

PIA # and Name- assigned by Privacy Office

1 General Information

1. Name of Department, Branch and Program Area

Student Success

2. Name of Program or Service Representative

Student Experience & Planning

3. When will the initiative take place? 9/15/23

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 University of Northern British Columbia (UNBC) hired Customer Relationship Index (CRi), a consulting firm specializing in higher education research across Canada, to conduct a retention & readiness survey of first-year entering students.

7. Describe the Purposes, Goals and Objectives.

HeadStart retention and readiness survey to be delivered to entering first-year students at UNBC. Web Survey results include anonymized unique identifiers that Headstart CRI staff use to analyze survey results.

Contractor analyses results and provides UNBC with the anonymized collected data in the form of a dashboard. Personal details added in specific fields by UNBC once the dashboard is received in order action pro-active retention reach-outs and further analysis.

The analysis of the survey results will create a predictive model that will allow UNBC to identify entering students who are at higher risk of quitting before the end of first year.

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

Director Student Success

9. List any Relevant PIAs

This is an update to PIA 22-011

10. List of all interested parties (i.e. who are you collecting information from, UNBC roles using PI, 3rd parties with whom you will share information)

Interested Party	Role in the initiative
UNBC Student Success	Recipient of Survey data
CRI	Developing data collection tool, analysis, and reporting
UNBC students	Survey participants
UNBC student advisors	will follow-up with survey respondents
UNBC Student Life Coordinators and Ambassadors	further reach outs to survey respondents for social activities

11. List any relevant contracts or software purchases. Be sure to follow [UNBC guidelines](#) regarding purchasing policies.

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)
See appendix 1 for list of questions	survey data will help to contribute to student success program	Direct Indirect	26(e)
Student wellbeing	Advisors follow-ups; part of normal workflow and workload	Direct Indirect	26(e)
		Direct Indirect	TBD

13. Describe how personal information is to be collected

- UNBC will email a survey link out to all students
- Survey question: confirm preferred contact method and confirm phone number if applicable
- Name/identifier/email not collected in the survey
- CRI consulting will manage the survey link and provide the survey data to UNBC.
- UNBC matches up the survey link (CRi ID) and the Student Number to track respondents, identify the students who are at risk for attrition, and action reach outs (using preferred contact method)

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

Director Student Success

general project oversight

Manager, Student Experience and Planning

general project oversight

Student Advisors

contact at risk students and check-in on wellbeing (part of regular workflow)

Student Life Coordinators and Ambassadors

send email invite to at risk students for social events.

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.

Contact will be briefly documented in the dashboard Excel (for reporting purposes) and tracking of project deliverables. This document is stored in TEAMS - locked channel managed by the Director and Manager. This information is stored for the duration of the project.

Personal student details will be tracked in the Student Advising OneNote. Stored on the G-Drive -- locked down and managed by Advising and Registrar. This information is stored indefinitely, or until new systems are in place to store student advising notes through consultation with CRM and privacy.

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).

During Data collection:

Survey responses are stored on QuestionPro servers in Toronto

CRI consultants will download the data from QuestionPro servers, PI info will be temporarily stored on with CRI, Inc on a single desktop computer,

At UNBC:

CRI will be shared via OneDrive link with UNBC, at UNBC will be stored on the G drive (accessed possible by Advising and Student Success Manager and Director; and a locked Teams channel.

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.)

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.

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.

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.

CRi, Inc. will have access to all data. From the QuestionPro server in Toronto, data is downloaded to a single CRi desktop computer with up-to-date anti-virus, spyware & firewall protection. It is only ever accessed by one team member and the data never leaves the CRi office.

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.

NA

6 Accuracy and Correction

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

- Students will complete the survey themselves (direct collection).

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

Yes

No

32. If yes, please describe your process below?

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

It will not be possible to correct incorrect responses once a survey is completed.

Personal follow details (ie. phone number) can be corrected if the student identifies they are receiving a phone call on device that is not preferred.

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?

NA. not 3rd disclosure resulting from initiative.

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?

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.)

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

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?

Empty response box for question 44.

