

Privacy Impact Assessment

Student Housing Demand Survey -AEST

PIA# 19-002 (Office of the University Secretariat to assign)

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

Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at adam.cullum@unbc.ca or (250) 960-5139 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 Information Governance Officer 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:	Business Services		
PIA Drafter:	Christie Ray		
Email:	Christie.Ray@unbc.ca	Phone:	2509605103
Department Manager:	Lisa Haslett		
Email:	Lisa.Haslett@unbc.ca	Phone:	2509606443

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

1. Description of the Initiative

The University of Northern British Columbia (UNBC) is supporting the Ministry of Advanced Education, Skills, and Training (AEST) to conduct a Student Housing Demand Survey to assess the housing needs of students at UNBC. AEST hired Customer Relationship Index (CRI), a consulting firm specializing in higher education research across Canada, to conduct this survey across the province and UNBC is one of the institutions being surveyed. The survey data will be used to develop a demand calculator to inform future investments.

CRI requires the co-operation of UNBC in order to be able to survey their entire student body. CRI uses QuestionPro's survey tools to carry out all its surveys. An audited SOC 2 Type 2 data centre report documents a secure, well-governed facility. QuestionPro maintains full control of their bare metal server, from the Operating System through to their web survey software. Offsite backup copies also remain in Canada.

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UNBC will generate alias email addresses to maintain anonymity if the student does not provide identifying information in open ended questions. UNBC will provide the list of alias emails to CRI to conduct their survey. The alias email address list corresponds to the students UNBC email address to allow communication between CRI and the students without identifying the students. UNBC's email servers will automatically translate the aliased email address to the student's UNBC email address and forward the survey invitations to the students. CRI will use individual links associated with survey IDs that correspond with the individual alias emails. CRI will never provide the table linking survey IDs to alias emails and UNBC will never provide the table linking alias emails to actual UNBC email addresses.

2. Scope of this PIA

All UNBC students that are eligible for student housing will be contacted to participate in the survey. The contractor (CRI) analyses results and provides AEST with the anonymized collected data and analyses which is then provided to UNBC.

3. Related Privacy Impact Assessments

PIA# AEST19002 is the master PIA conducted by the Ministry of Advanced Education, Skills, and Training. This PIA will support UNBC's management of information in this project.

4. All Elements of Information or Data

UNBC student email address, alias student email address, survey participant ID, anonymized demographic information, anonymized opinions, and aggregate reports.

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 the Information Governance Officer for review. You will receive support completing the remaining steps of the 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

QuestionPro is headquartered in the United States and has localized operations around the world. For Canadian users, it maintains server capacity in a secure data centre in downtown Toronto. CRI servers are located in Toronto, ON Canada. All information will be anonymous and cannot be correlated to an individual to identify that person outside of the country. Individuals are warned in the informed consent notice not to provide information in open-ended questions that could be used to identify themselves or others. If individuals do provide identifiable personal information after agreeing to the informed consent notice, they consent and take responsibility for the identifiable information they provide along with the possibility it will be transmitted outside of Canada. If maintenance and troubleshooting requests require data from QuestionPro servers to be distributed to international servers in Australia, United Kingdom, and the United States, the limited personal information is authorized to be disclosed for this purpose under section 33.1(1)(p) of the Act if access is temporary, not regular, and for the minimum time necessary to conduct technical support.

6. 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.

1. Personal information from one database is linked or combined with personal information from another database;	yes
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 Information Governance Officer to discuss the requirements of a data-linking initiative.	N/A

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7. Common or Integrated Program or Activity*

<p>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.</p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	yes
<p>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;</p>	no
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	no
<p>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</p>	N/A

