

PIA # 21-005

ClockWork

## 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: **Access Resource Centre**

PIA Drafter: **Chrissy Ingram**

Email: **chrissy.ingram@unbc.ca**

Phone: **250-960-6711**

Oversight Provided by: **Shelley McKenzie**

Email: **shelley.mckenzie@unbc.ca**

Phone: **250-960-5177**

### 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? **Yes - Clockworks pulls data from banner.**

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 is 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). **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 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.

<b>Personal Information Flow Table</b>			
	<b>Description/Purpose</b>	<b>Type</b>	<b>FIPPA Authority</b>
1.	<i>Intake – students answer questions related to study, funding, referrals, campus resources accessed and functional limitations and submit consent and third-party authorization forms and documentation of a disability.</i>	<i>Collection</i>	<i>26(c), 26(d), 26(e)</i>
2.	<i>Self-registration – students select approved academic accommodations to release in accommodation letters to instructors for courses they are registered in.</i>	<i>Disclosure</i>	<i>33.1(1)(b), 33.1(e)(i)</i>
3.	<i>Instructor acknowledgment – faculty acknowledge receipt of accommodation letters from students.</i>	<i>Disclosure</i>	<i>33.1(e)(i)</i>
4.	<i>Note-taking – students with “use of a notetaker” as an approved accommodation request a notetaker; instructor receives request for peer notetaker and elicits volunteers from class; student volunteer notetakers upload notes taken in class; ARC-registered students who have requested “use of a notetaker” download notes.</i>	<i>Use</i>	<i>32(b)</i>
5.	<i>Exam-booking – students book exams (midterms, quizzes, and finals) through module, triggering email notifications and reminders of exam bookings to instructors.</i>	<i>Use</i>	<i>32(b)</i>
6.	<i>Exam-booking modification and materials – instructors can modify exam bookings as needed and upload exam materials for ARC staff to print for use during exam invigilation at the centre.</i>	<i>Use</i>	<i>32(b)</i>
6.	<i>Funding/financial assistance – ARC staff work with eligible ARC-registered students to complete Canada Student Grant for Students with Permanent Disabilities (CSG-PD) funding applications. Associated forms are stored within ClockWork in the student’s file.</i>	<i>Collection</i>  <i>Use</i>  <i>Disclosure</i>	<i>26(c), 26(d), 26(e)</i>  <i>32(a), 32(b)</i>  <i>33.1(1)(b), 33.1(e)(i)</i>
7.	<i>Service/equipment requests – ARC staff work with the Ministry of Advanced Education and Assistive Technology BC (AT-BC) to support service and equipment needs of eligible students. Associated forms are stored within ClockWork in the student’s file.</i>	<i>Collection</i>  <i>Use</i>	<i>26(c), 26(d), 26(e)</i>  <i>32(a), 32(b)</i>

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		<i>Disclosure</i>	<i>33.1(1)(b), 33.1(e)(i)</i>
<b>8.</b>	<i>Student files are disposed of in adherence to the ARC's records retention and management schedule.</i>	<i>Disposal</i>	<i>31</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.

<b>Risk Mitigation Table</b>				
	<b>Risk</b>	<b>Mitigation Strategy</b>	<b>Likelihood</b>	<b>Impact</b>
1.				
2.				

**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.

**Copy/Paste or Fill in here**

This information is being collected in order to determine your eligibility to receive academic accommodations and under the authority of section 26(c) of the British Columbia *Freedom of Information and Protection of Privacy Act RSBC 1996 c.165*. If you have any questions about the collection of this information, please contact the Access Coordinator by phone at 250-960-6711.

### **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?

**Admin access is managed with local accounts. Only Access Resource Center staff have access to Clockworks application.**

**Student and Faculty access is managed by Ellucian Ethos Identity (EEI) for single Sign On, this is the web based application.**

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?

**Daily updates from Banner, Students update information in Self Service Banner and then the information syncs over from Banner Daily. Any updates in Clockworks get over written daily. Banner is the authoritative source.**

**Information gathered during intake, does not get changed.**

### **Information Disposal**

Does your initiative use personal information to make decisions that directly affect an individual(s)? **Yes**

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.

**Documentation of a disability is uploaded into ClockWork either by the student when completing the intake module or by ARC staff upon receipt of such documentation. ARC staff "chart" decision-making in the "ARC History" tab in student files due to the legal duty to accommodate and the potential for a request for records from the Human Rights Tribunal. As per the current Access and Accommodation policy, student records are maintained for 5 years.**

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.

**Student record retention schedule is to purge records after 5 years.**

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**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. **Yes** .

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. **Yes**

*Within the ClockWork Database, the information noted below is held in particular "tabs," within a student's file. Users can search a student by name or ID number. The following tabs populate when you select a student: Summary, Student Info, Courses, Accommodations, Disability, ARC History, and Intake.*

- *Student's name, preferred name, and pronouns*
- *Age*
- *Gender*
- *Address*
- *Student and personal email address*
- *Phone number*
- *Emergency contact information*
- *Educational history (courses)*
- *Status (part-time/full-time, international)*
- *Degree (UG, G, PhD)*
- *Major*
- *Program*
- *Academic probation*
- *Campus*
- *First Language*
- *Financial information (Canada Student Grant – Permanent Disability forms and associated service and equipment requests and/or agreements)*
- *Referred by*
- *Campus supports accessed (e.g. ASC, FNC, Counselling Services, Health Services)*
- *Consent (e.g. Use of video-conferencing software, Wellness, Release of Information)*
- *Health information (documentation of disability, doctor's notes)*
- *Chart notes from intakes, follow-up appointments, meetings, and email correspondence*
- *Accommodations*
- *The release of accommodation letters*
- *Forms (e.g. Invigilation, audio-recording, or note-taking agreement)*
- *Exam bookings*

*The authority for collecting this personal information is the information relates to and is necessary for a program or activity of the public body as per section 26(c) and 26(d) of the Act, and the information is necessary for the purpose of planning or evaluating a program or activity of a public body as per section 26(e) of the Act.*

**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.

ACTIVE  
INITIATIVE