

Privacy Impact Assessment

PIA # and Name- 2352_EDIsurvey

Legislative Requirement

Under Section 69 (5.3) of FIPPA UNBC is required to conduct a privacy impact assessment (PIA) and must do so in accordance with the directions of the Minister responsible for the Act.

A PIA needs to be conducted

- For a new initiative for which no PIA has previously been conducted.
- Before implementing significant change to an existing initiative, including but not limited to a change in the location in which sensitive personal information is stored.
- At the discretion of the person(s) with delegated authority under section 66 of the Act.

1. Accountability

1.1 Identify Department, Branch, or Program Area involved in the initiative

Office of Equity Affairs and UNBC Executive

1.2 Identify UNBC role responsible for the Initiative

inform and develop the UNBC Accessibility Plan in accordance with section 11 of the Accessible British Columbia Act.

1.3 Describe the Governance Model – who is accountable for the program or system.

UNBC Executive is accountable to the Act.

1.4 Timeline for the initiative

Anticipated start date for the initiative,

10/1/23

Is this a one-time event?

Yes

No

2. Overview

2.1 Describe the New Program or Service or the Change.

- The Feedback Mechanism is a requirement mandated by the Accessible British Columbia Act to identify barriers to individuals studying at, working for, or interacting with the university.

- The form will inform the continuous development and implementation of the UNBC Accessibility Plan for 2024-2026.

- As per Accessible British Columbia Act

Accessibility plan

11 (1) An organization must develop a plan to identify, remove and prevent barriers to individuals in or interacting with the organization.

(2) An organization must review and update its accessibility plan at least once every 3 years.

2.2 Describe the Purposes, Goals and Objectives.

- The form is a mechanism to gather information around inaccessibility at UNBC. The form is designed to solicit feedback that will then develop and inform UNBC's Accessibility Plan for each 3 year time period.

- Mandated as per Accessible British Columbia Act

- The form will be used for continued Accessibility Plan's following 2026.

- The plan will be created by the Office of Equity Affairs with support and feedback from the Accessibility Committee, and with consultation with staff, students, faculty and the public.

- As per the Accessible BC Act

Public feedback

12 An organization must establish a process for receiving comments from the public on

(a) the organization's accessibility plan, and

(b) barriers to individuals in or interacting with the organization.

2.3 List any Relevant PIAs

PIA 20-007:MS 365

2.4 List any relevant contracts or software purchases.

Be sure to follow [UNBC policies](#) regarding purchasing policies.

Not applicable

2.5 List all interested parties impacted / Involved

(i.e. who are you collecting information from, UNBC roles accessing/using information, 3rd parties with whom you will share information)

Interested Party	Role in the initiative
UNBC Students, Staff, Faculty	will provide information via feedback form
Public Feedback from communities UNBC operates in	will provide information via feedback form
UNBC Office of Equity Affairs	collects, analyzes and develops Accessibility Plan
Accessibility Committee	provide feedback, support, and advise on Accessibility Plan
internal departments such as Student Services, CTLT, Facilities, Access Resource Centre, Wellness, Human Resources	will need to address barriers and challenges provided through the feedback form

COMPLIANT INITIATIVE

3. Collection of Personal Information

3.1 List the data elements or personal information involved in your initiative.

Data Element name, email, id#, grade	Rationale for collection	Method of Collection	FIPPA Authorization
Experience accessing campus/university through a variety of methods	This meets the need for the form to provide feedback on the challenges and barriers at the university	Direct Indirect NA	26(c)
Role at UNBC (ie. grad, undergrad, staff, faculty, visitor, other)	optional question, to understand which group the challenge/barrier was faced by	Direct Indirect NA	26(c)
if they currently live with a disability	optional, understanding if the person had a disability provides insight on lived experience	Direct Indirect NA	26(b)
where they live	optional, understanding which community they live in and which campus can address the issue	Direct Indirect NA	26(c)
contact	optional, in case they would like someone to contact them	Direct Indirect NA	26(c)
		Direct Indirect NA	TBD
		Direct Indirect NA	TBD

3.2 Describe how personal information is to be collected.

If you already have a collection notice, attach it as an appendix.

