

Form A

Please review the entire form before you answer any questions. Providing more information than the questions asks, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open ended questions in the **bolded** prompts. Keep bold font on all answers provided. Answer **Yes / No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes / No** responses.

Description and Scope of Information Management

Describe the purpose of your project/initiative/software. Describe a brief high level overview of the functions, who will benefit from those functions, and who will be impacted if that is not transparent. Indicate if there are groups that are restricted from use and the reason for proposed restrictions. Describe whether there are other reference documents including previous PIAs, whitepapers, or compliance documentation that may support this assessment.

The Canadian University Consortium coordinates surveys of students in member institutions, facilitates the exchange of the survey data among member institutions, and promotes awareness of the value of the surveys among university administrators and policy makers in the postsecondary educational system.

The survey data is an analysis having five broad purposes:

- 1) To better understand and track student experience and satisfaction with many aspects of the institutions they attend**
- 2) To improve student educational outcomes**
- 3) To improve the services available to students**
- 4) To benchmark for purposes of internal management and decision making, and**
- 5) To contribute to accountability reports to the governing bodies of member institutions, governments and the public;**

CUSC-CCREU surveys operate on a 3-year cycle:

- a) Survey of First Year Students will be conducted in 2022, 2025, 2028, etc.**
- b) Survey of Middle Years Students will be conducted in 2023, 2026, 2029, etc.**
- c) Survey of Graduating Students will be conducted in 2021, 2024, 2027, etc.**

All Elements of Information or Data

Using concise point form, please list the elements of information or data involved in the initiative, even if no personal information is involved. This could include client's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area.

PIA # 21-002

Canadian University Campus Consortium (CUSC)

<i>Focus:</i>	first year making transitions	middle years persistence	graduating retrospective and career pathway
Question theme			
Academic history	some	some	✓
Applications to post-secondary	✓	0	0
Activities - academic, on-campus, volunteer	0	✓	✓
Comments (open ended) - negative, positive	✓	✓	✓
Commitment to completion	✓	✓	0
Commuting to campus	0	✓	✓
Current employment	✓	✓	✓
Current living arrangements	✓	✓	✓
Demographics – age, citizenship, ethnicity, gender	✓	✓	✓
Demographics - marital status, children	✓	✓	0
Demographics – parent/ guardian education	✓	✓	✓
Disability - types, accommodation	✓	✓	✓
Expectations versus experience	✓	some	some
Services - use, satisfaction	✓	✓	✓
Finances - credit cards	✓	✓	✓
Finances - financial assistance from this university	✓	0	0
Finances - income sources, amount	0	✓	✓
Finances - repayable debt sources, amount	0	✓	✓
Goal development - career/ employment plans	✓	✓	✓
Goal development - major/ academic program	✓	✓	some
Growth and development - knowledge, skills	0	✓	✓
Motivation - reasons to attend university	✓	0	0
Overall evaluation of university experience	some	some	✓
Post-graduation - education plans	0	0	✓
Post-graduation - employment plans	0	0	✓
Professors, teaching, treatment	✓	✓	✓
Selection - reasons to attend this university	✓	0	0
Sources of information - about this university	✓	0	0
Staff	✓	✓	✓
Transition to university	✓	0	0

Aggregate statistical data provided to researchers from UNBC at the individual level (cohort file): Name, unbc email, personal email, year of study, length of degree, age, citizenship, gender, and load. Self-reported information within the survey by individual submission: academic history including Year studies began, first year at institution, if transferred from another PSI, overall average grade, and stop-outs; activities including social and study habits; employment; finances including debt and income; living

PIA # 21-002

Canadian University Campus Consortium (CUSC)
arrangements including marital status and number of children by age group; disabilities;
parent’s education level; and ethnicity.

Location of Where Information is Managed

Does the information manager, vendor, and / or service provider operate from an office outside of Canada? **No**

Does any user of the information managed in this initiative access this information from outside of Canada beyond during short-term temporary travel? **No**

Does this initiative have any components that temporarily process information outside of Canada? **No**

Does this initiative store information for operational use outside of Canada? **No**

Does this initiative back up or make additional or redundant copies of information outside of Canada? **No**

Privacy Officer Comments, Conditions & Concerns

This PIA is based on a review of the material provided to the Information Governance Officer as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA update and submit for approval.

