

Form A

Please review the entire form before you answer any questions. Providing more information than the questions asks, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open ended questions in the **bolded** prompts. Keep bold font on all answers provided. Answer **Yes / No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes / No** responses.

Name of Department: **Institutional Research**

PIA Drafter: **Valerie Boyes**

Email: **Valerie.boyes@unbc.ca**

Phone: **250-960-5540**

Oversight Provided by: **Trevor Smith**

Email: **trevor.smith@unbc.ca**

Phone: **250-960-5888**

Description and Scope of Information Management

Describe the purpose of your project/initiative/software. Describe a brief high level overview of the functions, who will benefit from those functions, and who will be impacted if that is not transparent. Indicate if there are groups that are restricted from use and the reason for proposed restrictions. Describe whether there are other reference documents including previous PIAs, whitepapers, or compliance documentation that may support this assessment.

In 2016, the BC Sexual Violence and Misconduct Policy Act was introduced requiring all public post-secondary institutions (PSIs) to put in place policies to prevent and respond to sexual violence and misconduct (SVM). Section 5(1) of the Sexual Violence and Misconduct Policy Act allows the Minister of Advanced Education and Skills Training (Ministry) to direct Post Secondary institutions to conduct the survey to assess the effectiveness of their policy. The Ministry, working with representatives from across the public post-secondary system developed a short ‘Student Perception Survey’ on key issues related to sexual violence policy implementation at their institutions. This survey is a collaborative effort between Leger (formerly Insights West) and BCcampus and was supported by a working group and a Technical Advisory Group from the post-secondary sector.

The purpose of the survey is to gather baseline data to better understand students’ knowledge, attitudes, and perceptions of sexual violence and misconduct (SVM) pertaining to process and policy implementation at the institutions they are attending. This survey will assess the effectiveness of sexual violence policies in responding to and preventing sexual violence. The results from this survey will be used to inform both current and future initiatives to ensure that students are safe and supported. Survey questions are designed to measure student attitudes, behaviours, and knowledge

Privacy Impact Assessment (“PIA”)

PIA # 2021-020

Student Sexual Violence Perception Survey regarding sexual violence at post-secondary institutions. At no time will respondents be asked personal questions related to sexual violence experiences.

The objective of this study is to better understand student perceptions of sexual violence at B.C. post-secondary institutions so we can create a safer and healthier learning environment for students.

The Ministry expects that all institutions will participate and circulate the Student Sexual Violence Perception survey to their students during Winter 2022 semester. Survey participation will be voluntary for students. Leger will prepare a report on the aggregated outcomes of the survey for the Ministry, which will also be shared with post-secondary institutions. In addition, Leger will also provide a basic individualized survey report to each institution and an optional analytical analysis report; these reports will not be shared with the Ministry. To track changes over time, it is the intention of the Ministry to work with the sector to administer the survey again in future years.

Students to be excluded are those:

- Under the age of 17 years; or
- Enrolled as dual-credit students; or
- Enrolled for less than three credits or 42 hours to date; or
- Enrolled in a contract training program through their employer.

All Elements of Information or Data

Using concise point form, please list the elements of information or data involved in the initiative, even if no personal information is involved. This could include client’s name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments on a blog, or information specific to your subject area.

The following demographic data will be collected to help us understand differences in students’ opinions, experiences, and perspectives:

- Age
- Gender identity
- Identification as 2LGBTQQIA+
- Identification as an Indigenous person
- Identification as a visible minority
- Domestic or international student
- Identification as a person with a disability
- On-/off-campus residency
- Graduate or undergraduate student
- Years at current institution

Questions on the survey include:

- Enrollment type (full-time, part-time/continuing studies, not currently enrolled)
- Course delivery type
- Online interaction with other students
- Access/understanding of sexual violence and misconduct resources

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Student Sexual Violence Perception Survey

- **Ability to report sexual violence**
- **Perception of safety from SVM on campus**
- **Perception of actions taken steps to prevent sexual violence**
- **Sexual violence information, education, training or supports at institution to understand ‘health relationships’ and ‘sexual boundaries’.**
- **Types of sexual violence education needed at institution**
- **Perception of prevalence of sexual violence at institution including SVM involvement with alcohol or drugs**
- **Perception of online/technology use in sexual violence at institution**
- **Students knowledge of consent and myths about SVM**
- **Agreement with statements about behaviours towards and beliefs about SVM at institution**
- **Students knowledge of sexual violence incidents occurring at institution**
- **Trust in institutions sexual violence policies and procedures, and response**
- **Who at the institution student would most likely report an incident to**
- **What can institution do to encourage reporting an incident**
- **How to improve prevention of and response to sexual violence at institution**
- **Feedback on the survey**

Students will not be asked for contact information and no incentive will be offered with this survey.

