

Privacy Impact Assessment Form

PIA # and Name-**assigned by Privacy Office**

1 Key concepts

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“**personal information**” means recorded information about an identifiable individual, including,

- (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- (c) any identifying number, symbol or other particular assigned to the individual,
- (d) the address, telephone number, fingerprints or blood type of the individual,
- (e) the personal opinions or views of the individual except where they relate to another individual,
- (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- (g) the views or opinions of another individual about the individual, and
- (h) the individual’s name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

2 General Information

1. Name of Department, Branch and Program Area

Student Experience, Student Advising & Career Centre
Student Recruitment

2. Name of Program or Service Representative

Career Cruising

3. When will the initiative take place? 3/8/23

4. Is this a one-time event?

Yes

No

5. Do you have an end date planned?

Yes

No

6. Describe the New Program or Service or the Change

The Student Advising department, in collaboration with the Career Centre, has been assigned the work of providing Career development/coaching/advising to current students; however, the student advisors lack the tools to provide adequate career coaching.

The Career Cruising platform: <https://public.careercruising.com/en/> provides students access to the following services

Matchmaker Assessment (Career matching)

Learning Style Inventory Assessment

My Skills Assessment (Skills matching for further insight into career exploration)

Individualized Student Career Plans and Pathways, customizable based on education

Resources & Activities that Advisors engage with students (ie. Workshops)

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7. Describe the Purposes, Goals and Objectives

Why are you doing the initiative? What need does the initiative meet?

Purpose: Provide students with access to Career development resources, thereby improving student recruitment and retention.

Goal: Direct students to programs that match their career aspirations, while identifying their strengths and interest in alignment with UNBC programs.

Objective: Provide scalable career services as part of the Student Advising and the Career Centre mandate.

8. Describe the Governance Model

Accountability – who is ultimately accountable for the program or system

Director of Student Success and the Manager of Student Experience are responsible for the implementation of Career Cruising for current UNBC students, and will work closely with the Director of Recruitment for cross-over activities to help prospective students.

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9. List of All Stakeholders Impacted / Involved

Stakeholder	Role
Student Advisors	Access Career Cruising as "Counsellors" and provide 1:1 guidance and coaching to current students in using the platform.
Student Recruiters	Access Career Cruising as "Counsellors" and provide 1:1 guidance and coaching to prospective students in using the platform.
Current Students	Individually access the Career Cruising platform, completing assessments on career aspirations and exploring relevant matched careers.
Prospective Students	Individually access the Career Cruising platform, completing assessments on career aspirations and exploring relevant matched careers.
Career Cruising personnel	Provide onboard training for UNBC staff and are available for assistance as required.

10. Please add any additional comments below.

11. Describe any Relevant Existing Policies

Protection of Privacy Policy GV 2

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12. Describe any Related PIAs

13. Describe any Relevant contracts

14. Research / Health System Use

Do you anticipate that data collected by this program / system will be used for research or health system use?

Yes

No

15. If so, please explain and provide details of data state (aggregate, de-identified, anonymized etc.)

3 Collection, Use, and Disclosure

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

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

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FIPPA Section	Authority to Collect Personal Information
26(a)	The collection of the information is expressly authorized under an Act
26(b)	The information is collected for the purposes of law enforcement
26(c)	The information relates directly to and is necessary for a program or activity of UBC
26(e)	The information is necessary for the purposes of planning or evaluating a program or activity of UBC
26(f)	The information is necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur
26(g)	The information is collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appears, and that is open to the public

Data Element	Rationale for collection, use or disclosure	Method of Collection or Disclosure	FIPPA Section
Student Name	Required to register for a Career Cruising account	student voluntarily discloses	26 (c) & (e)
Student Address	Required to register for a Career Cruising account; used for geographic specific career services (ex. job search engines)	student voluntarily discloses	26 (c) & (e)
Student Email	Required to register for a Career Cruising account	student voluntarily discloses	26 (c) & (e)
Student assessments	Completed by students (optional) within the Career Cruising platform	student voluntarily discloses	26 (c) & (e)
Student Resumes	Completed by students (optional) within the Career Cruising platform	student voluntarily discloses	26 (c) & (e)

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3.1 Collection Notice

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. personal information may be collected only if such collection is authorized by or under legislation, essential for operating programs or activities, or collected for law enforcement purposes.