45. How will those found to abuse access privileges be sanctioned ?

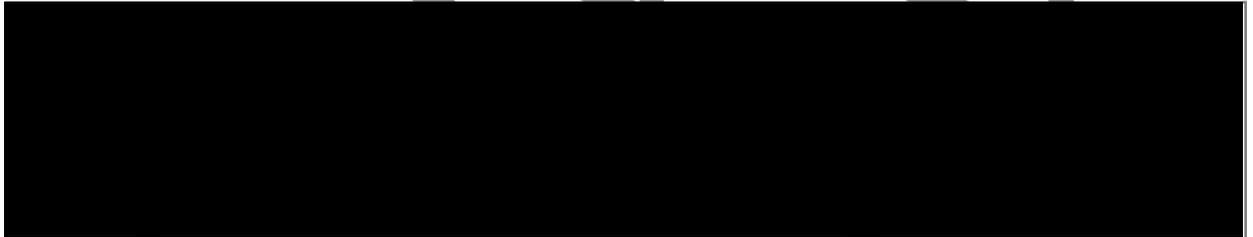
Empty response box for question 45.

8 Privacy and Security Safeguards

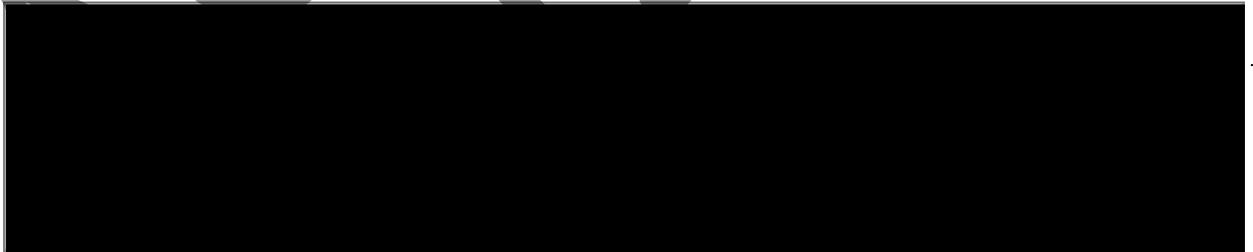
46. Describe administrative safeguards (i.e. policy documents, procedures, or training).

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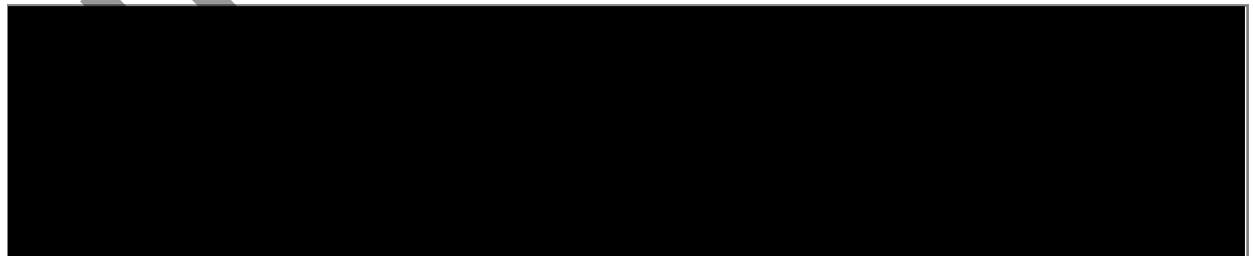
47. Describe physical safeguards (i.e. locked, filing cabinets, locked doors, or restricted areas).

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

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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](#)).