Location of Where Information is Managed

Does the information manager, vendor, and / or service provider operate from an office outside of Canada? **No**

Does any user of the information managed in this initiative access this information from outside of Canada beyond during short-term temporary travel? **No**

Does this initiative have any components that temporarily process information outside of Canada? **No**

Does this initiative store information for operational use outside of Canada? **No**

Does this initiative back up or make additional or redundant copies of information outside of Canada? **No**

Form B

Please review the entire form before you answer any questions. Providing more information than the questions asks, providing information answering the wrong questions, or leaving sections blank will delay Privacy Officer approval.

In the following questions, answer the open ended questions in the “Answer here” prompts. Keep bold font on all answers provided. Answer **Yes / No** questions by deleting the answer that does not apply. Do not add open ended text to **Yes / No** responses.

Name of Department: **Institutional Research**

PIA Drafter: **Valerie Boyes**

Email: **Valerie.boyes@unbc.ca**

Phone: **250-960-5540**

Oversight Provided by: **Trevor Smith**

Email: **trevor.smith@unbc.ca**

Phone: **250-960-5888**

Institutional Approvals and Assessments

I have contacted the Chief Information Security Officer to complete all required physical and technical security assessments to ensure my initiative complies with industry standards as applicable to my initiative. **Yes**

I have contacted the Contracts and Supply Chain Management department to complete a review that ensures the purchasing agreement, service agreement, contract, MOA, MOU or other contractual agreement with any external parties involved ensures the compliant management of any information that UNBC provides about its stakeholders. **Yes**

Does the initiative involve systematic disclosures of personal information outside of UNBC? If yes, I will contact the Privacy Officer to ensure that an Information Sharing Agreement is in place. **No**

Does the program involve access to personally identifiable information for research or statistical purposes? If yes, I will contact the Privacy Officer to ensure that an Access to Restricted Records Agreement is in place **No**

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.

Is personal information from one database linked or combined with personal information from another database? **No**

Is the purpose for the linkage different from the original purpose for which the personal information in each database was originally obtained or compiled? **N/A**

Is the data linking is occurring between either two or more public bodies or one or more public bodies and one or more agencies? **N/A**

If I have answered yes to the above three questions, I will work with the Privacy Officer to ensure I meet the requirements for a data-linking initiative? **N/A**

Common or Integrated Program or Activity

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.

Does this initiative involve a program or activity that provides a service (or services) through a public body and at least one other public body or agency working collaboratively to provide that service? **No**

Does this initiative involve a program or activity that provides a service (or services) through a public body that is working on behalf of one or more other public bodies or agencies? **No**

The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the Regulations? (Privacy Officer will answer). **No**

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 Governance Officer – Access, Privacy and Records Management to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.

Personal Information Flow Diagram and/or Personal Information Flow Table

In the table below, complete the Description / Purpose highlighting separately by row each instance that information is collected, used, stored, protected, disclosed and disposed of during this initiative. Unless not possible, ensure these steps are arranged how they would occur chronologically in order to make a transparent work flow. The Privacy Officer will review your steps and determine which type of information management practice each entry is and ensure that the practice is compliant with sections under the Act. This table must be accompanied by a workflow diagram if practices are not transparent or if the PIA is related to a common or integrated program or activity or a data-linking initiative.