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

17. Describe how personal information is to be collected

Personal information will be collected through the Career Cruising platform (online). Students will be directed to the portal access (link on the UNBC website) where they will be promoted to create a profile.

Collection notice language:

"The information collected through registering for a Career Cruising account is collected under Section (c) and (e) of the Freedom of Information and Protection of Privacy Act. The information you provide will be used to create your profile on the Career Cruising platform. Your information will be used by UNBC to help assist you in career assessments, matching, and coaching. Your information will not be shared, sold, or used by any third parties. If you have any questions about the collection, use, and disclosure of your information contact: Rachelle Munchinsky, Manager, Student Experience, UNBC: rachelle.munchinsky@unbca.ca"

18. Review the sample collection notice and attach the notice as an appendix.

(See Appendix C for an example)

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3.2 Use

19. Please list all users of PI including third parties

Career Cruising
UNBC

20. Describe how personal information is to be used

Personal information voluntarily submitted by current UNBC and prospective students to UNBC will be used to for career advising and recruitment activities such as: personality assessments, career matching, career development worksheets, resume and cover-letter development, and career coaching.\

Information is only used to meet contract requirements with Career Cruising. Data is not sold, shared or used by third parties or Xello/CareerCruising for any other activities. Please see the Career Cruising Privacy Policy <http://public.careercruising.com/en/privacy-policy/>

3.3 Disclosure

Section 26 states that 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. A public body may

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disclose personal information referred to in section 33 inside or outside Canada as follows:

in accordance with Part 2;

if the information or disclosure is of a type described in section 22 (4) (e), (f), (h), (i) or (j);

if the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable.

21. To whom will you be disclosing personal information?

Provide details on the disclosure, including where and how personal information will be stored.

Only identified UNBC staff will have Administrative access and/or Counselling access to student profiles. These professional staff will include: Student Recruiters, Student Advisors, Career Centre staff, Student Success Managers and Directors, and Student Recruitment Managers and Directors.

Career Cruising - Technical support will have access for support, maintenance of the SaaS platform. These staff will have access to support and answer queries for UNBC staff and/or students if needed; however access to UNBC data is limited and not all Career Cruising employees will have access.

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22. Will it be disclosed to anyone outside of Canada?

Provide details on the disclosure, including where and how personal information will be stored.

No.

23. Will it be disclosed as part of Health System Use?

Provide details on the disclosure, including where and how personal information will be stored.

No

24. Will it be disclosed as part of Research / Open Data?

Provide details on the disclosure, including where and how personal information will be stored.

No.

4 Storage and Location of the Personal Information

25. Is any personal information stored outside of Canada?

Yes

No

26. Describe how PI information will be stored

If you are using a cloud solution, there may be multiple cloud service providers involved in your initiative. Cloud solutions are typically considered to be made up of a 'stack' of infrastructure (IaaS), platform (PaaS) and/or software (SaaS) that might be operated by the same or different cloud service providers.

For example, Software as a Service (SaaS) providers often offer services built on infrastructure (IaaS or Infrastructure as a Service) offered by a different cloud service provider.

SaaS

Canadian data centres with encryption at both the hardware and software level. Databases are further encrypted using an internal encryption algorithm as an additional layer of defense.

These systems are protected with next generation that is behavior and signature based. This information feeds into our organizations Security Identity

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27. Describe the contractual terms in place.

Here you will describe what type of contract you rely on for your initiative (if applicable). For example, you might be contracting a cloud-based service specifically for your initiative, or you might be using an enterprise offering.