The management of personal information that could affect an individual’s reputation or right to privacy if disclosed requires Form B to be completed.

PIA # 21-002

Canadian University Survey Consortium (CUSC) Surveys

Form B

Please review the entire form before you answer any questions. Providing more information than the questions asks, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open ended questions in the “Answer here” prompts. Keep bold font on all answers provided. Answer **Yes / No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes / No** responses.

Name of Department: **Institutional Research**

PIA Drafter: **Valerie Boyes**

Email: **valerie.boyes@unbc.ca**

Phone: **250-960-5540**

Oversight Provided by: **Trevor Smith**

Email: **Trevor.Smith@unbc.ca**

Phone: **250-960-5888**

Institutional Approvals and Assessments

I have contacted the Chief Information Security Officer to complete all required physical and technical security assessments to ensure my initiative complies with industry standards as applicable to my initiative. **Yes**

I have contacted the Contracts and Supply Chain Management department to complete a review that ensures the purchasing agreement, service agreement, contract, MOA, MOU or other contractual agreement with any external parties involved ensures the compliant management of any information that UNBC provides about its stakeholders. **Yes**

Does the initiative involve systematic disclosures of personal information outside of UNBC? If yes, I will contact the Privacy Officer to ensure that an Information Sharing Agreement is in place. **No**

Does the program involve access to personally identifiable information for research or statistical purposes? If yes, I will contact the Privacy Officer to ensure that an Access to Restricted Records Agreement is in place. **No**

Data-linking Initiative

In FIPPA, “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**

Is the purpose for the linkage different from the original purpose for which the personal information in each database was originally obtained or compiled? **No**

Is the data linking occurring between either two or more public bodies or one or more public bodies and one or more agencies? **No**

If I have answered yes to the above three questions, I will work with the Privacy Officer to ensure I meet the requirements for a data-linking initiative? **N/A**

Common or Integrated Program or Activity

In FIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

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). **N/A**

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 Information Governance Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.

Personal Information Flow Diagram and/or Personal Information Flow Table

In the table below, complete the Description / Purpose highlighting separately by row each instance that information is collected, used, stored, protected, disclosed and disposed of during this initiative. Unless not possible, ensure these steps are arranged how they would occur chronologically in order to make a transparent work flow. The Privacy Officer will review your steps and determine which type of information management practice each entry is and ensure that the practice is compliant with sections under the Act. This table must be accompanied by a workflow diagram if practices are not transparent or if the PIA is related to a common or integrated program or activity or a data-linking initiative.

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	<i>UNBC registers to have CUSC Surveys deployed to target student groups depending on the nature of the survey. UNBC provides a list of eligible students that correlates to the survey being deployed to Prairie Research Associates Inc., which is the service provider CUSC uses to manage their surveys. IR submits codified IDs and holds the mapping to the actual banner id in a password protected excel file to protect student privacy.</i>	<i>Protection / Disclosure</i>	<i>30, 33.2(l)</i>
2.	<i>UNBC chooses to omit or ask additional questions to meet UNBC's quality assurance and quality improvement needs.</i>	<i>Collection</i>	<i>26(e)</i>
3.	<i>UNBC provides consent notice language, and invitation and reminder email language to Prairie Research Associates Inc. to support survey deployment.</i>	<i>Protection</i>	<i>30</i>
4.	<i>UNBC confirms schedule for white listing of IP addresses to avoid email filters from blocking students from receiving the invitation</i>	<i>Protection</i>	<i>30</i>
5.	<i>Prairie Research Associates Inc. administers the survey, manages email invitations and reminders to students, collects and analyzes data, and generates data files and reports for UNBC. UNBC manages some reminder notices to ensure students understand the legitimacy of the request.</i>	<i>Collection, Use, Disclosure</i>	<i>26(e), 32(b), 32(c), 33.2(l)</i>
6.	<i>UNBC receives data package including closed ended survey items from all participating member universities, the master report, UNBC's individualized report, data files of all full responses from UNBC's students, and optional items ordered.</i>	<i>Collection</i>	<i>26(c)</i>
7.	<i>Prairie Research Associates Inc. deletes the sample files that UNBC sent and only keeps the resulting survey data. Survey</i>	<i>Disposition</i>	<i>31</i>