COMPLIANCE INITIATIVE

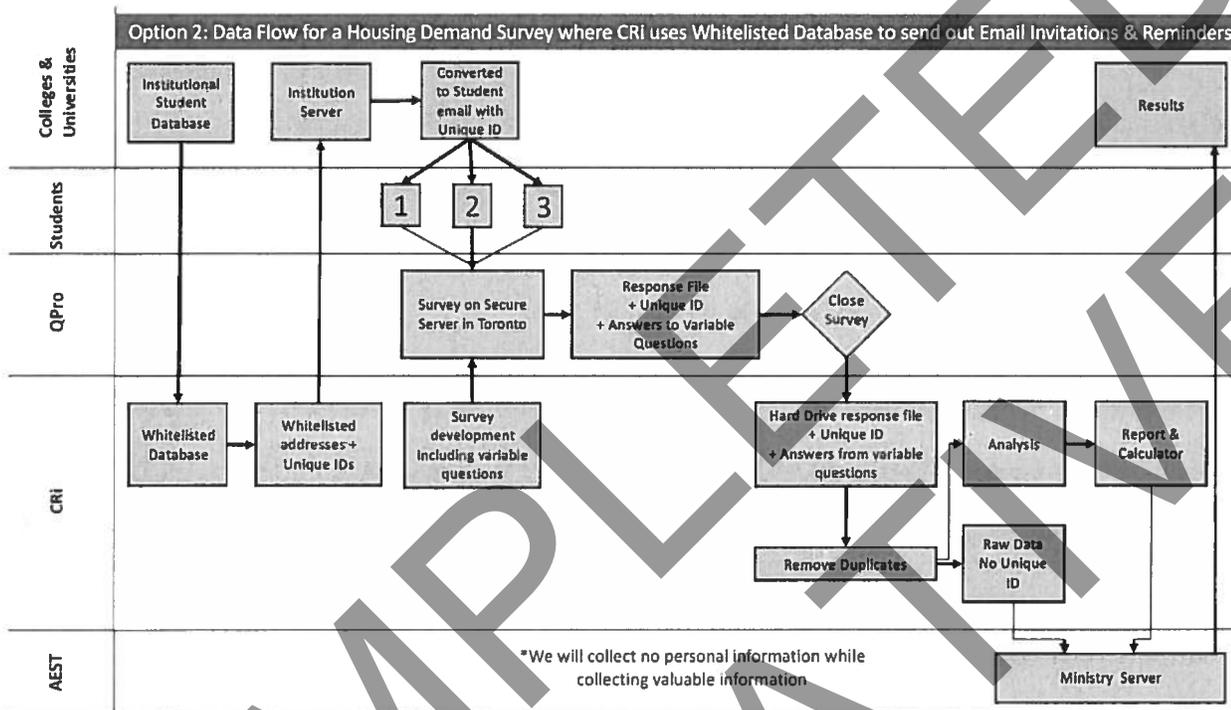
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8. Personal Information Flow Diagram and/or Personal Information Flow Table



Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Using the Banner Student Information System, UNBC's ITS department generates a list the names and UNBC email addresses of all eligible student participants.	Collection	26(c)
2.	UNBC's ITS department creates an alias for each of the student's UNBC email addresses and creates a text file list which is converted to a CSV file and provided to CRI. Only the list of aliases is provided to CRI.	Use / Disclosure	32(a), 33.1(e.1)
3.	CRI uses the list of alias email address to link to unique Respondent ID numbers they generate to allow for analysis of individual participants	Use	32(a)
4.	CRI uploads the list of aliases to QuestionPro, and uses QuestionPro to contact the students through the alias email address linking to their UNBC email address. CRI only uses QuestionPro to contact the students to invite them to	Disclosure	33.1(e.1)

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	<i>the survey and to remind them up to two times to submit responses if needed. Each student receives an individual token as a hyperlink in their email which will correspond to the Respondent ID numbers created at CRI. When students complete a survey, their alias email is removed from the whitelist to avoid further contact.</i>		
5.	<i>Students access the survey through their tokenized link in the student's email. The tokenized link connects the student to QuestionPro to submit the answers to the survey questions. Survey answers are stored on QuestionPro until the data collection and reporting periods have ended. Students will be informed of the risks when answering open ended questions or opting into the draw through a collection notice in their email invitation.</i>	Collection / Use	26(e), 32(b)
6.	<i>CRI will run intermittent reports to determine which alias emails have not provided submissions and whether response rate goals have been met.</i>	Use	32(a)
7.	<i>When the data collection period closes, CRI will randomly draw alias emails to receive incentive prizes from those who opted-in to participate. CRI will inform UNBC Business Services which aliases were selected, and UNBC ITS will correspond those aliases to student email addresses to allow UNBC Business Services to contact them.</i>	Use	32(b)
8.	<i>After the data collection period ends, UNBC ITS will purge the alias list and its link to UNBC student emails. CRI will purge their own list of alias emails, survey URLs and Respondent IDs from the raw data</i>	Disposition	31
9.	<i>CRI aggregates raw data to generate analytical reports to submit to UNBC along with a calculator tool.</i>	Use	32(a)

9. 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. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