Personal information will be collected online, through a Microsoft Form, over the phone, through voicemail, in-person or via email.

4. Use of Personal Information

4.1 List all users of PI and Describe how personal information is to be used.

User (UNBC Roles e.g Governance officer)	How the info is used
Office of Equity Affairs	To contact individuals, if they would like to be contacted. Use to inform Accessibility Plan. (no personal information will be included in the plan) All video/media files uploaded will be de-identified when sharing with various departments on addressing accessibility videos. Only feedback will be shared, if necessary.

4.2 Describe the record management of Personal information involved in the initiative.

Does the initiative involve using personal information to make a decision about an individual?	Does the initiative have a retention schedule regarding personal information used to make decisions?
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the initiative involves using personal information to make a decision about an individual, but does not have a record retention schedule, 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.	
The data will be retained for up to a 3 year period as it will inform each 3 year Accessibility Plan.	

5. Research/ Health System Use of Personal Information

5.1 Will data collected through this initiative be used for research or health system use?

Yes

No

If "Yes" answer the following questions, if "No" please proceed to the next section.

5.2 Explain and provide details of data state (aggregate, de-identified, anonymized etc.)

Not applicable

5.3 If data will it be disclosed as part of Health System Use, provide details on the method of disclosure, as well as where and how personal information will be stored by 3rd party.

Not applicable

5.4 If data will it be disclosed as part of Research/ Open Data, provide details on the method of disclosure, as well as where and how personal information will be stored by 3rd party.

Not applicable

6. Storage of Personal Information

6.1 Does the initiative involve digital tools, databases, or information systems?

Yes

No

If yes, contact UNBC Information Security to determine whether the initiative requires a security and threat risk assessment.

6.2 As part of this initiative, will Personal information be store outside of Canada?

Yes

No

6.3 Describe how information will be stored during this initiative (i.e., cloud storage, SaaS, etc).

The information will be stored in Microsoft 365, In Teams channel for Office of Equity Affairs using Microsoft Forms. Only those with access to the Teams channel will have access to the data.

7. Disclosure of Personal Information

7.1 Does the initiative involve disclosing information to 3rd parties (i.e. non-unbc employees)?

Yes

No

If "Yes" answer the following questions, if "No" please proceed to the next section.

7.2 Provide details on the disclosure, including to whom, purpose, method of disclosure, and how personal information will be stored by 3rd party.

Not applicable

7.3 If disclosing information to anyone outside of Canada, Provide details regarding to whom purpose, method of disclosure, and how personal information will be stored by 3rd party.

Not applicable

8. Accuracy and Correction of Personal Information

8.1 How will you make sure that the personal information collected is accurate and complete?

- There are specific answers for each question in the form, with some options that have an open text box. This will help reduce errors.
- The intent of the form is to collect data that is being used for feedback and progress towards accessibility.
- Personal information shared is completely optional.

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

Yes

No

8.3 If yes, please describe your process below?

Not applicable

8.4 Describe the process of how you will make a note on the record, if you're not able to correct the record itself.

Not applicable

8.5 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, how will you ensure that you conduct these notifications when necessary?

Not applicable

9. Personal Information Bank

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

9.1 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.

9.2 Describe the business purpose for the information bank (i.e., account management of clients/ students).

Personal information will only be used if the person would like to be contacted after they've submitted the form.

9.3 If aggregate reports are generated from the information bank, explain how Personal Information will be de-identified or anonymized.

Any information with names/emails will be deleted from the data set before sharing the data.

9.4 Describe the category of users and the information to which the user will have access

Category of Users (i.e., system admin, clerk, etc.)

Information accessed (i.e. contact info, grades, fee etc.)

