

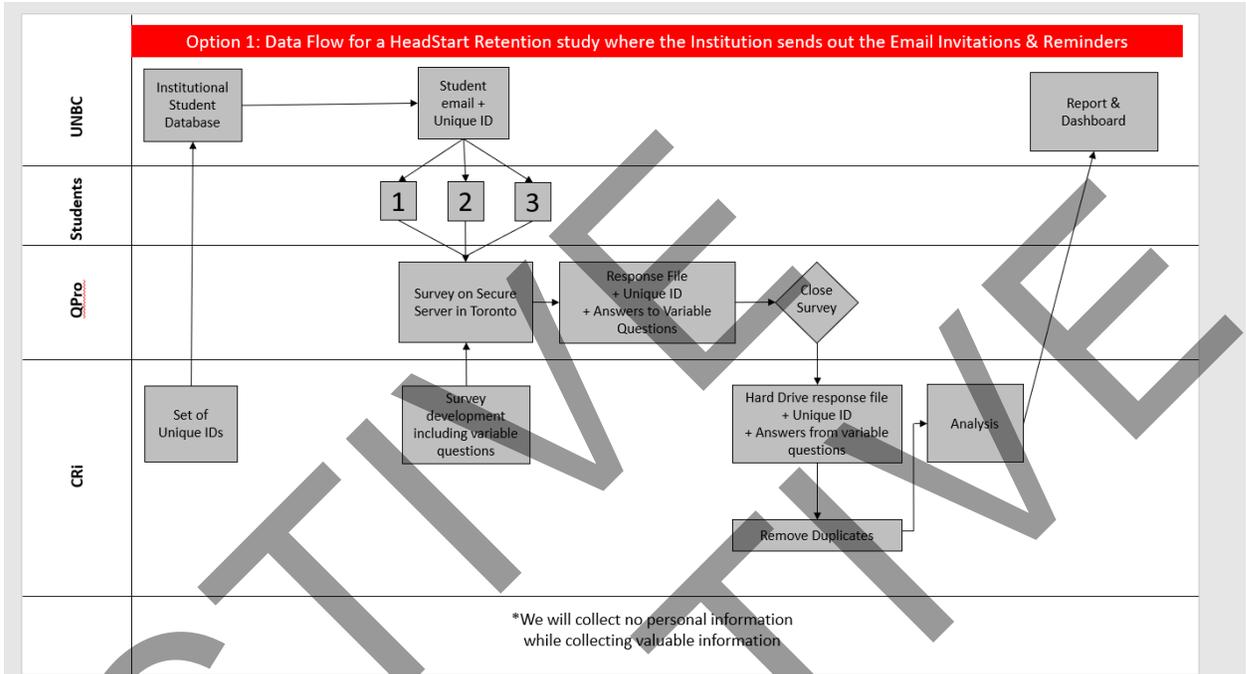
Add any applicable definitions here:  
See Appendix C for examples

Term/Acronym	Definition

**1. Personal Information Flow Diagram and Explanation**

## PIA Determination and Template

PIA#: 22-11 CRI Headstart Retention PIA



a) List of Personal health information / personal information / sensitive information to be Collected, Used and/or disclosed and the Rationale for each.

Option 1

## PIA Determination and Template

**PIA#: 22-11 CRI Headstart Retention PIA**

However, if you take any other action, including storing the information or using it in your own work, under FOIPPA you have collected personal information without authorization and that is considered a privacy breach.

I am not collecting, using, storing, sharing, disclosing, or deleting any personal information for this initiative.

Staff Name \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

**PRIVACY OFFICE USE ONLY**

This initiative does not require a full PIA document.

\_\_\_\_\_  
Governance Officer name

\_\_\_\_\_  
Governance Officer Signature

\_\_\_\_\_  
Date

## PIA Determination and Template

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### PART B

#### 2. Collection, Use and Disclosure of Personal Information

Personal Information is being collected under the authority of the University Act and Section 26 of BC's Freedom of Information and Protection of Privacy Act.

##### a) Collection

1. Please tell us how strongly you agree or disagree with each of the statements below. Response required

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
I generally consider myself a cheerful person.	<input type="radio"/>				
I entered the program of my choice at UNBC.	<input type="radio"/>				
My inability to get loans significantly impacts my ability to attend university.	<input type="radio"/>				
I do not have any clear idea about what I want to do after university.	<input type="radio"/>				
I can depend on my family for financial support.	<input type="radio"/>				
My program provides me with great job prospects and/or career opportunities.	<input type="radio"/>				
My family places a high degree of importance on getting a higher education.	<input type="radio"/>				
I worry about fitting in.	<input type="radio"/>				
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
I feel I have great prospects for success at the university.	<input type="radio"/>				
I have carefully prepared a budget for my time at UNBC and I know exactly how much I can spend each month.	<input type="radio"/>				
I'm worried about my lack of recent educational experience.	<input type="radio"/>				
Not wanting to borrow money may hurt my ability to attend university.	<input type="radio"/>				
I expect UNBC's academic environment is really competitive.	<input type="radio"/>				
My current debt really puts pressure on my ability to afford university.	<input type="radio"/>				
Prior to coming to UNBC, I received all the information I needed to make the best course choices.	<input type="radio"/>				