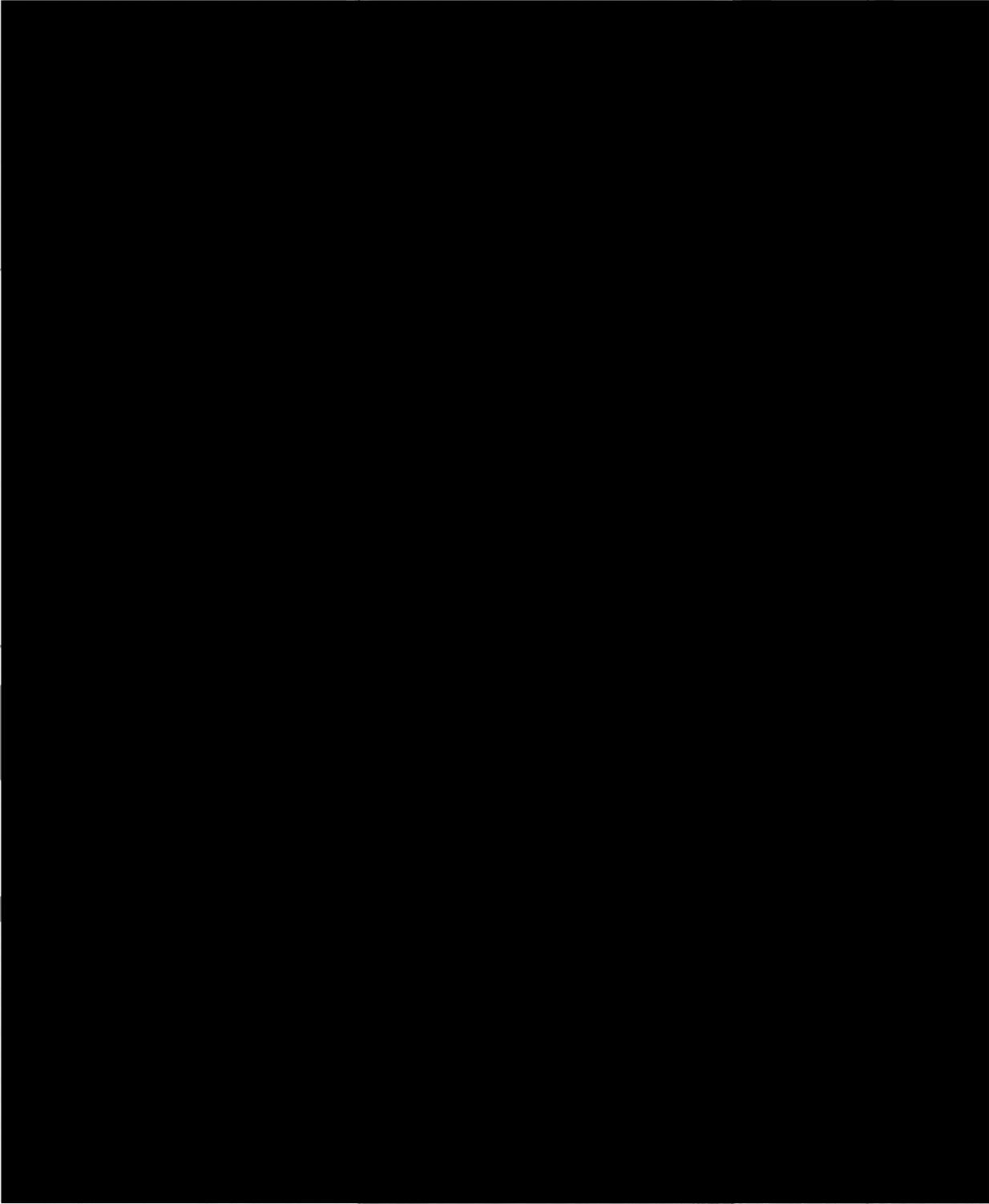
Examples can be removed and additional lines added as needed.