Office of Equity Affairs

Name, Email, Location

9.5 Identify the UNBC role(s) responsible for managing user accounts and audit user access.

Office of Equity Affairs

9.6 Describe the process for auditing user access.

How detailed is the data (e.g., date stamps, time stamps, IP address, etc.)? Does the audit log include the purpose of an access?

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9.7 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

Yes

No

9.8 Are the audit logs immutable?

Yes

No

9.9 Is the system responsive or passive?

Is it possible to put a monitor on particular individuals? Will access produce an immediate response/notification or a log entry for review?

[Empty response box for question 9.9]

9.10 How will those found to abuse access privileges be sanctioned ?

[Empty response box for question 9.10]

10. Common or Integrated Program or Activity

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.

10.1 Does this initiative involve a program or activity that provides a service(s) through at least one other public body or agency working collaboratively to provide that service?

Yes No

10.2 Does this initiative involve a program or activity that provides a service(s) through UNBC that is working on behalf of one or more other public bodies or agencies?

Yes No

10.3 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

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.

11. Privacy and Security Safeguards

11.1 Describe administrative safeguards(i.e. policy documents, procedures, or training).

[Redacted content]

11.2 Describe physical safeguards(i.e. locked, filing cabinets, locked doors, or restricted areas).

[Redacted content]

11.3 Describe the controls in place to prevent unauthorized access to personal information(i.e. role-based access to software, access logs).

[Redacted content]

11.4 Describe technical safeguards(i.e. firewalls, encryption, or intrusion prevention systems).

[Redacted content]

12. Privacy Risk Identification and Mitigation

Identify any privacy risks and the corresponding mitigation strategies that will be implemented. Try to include at least one risk related to each step in the information cycle (collection, use, storage, disclosure, and retention). Refer to the risk classification table to assist with likelihood and impact rating. **If you are disclosing or storing data outside of Canada you will need to identify additional risks related to storage/disclosure outside of Canada.**

12.1 Risk Description	Likelihood	Impact	Risk level	Mitigation Strategy <small>Describe how above safeguards could be used to mitigate the risk</small>

	Certain Likely Moderate Unlikely Rare	Severe Major Significant Minor Insignificant	Minimal	
	Certain Likely Moderate Unlikely Rare	Severe Major Significant Minor Insignificant		

13. Collection Notice

All collection notices must include the:

- Purpose for the collection
- Legal authority for the collection
- Contact information for an employee of UNBC who can answer the individual's questions about the collection.

The employee responsible for responding to data collection questions should be able to explain why the personal information is being collected and how it will be used, retained, and disclosed.

The contact method should suit the collection method. For example, if you collect personal information through an online form, you could include an email contact.

13.1 Privacy notice

Be sure to include all 3 required parts of the notice

All the questions in this form are optional. You can share as much or as little as you want. The Office of Equity Affairs will read the information you provide. We may share some of this information with other areas of the University to help them address the barrier(s). We will make every effort to protect privacy but can't guarantee total anonymity. We are collecting your personal information to help us identify barriers at UNBC. Section 26(c) of the Freedom of Information and Protection of Privacy Act permits this collection. Do you have questions about the collection, use and disclosure of your information? Please contact the Office of Equity Affairs at accessibility@unbc.ca.

13.2 Location of Privacy Notice

If the notice is to be posted on the website please include url of webpage.

webpage once created and on Microsoft Form

14. Signing and Approval

Individual leading the Program/Project: ~~EDI~~ Mindy Gabb

Position: EDI specialist.

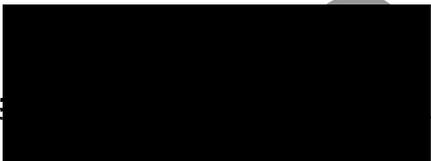
I confirm the information management practices in this initiative have been documented as accurately as I am aware. I commit to communicating appropriate information management practices to all individuals participating in this initiative. I commit to following the documented practices on this PIA, or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

Signature: 

Date: Nov 21/2023

Director/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: Nov 23/2023

Vice-President authorizing the Program/Project:

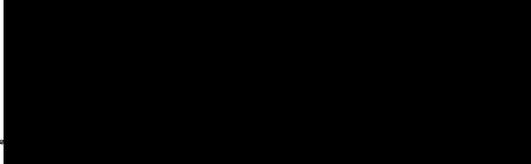
I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that complies with policies and procedures of the University of Northern British Columbia.