## PIA Determination and Template

PIA#: 22-11 CRI Headstart Retention PIA

2. Are you working on your undergraduate degree as a Full-time or Part-time student?

- Full-time (9+ credits per semester)
- Part-time

3. Did you interrupt your studies just prior to starting your program at UNBC and if so, for how long?

- No, I did not interrupt my studies
- Interrupted for 1 year
- Interrupted for 2 years
- Interrupted for 3 or more years

4. Please indicate your overall grade level before entering university.

- Top 25% of my graduating class
- Second 25% of the class
- Bottom 50% of class

5. Please tell us, on average, how many paid hours of employment you will be working every week while you are studying at UNBC.

-- Select -- 

6. Do you identify yourself as an Indigenous person, that is, First Nations, Métis or Inuit?

- Yes
- No

## PIA Determination and Template

### PIA#: 22-11 CRI Headstart Retention PIA

7. Please select the response that best describes you for each of the statements below. Response required

**1st of 3**

	Never like me	Once in a while like me	Sometimes like me	Often like me	Always like me
I am confident about managing my month-to-month living expenses.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have achieved important goals no matter how difficult it was to do so.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I consider the needs of others as well as my own when reaching an agreement.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I know how to budget for my education.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I always complete my assignments on time.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I am a hard worker.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I am a fast learner.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I can learn almost anything if I set my mind to it.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I am not worried about my student debt.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I make friends easily.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I will have enough money to complete my studies.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I organize my thoughts before beginning an assignment.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. Please select the response that best describes you for each of the statements below. Response required

**2nd of 3**

	Never like me	Once in a while like me	Sometimes like me	Often like me	Always like me
I have achieved a goal that took years of work.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I try again after facing disappointment or failure.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I make sure I know where to get academic help if I need it.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I'm willing to compromise when resolving a conflict.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I am calm and emotionally stable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I like to cooperate with others.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I avoid activities that require meeting new people.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I accept people just as they are.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I tend to worry a lot.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I can be rude to others.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have used several different strategies to complete difficult homework assignments.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Once I set a goal, I do my best to achieve it.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## PIA Determination and Template

PIA#: 22-11 CRI Headstart Retention PIA

9. Please select the response that best describes you for each of the statements below. Response required

3rd of 3

	Never like me	Once in a while like me	Sometimes like me	Often like me	Always like me
I have everything I need to begin my studies with complete confidence.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I start homework assignments early enough to avoid having to rush to complete them.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I find it hard to talk to people I don't know well.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I handle stress well.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I do my best in my classes.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I'm a patient person.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I highlight key points when I read assigned materials.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I am often critical of other people.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
When I make plans, I do them.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I consistently do my schoolwork well.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
When I am confused by an assignment, I seek help right away.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I have empathy for others.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### b) Consent

You may not need a collection notice if:

- You collect personal information indirectly, meaning you get the information from another public body and not from the individual who owns the information
- You collect personal information for law enforcement
- You collect information by observing a person at a public event

FOIPPA section 27(3) and (4) tells you more about when you do not need a collection notice. If you determine that you do not need a collection notice, explain why.

Copy/Paste or Fill in your Privacy/Consent Notice here:

### Collection Notice

The information included in your survey responses is collected under Section 26 (c) and (e) of the Freedom of Information and Protection of Privacy Act. The information you provide is collected *anonymously*; the survey data will help contribute to student success programs at

## PIA Determination and Template

### PIA#: 22-11 CRI Headstart Retention PIA

UNBC. Please do not enter personal information about yourself or others in any free text fields. If you have any questions about the collection, use and disclosure of this information **contact:**

#### c) Use

**Data and PI collected will only be used by Institutional Research?**

#### d) Disclosure

To whom will you be disclosing personal information?

#### **Disclosure of personal information**

**33** A public body may disclose personal information in its custody or under its control only as permitted under section 33.1, 33.2 or 33.3

##### i. Health System Use

##### ii. Research / Open Data

#### e) The Sources and Accuracy of the Personal Information

Information will be collected from students about themselves so it can be considered very accurate.

FOIPPA section 29 states that a person can ask you to correct any of their personal information in your custody or control. If you cannot correct the record itself, you must make a note on the record (annotate the record). If you've disclosed the personal information to any other public body or third party in the last year, you must also notify them of any corrections you make.

#### f) Storage and Location of the Personal Information

All data and PI collected will be stored and processed in Canada.

### Data Linking

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.