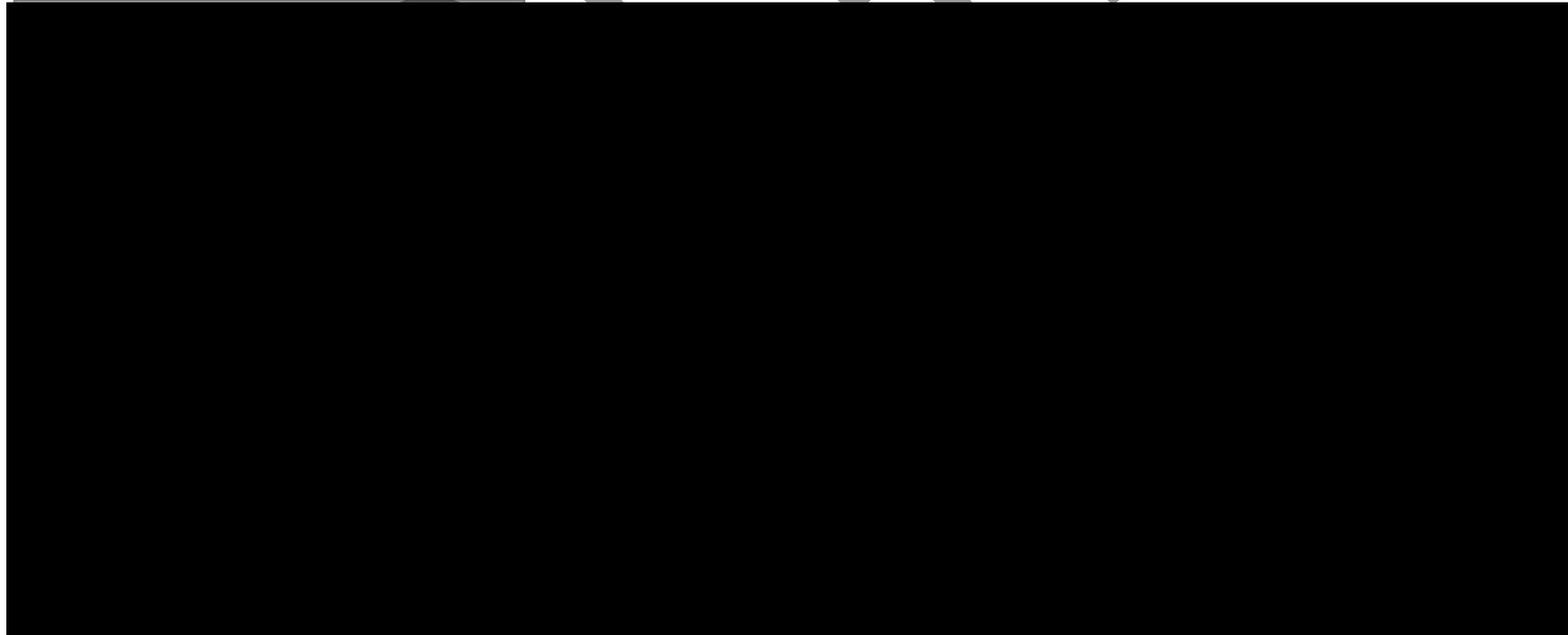
Try to include at least one risk related to each step in the information cycle (collection, storage, access, disclosure, and destruction). **If you are disclosing or storing data outside of Canada you will need to identify additional risks related to storage/disclosure outside of Canada**

RISK

LIKELIHOOD

IMPACT

MITIGATION STRATEGY



RISK

LIKELIHOOD

Low
Moderate
High

IMPACT

Low
Moderate
High

MITIGATION STRATEGY

Low
Moderate
High

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 PIA 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: Rachelle Munchinsky

Position: **Manager, Student Experience & Planning**

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: _____

Aug 4, 2023

Date: _____

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: 08/11/2023

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 of Information and Protection of Privacy Act.

Signature: _____

Aug 8, 2023

Date: _____

12 Privacy Notice

WHY ARE WE DOING THIS?

The University of Northern British Columbia (UNBC) is working with CRI consulting, a consulting firm specializing in higher education research across Canada, to conduct a retention & readiness survey of first-year students entering studies at UNBC.

The Student Success Survey will take 5-10 minutes to complete online. Survey results will provide the UNBC Student Success team with insight on how to best support first year students. Students may be contacted by the Student Advisor to discuss personalized support strategies.

WHAT TO DO IF YOU HAVE QUESTIONS?

This information is being collected by UNBC under section 26(e) of the Freedom of Information and Protection of Privacy Act of BC. If you have any questions about the collection of this personal information, please contact: studentsuccess@unbc.ca

By clicking on "accept", you indicate you have read, understand, and agree to the privacy statement.

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.