Signature: 

Date: Nov 23/2023

Privacy Officer reviewing the Program/Project: Christopher Ross

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: November 27, 2023

15. Reference Tools

"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,
- (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.

Privacy Impact Risk assessment:

		Impact Severity of outcome of identified risk occurs				
		Insignificant 1	Minor 2	Significant 3	Major 4	Severe 5
Probability Likelihood that identified risk will occur	almost certain 5	Medium 5	High 10	Very High 15	Extreme 20	Extreme 25
	Likely 4	Medium 4	Medium 8	High 12	Very High 16	Extreme 21
	Moderate 3	Low 3	Medium 6	Medium 9	High 12	Very High 15
	Unlikely 2	Very low 2	Low 4	Medium 6	Medium 8	High 10
	Rare 1	Very low 1	Very low 2	Low 3	Medium 4	Medium 5

Risk Rating	*Risk Levels	Description	Actions Required
1-4	Minimal	Unlikely that associated risk would result in harm to privacy	Review of safeguards to be done at PIA review date
5-9	Moderate	Unlikely that associated risk would result in significant harm to privacy	annually review existing safeguards required
10-16	Elevated	Likely that associated risk would result in harm to the privacy	Routine monitoring of data processing or additional safeguards required
17-25	Unacceptable	Associated Risk would likely cause significant and immediate harm to the privacy	Must not proceed as existing safeguards and controls are insufficient

Return to Risk Matrix

Accessibility feedback form

Give Feedback on Accessibility

We want to know the specific barriers people face when they are trying to:

- Access a UNBC program, building, or information.
- Receive a service or support.

Collection notice

All the questions in this form are optional. You can share as much or as little as you want.

The Office of Equity Affairs will read the information you provide and will inform UNBC's Accessibility Plan. We may share some of this information with other areas of the University to help them address the barrier(s). We will make every effort to protect privacy but can't guarantee total anonymity.

We are collecting your personal information to help us identify barriers at UNBC. Section 26(c) of the Freedom of Information and Protection of Privacy Act permits this collection.

Do you have questions about the collection, use and disclosure of your information? Please contact the Office of Equity Affairs at accessibility@unbc.ca.

* Required

* This form will record your name, please fill your name.

Report an accessibility barrier and/or challenge

Tell us about a problem accessing a UNBC service.

1. What is your role? *

- I am describing a barrier and/or challenge that someone else experienced.
- I am describing a barrier and/or challenge that I experienced

2. What is your relationship with the person who experienced the barrier?

- Parent or guardian
- Family member or loved one
- Advocate
- Support person
- Colleague
- Witness
- Other

3. Did the barrier relate to any of the following? Select all that apply.

- Attitudinal
- Organizational or Systematic
- Architectural or physical
- Information or communication
- Technological
- Other

4. how were you trying to access UNBC?

- In-person
- Phone
- Email
- Online

5. What online option did you try to access?

- Website
- Virtual class/meeting
- Social media

Recommendations

What recommendations do you have for the University of Northern British Columbia to improve accessibility for what you are reporting?

- 10. What recommendations do you have for the University of Northern British Columbia to improve accessibility for what you are reporting?

- 11. What accessibility improvements, have you noticed, that the University of Northern British Columbia has made, if any?

COMPLETED INITIATIVE

17. May staff from the Office of Equity Affairs contact you about your feedback?

We may share a summary of your feedback with the university department responsible for the barrier and/or challenge. They may wish to contact you to clarify your feedback. This does not guarantee they will contact you.

- Yes
- No

This content is neither created nor endorsed by Microsoft. The data you submit will be sent to the form owner.

 Microsoft Forms

COMPLETED INITIATIVE