Is personal information from one database linked or combined with personal information from another database? **NO**

## PIA Determination and Template

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Is the purpose for the linkage different from the original purpose for which the personal information in each database was originally obtained or compiled?

Is the data linking is occurring between either two or more public bodies or one or more public bodies and one or more agencies?

**If this PIA addresses a data-linking program, UNBC must submit this PIA to the Office of the Information and Privacy Commissioner and be subject to their examination, advice and timelines.**

### Common or Integrated Program or Activity

Does this initiative involve a program or activity that provides a service (or services) through a public body and at least one other public body or agency working collaboratively to provide that service? **NO**

Does this initiative involve a program or activity that provides a service (or services) through a public body that is working on behalf of one or more other public bodies or agencies? **NO**

The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the Regulations? (Privacy Officer will answer). **NO**

Please note: 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) as well. Contact the Governance Officer – Access, Privacy and Records Management to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.

**If this PIA addresses a common or integrated program, UNBC must submit this PIA to the Office of the Information and Privacy Commissioner and be subject to their examination, advice, and timelines.**

### **g) The Retention Schedule and Method of Destruction for Personal Information**

Do you use personal information in your initiative to make a decision about an individual? Examples of using personal information to make decisions include but are not limited to:

- Using a person's date of birth or income to decide whether a person qualifies for a benefit

## PIA Determination and Template

### PIA#: 22-11 CRI Headstart Retention PIA

- Using a person's employment history to decide whether they can move forward in a job competition
- Using a person's health information to decide the level and type of care they receive

Keeping information for one year after it is used to make a decision that affects an individual is the minimum requirement under FOIPPA.

You may have other operational or administrative requirements that dictate how long records must be kept and when they must be disposed of. It's important to maintain the records in your initiative according to an approved records schedule

#### **Retention of personal information**

**31** *If an individual's personal information*

*(a) is in the custody or under the control of a public body, and*

*(b) is used by or on behalf of the public body to make a decision that directly affects the individual, the public body must ensure that the personal information is retained for at least one year after being used so that the affected individual has a reasonable opportunity to obtain access to that personal information.*

**Answer here or state N/A:**

If you answered yes above, please describe retention schedules that apply where retention exceeds the one-year requirement under the Act. Please contact the Governance Officer – Privacy, Access and Records Management if you require assistance.

**Answer here or state N/A:**

#### **Personal Information Banks**

Will a database or series of folders be created in this initiative that organizes information by name, identifying number, symbol, or other particular identifier of each individual involved.

If yes, will the records or information collected about the individual contain similar types of personal information. If yes, I will contact the Privacy Officer to ensure that I am identifying that this is a Personal Information Bank (PIB) and identifying the legislatively required descriptors listed in section 69 (6) of FOIPPA.

A personal information bank is a collection of personal information that is organized or searchable by the name of the individual or an identifying number, symbol or other identifier. A personal information bank can be a simple list of personal information. Personal information banks contain personal information that is:

- Linked to an identifiable individual
- Organized and capable of being retrieved by a personal identifier
- Normally compiled for a single purpose

## PIA Determination and Template

### PIA#: 22-11 CRI Headstart Retention PIA

Briefly describe your personal information bank and the partners and organizations involved.

Name:

Location:

Description:

Authority: This personal information is begin collected under the authority of the *University Act* and section 26 (a), (c), and (e) of the *Freedom of Information and Protection of Privacy Act (FOIPPA)*.

Purpose:

Category of Users:

#### **h) Method of De-identification/Anonymization/Aggregation for Personal Information**

Please explain how Personal Information will be de-identified or anonymized and by whom?

#### **i) Users of Personal Information**

Please list all users of PI including third parties

#### **j) Audits**

- What does the audit log track? How detailed is the data (e.g., date stamps, time stamps, access control number, IP address, etc.)? Does the audit log include the purpose of an access?
- Are the audit logs immutable?
- Who reads the audit logs, and how long are they kept?
- Who is responsible for oversight of user access?
- Is there a separation of responsibility between those who supervise administration of the system, or security of the system, and those who verify the audit logs (e.g., does the auditor in the organization have a role, or is it the security department?)
- Is the system responsive or passive? For instance, is it possible to put a monitor on particular individuals (e.g., in a hospital setting, if a celebrity is admitted as a patient, etc.)? Will access produce an immediate response and not just a log entry for review months later?
- Will those found to abuse access privileges be sanctioned in a meaningful (and visible) way?

### **4 Access Rights for Individuals to their Personal Information**

#### **Access Request Management**

Section 4 of FOIPOP gives individuals the right to access any record under the custody or control of a public body. UNBC is a public body under the Act.

How will you manage access to information requests?

If only aggregate or de-identified data to be released, who is responsible to do so and how is that done?

## PIA Determination and Template

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### Request for Personal Information from Persons to Whom It Relates

How will personal requests for access be managed?