Software of a service

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

Career Cruising maintains a strict zero trust policy and monitor all access requests to servers internally and unauthorized attempts externally. As such access is limited to personal information on an as needed basis.

29. Please provide details on how you will track access to personal information.

Users will only maintain access to their profiles, while administrators (UNBC authorized staff) will have access to accounts to all standard users. CareerCruising employees will have limited access to certain data to provide support and access, unauthorized attempts provide alerts through Career Cruising / Xello's security systems.

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30. Describe the privacy risks for disclosure outside of Canada.

Use the table below to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk identified, describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) that you outlined above.

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure, or storage of PI (low, medium, high)	Level of privacy risk (low, medium, high)	Risk response (this may include contractual mitigations, technical controls and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.

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ACTIVELY INITIATIVE

5 Data Linking

In FOIPPA, “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.

31. 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?

Yes No

32. 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?

Yes No

33. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the Regulations? (Privacy Officer will answer).

Yes No

6 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 your personal information is safely secured in both physical and technical environments.

34. Does your initiative involve digital tools, databases information systems?

Yes

No

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.

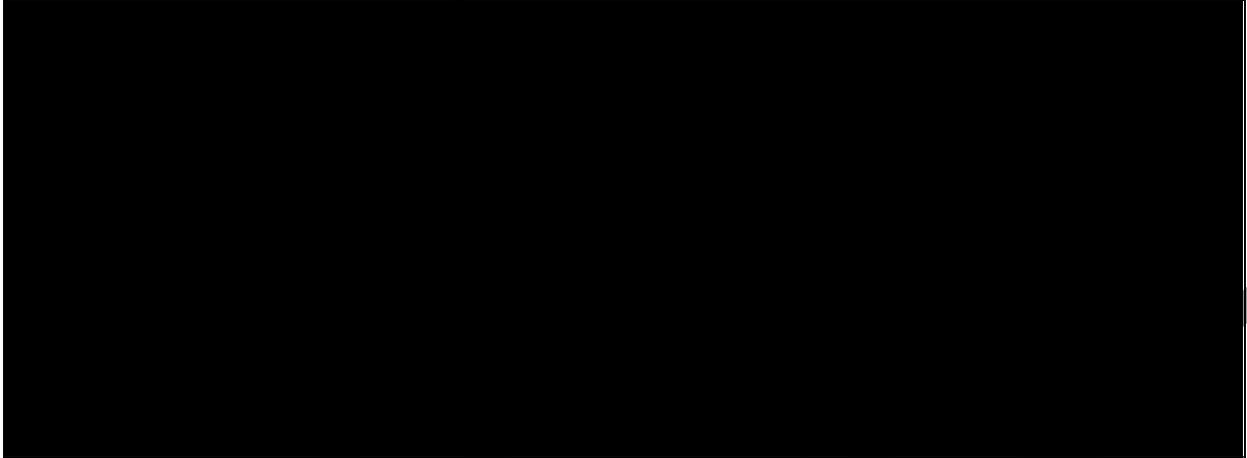
6.1 Security Safeguards

There are three broad types of security measures:

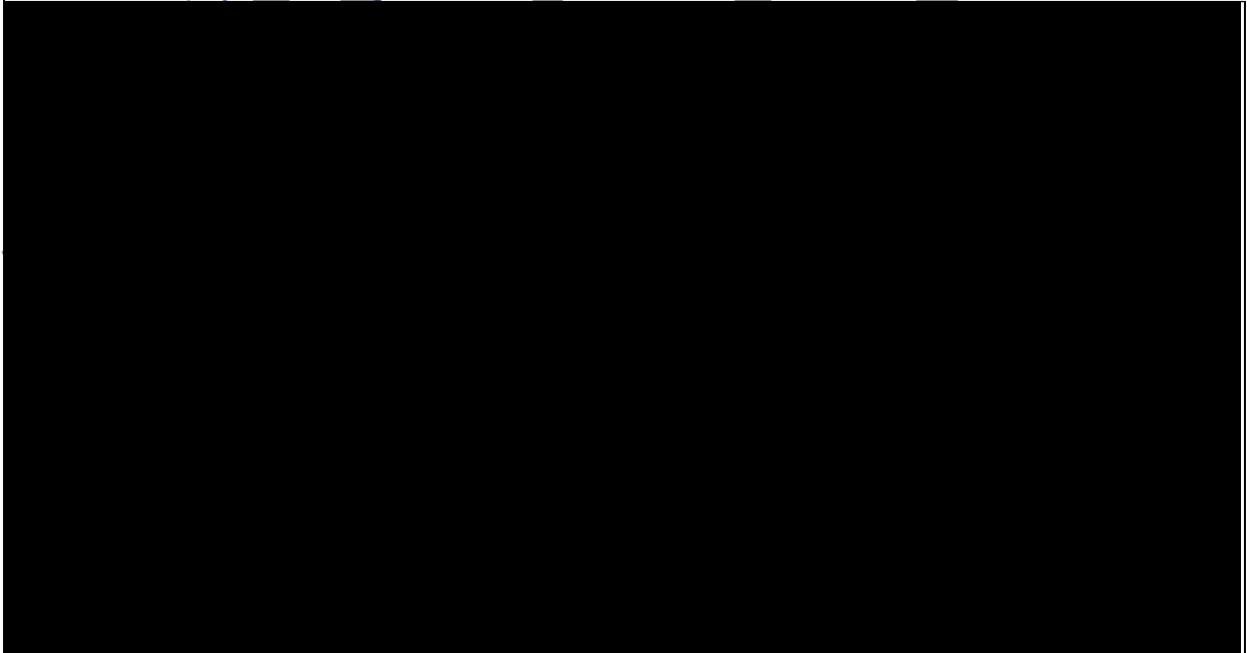
PHYSICAL	These security measures relate to the physical environment that the information is stored in; for example, whether your organization limits access to the filing cabinet or file room through select staff having a key.
TECHNICAL	Technical measures relate to your organization's hardware and software; for example, firewalls, encryption, and intrusion prevention systems.
ADMINISTRATIVE	Administrative controls are rules and processes for your employees or third parties that prevent them from inappropriately accessing, using, or disclosing your client's personal information; for example, role-based access controls, annual privacy training, employee codes of conduct, and privacy-related clauses in contracts.

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35. Describe administrative safeguards



36. Describe physical safeguards



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37. Please reach out to our CISO Office and ITS for the vendor assessments and technical requirements for IT/security threat risk assessment to fill out these sections or attach that assessment to this PIA.

7 Privacy Risk Identification and Mitigation

PRELIMINARY RISK ASSESSMENT

PROGRAM/ACTIVITY

LOWER RISK
HIGHER RISK

Your program's risk level is based on the total of all risk factors. Each risk factor either increases or decreases the overall program risk.

Involves limited personal information	Involves large amount of personal information
Does not involve sensitive personal information	Involves sensitive personal information such as financial or medical information, SIN, children's information
Context is not sensitive	Context is sensitive
Involves the personal information of a few individuals	Involves the personal information of many individuals
Does not involve personal information of vulnerable populations	Involves personal information of one or more vulnerable populations
Has a minimal impact on individuals (e.g. lower stakes)	Has a major impact on individuals (e.g. high stakes)
Is one-time or short term	Is long-term
Does not involve the additional risk factors (see additional risk factors above)	Involves one or more of the additional risk factors (see additional risk factors above)

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38. Identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented.

