

Privacy Impact Assessment

[Online Application for Graduation]

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

PIA# 14-005 (Privacy Officer to complete)

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the Privacy Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FOIPPA generally, please contact Shelley McKenzie (Privacy Officer) at shelley.mckenzie@unbc.ca or (250) 960-6310 or visit <http://www.unbc.ca/foippa>.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 - General

Name of Department:	Office of the Registrar		
PIA Drafter:	Zarah Holvick		
Email:	Zarah.holvick@unbc.ca	Phone:	250-960-6304
Program Manager:	Troy Hanschen		
Email:	troy.hanschen@unbc.ca	Phone:	250-960-6301

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

In order to keep the university competitive, and continue to offer 'green' initiatives which fit within the mission of the institution, and are fiscally beneficial, an Online Application for Graduation has been proposed. Following last year's migration to a graduate level online admissions application, this project will assist in creating a sustainable administrative process for graduation applications, allow for more efficient processes, and provide better customer service to graduands.

ITS and the Office of the Registrar will be the major administrative stakeholders in this project, who will develop and utilize Banner Self-Service functionality to enhance the graduation application experience.

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2. Scope of this PIA

This PIA covers the all three related phases, which will fit within a four week period of initialization, development, and completion. Phase one is the initial consultation, research, and decision making on requirements. Phase two is the development of the product using ITS and Office of the Registrar resources. This phase includes end user testing, and modifications based on that testing, as well as staff training. The final phase is the roll out of the product, and additional staff training. This PIA will not cover a debrief of the project, or any follow up process changes that occur after the roll out.

3. Related Privacy Impact Assessments

There are no additional PIAs related to this project.

4. All Elements of Information or Data

The elements of information that will be involved in this project are: student name, additional name information (phonetics), student ID, student email, personal email, address, phone number, educational history, application credential(s), indication of college, semester of completion, date of application, application fee, and payment information.

Additional elements may include: attendance, guests, indication of ceremony, indication of region, parchment decisions (pick up or courier), authorization information, additional address, fee for courier, and payment information. {Phase 2}

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.

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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

All the information gathered from the online application to graduate will be stored locally on the UNBC servers, and be accessed through the local Banner system. Ellucian support of the Banner system may be required, and therefore, there is potential for outside access to the system (and thus the information).

Payments will be initiated through Banner Self-Service, with Moneris as the vendor which provides service to the Finance Department in processing of online payments. Moneris may have access to the payment information which is disclosed on the application. Moneris is a Canadian company with Canadian servers and are PCI-compliant.

6. Data-linking Initiative*

In FOIPPA, "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.

1. Personal information from one database is linked or combined with personal information from another database;	no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
If you have answered "yes" to all three questions, please contact the Privacy Officer to discuss the requirements of a data-linking initiative.	

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7. Common or Integrated Program or Activity*

<p>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.</p>	
1. This initiative involves a program or activity that provides a service (or services);	yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	x

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

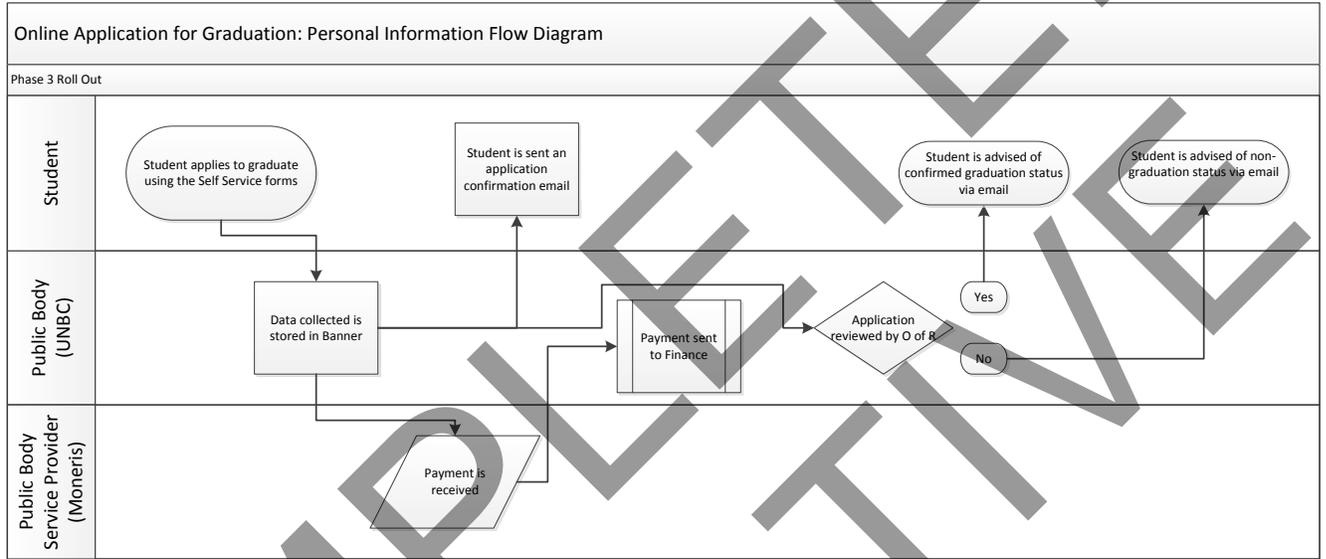
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8. Personal Information Flow Diagram and/or Personal Information Flow Table



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Student data is collected in Banner	Collection	
2.	Payment is received by Public Body service provider	Collection	
3.	Payment is transferred to Finance	Disclosure & Use	
4.	Student is sent an application confirmation	Disclosure	
5.	Application is reviewed by Office of the Registrar	Use	
6.	Student is either confirmed or denied for graduation	Disclosure	

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9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.				
2.				
3.				
4.				