PIA # 21-002

Canadian University Survey Consortium (CUSC) Surveys

	<i>response data is kept anonymous to protect students personal information when this information is retained</i>		
8.	<i>UNBC uses the resulting data to conduct initiatives that improve the quality of the university services provided to students</i>	<i>Use</i>	<i>32(c)</i>

Risk Mitigation Table

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.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.				
2.				
3.				

Collection / Consent Notice

If your initiative is collecting personal information directly or indirectly from individuals, you must ensure that all individuals involved are told the following:

- The purpose for which the information is being collected
- The legal authority for collecting it, and
- The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place in the space below. The Privacy Officer will review and provide feedback.

SAMPLE LANGUAGE

From: PRA on behalf of the University of Northern British Columbia
Subject: UNBC wants feedback from graduating students

Dear <Student First Name>:

I am writing to request your participation in the CUSC-CCREU 2021 Survey of Graduating Students. This study is being conducted at more than 40 Canadian institutions to help us learn about our students and their experiences at UNBC. By completing this survey, you are making a substantial contribution to future research that identifies changes and patterns in the experience of undergraduate students from Canadian institutions. UNBC collections your personal information through the use of this service under section 26(e) of British Columbia’s Freedom of Information and Protection of Privacy Act.

The CUSC-CCREU 2021 Survey of Graduating Students is managed by Prairie Research Associates (PRA), a Canadian company, using the survey platform Acuity by Voxco, a global company. By choosing to participate in this survey, you consent to disclose your responses to PRA through the Acuity platform. Please be aware that UNBC does not have direct control over the management of information collected through this survey.

If you have any questions about this survey, or how UNBC plans to use the results, please contact the Interim Director of CTLT, Anne Sommerfeld at anne.sommerfeld@unbc.ca.

We value your feedback and appreciate your support in our effort to improve the UNBC experience for current and future students. The survey should take about 20 minutes to complete. Each question requires a response. By completing the questionnaire, you will automatically be entered into a draw to win one of three UNBC Bookstore gift cards valued at \$50 each.

Privacy Impact Assessment (“PIA”)

PIA # 21-002

Canadian University Survey Consortium (CUSC) Surveys

To complete the survey, click on the link below or copy and paste the link into your browser. If you are asked for your survey access code, it will be the last 8 characters of the link. The survey link below is unique to you and can only be used once.

[CLICK HERE]

[survey link]

All of your responses are confidential. If you have problems completing the survey, please contact Nicholas Borodenko of PRA, the research company CUSC-CCREU hired to conduct this research, at cusc@pra.ca.

Thank you in advance for providing this important feedback.

Dr. Mark Dale

Interim Provost and Vice-President Academic

University of Northern British Columbia

Use this link to prevent future mailings to this email address regarding this survey:

[Unsubscribe link]

ACTIVELY INITIATIVE

Information Management Controls

Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information. How is access to information monitored and logged?

UNBC: Institutional Research staff manage any raw data exclusively and do not provide that information to other departments for secondary use. Institutional Research staff will ensure that they have the opportunity to work with other departments to support those interpreting aggregate data.

CUSC/PRA: CUSC releases data to member institutions and imposes a Protocol for Data Use that limits how that information can be used if member institutions intend to continue utilizing CUSC surveys. The Protocol for Data Use consists of the following understanding and restrictions.