**\*\*Please note\*\*\***

Individuals do not have to make a formal FOI request to access their own personal information held by UNBC.

#### 5 Privacy and Security Safeguards

People, organizations and 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.

Does your initiative involve digital tools, databases information systems? IF yes please discuss with ITS whether you also require a security and threat risk assessment

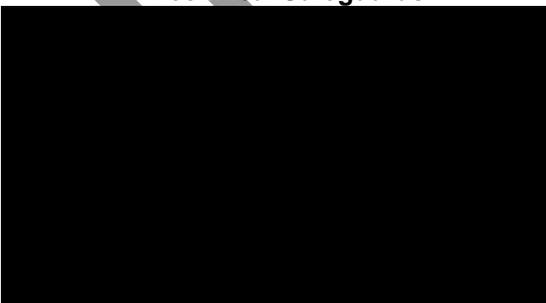
A digital tool, database or information system may leave personal information exposed or otherwise vulnerable to security threats. Security assessments are used on information systems and other digital tools to assess and document security risks, risk ratings and planned risk responses.

##### a) Security Safeguards

- Administrative Safeguards



- Technical Safeguards



## PIA Determination and Template

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- **Physical Safeguards**

This question is to identify how you reduce the risk that you store personal information in a computer system or physical location where unauthorized access can happen.

Technical records are records that are stored electronically, including but not limited to records stored:

- In a database
- On a LAN (local area network)
- On a hard drive
- On a mobile device or laptop

Technical security includes any digital or electronic system set up to keep your records secure, including:

- Using UNBC firewalls
- Encrypting personal information before it is stored or transferred
- Relying on how your cloud service provider protects information in the cloud
- Using passwords to protect digital files and laptops

If your records are not stored on UNBC servers, use this question to list technical security on the system where records are stored.

Physical records include but are not limited to:

- Paper records
- Film or video
- Photographs
- Audio recordings
- Maps

Physical security is anything you do to keep physical records safe and secure, including:

- Locking filing cabinets and rooms
- Having security guards that patrol the building
- Restricting access to rooms or buildings where information is stored
- Using alarm systems in the building or room where information is stored

If your physical records are not kept in UNBC buildings with standard UNBC security, use this question to list the physical security in the building and rooms in which records are kept. IF there re not physical records you can skip this section.



## PIA Determination and Template

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- Identify any outside partners or companies involved that may have access to the personal information
- Website Domain Ownership (if applicable)

**6 Privacy Risk Identification and Mitigation**

Risk Rating Overview			
Factor	Risk Rating		
	Low	Medium	High
<b>Nature of personal information</b>	<ul style="list-style-type: none"> <li>✓ Publicly available personal information not associated with any other information</li> </ul>	<ul style="list-style-type: none"> <li>✓ Personal information unique to the organization that is not medical or financial information</li> </ul>	<ul style="list-style-type: none"> <li>✓ Medical, psychological, counselling, or financial information or unique government identification number</li> </ul>
<b>Relationships</b>	<ul style="list-style-type: none"> <li>✓ Accidental disclosure to another professional who reported the breach and confirmed destruction or return of the information</li> </ul>	<ul style="list-style-type: none"> <li>✓ Accidental disclosure to a stranger who reported the breach and confirmed destruction or return of the information</li> </ul>	<ul style="list-style-type: none"> <li>✓ Disclosure to an individual with some relationship to or knowledge of the affected individual(s), particularly disclosures to motivated ex-partners, family members, neighbors or co-workers</li> <li>✓ Theft by stranger</li> </ul>
<b>Cause of breach</b>	<ul style="list-style-type: none"> <li>✓ Technical error that has been resolved</li> </ul>	<ul style="list-style-type: none"> <li>✓ Accidental loss or disclosure</li> </ul>	<ul style="list-style-type: none"> <li>✓ Intentional breach</li> <li>✓ Cause unknown</li> <li>✓ Technical error – if not resolved</li> </ul>
<b>Scope</b>	<ul style="list-style-type: none"> <li>✓ Very few affected individuals</li> </ul>	<ul style="list-style-type: none"> <li>✓ Identified and limited group of affected individuals</li> </ul>	<ul style="list-style-type: none"> <li>✓ Large group or entire scope of group not identified</li> </ul>