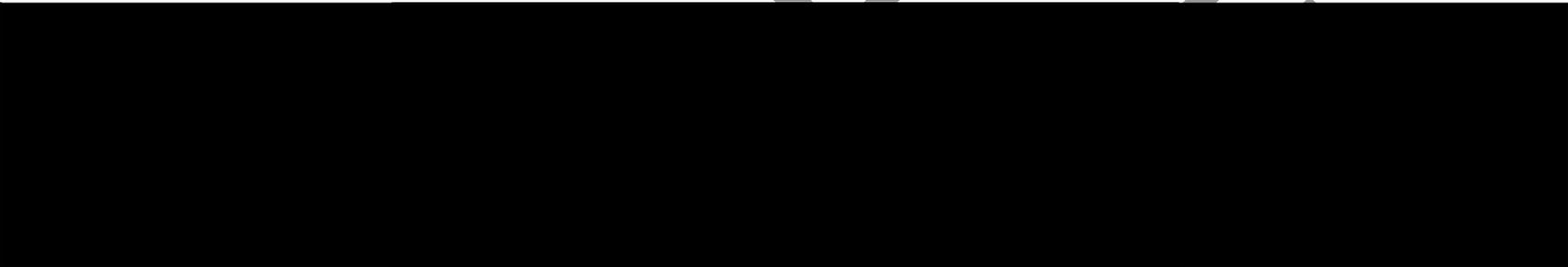
Please provide details of all such strategies. The Privacy Officer will help identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

*Risk Levels	Likelihood	Harm
Low	Little possibility that the risk will occur due to mitigating factors	Compromise would likely not result in any significant harm to the privacy, safety, or economic standing of individuals or the corporation.
Moderate	A possibility that the risk will occur if no additional measures are taken.	Compromise would likely cause some harm to the privacy, safety, or economic standing of individuals or the corporation.
High	Near certainty that the risk will occur in the future if no corrective measures are taken.	Compromise would likely cause significant and immediate harm to the privacy, safety, or economic standing of individuals or the corporation.

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RISK	MITIGATION STRATEGY	LIKELIHOOD	IMPACT
<p>EXAMPLES</p> <p>Data that is no longer needed is at risk of being breached because it is being retained in the platform longer than is necessary</p>	<p>Implement a process on the IT platform to automatically delete data once is it no longer needed</p>	<p>Moderate</p>	<p>High</p>

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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.

8 Accuracy, Correction, and Retention

39. 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.

If required, CNC professional staff can compare Career Cruising student profiles to UNBC student profiles to check for accuracy. This may occur while an advisor is working with a student and wants to advise them on their academic program requirements in alignment with their career aspirations noted in their Career Cruising account.

Students have access to their own accounts and can correct their own information.

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

Yes No

41. If yes, please describe your process below?

The Advisor would note the inaccurate information, notify the student, and manually change the information as appropriate in the system, or the student will change their inaccurate info themselves.

The likely of this occurring is low.

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42. 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. Describe the process of how you will make a note on the record.

n/a

43. 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 recipient of the request for correction. How will you ensure that you conduct these notifications when necessary?

UNBC will document all requests for information and liaise with Career Cruising and the student as necessary.

44. 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
- Using a person's employment history to decide whether they can move forward in a job competition

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- Using a person's health information to decide the level and type of care they receive

Yes

No

45. If yes, do you have an approved information schedule in place related to personal information used to make decisions?

Yes

No

46. If yes, please include your approved information schedule here.

47. If you answered 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.

information will not be used to make decisions. It is only used by the student to help inform their own career/program direction.

9 Personal Information Banks

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

48. Will your initiative result in a personal information bank?

Yes No

If yes, answer the following questions, if "No" please proceed to the next section?

9.1 Description of personal information bank.

49. Name:

Basic information, such as student name and email can be accessed in a simple bank of all student information on the career cruising platform.

Student career assessments, resume templates and drafts.

50. Location:

Career Cruising platform, SaaS

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51. Description:

Lists of student information -- to be pulled for reports (ex. how many students are using the service)

52. 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).

26 (c) & (e)

53. Purpose:

To support student career advising holistically by assessing usage reports

54. Category of Users:

students

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9.2 Method of De-identification/Anonymization/Aggregation for Personal Information

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

Career Cruising's policy for removing personal information is to physically and permanently delete the data from our database. They do not use de-identification or anonymization methods to remove personal information from our database.

