



# Privacy Impact Assessment

## *Entrance Rewards*

### **Part 1 – General**

---

Name of Department:	VCC Registrar Office		
PIA Drafter:	Norman Chang		
Email:	<a href="mailto:nchang@vcc.ca">nchang@vcc.ca</a>	Phone:	604-868-1068
Department Mgr:	Dave McMullen		
Email:	<a href="mailto:dmcmullen@vcc.ca">dmcmullen@vcc.ca</a>	Phone:	604-871-7000

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

#### **1. Description of the Initiative**

*The Entrance Rewards portal (<https://entranceawards.vcc.ca/>) is developed to accept application for student entrance awards and bursaries.*

*The background and rationale for this is so that the College can work to actively recruit potential students to undersubscribed programs and areas of the College. By leveraging existing capabilities within VCC Banner system, VCC will begin to track recruits as part of outreach initiatives. By gathering information about students who attend VCC school visits, outreach events, contact Advisors, etc, VCC will be in a better position to engage in organized and focused processes by which VCC can encourage students to move from someone who had initial contact with the College to being an actual student. The Entrance Awards are but one mechanism by which we intend to influence potential student behavior to become VCC students in programs that are undersubscribed.*

*VCC encourages students to have submitted an VCC admission application prior to submitting an application for an Entrance Award. This is not mandatory however. The information that VCC will capture as part of the entrance awards application will be compiled so that when VCC reaches deadlines for adjudication, VCC has the information available to determine which applications will be granted entrance awards. VCC would also be populating information received from the application to create a recruit record in Banner. This would allow VCC to delineate information of potential students so that VCC could follow up with them to move them forward in the admission or confirmation process to ensure they attend VCC.*



# Privacy Impact Assessment

## *Entrance Rewards*

---

*Reporting: Leverage dashboards and reports to make business-intelligent decisions.*  
<https://app.powerbi.com/groups/3d120ffb-ddd3-409e-88ce-54c27f2a0132/reports/7dc4208c-64cf-41f8-85cd-759375fc3872/ReportSection>

### **2. Scope of this PIA**

*This PIA covers the use of the self-hosted software portal (entranceawards.vcc.ca), authentication with Active Directory and Power BI integration.*

*AWS as a hosting service is outside the scope of this PIA.*

*Active Directory (AD) is outside the scope of this PIA.*

*Microsoft Power BI is outside the scope of this PIA.*

### **3. Related Privacy Impact Assessments**

*The use of AWS is covered by the BCNET PIA.*



2017 BCNET AWS  
PIA.doc

### **4. All Elements of Information or Data**

*The elements of information or data utilized various based on the integration of service.*

*User interaction with Entrance Rewards Portal:*

- *Name (first, middle and last)*
- *Contact information (email address, telephone number)*
- *Birthdate*
- *Citizenship status*
- *Indigenous status*
- *SIN*
- *VCC student number*



# Privacy Impact Assessment

## *Entrance Rewards*

- 
- *Personal statements*
  - *No access control required as the portal will be opened to general public.*

*Admin interaction with Entrance Rewards Portal:*

- *None*

*Admin interaction with Reporting Portal (Power BI):*

- *Read only access to all inputted information.*
- *Require active directory access.*

*Historical data migration:*

- *No historical data migration.*

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



# Privacy Impact Assessment

## *Entrance Rewards*

---

### **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**

*Data for this initiative will only be stored and accessed in Canada.*

*Access to the data in this initiative is restricted to VCC staff only.*

#### **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 integration
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
<b>If you have answered "yes" to all three questions, please contact the Privacy Officer to discuss the requirements of a data-linking initiative.</b>	



# Privacy Impact Assessment

## *Entrance Rewards*

### 7. Common or Integrated Program or Activity\*

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.

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.	no
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	



# Privacy Impact Assessment

## *Entrance Rewards*

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

s. 15(1)(l)



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	User accesses Entrance Awards Portal to submit the award application	Collection	26(c)
2.	Existing staff accesses Power BI portal using VCC employee login and password	Use	32(b)

### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Staff and contract instructors bound by employee/contractor agreement; staff bound by Standards of Conduct	Low	High
4	Database integration server is compromised	This server will be located behind VCC firewall and protect with standard VCC security practices	Low	High

### 10. Collection Notice

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



# Privacy Impact Assessment

## *Entrance Rewards*

1. *The purpose for which the information is being collected*
2. *The legal authority for collecting it, and*
3. *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. You can also attach a screen shot or a copy of your form where the collection notice would be located.*

*VCC privacy page link is added to the first page of the website:*

<https://www.vcc.ca/about/college-information/privacy-policy/>

*Within the above policy, a summary of the approach has been provided with link to disclaimer as well as contact information (#3).*

*More detail information is included under the information disclaimer section:*

<https://www.vcc.ca/about/college-information/disclaimer/>

### ***Under What Authorization We Collect (#2)***

*We collect personal information from you as authorized by the College and Institute Act. The personal information we collect is necessary to:*