- 1. The purpose of the survey is to produce data that will allow participating institutions to assess their programmes and services. Comparisons with other institutions are made to assist in these assessments. Ranking of institutions is not, in itself, a purpose of the survey.**
- 2. The survey data are owned collectively by the participating institutions.**
- 3. The report that has been prepared may be reproduced and distributed freely on the campuses of participating institutions. However, use of the institutional code key is restricted to members of the steering committee and senior administration at the various campuses on a confidential basis.**
- 4. Institutions will receive a data package that includes data for all participating institutions along with the institutional identifiers so that appropriate institutional comparisons can be made by each institution. This must be done in a way that protects the confidentiality of the institutional identities and respects the absolute right of each institution to decide what portions of its data should be disclosed.**
- 5. For institutional promotion, recruiting or other public dissemination, rankings may not be used. However, an institution’s mean results, the aggregate mean results, and mean results for the comparable group of institutions in the survey report may be used, although the names of other institutions may not be used.**
- 6. Access to the aggregate data for research purposes may be granted to interested persons provided that the intended use is a legitimate, non-commercial one, the researcher is qualified and agrees to acknowledge the ownership of the data by participating universities and to provide the consortium with a copy of any report or publication that is produced. Decisions on such requests will be made by a sub-committee with consultation with members of the full steering committee in the case of requests that seem problematic.**

PIA # 21-002

Canadian University Survey Consortium (CUSC) Surveys

Prairie Research Associates Inc. does not provide access to any information that has not been approved through an order made and approved by CUSC.

How is an individual’s information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated. If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

Surveys only provide one token for use. When that tokens are used and the surveys are completed, participants do not have access to make updates or corrections to their submissions.

Information Disposal

Does your initiative use personal information to make decisions that directly affect an individual(s)? **No**

If you answered “yes”, please explain the efforts that will be made to ensure that information management from collection to disposal will ensure that information used to make a decision about someone is accurate, complete, available when needed and disposed of to meet legal requirements. Describe the records retention timeline for the records generated from this initiative.

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 Information Governance Officer if you require assistance.

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? **No.**

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 FIPPA. **N/A**

Privacy Officer Comments, Conditions & Concerns

This PIA is based on a review of the material provided to the Information Governance Officer as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA update and submit for approval.

While UNBC has been participating in CUSC surveys over a number of years, future participation must include FIPPA authority language that has been revised and presented in the Collection / Consent Notice section.

ACTIVELY
INITIATIVE

PIA # 21-002

Canadian University Survey Consortium (CUSC) Surveys

Form C

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.

Please fill in the name, position, and date in the bolded areas indicated then each individual signs under the signature line confirming that individual agrees with the corresponding statement above the signature line.

Name of Individual leading the Program/Project: **Valerie Boyes**

Position: **Institutional Planning Analyst**

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 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: **As per email chain**

Date **2021/01/26**

Director or Dean Overseeing the Program/Project: **Trevor Smith**

Position: **Senior Academic Budget / Planning Officer**

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: **As per email chain**

Date **2021/01/28**

Contact Responsible for Records Maintenance: **Valerie Boyes**

Position: **Institutional Planning Analyst**

I am responsible for ensuring that I understand how records are being maintained within paper, digital or other information systems within this PIA and that I communicate concerns regarding the feasibility, accuracy, or security of information management in this initiative.

Signature: **As per email chain**

Date **2021/01/26**

PIA # 21-002

Canadian University Survey Consortium (CUSC) Surveys

Privacy Officer: **Adam Cullum**

Position: **Information Governance Officer**

I confirm that this initiative to the best of my knowledge as written in Form A, and B as applicable, has information management practices that comply with British Columbia’s Freedom of Information and Protection of Privacy Act.

Signature: **As per email chain**

Date **2021/01/26**

A final copy of this PIA (with all signatures) will be kept on record with the Privacy Officer. The Privacy Impact Assessment does not commit UNBC to financially or operationally approve this initiative. This signed form does not guarantee that all other appropriate assessments have been completed for this initiative.

ACTIVELY INITIATED

Adam Cullum

From: Trevor Smith <Trevor.Smith@unbc.ca>
Sent: Thursday, January 28, 2021 5:46 PM
To: Adam Cullum; Valerie Boyes
Subject: RE: CUSC PIA is ready for your review

As overseeing Valerie in this project, I agree to provide that oversight to ensure adherence to the management practices presented in this PIA.

Thanks!