## PIA Determination and Template

PIA#: 22-11 CRI Headstart Retention PIA

Risk Rating Overview			
Factor	Risk Rating		
	Low	Medium	High
<b>Containment efforts</b>	<ul style="list-style-type: none"> <li>✓ Data was adequately encrypted</li> <li>✓ Portable storage device was remotely wiped and there is evidence that the device was not accessed prior to wiping</li> <li>✓ Hard copy files or device were recovered almost immediately and all files appear intact and/or unread</li> </ul>	<ul style="list-style-type: none"> <li>✓ Portable storage device was remotely wiped within hours of loss but there is no evidence to confirm that the device was not accessed prior to wiping</li> <li>✓ Hard copy files or device were recovered but sufficient time passed between the loss and recovery that the data could have been accessed</li> </ul>	<ul style="list-style-type: none"> <li>✓ Data was not encrypted</li> <li>✓ Data, files or device have not been recovered</li> <li>✓ Data at risk of further disclosure particularly through mass media or online</li> </ul>
<b>Foreseeable harm from the breach</b>	<ul style="list-style-type: none"> <li>✓ No foreseeable harm from the breach</li> </ul>	<ul style="list-style-type: none"> <li>✓ Loss of business or employment opportunities</li> <li>✓ Hurt, humiliation, damage to reputation or relationships</li> <li>✓ Social/relational harm</li> <li>✓ Loss of trust in the public body</li> <li>✓ Loss of public body assets</li> <li>✓ Loss of public body contracts or business</li> <li>✓ Financial exposure to public body including class action lawsuits</li> </ul>	<ul style="list-style-type: none"> <li>✓ Security risk (e.g. physical safety)</li> <li>✓ Identify theft or fraud risk</li> <li>✓ Hurt, humiliation, damage to reputation may also be a high risk depending on the circumstances</li> <li>✓ Risk to public health or safety</li> </ul>

Please identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. The Privacy Officer will help identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

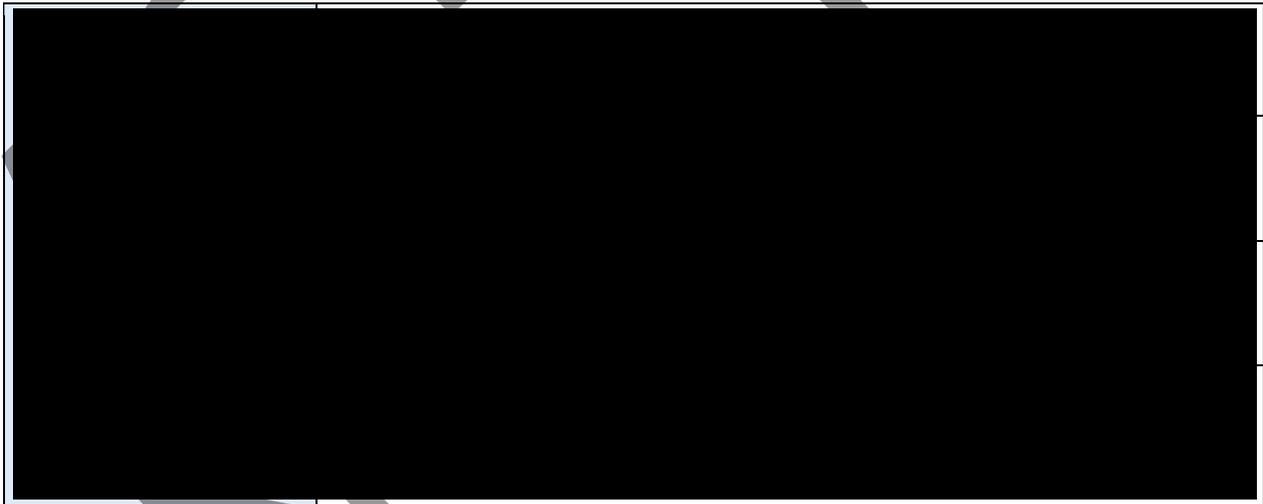
## PIA Determination and Template

### PIA#: 22-11 CRI Headstart Retention PIA

Please explain the risks in detail using the associated CSA Model Code (Appendix B).