- *obtain a personal education number (PEN) for the student*
- *carry out institutional responsibilities related to operating program or activity*
- *prepare and submit budgets, financial statements, reports and other information that the minister considers necessary to carry out the minister's responsibilities in relation to institutions*
- *conduct institutional research and statistical analysis*

*The Freedom of Information and Protection of Privacy Act has directed that we provide you with this background. You may be assured that we will take all reasonable measures to ensure that your information is treated in a confidential manner.*



# Privacy Impact Assessment

## *Entrance Rewards*

### **Why We Collect (#1)**

We collect personal information:

- For the purpose of sending you official correspondence related to your education at VCC, communicating with you in an instructional capacity, and gathering essential information for operating purposes.
- For the purpose of providing students with the opportunity to participate in former student outcome surveys. The results of these surveys are used to improve the quality and effectiveness of instruction and services that we provide.

The Ministry uses this information in order to monitor institutional progress and comply with government stated objectives.

To conduct institutional research on education policy issues, such as quality of education, student satisfaction, ease of transfers, student access, future student needs, evaluate training needs for a variety of population groups such as insert students, transfer students, first nations students, international student etc.

## **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).**

*Entrance Rewards portal server is hosted at the secure Amazon Web Services data centre in Montreal. AWS physical access security is stated in the details under this page:*

<https://aws.amazon.com/compliance/data-center/controls/>

#### **EMPLOYEE DATA CENTER ACCESS**

AWS provides physical data center access only to approved employees. All employees who need data center access must first apply for access and provide a valid business justification. These requests are granted based on the principle of least privilege, where requests must specify to which layer of the data center the individual needs access, and are time-bound. Requests are reviewed and approved by authorized personnel, and access



# Privacy Impact Assessment

## *Entrance Rewards*

---

is revoked after the requested time expires. Once granted admittance, individuals are restricted to areas specified in their permissions.

### THIRD-PARTY DATA CENTER ACCESS

Third-party access is requested by approved AWS employees, who must apply for third-party access and provide a valid business justification. These requests are granted based on the principle of least privilege, where requests must specify to which layer of the data center the individual needs access, and are time-bound. These requests are approved by authorized personnel, and access is revoked after request time expires. Once granted admittance, individuals are restricted to areas specified in their permissions. Anyone granted visitor badge access must present identification when arriving on site and are signed in and escorted by authorized staff.

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

*Information on technical security measures provided by AWS can be found at: <https://aws.amazon.com/compliance/data-center/controls/>.*

*This self-hosted application will follow standard VCC IT SLA and security policies.*

*Current plan is to do a penetration review as well as adding it to WAP (radware) for security monitoring.*

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

*Internal VCC security protocols and policies.*

### **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.**

*No end-user has access to delete or modify any submitted data. Power BI dashboard read only access will not be assigned to authorized users.*

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

*Access control will be granted through active directory with all access requests will go through our Helpdesk system.*



# Privacy Impact Assessment

## *Entrance Rewards*

---

### **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?**

*Data will not be able to change once it has been submitted.*

*Personal information is not shared outside of Vancouver Community College.*

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

*Submitted information will be used to evaluate the allocation of the rewards.*

- 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.**

*Information will be submitted by the applicants directly. VCC will not add any additional contents.*

- 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?**

*Grade information is retained as per the college's Record Management Policy:*

<https://www.vcc.ca/media/vancouver-community-college/content-assets/documents/policies/a.3.9-records-management-policy-2018-06-27.pdf>

*and associated procedures:*

<https://www.vcc.ca/media/vancouver-community-college/content-assets/documents/policies/a.3.9-records-management-procedures-2018-06-27.pdf>

### **Part 5 – Further Information**

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



# Privacy Impact Assessment

## *Entrance Rewards*

No.

***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.**

No.

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

- 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.**

*A personal information bank of award application will be created. VCC is able to provide the descriptors required as part of this initiative.*

*As per section 69 (6) of FOIPPA:*

*(6) The head of a public body that is not a ministry must make available for inspection and copying by the public a directory that lists the public body's personal information banks and includes the following information with respect to each personal information bank:*

*(a) its title and location;*

*(b) a description of the kind of personal information and the categories of individuals whose personal information is included;*

*(c) the authority for collecting the personal information;*

*(d) the purposes for which the personal information was obtained or compiled and the purposes for which it is used or disclosed;*



# Privacy Impact Assessment

## *Entrance Rewards*

---

*(e) the categories of persons who use the personal information or to whom it is disclosed;*



# Privacy Impact Assessment

## *Entrance Rewards*

---

### **Part 6 – Privacy Comments**

*This PIA is based on a review of the material provided 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.*



# Privacy Impact Assessment

## *Entrance Rewards*

---

### **Part 7 - Program Area Signatures**

\_\_\_\_\_  
Registrar

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Director IT

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date