Trevor Smith
trevor.smith@unbc.ca

From: Adam Cullum <Adam.Cullum@unbc.ca>
Sent: Tuesday, January 26, 2021 2:49 PM
To: Valerie Boyes <Valerie.Boyes@unbc.ca>; Trevor Smith <Trevor.Smith@unbc.ca>
Subject: RE: CUSC PIA is ready for your review

I consider the plan as presented compliant with FIPPA and have effectively signed the Privacy Officer line under Form C.

Adam Cullum, BA, CRA (Certified Records Analyst)

Information Governance Officer
Office of the University Secretariat
Room ADMN 2021
University of Northern British Columbia
3333 University Way
Prince George, BC V2N 4Z9
Telephone: 250 960 5139

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From: Valerie Boyes <Valerie.Boyes@unbc.ca>
Sent: Tuesday, January 26, 2021 2:47 PM
To: Adam Cullum <Adam.Cullum@unbc.ca>; Trevor Smith <Trevor.Smith@unbc.ca>
Subject: RE: CUSC PIA is ready for your review

The PIA documents look good to me and you can consider this email as authorization for the two signatures in my name:

1. Name of Individual leading the Program/Project: Valerie Boyes
2. Contact Responsible for Records Maintenance: Valerie Boyes

Valerie Boyes, BComm

Institutional Planning Analyst
Integrated University Planning – Institutional Research
University of Northern British Columbia

250.960.5540

<http://www.unbc.ca/institutional-research>

Canada's Green University™

+ Please consider the environment before printing this e-mail.

From: Adam Cullum <Adam.Cullum@unbc.ca>
Sent: Tuesday, January 26, 2021 12:48 PM
To: Valerie Boyes <Valerie.Boyes@unbc.ca>; Trevor Smith <Trevor.Smith@unbc.ca>
Subject: RE: CUSC PIA is ready for your review

Hi Valerie and Trevor,

For the most part I agree with everything Valerie edited. Under Information Management Controls, Valerie had a question in two places regarding sharing raw data with the CTLT. Given that I copied CUSC's protocol word for word here mentioning that access controls on site have to be restricted, going forward only IR can access the raw data without assessing requests and providing limited permission in other instances.

With all of that said, please find the latest version of the PIA and let me know if you are satisfied with proceeding.

Adam Cullum, BA, CRA (Certified Records Analyst)

Information Governance Officer

Office of the University Secretariat

Room ADMN 2021

University of Northern British Columbia

3333 University Way

Prince George, BC V2N 4Z9

Telephone: 250 960 5139

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From: Valerie Boyes <Valerie.Boyes@unbc.ca>
Sent: Monday, January 25, 2021 4:06 PM
To: Adam Cullum <Adam.Cullum@unbc.ca>; Trevor Smith <Trevor.Smith@unbc.ca>
Subject: RE: CUSC PIA is ready for your review

Hi Adam and Trevor,

Attached are my revisions to the Form A and Form B with revision marking turned on so you can see me changes and notes. Also attached is a Prairie Research Associates Privacy Document that I found in my files. It includes some additional information to what is already covered by the Service Agreement.

Adam, I have added some notes to clarify some points for you. Let's discuss if you think any of these are an issue. Also, thanks for pulling this together for us. I appreciate this more than I can say.

Best,
Valerie

Valerie Boyes, BComm

Institutional Planning Analyst
Integrated University Planning – Institutional Research
University of Northern British Columbia

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<http://www.unbc.ca/institutional-research>

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+ Please consider the environment before printing this e-mail.

From: Adam Cullum <Adam.Cullum@unbc.ca>
Sent: Monday, January 25, 2021 11:44 AM
To: Valerie Boyes <Valerie.Boyes@unbc.ca>; Trevor Smith <Trevor.Smith@unbc.ca>
Subject: CUSC PIA is ready for your review
Importance: High

Hi Valerie and Trevor,

Please review the following forms and if you agree with the language presented in Form A and B, then we can work on “signing” Form C.

I appreciate your patience while you have waited for me to get this together.

Adam Cullum, BA, CRA (Certified Records Analyst)

Information Governance Officer

Office of the University Secretariat

Room ADMN 2021

University of Northern British Columbia

3333 University Way

Prince George, BC V2N 4Z9

Telephone: 250 960 5139

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