PIA # and Name- 23014 inbound student Exchange

1 General Information

1. Name of Department, Branch and Program Area

Office of the Registrar, International Inbound Exchange

2. Name of Program or Service Representative

Amy Beyer, Associate Registrar - International

3. When will the initiative take place?

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 International Exchange Program is an ongoing program. Twice per year, students apply for nomination at their home institution. Their home institution submits the nomination to UNBC. UNBC then sends nominated students an exchange application to apply to UNBC. The students then attends UNBC on a 4 month or 8 month exchange. After they attend UNBC, students return to their home institution.

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7. Describe the Purposes, Goals and Objectives.

Exchange partnerships are relationships that are built on reciprocity and allow UNBC to showcase itself to international partners and students. Exchange students belong to another institution and therefore return home and share their experiences. It is important that inbound exchange students have a smooth application process and are welcomed and supported while attending UNBC.

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

Office of the Registrar.

9. List any Relevant PIAs

PIA 22005b Banner (BCNET PIA, no UNBC PIA)
PIA 21009 guard.me

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10. List of All Stakeholders Impacted / Involved (i.e. who are you collecting information from, UNBC roles using PI, 3rd parties with whom you will share information)

Stakeholder	Role in the initiative
International Exchange Students	Data subjects
International Partners	They are sending students and recommending UNBC as a host institution
Office of the Registrar - International	responsible for forming agreements and partnerships and renewing those agreements.
Office of the Registrar	Admitting students, student registration and issuing transcripts
International Retention Coordinator	Communicating with students and following up with the students and ensuring they have required documents.
Guard.me	All international students, who are new arrivals to British Columbia and/or Canada, are required to have private health insurance.

11. List any relevant contracts or software purchases. Be sure to follow UNBC guidelines regarding purchasing policies.

Exchange agreements will be signed with each institution and added as an addendum

2 Collection and Use of Personal Information

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

Data Element name, email, id#, grade	Rationale for collection, use or disclosure	Method of Collection or Disclosure	FIPPA Section (completed by Privacy)
Name, email, home institution & program	collected from nominations from institutions.	Direct **Indirect**	26(c)
Student exchange application	collected to ensure admissibility and suitability to UNBC.	**Direct** Indirect	26(c)
Transcripts	disclosed to Home institution	**Direct** Indirect	26(c)
First/last name, DOB, Nationality	disclosed to guard.me for health insurance	Direct **Indirect**	26(c)
		Direct **Indirect**	TBD
		Direct **Indirect**	TBD
		Direct **Indirect**	TBD

13. Describe how personal information is to be collected

Students first apply for exchange through their home institution. The institution then nominates eligible students to UNBC by emailing their name, email address and program information.

UNBC then sends an application form to the students. The students complete the form and email it back. Once students are admitted we communicate with them through their UNBC email address and the student portal. The students are admitted the same as any other students and a student file is created.

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

15. Please 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 the Registrar - International	Communicating with students and following up with the students and ensuring they have required documents.
Office of the Registrar	Admitting students, student registration and issuing transcripts

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16. Do you use personal information in your initiative to make a decision about an individual?

    [✔] Yes   [ ] No

17. If yes, do you have a retention schedule in place related to personal information used to make decisions?

    [✔] Yes   [ ] No

18. If yes, please your approved information schedule as an appendix.

19. 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.

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3 Storage of Personal Information

20. Is any personal information stored outside of Canada?

☐ Yes   ☑ No

21. Describe how PI information will be stored

For example, are *you using a cloud* storage (OneDrive), or Software as a Service (SaaS).

Office of the Registrar - International will keep a student file for the duration of the exchange on the G:/drive.

International keeps a spreadsheet of the number of students who have attended UNBC on exchange. Only the number of students and the year they attended is kept. This is done by staff members in the international office.