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	<i>UNBC designates a contact person to act as the survey liaison with Leger, selects survey fielding time, and determines customization level of results to receive. UNBC communicates this information along with the size of our student body qualified to participate to Leger.</i>		
2.	<i>Leger provides a unique survey URL for UNBC to use in email invitations and reminders to UNBC’s survey contact(s) only</i>		
3.	<i>UNBC prepares survey email invitations and reminders with the unique survey URL, closing date, “from” contact person, and support or information resources links, in addition to those already provided with the survey. UNBC prepares social media communications.</i>		
4.	<i>UNBC sends survey invitations followed with reminders in accordance with our chosen survey fielding time to all students excluding those described in the ‘Description and Scope of Information Management’ section of Form A in this PIA</i>		
5.	<i>Students participate in the survey anonymously. Students will not be asked for their contact information, they will be emailed the same link to the survey by UNBC and Leger will not track IP addresses meaning students will not be linked to their survey answers. Only UNBC and Leger will know the survey link. Results will be provided in aggregate to the Ministry and UNBC to remove the possibility of identifying students through the mosaic.</i>		
6.	<i>Leger will confirm when they start to receive survey responses and will send weekly response rate updates.</i>		
7.	<i>At the end of the survey Leger conducts data analysis and reporting. Leger will provide the Ministry of Advanced Education and Skills Training and BC Campus with a written</i>		

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	<i>report based on the total aggregated responses for all institutions. This report will include charts that show the results from all the questions, a written analysis of the results, and an executive summary of key insights. Within this analysis, results for key subgroups where differences are relevant and significant will be reported on, including demographics (e.g., gender, membership in minority groups, etc.), behavioural differences (e.g., received education or training on sexual violence), and institutional results (e.g., institution type, urban vs. rural, etc.).</i>		
8.	<i>UNBC will receive the results for their institution at no additional charge. These results will be provided as Excel-based data tables that show the results for the specific institution in comparison to the aggregated results for all institutions. It will include standard cross-tabulations (including demographics and behaviours) for results from that institution where sample sizes allow for reliable analysis.</i>		
9.	<i>Final cross-tabulation specifications are to be determined by the Ministry.</i>		
10.	<i>UNBC may also purchase additional customized results, including a PowerPoint report plus custom data tables directly from Leger. This optional report is only available if sufficient number of survey responses are available to perform this level of analysis without risk of identifying students through mosaic.</i>		
11.	<i>UNBC reviews results and shares them with stakeholders as needed for assessment and decision making on sexual violence processes and policies.</i>		

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. The Privacy Officer will help identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

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

3.				

COMPLETED
INITIATIVE

Collection / Consent Notice

If your initiative is collecting personal information directly or indirectly from individuals, you must ensure that all individuals involved are told the following:

- The purpose for which the information is being collected
- The legal authority for collecting it, and
- The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

Please include your proposed wording for a collection & consent notice and where it will be located for individuals to read before collection takes place in the space below. The Privacy Officer will review and provide feedback.

Initial Survey Invitation – Sample Language:

Email subject line: Sexual Violence Perception Survey Invitation

Dear [INSERT STUDENT NAME],

Sexual violence prevention in all its forms is a top priority at UNBC.

The Province of B.C. is conducting an important survey to better understand how post-secondary students see and perceive the ways sexual violence is handled at your school and about your insights into accessing information and resources.

Add your voice to help create better supports and services at B.C. post-secondary schools. Feedback from this survey will help UNBC assess how we are doing in serving the needs of our students and inform future programs and policies at our institution.

All responses to the survey will be completely anonymous; results will be provided in aggregate, and you will not be linked with your individual answers.

If you choose to complete the survey, know that at no time will you be asked to disclose information about personal experience related to sexual violence.

The survey should take about 15 minutes to complete. We value your feedback and appreciate your support in our effort to improve the UNBC experience for current and future students.

The survey closes soon, so please click below to participate today!

SURVEY LINK

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TRIGGER WARNING: This survey, and pages it links to, contain information about sexual violence that may be triggering. Although the survey does not ask questions about a respondent’s personal experience with sexual violence, it does refer to acts or attempted acts related to sexual violence, including those that lack consent. If any content upsets you, please feel free to exit the survey at any time.

If the survey link does not work, copy and paste the following URL into your browser’s address bar: [INSERT SURVEY URL]

UNBC does not have direct control over the management of the information collected and has not directly assessed the security of its handling. BCCampus has conducted a Privacy Impact Assessment for this survey. Though anonymous, survey responses will include a respondent's school. In the event of a data breach at the survey service provider, it is possible that individual respondents from UNBC could be identified due to the relatively small size of the UNBC student body.