Career Cruising's data deletion process is managed by their internal team, and they ensure that the deletion is complete and permanent to protect the privacy of users. Career Cruising team follows strict protocols to ensure that personal information is securely and permanently deleted from their systems.

9.3 Audits

56. 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?



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57. Are the audit logs immutable?



58. Who reads the audit logs, and how long are they kept?

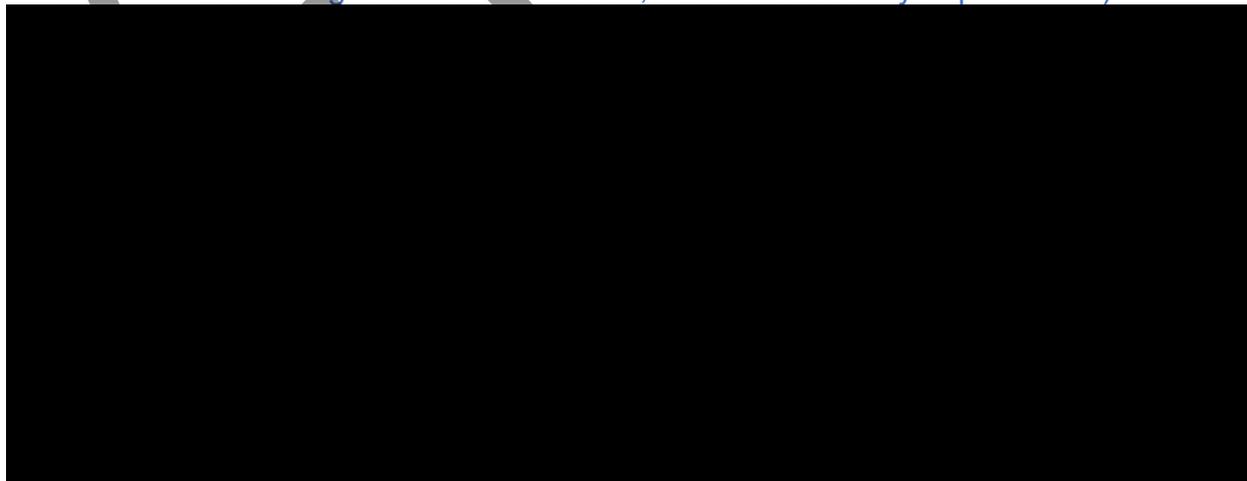
Audit logs are only visible by Career Cruising (Xello). Some events are visible by admins/users such as login activity.

59. Who is responsible for oversight of user access?

Customers, such as UNBC, are responsible for provisioning their own users in the Career Cruising SaaS platform, including setting permissions and providing access. This means that customers have complete control over who can access their data and what level of access each user has.

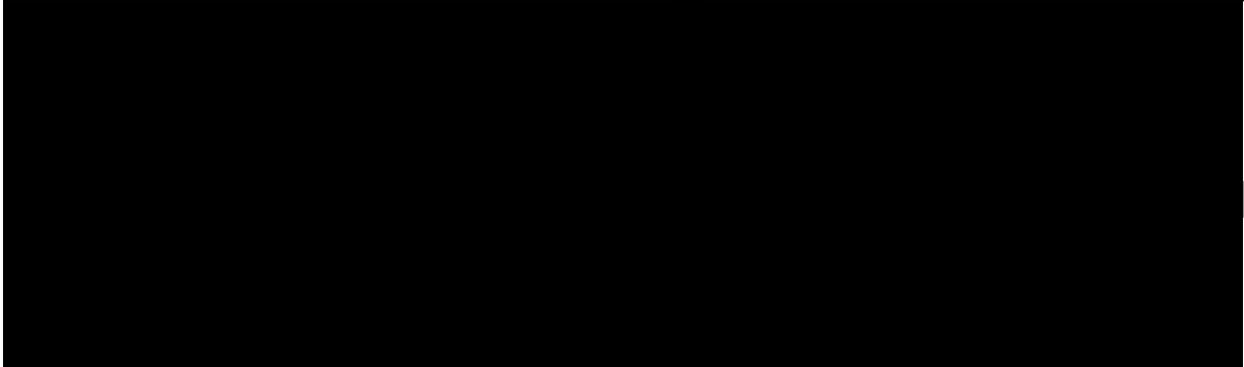
Career Cruising provides a user management system that allows customers to easily create, edit, and delete user accounts, as well as set permissions and access levels. The Career Cruising support team is available to assist customers with any questions or issues they may encounter when managing user access.