Once the exchange is complete any relevant documentation is moved to the permanent student file and the rest is destroyed. (1 year)

Admission information and transcripts are stored in banner see PIA 22005b

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

☐ Yes   ☑ No

If yes, please discuss with UNBC Information Security whether you also require a security and threat risk assessment

4 Research / Health System Use

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

☐ Yes   ☑ No

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

24. Please explain and provide details of data state (aggregate, de-identified, anonymized etc.)

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

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

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

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

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5 Disclosure

27. Will you be 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.

28. To whom will you be disclosing personal information? Provide details on the disclosure, including where and how personal information will be stored.

> All international students, who are new arrivals to British Columbia and/or Canada, are required under UNBC policy to have private health insurance.
> See PIA 21009 for description of disclosure
>
> Once students have completed exchange they request transcripts to be sent to their home institution electronically and by hardcopy.

29. If personal information will be disclosed to anyone outside of Canada, provide details on the disclosure, including where and how personal information will be stored.

> Official copies of transcripts are send to home institutions of exchange students. Each institutions data management practices are out of scope of this PIA.

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6 Accuracy and Correction

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

Forms require data to be entered in a specific way. Forms are now fill able to ensure clear responses. Information is received directly from the student. Students must submit official documents (transcripts and language tests) or documents must be received directly from their home institution.

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

☑ Yes   ☐ No

32. If yes, please describe your process below?

We have the ability to makes notes and document a student file of any corrections.

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

34. 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?

We have standard procedures so we are aware of all normal communication and disclosures, when they happen and who is included. We ensure that any requests for information are handled by the appropriate department so they are properly documented and tracked. If we receive a request for correction we would easily be able to see the communication that had been sent out.

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7 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

35. 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.

36. Describe the business purpose for the information bank (i.e., account management of clients, student record management)

37. If aggregate reports are generated, explain how Personal Information will be de identified or anonymized and by whom?

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38. Describe the category of users and the information to which they will have access

Category of Users

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

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39. Who is responsible for oversight of user access?

[ ]

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

[ ]

41. 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?

[ ]

42. Are the audit logs immutable?

[ ] Yes   [ ] No

43. 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?)

[ ] Yes   [ ] No

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44. 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?

45. How will those found to abuse access privileges be sanctioned ?
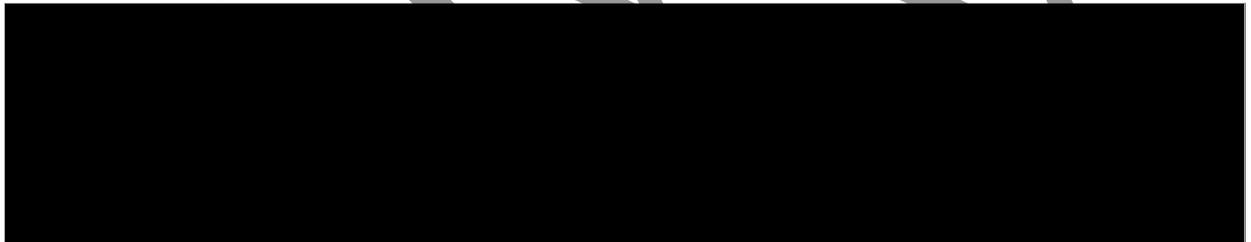
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8 Privacy and Security Safeguards

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

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

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

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

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9 Privacy Risk Identification and Mitigation

50. Identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented (see risk classification table).
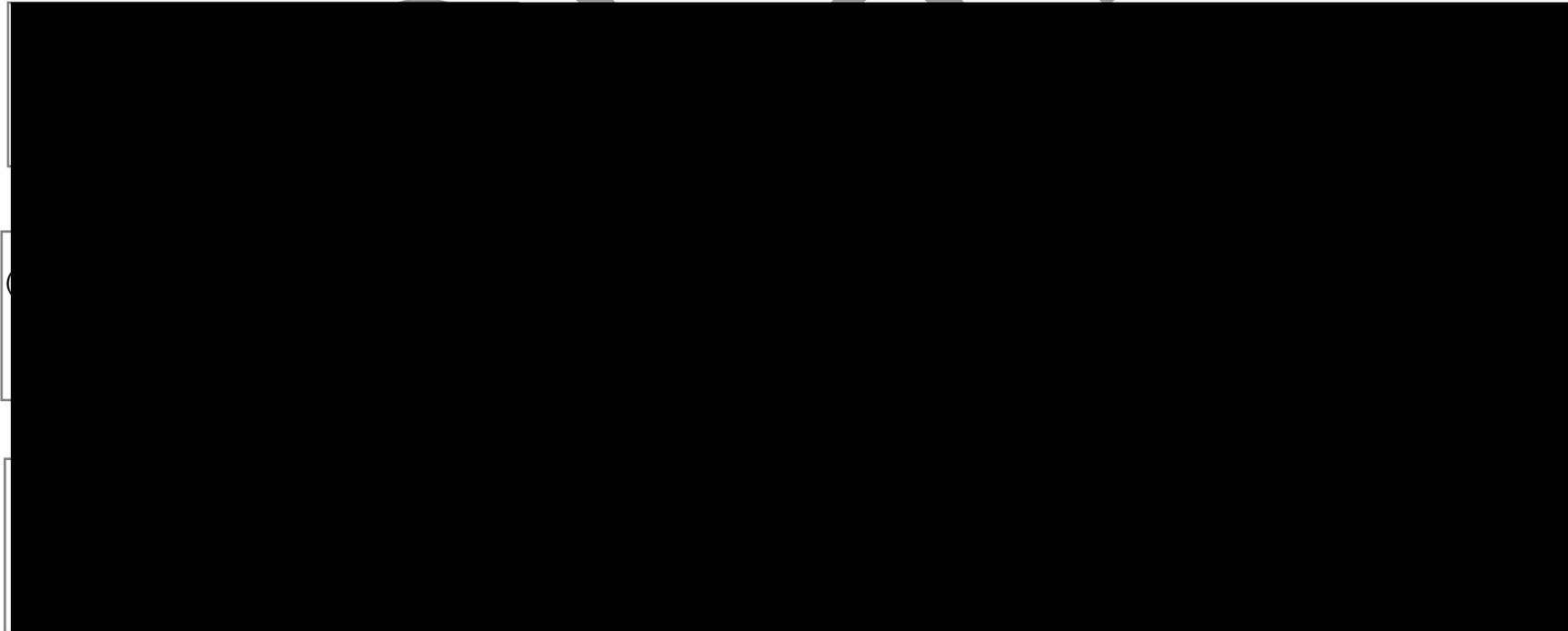
Try to include at least one risk related to each step is the information cycle (collection, storage, access, disclosure, and destruction. **If you are disclosing or storing data outside of Canada you will need to identify additional risks related to storage/disclosure outside of Canada**

RISK	LIKELIHOOD	IMPACT	MITIGATION STRATEGY

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RISK

LIKELIHOOD

IMPACT

MITIGATION STRATEGY

LIKELIHOOD	IMPACT
Low	Low
Moderate	Moderate
High	High

LIKELIHOOD	IMPACT
Low	Low
Moderate	Moderate
High	High

LIKELIHOOD	IMPACT
Low	Low
Moderate	Moderate
High	High

LIKELIHOOD	IMPACT
Low	Low
Moderate	Moderate
High	High

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10 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.

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

☐ Yes   ☑ No

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

☐ Yes   ☑ No

53. 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 Conclusions and Approvals

Individual leading the Program/Project: Amy Beyer

Position: Associate Registration, International

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.

May 8th, 2023

Signature:_ ███████████████████████   Date:_____

Director/Dean Overseeing the Program/Project: Kimberly Read, Interim Registrar

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: 6/12/2023_____

Name of Vice-President

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:_____

Name of Privacy Officer: 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 o███████████████████████

Signature: ███████████████████████   Date:_____

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12   Privacy Notice

Collection notice is on student exchange application form.

13 Key Terms

"**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.

Risk Classification Table

*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.