If you have any questions about this survey, or how UNBC plans to use the results, please contact the Interim Director Student Affairs and Housing, Justin Foster at justin.foster@unbc.ca

Thank you for your time and consideration in completing this survey.

Sincerely,

Dr. Mark Dale

Interim Provost and Vice-President Academic

SUPPORTS: If you experience distress before, during, or after you complete this survey or wish to access support, please visit <https://www2.unbc.ca/sexual-violence/help> or contact VictimLinkBC at 1-800-563-0808 or www.endingviolence.org/need-help or Victim Safety Unit at 604-660-0316 or Toll Free 1-877-315-8822.

This survey is hosted by Leger, an independent research company. If you have questions or need technical help while you complete the survey, please email legerweb@leger360.com.

You can find privacy information for BCCampus at Privacy – BCCampus and for Leger at Privacy Policy – Leger (leger360.com).

If you wish to opt-out of future survey notifications or reminders, please email institutionalresearch@unbc.ca requesting that your email be removed from the next reminder email(s).

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Reminder emails use the same language in regards to purpose, authority, and support contact.

Survey landing page – Headers and setup:

[DISPLAY MINISTRY OF ADVANCED EDUCATION AND SKILLS TRAINING LOGO IN BANNER]

[SCRIPT USING Voxco SOFTWARE FOR EXCLUSIVELY CANADIAN SERVER STORAGE]

[SHOW SURVEY PROGRESS TRACKING BAR]

[TURN IP ADDRESS/TRACKING COOKIES OFF (RESPONDENTS CANNOT RETURN TO THE SAME PLACE IN THE SURVEY)]

[INCLUDE THE OPTION TO SKIP EACH INDIVIDUAL QUESTION]

[INCLUDE OPTION TO EXIT SURVEY AT ANY TIME]

Survey landing page – Consent Language:

Introduction

Thank you for taking the time to share your opinions with us. This survey is for undergraduate and graduate students in British Columbia and should take you about 15 minutes to complete. It is being conducted on behalf of the Ministry of Advanced Education and Skills Training to better understand student perceptions of sexual violence at B.C. public post-secondary institutions.

Your response is anonymous, and the results will be provided to the Ministry in aggregate; you will not be linked with your individual answers.

You will not be asked for any personal information during this survey. Sometimes, people may unintentionally share personal information while completing a survey. If this happens, the information remains confidential under the Freedom of Information and Protection of Privacy Act.

Your personal information is collected under Sections 26 (c) and (e) of the Freedom Of Information and Protection of Privacy Act (FOIPPA). If you have any questions about this collection you may contact:

Director, Colleges and Community Access
PO Box 9877; STN PROV GOVT
Victoria, BC, V8W 9T6
Ph: 250 952-2011

TRIGGER WARNING: This survey, and pages it links to, contain information about sexual violence that may be triggering. Although the survey does not ask questions about your personal experience with sexual violence, it does refer to

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Student Sexual Violence Perception Survey
acts or attempted acts related to sexual violence, including those that lack
consent. If any content is upsetting, please feel free to exit the survey at any time.

The results will be used by B.C. post-secondary institutions to inform policies and programs that create a safer and healthier learning environment for students. You will be asked about your perceptions of the culture at your school as well as your access to information and resources. At no time will you be asked to disclose information about personal experience related to acts of sexual violence.

If you experience distress before, during, or after you complete this survey or wish to access support, please visit:

<https://www2.gov.bc.ca/gov/content/safe-campus-bc/help-on-campus>
or contact VictimLinkBC at 1-800-563-0808
or www.endingviolence.org/need-help/

This survey is conducted by Leger, an independent market research company. It is in full compliance with British Columbia’s Freedom of Information and Protection of Privacy Act (FOIPPA).

For more information about this survey, please contact legerweb@leger360.com.

[PROGRAM ON SAME SCREEN AS INTRODUCTION]

Do you want to participate in the survey?

Choose one.