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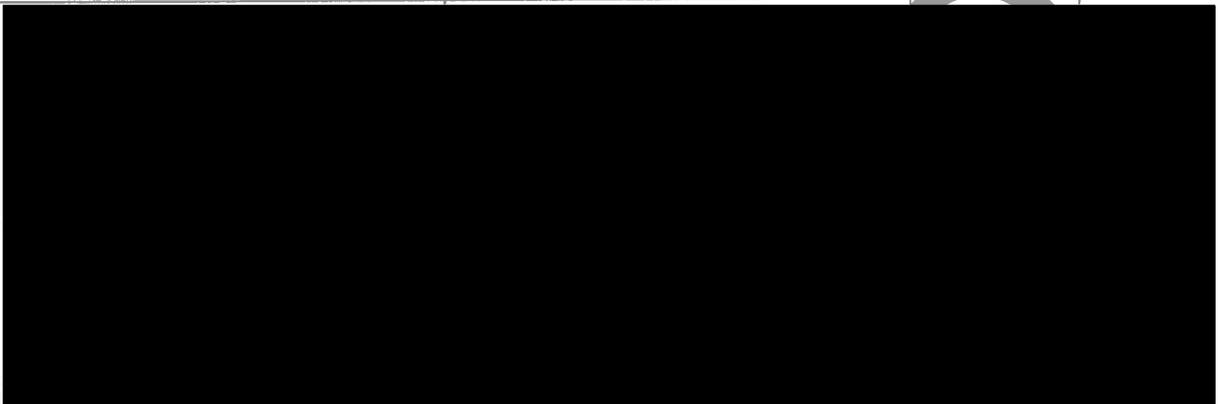
Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact
1.			
2.			
3.			

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4. 

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10. Collection Notice

To be attached to email and reminders sent to survey participants before the survey URL and instructions to begin.

The Ministry of Advanced Education, Skills and Training, in partnership with UNBC, is seeking input from students regarding housing needs and preferences while studying at a post-secondary institution.

By accepting below, I consent to allow CRI Inc. to collect my personal information on this survey on behalf of the Ministry of Advanced Education, Skills and Training using QuestionPro. CRI's data will be stored on servers in Toronto, Ontario, Canada; however, your data will still be accessible by Question Pro and third party teams outside of Canada including Australia, the United Kingdom and the United States for the purpose of implementing, maintaining, repairing, troubleshooting or upgrading services provided by QuestionPro.

CRI is collecting the information on behalf of the Ministry of Advanced Education, Skills and Training in the following survey for a number of reasons:

- * Determining student housing type needs, preferences and intentions of living in student housing.
- * Understanding motivating factors behind the decision to choose specific accommodations.
- * Clarifying satisfaction levels with the current student housing model as well as identifying factors that could make living in student housing more attractive.

My individual responses will be removed from QuestionPro's servers on or before May 31, 2019 and from the CRI's servers on or before August 1, 2019. Responses provided in this study will not be linked to my identity.

The Ministry of Advanced Education, Skills and Training does not have direct control over the security of the information that I provide in the following survey. I understand that by accepting below I am responsible for any risk associated with providing an external company with any of my identifiable personal information. I understand that I can stop completing the survey if I do not feel comfortable answering the questions.

I understand that by refusing to accept the terms in this notice, I will not be able to participate in the following survey.

I have read the contents of this consent notice, and by accepting, I am providing informed consent to participate according to the terms above.

Accept = go to survey

Refuse = terminate

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Part 3 – Security of Personal Information

Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.

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

A large black rectangular redaction box covering the response to question 11.

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

A large black rectangular redaction box covering the response to question 12.

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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]

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?

Respondents may ask that their complete response is withdrawn by contacting Christie Ray, Senior Advisor, Business Development who will request the alias email corresponding to the student from ITS. Christie will then provide the alias email address to CRi to remove that respondent's submission from their results.

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

No.

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.

N/A

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?

N/A

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Part 5 – Further Information

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

No

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

N/A

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

No

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

N/A

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 FIPPA. Under this same section, this information is required to be published in a public directory.

No.

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

Part 6 – Comments, Conditions & Concerns

Email invitations must include the collection notice identified in section 10.

Any survey responses containing specific demographic information within less than five responses, need to be aggregated to broader classifications during reporting.

Any substantive changes to the information provided in this PIA must be reviewed by the Information Governance Officer to reassess conditions of approval.

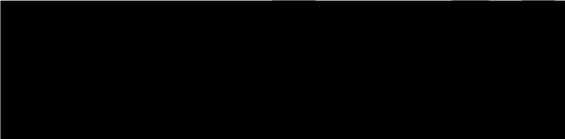
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Part 7 – Program Area Signatures

Christie Ray		Mar 5, 2019
_____ Name of Individual leading the Program/Project (Normally the individual who completed the PIA)	Signature	Date
Lisa Haslett		Mar. 5, 2019.
_____ Director or Dean Overseeing the Program/Project	Signature	Date
N/A Kevin Schretten	N/A	N/A
_____ Contact Responsible for Systems Maintenance and/or Security (if applicable)	Signature	Date
Adam Cullum		Mar 5 2019
_____ Information Governance Officer (Privacy Officer)	Signature	Date

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.

COMPLETED
INITIATIVE