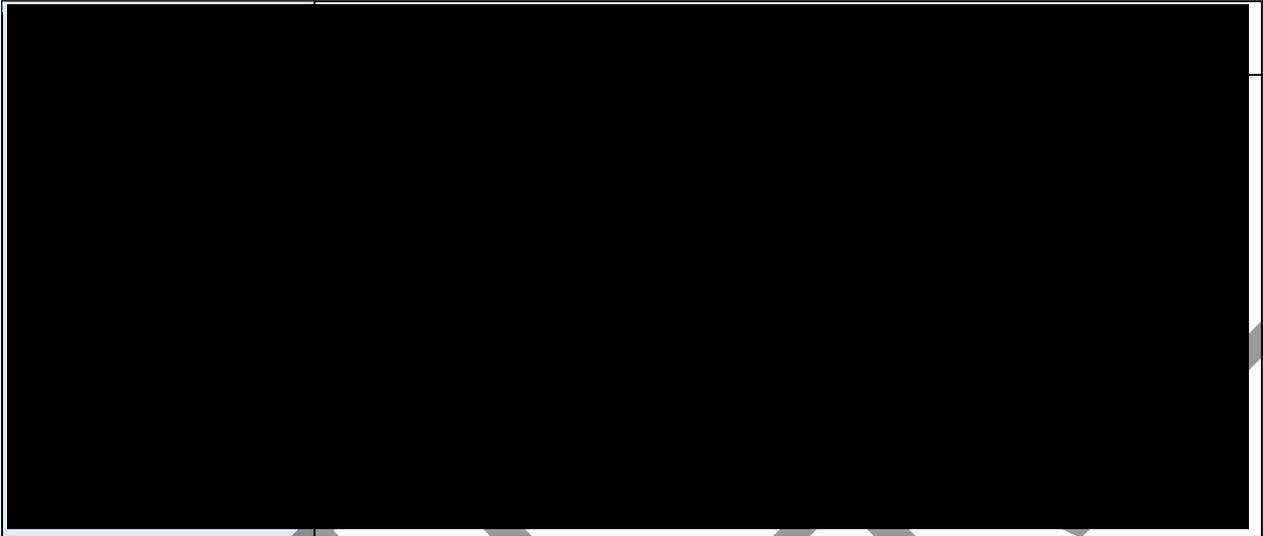
#### EXAMPLE

<p><b>Risk # 1</b></p> <p>Data that is no longer needed is at risk of being breached because it is being retained in the IT platform longer than necessary.</p> <p><b>Related CSA Principle:</b></p> <p><b>Safeguards</b></p>	<p><b>Cause:</b> Data is not being deleted from the IT platform in a timely manner once it is no longer needed.</p>
	<p><b>Probability:</b></p> <p>Low</p>
	<p><b>Impact:</b></p> <p>High</p>
	<p><b>Mitigation:</b></p> <p>Implement a process on the IT platform that automatically deletes data once it is no longer needed, per the policy established by X</p>



## PIA Determination and Template

PIA#: 22-11 CRI Headstart Retention PIA



<b>Risk # 3</b>  <b>Related CSA Principle:</b>	<b>Cause:</b>
	<b>Probability:</b>
	<b>Impact:</b>
	<b>Mitigation:</b>

**PART C**

**Conclusions and Approvals**

Once the PIA has been approved with or without conditions, the Privacy Officer will collect signatures from the individuals provided below. A copy of the PIA will be distributed to all signatories for convenience or to attach to a requisition or file with a contract.

**Name of Individual leading the Program/Project:** Christie Ray  
 I confirm the information management practices in this initiative have been documented on Form A, and B as applicable, as accurately as I am aware and I commit to communicating appropriate information

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management practices to all individuals participating in this initiative as appropriate. I commit to following the documented practices on this PIA, or arranging a PIA amendment if I am aware information management practices in this initiative change.

Signature: \_\_\_\_\_ Date: July 7, 2022

**Director or Dean Overseeing the Program/Project:** Justin Foster

I am accountable for overseeing my staff involved in this initiative to ensure they adhere to information management practices presented in this PIA. I will arrange for the project lead named above to contact the Privacy Officer to arrange a PIA amendment if required.

Signature: \_\_\_\_\_ Date: July 7, 2022

**Chief Information Security Officer**

Signature: \_\_\_\_\_ Date: July 08, 2022

**Governance Officer: Doris Marshall Greenlaw**

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

Signature: \_\_\_\_\_ Date: 8 July 2022

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### APPENDIX 1 DEFINITIONS

<b>Confidentiality</b>	The assurance that information about identifiable persons, the release of which would constitute a privacy breach, will not be disclosed without consent, except as allowed by law.
<b>Consent</b>	Consent, in the context of personal information, means the agreement of someone to provide their personal information for the purposes identified to them. In some cases, consent may not be possible (e.g., medical emergency) or may not be required (e.g., collection by police of information relating to a suspect where the collection is not a search or seizure). Consent is generally given by a specific act of the individual, but sometimes it can be implied. In the public sector, consent is not always a requirement for the collection of personal information – having the legal authority to collect personal information is.
<b>Core privacy principles</b>	<p>In March 1996, the Canadian Standards Association (CSA) developed a national, voluntary code that sets basic principles for safeguarding personal data. The Code establishes 10 basic principles for all organizations that collect or use personal information. In some cases, certain principles may not apply to public sector regimes. For example, in the public sector, the “consent” principle listed as number three below is often substituted for “legal authority”.</p> <ol style="list-style-type: none"> <li>1. <i>Accountability</i> - An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.</li> <li>2. <i>Identifying Purposes</i> - The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.</li> <li>3. <i>Consent</i> - The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.</li> <li>4. <i>Limiting Collection</i> - The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.</li> <li>5. <i>Limiting Use, Disclosure and Retention</i> - Personal information shall not be used or disclosed for purposes other than those for which it is collected,</li> </ol>

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except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of the stated purposes.