Yes

No

Information Management Controls

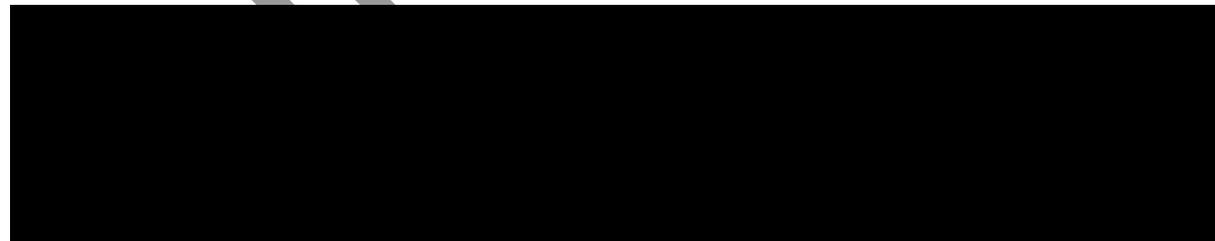
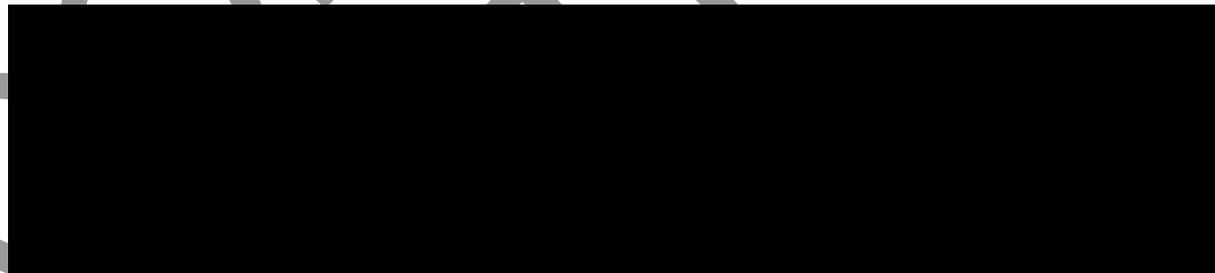
Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information. How is access to information monitored and logged?

UNBC: The institution is responsible for sending email invitations and reminders about the survey directly to its student body with the imbedded URL, inviting students to participate. Other than sharing with Leger the number of initial survey invitations sent, institutions are not required to share any other information about individual students or the student body.

UNBC will receive data in aggregate form only. Institutional Research staff will ensure they have the opportunity to work with other departments to support those interpreting aggregate data.

Insights West: Insights West was purchased by Leger in 2021 and Leger is fulfilling their contract with BC Campus to conduct this survey using the software and contract BC Campus entered into with Insights West. The name Insights West has been replaced with the name Leger when information has been copied from the BC Campus PIA for the survey and other survey documents (e.g. Implementation Guide) into UNBC’s PIA.

Leger: Survey data is collected by a Leger survey built in Voxco Web Survey tool called “Voxco Online”. Voxco’s head office are in Montreal, Quebec and their client list includes high profile Government of Canada departments as well as Canadian corporations. Their website includes the following security statement: “Our system includes strong security controls, password management, and granular access permissions. It enables you to comply with regulations that govern privacy and data protection such as GDPR, HIPAA, FISMA, PIPEDA, CNIL.”



[REDACTED]

For more information on Technical Specs and the Montreal Data Center that Voxco uses, please visit: <http://www.cologix.com/data-centers/montreal/mtl3/>.

Leger’s experience in the market research industry has them attuned to the importance of security and confidentiality in the industry. Only those directly involved in the SVM Student Climate Survey work will have access to the project files. Furthermore, all personal/confidential information is removed from data files prior to working with any outside partners. Across the different survey types, personal information is only used in cases where it is needed to segment the data during the data processing stage. Our data processor only sees unique id codes, so that respondents are anonymous. All printed materials are disposed of through shredding services.

Leger works on an Apple environment (MacBook, iPhone), which allows for remote clearing of hard drive data should any of these devices be compromised. [REDACTED]

[REDACTED]

[REDACTED]

Leger has worked with Macinhome Consulting Inc. to set up their secure network and ensure its ongoing security. This is an independent company hired by Leger to ensure their client data is safe from any potential threats. Leger is committed to conducting audits no less than once a year, with the likelihood of an increased frequency as the company grows. Potential security issues are being identified and addressed on an ongoing basis as Leger grows. This is conducted by the Macinhome support team, which provides 24-hour emergency support service and are able to log into computers remotely via secure connection to fix any issues.