60. 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?)



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61. 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?



62. Will those found to abuse access privileges be sanctioned in a meaningful (and visible) way?

Career Cruising takes access control and security very seriously and expect all users to adhere to our policies and guidelines. Any misuse or abuse of access privileges will be investigated thoroughly, and appropriate action will be taken, which may include revoking access privileges and reporting the incident to the appropriate authorities. Career Cruising believes that it is important to maintain transparency in our response to any security incidents, and they will take appropriate steps to ensure that the consequences of such incidents are visible to all relevant parties.

10 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: _____

Position: _____

I confirm the information management practices in this initiative have been documented 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: _____ Date: _____

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Name of Director or Dean Overseeing the Program/Project:

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: _____

Name of Chief Information Security Officer

I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that satisfactorily comply with the information security standards of the University of Northern British Columbia.

Signature: _____ Date: _____

Name of Privacy Officer:

Position:

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

Signature: _____ Date: _____

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ACTIVE
INITIATIVE

11 APPENDIX A: DEFINITIONS

Confidentiality	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.
Consent	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.
Core privacy principles	<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"> 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. 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. 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.

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4. *Limiting Collection* - 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.
5. *Limiting Use, Disclosure and Retention* - Personal information shall not be used or disclosed for purposes other than those for which it is collected, 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.

Data (information) flows	Mapping the flow and manipulation of information within and across systems or business processes.
<hr/>	
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
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data pertains. Included in this definition of data-matching is data linkage, also known as data profiling.

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,

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),

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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.

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.
-

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

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.

Privacy Impact Assessment Form

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

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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12 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.** 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

13 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. Enroll you
2. Confirm sponsorship arrangements
3. Process your payment
4. Generate a class list for instructors
5. Ensure that grades and certificates are assigned to the correct student
6. Assist our partners in verifying certificate validity

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

Continuing Studies must directly disclose some information on this form and your course completion status to your sponsor, including your employer if you are sponsored through your job. Continuing Studies may need to share the information on this form with anyone repairing or maintaining electronic systems involved in this Continuing Studies course.

UNBC Continuing Studies is the training agency chosen to deliver the Wildlife Dangerous Tree Assessor courses on behalf of the Wildlife Dangerous Tree Committee of BC (WDTC). Under the terms of our agreement with the WDTC, Continuing Studies

Privacy Impact Assessment Form

provides a list of current assessors upon request. Under the terms of this agreement UNBC also provides a list of current Fire assessors to BC Wildfire Services (BCWS), twice a year to support certificate verification. Personal information on this form will be shared confidentially with members of the WDTC. Certificate status, certificate number and copies of certificates may be shared upon request by contractors and employers for the purpose of confirming qualifications.

You have the right to revoke consent to the collection, use, retention, and disclosure of personal information at any time, but doing so will result in consequences including, but not limited to, forfeiting registration in the course.

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 and when its period of usefulness is over we will securely delete or destroy it. In the case of the Wildlife Dangerous Tree Assessor Certificate Program, hardcopy materials are kept for the life of the Certificate, which is four years, before being destroyed.

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

Please contact UNBC Continuing Studies at: 250-960-5980 OR cstudies@unbc.ca

If you still have questions or concerns, please contact: Governance Officer for Access, Privacy and Records Management at 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.

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Signature: _____ Date: _____

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