6. *Accuracy* - Personal information shall be as accurate, complete and up-to-date as is necessary for the purpose for which it is used.
  7. *Safeguards* - Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
  8. *Openness* - An organization shall make specific information about its policies and practices relating to the management of personal information readily available to individuals.
  9. *Individual Access* - Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information, and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
  10. *Challenging Compliance* - An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.
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#### Data (information) flows

Mapping the flow and manipulation of information within and across systems or business processes.

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#### Data matching

An activity that involves comparing personal data obtained from a variety of sources, including personal information banks, for the purpose of making decisions about the individuals to whom the data pertains. Included in this definition of data-matching is data linkage, also known as data profiling.

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#### Personal information

For data to be categorized as *personal* information (rather than just information, in general), it must have details sufficient to identify an individual. Individual identification is thus the threshold for transforming general information into personal information and where rights, protections, and requirements associated with the proper handling of personal information are triggered.

Without restricting the generality of the foregoing, personal information may include, for example:

- information relating to the race, national or ethnic origin, colour, religion, age or marital status of the individual,
  - information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
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- any identifying number, symbol or other particular assigned to the individual,
- the address, fingerprints or blood type of the individual.
- the personal opinions or views of the individual except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual by a government institution or a part of a government institution specified in the regulations.
- correspondence sent to a government institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to such correspondence that would reveal the contents of the original correspondence.
- the views or opinions of another individual about the individual.
- the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual by an institution or a part of an institution referred to in paragraph (e), but excluding the name of the other individual where it appears with the views or opinions of the other individual, and,
- the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual,

In some jurisdictions, personal information **may not include** information about an individual who is or was an officer or employee of a government institution that relates to the position or functions of the individual including,

- the fact that the individual is or was an officer or employee of the government institution,
  - the title, business address and telephone number of the individual,
  - the classification, salary range and responsibilities of the position held by the individual
  - the name of the individual on a document prepared by the individual in the course of employment, and,
  - the personal opinions or views of the individual given in the course of employment.
  - information about an individual who is or was performing services under contract for a government institution that relates to the services performed, including the terms of the contract, the name of the individual and the opinions or views of the individual given in the course of the performance of those services,
  - information relating to any discretionary benefit of a financial nature, including the granting of a license or permit, conferred on an individual, including the name of the individual and the exact nature of the benefit, and
  - information about an individual deceased for more than twenty years.
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**Privacy** Privacy is the claim of individuals, groups or institutions to determine for themselves when, how and to what extent information about them is communicated to others.

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**Privacy officer** A privacy officer is a person within an organization whose job it is to:

- encourage compliance with sound privacy principles, prevailing privacy policies and privacy laws;
- respond to requests for access to and correction of personal information and general issues within a public body concerning personal information; and
- work with information and privacy commissioners during the investigation of a privacy complaint against an organization.

Privacy officers may also be responsible for managing changes to an organization's:

- information management practices, policies and procedures;
- staff training, vis-a-vis privacy and information handling;
- privacy policies and procedures; and
- inquiry and complaint processes.

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**Privacy protection** Preventing unauthorized collection, use and disclosure of an individual's personal information.

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**Program manager** The person responsible for managing and directing the projects of a public body, with emphasis on coordinating and prioritizing resources, and managing the risks which emanate from projects in development or underway. Program managers are responsible for ensuring that the projects they lead or direct are compliant with government policies and the law.

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**Risk assessment** The process of quantifying the impact of implementing a particular idea, process, system or strategy.

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**Threat and Risk Assessment (TRA)** A risk management process used to evaluate the security threats associated with information technology projects, including potential system vulnerabilities and impacts on data integrity and confidentiality. TRAs, when completed in conjunction with a PIA, can help provide recommendations to lower information and privacy risks to acceptable levels.

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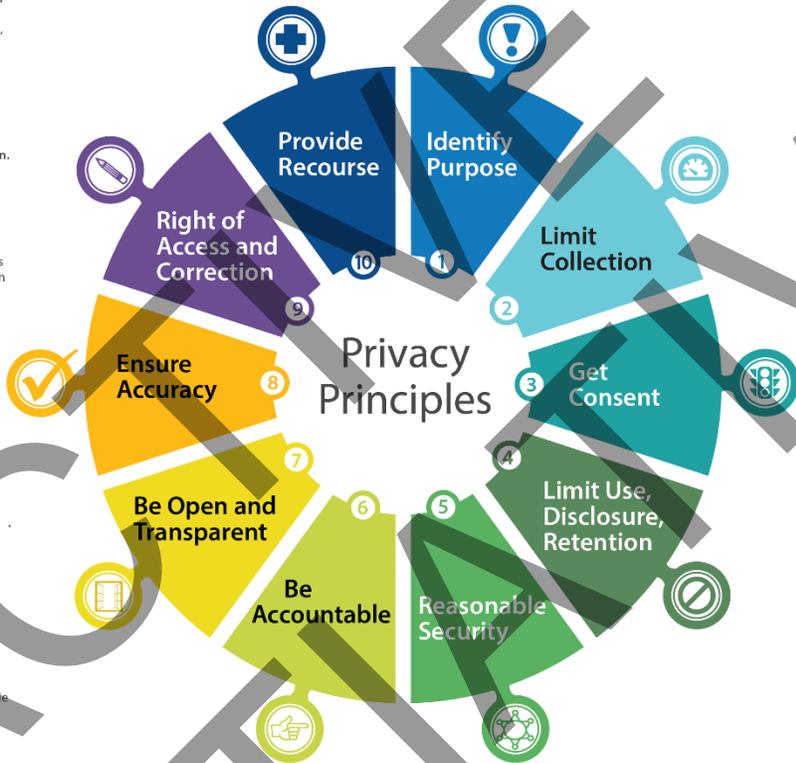
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### APPENDIX B CSA MODEL CODES