Every employee of Leger is held accountable for the security of their panel list and client information and their contracts tie them to act professionally in all aspects of their work. Employees responsible for security or privacy breaches are subject to disciplinary action up to and including termination.

Leger will provide each institution with a unique survey URL to distribute to the students in the survey invitations. The URL will be an open link that does not track IP addresses, so it can be used by all students at your institution anonymously.

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Leger accesses the data to create reports for the BC Government and individual institutions. The data set has personally identifiable information removed before Leger uploads it for report creation. Only the project manager and data analyst have access to the data. The raw data will be stored in secure cloud storage and only accessed for report creation.

Leger provides BC Campus with a written report based on the total aggregated responses for all institutions that pose no privacy risk if they were made public. It is anticipated these reports will be delivered via email and then distributed to the Ministry and individual institutions.

UNBC will receive the results as Excel-based data tables that show the results for UNBC in comparison to the aggregated results for all institutions. UNBC will only be given cross-tabulations where sample sizes allow for reliable analysis and only if there at least 100 completed surveys for the institution.

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?

To protect student privacy all students are provided the same link which is unique to UNBC. Sometimes, people may unintentionally share personal information while completing a survey. If this happens, the information remains confidential under the Freedom of Information and Protection of Privacy Act.

Students who have questions or need technical help while you complete the survey, please email legerweb@leger360.com.

Information Disposal

Does your initiative use personal information to make decisions that directly affect an individual(s)? **No**

If you answered “yes”, please explain the efforts that will be made to ensure that information management from collection to disposal will ensure that information used to make a decision about someone is accurate, complete, available when needed and disposed of to meet legal requirements. Describe the records retention timeline for the records generated from this initiative.

N/A

If you answered yes above, please describe retention schedules that apply where retention exceeds the one-year requirement under the Act. Please contact the Governance Officer – Privacy, Access and Records Management if you require assistance.

N/A

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Leger has confirmed that they will delete all survey data after 12 months unless an extension is requested by the client.

Personal Information Banks

Will a database or series of folders be created in this initiative that organizes information by name, identifying number, symbol, or other particular identifier of each individual involved. **No.**

If yes, will the records or information collected about the individual contain similar types of personal information. If yes, I will contact the Privacy Officer to ensure that I am identifying that this is a Personal Information Bank (PIB) and identifying the legislatively required descriptors listed in section 69 (6) of FIPPA. **N/A**

COMPLETED INITIATIVE

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Student Sexual Violence Perception Survey

Form C

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

Please fill in the name, position, and date in the bolded areas indicated then each individual signs under the signature line confirming that individual agrees with the corresponding statement above the signature line.

Name of Individual leading the Program/Project: **Valerie Boyes**

Position: **Institutional Planning Analyst**

I confirm the information management practices in this initiative have been documented on Form A, and B as applicable, as accurately as I am aware and I commit to communicating appropriate information management practices to all individuals participating in this initiative as appropriate. 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: _____

[Redacted Signature]

2022/02/04

Date **YYYY/MM/DD**

Chief Information Security Officer **Dave Kubert**

(insert whatever message you feel appropriate here)

Signature: _____

[Redacted Signature]

Date **YYYY/MM/DD**

Director or Dean Overseeing the Program/Project: **Enter here** Justin Foster

Position: **Enter here** Director, Student Affairs and Housing

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: _____

[Redacted Signature]

Date **YYYY/MM/DD** 2022/02/06

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Student Sexual Violence Perception Survey

Privacy Officer: **Doris Marshall Greenlaw**

I confirm that this initiative to the best of my knowledge as written in Form A, and B as applicable, has information management practices that comply with British Columbia's Freedom of Information and Protection of Privacy Act.

Signature



Date **2022-02-04**

A final copy of this PIA (with all signatures) will be kept on record with the Privacy Officer. The Privacy Impact Assessment does not commit UNBC to financially or operationally approve this initiative. This signed form does not guarantee that all other appropriate assessments have been completed for this initiative.

COMPLETED INITIATIVE