10. Collection Notice

The following is the proposed wording for each category of collection:

1. In addition to internal administrative uses, student information may also be used in strict confidence in University research and planning. Certain student information is provided on a confidential basis to Partner Institutions, to Statistics Canada as governed by the *Canada Statistics Act*, and the BC Government. The internal use of student records, and the obligatory reporting of student data to external bodies, respects the absolute confidentiality of student information.
2. Students are advised that the use of information provided on this Application for Graduation form, and other information placed in a student record, complies with the BC *Freedom of Information and Protection of Privacy Act*, and with the policies and procedures of the University of Northern British Columbia.
3. Office of the Registrar; University of Northern British Columbia; 3333 University Way Prince George BC, V2N 4Z9; 250-960-6300 or (fax) 250-960-6330; registrar-info@unbc.ca

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Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with the Privacy Officer, CIO or IT Security Officer when filling out this section.

11. Please describe the physical security measures related to the initiative (if applicable).

[Redacted]

12. Please describe the technical security measures related to the initiative (if applicable).

[Redacted]

13. Does your department rely on any security policies? If so, indicate here:

[Redacted]

14. 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.

[Redacted]

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[REDACTED]

15. Please describe how you track who has access to the personal information.

[REDACTED]

Part 4 – Accuracy/Correction/Retention of Personal Information

16. 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?

Students have access to update their own information, and designated staff has access to modify a record on behalf of the student. These staff members include positions that deal directly with students (i.e. front counter, advising, awards, etc). However, positions, such as advising, will also be updating student records based on auditing processes.

If errors are caught by staff efforts are made to contact the student to confirm the information. Data cleaning procedures, those that can be confirmed without student feedback, are changed..

Confidential lists of student status are required for the graduation process, but all effort is taken to only include pertinent information. Reports are pulled for Departments for tracking purposes, but the students are notified of use in the communications from the Office of the Registrar and Convocation Office, as well as on the application itself.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

Students will not be able to graduate unless they complete and pay for the online application to graduate. The information they give is critical to their successful Convocation. This process will initiate an official degree audit to be performed by the Office of the Registrar staff. Therefore, this system will be used to make a decision about if a student will be graduating from UNBC in the year applied for.

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Additionally, items such as name, degree, and confirmation of hometown need to be confirmed, as these items will be printed on their parchment, and/or in the program. If students decide to change some of this information, that will directly impact the information pulled from banner to create Convocation related materials.

18. If you answered “yes” to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

Students will log into the Self Service in order to complete the online application for graduation, and this log in requires a student ID and password.

A confirmation email will be sent to the student’s UNBC email account upon successful completion of the application.

The University will make every reasonable effort to ensure that the personal information it uses is accurate and complete. By the permission authority of the Assistant Registrar Record/Ops, the Office of the Registrar staff will be authorized to correct or annotate the information of a correction with regard to a student record. Documentary evidence must be provided to substantiate the correction.

19. If you answered “yes” to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

Currently, the University retains, for a minimum of 13 months, an individual’s personal information which directly relates to the Convocation cycle, such as the Convocation and Parchment Information forms. Student files, containing items such as parchments, and retained indefinitely.

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

Office of the Registrar has a regular exchange of personal information from students (both collection and disclosure) to provide services to students. These are internal administrative processes which related to graduation, such as the creation of the Convocation program, reports, and lists generated of graduating students. Personal information is also disclosed to the External Relations, Alumni Relations, Development, and academic Departments as it relates to their functions, specific reporting, communication pieces, and tracking.

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Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the Privacy Officer.

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

Access to personal information for research, statistical, archival or historical purposes will be allowed under conditions specified in Sections 35 and 36 of the FOIPPA Act. These include the written agreement of the researcher to comply with all relevant sections of the Act and with the University's policies and procedures relating to the protection of personal information.

Except from Collection Notification:

In addition to internal administrative uses, student information may also be used in strict confidence in University research and planning. Certain student information is provided on a confidential basis to Partner Institutions, to Statistics Canada as governed by the *Canada Statistics Act*, and the BC Government.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Privacy Officer, the UNBC Research Office or UNBC Archives.

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FOIPPA. Under this same section, this information is required to be published in a public directory.

The existing Banner system is a form of PIB. In terms of the Online Application for Graduation, information will be pulled from the system to create a Convocation program, which is a publically accessible document.

(a) its title and location:

Convocation program located in the Convocation computer files (G:/Drive)

(b) a description:

The current graduate's full name, credential(s) and hometown are included in the document.

(c) authority:

The Office of the Registrar, collects this data with the application of graduation, but may also obtain this information through other completed forms and staff communications to students.

(d) purpose to gather and disclose:

The initial purpose of the data collection is to confirm a desire to graduate, trigger an audit process which will confirm requirements for credentials are met, and then to acknowledge

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student graduation in a formal program which is both utilized by the institution and the student as a record of graduation.

(e) to whom it is disclosed:

The program information is disclosed to the graduates, the individuals present at the ceremony, internal departments who use the data for reporting (i.e. External Relations), and archives.

Please ensure Parts 6 and 7 are attached to your submitted PIA.

Part 6 – Privacy Officer Comments

This PIA is based on a review of the material provided to the Privacy 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 it to Privacy Officer.

Privacy Officer/Privacy Office
Representative

Signature

Date

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Part 7 - Program Area Signatures

	October 30, 2014
Troy =anschen (Registrar)	Signature Date
Kevin Stewart (Enterprise Applications Manager)	Signature Date
Shelley McKenzie (Manager Access/Privacy/Records)	Signature Date

Please send a copy of this PIA with the respective signatures to Shelley McKenzie for comment, review, approval & filing.

A final copy of this PIA (with all signatures) will be kept on record with the Privacy Office.