#### The 10 Privacy Principles

- 10. **Provide Recourse.** If you receive a complaint about how an individual's personal information has been handled, direct it to the Privacy, Compliance and Training Branch immediately, via the breach reporting line: 7-7000, option 3. Learn more from link provided below.
- 9. **Right of Access and Correction.** Individuals have a right to access their own personal information, or have that information corrected. Be aware of the FOI process, and direct any requests to Information Access Operations immediately. More information provided at link below.
- 8. **Ensure Accuracy.** You must make a reasonable effort to ensure personal information collected is accurate and complete if it will be used to make a decision affecting the individual it is about. Find out more about this requirement at the link below.
- 7. **Be Open and Transparent** Routinely release any records that can be regularly provided to the public. Proactively disclose any records that will be of interest to the public. Consult with Information Access Operations on these processes. Find the Open Information Open Data Policy provided at the link below.
- 6. **Be Accountable.** Be responsible for all personal information under your control, including contractors' records. Be aware of who your Ministry Privacy Officer is. Find your MPO at the link below.



- 1. **Identify Purpose.** Must identify in writing; the purpose for which you are collecting personal information, the legal authority and contact information of someone who can answer questions about the collection, unless an exception applies. See link below for more.
- 2. **Limit Collection.** Do not collect personal information indiscriminately or without a legal authority. Information must be necessary to fulfill identified purposes, and be reasonable and appropriate. Find more information at the link below.
- 3. **Get Consent.** Secure consent as a means to use or disclose personal information for secondary purposes. Consent must be written and explicit. There are some specific circumstances where consent is not required. See the link below.
- 4. **Limit Use, Disclosure, Retention.** You may use or disclose personal information for the purposes identified when it was collected, or another reason authorized by FOIPPA. For new uses, get consent. More information provide at the link below.  
  
**Limit Retention.** Personal information used to make a decision about an individual must be retained for at least one year. Information must be destroyed in accordance with any applicable records retention schedules. Find your Records Officer at the link below.
- 5. **Reasonable Security.** Must make reasonable security arrangements to protect personal information. Measures should be appropriate and proportional to the sensitivity of the information. Consideration should be given to physical, technical and procedural measures. Find your MISO at the link below.

For more information on the privacy principles and resources, visit: [www.gov.bc.ca/privacyprinciples](http://www.gov.bc.ca/privacyprinciples)

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### APPENDIX C

#### SAMPLE PRIVACY AND CONSENT NOTICE

##### WE NEED TO COLLECT INFORMATION FROM YOU

UNBC Continuing Studies needs to collect information from you to:

1. why are you collecting it?

##### WE HAVE PERMISSION TO DO THIS

The University of Northern British Columbia collects, uses, shares, discloses, maintains and when applicable deletes and destroys Personal Information provided on this form according to the *Freedom of Information and Protection of Privacy Act* [RSBC 1996 c. 165].

##### HOW WE WILL USE AND SHARE YOUR INFORMATION

How will you use the information collected-be specific

##### HOW WE WILL PROTECT YOUR INFORMATION

UNBC is obligated to protect your personal information and has various processes in place to ensure it is secure.

##### HOW LONG WE WILL KEEP YOUR INFORMATION

The *Freedom of Information and Protection of Privacy Act* allows us to keep your Personal Information for at least one year after collection IF the information is used to make a decision about someone and when its period of usefulness is over we will securely delete or destroy it.

##### WHAT TO DO IF THE INFORMATION WE HAVE COLLECTED FROM YOU IS INCORRECT, OR YOU HAVE QUESTIONS?

Please contact X

If you still have questions or concerns, please contact: Doris Marshall-Greenlaw, Governance Officer for Access, Privacy and Records Management at 250-960-5139 OR [privacy@unbc.ca](mailto:privacy@unbc.ca)

By registering for this course, you indicate you have read, understand, and agree to the privacy statement. You also understand that you have the option to ask questions about any part of this statement before registering.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_