



Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

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 office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250-356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

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/Branch:	Office of the Vice President, Academics & COO		
PIA Drafter:	Lisa Richard, Executive Assistant, FIPPA Analyst		
Email:	Lisa.richard@nic.bc.ca	Phone:	250-334-5058
Program Manager:	Lisa Domae, Executive Vice President Academic & COO		
Email:	Lisa.domae@nic.bc.ca	Phone:	250-334-5272

1. Description of the Initiative

The Ministry of Advanced Education, Skills & Training (AEST) is committed to delivering on the Province's commitment to create 114,000 new affordable housing units over the next 10 years. Budget 2018 announced a new \$450M BC Student Loan Program for public post-secondary institutions (PSIs) to build approximately 5,000 new beds over the next 6 years. An additional 3,000 beds will be built, supported through grants, non-government partnerships and institutional self-financing, totaling approximately 8,000 new beds over the next 10 years. As part of this process the ministry has hired Customer Relationship Index (CRi), a consulting firm specializing in higher education research across Canada, to conduct a Province-wide survey of students so that more accurate assessments of student housing demand can be made going forward. The survey data collected will also be used by AEST to develop a demand calculator in inform future investments.



Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

North Island College is committed to supporting the Ministry's student housing initiatives through participation in the Provincial wide post secondary student housing survey, and will work with CRI in this process. CRI will generate and provide a pool of survey links for North Island College each with a unique identifier (survey ID/Link) for North Island College's students' to use in the survey.

CRI will track which unique links represent North Island College's non-respondents to the survey, and periodically send North Island College a list of those unique links. North Island College will be asked to send reminder emails to those who have not yet responded, nor explicitly opted out. Upon completing the survey, participants will be invited to choose to enter a draw for a gift card. The unique links of those who want to participate will be entered into a randomly selected draw for the prizes. Upon selecting the winning unique link, CRI will notify the PSI with a selected winner and arrange to provide the gift to the PSI. The PSI will then determine which student is associated with the winning unique link from its table, notify the winner and distribute the prize.

North Island College's role:

- *NIC will work with CRI who will generate and provide a pool of survey links, each with a unique identifier (survey ID/Link) for NICs usage in the survey. The unique identifier anonymizes the survey responses.*
- *NIC will contact students directly and provide each with one of the provided survey ID/Links containing a survey ID/Link embedded in the invitation. NIC maintains the connection between the survey ID/Link and the specific student at all times.*
- *Students wishing to participate in the survey will click on the link provided within the email and will be directed to QuestionPro's secure server in Toronto where they can answer the survey questions. Included within the survey are questions geared to cover any demographic variables (local, non-local, gender, level of scholastic achievement, etc.) Each student's responses and the survey ID/Link are captured.*
- *NIC does not share survey ID/Link-specific student information with the Ministry. CRI also does not share the ID/Link with the Ministry as part of the raw data sent to the Ministry. The Ministry shares the de-identified survey responses with each PSIs (ie: the unique IDs have been removed by CRI). CRI does not collect the IP addresses of survey respondents from QuestionPro's survey tool. Both the Ministry and CRI make no efforts to re-identify students from their responses.*
- *The unique IDs will be used by CRI to randomly select a few winners of survey completion and provide a few prizes as incentives (e.g. prepaid VISA cards of reasonable value). NIC would be notified of the winning ID/Link and would be require to identify the winner, contacting the individual(s) and award the prize.*

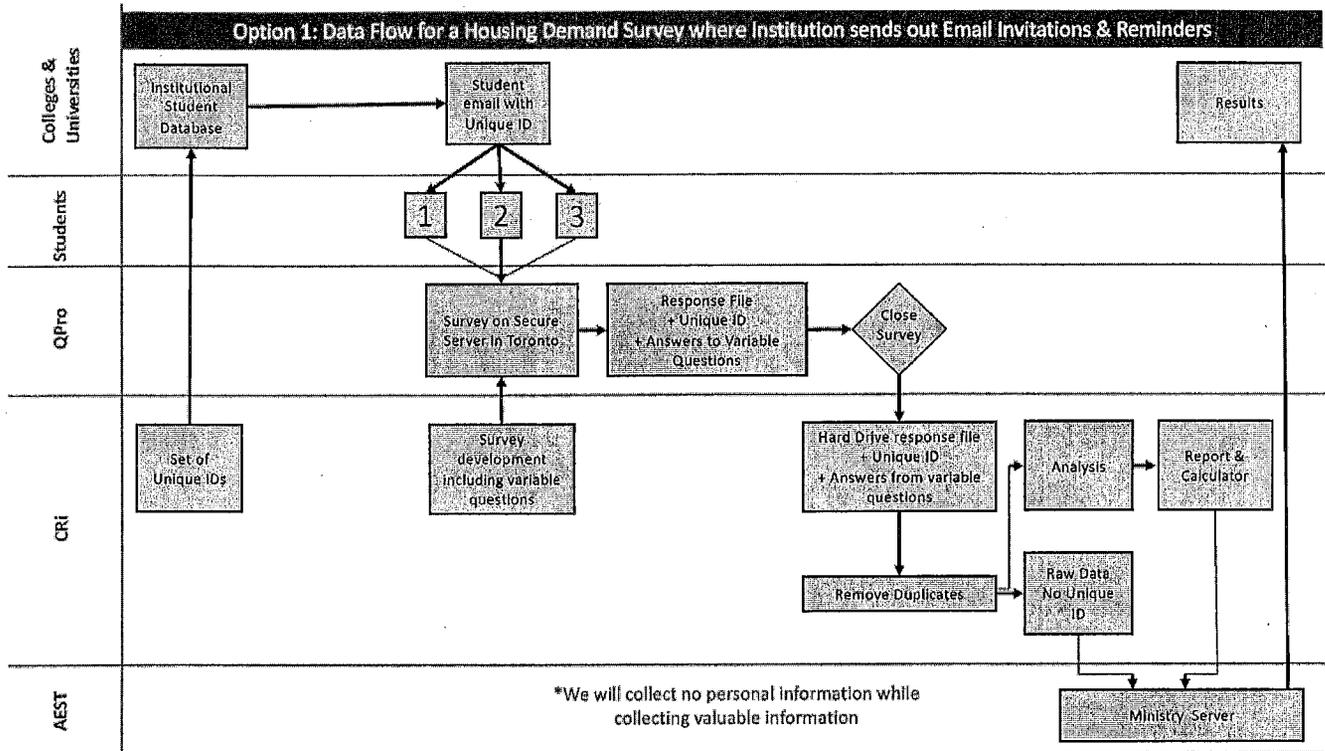


Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

Information Flow Diagram



2. Scope of this PIA

This covers North Island College's involvement with the Student Housing Demand Survey

3. Related Privacy Impact Assessments

AEST19002 – covering the Ministry of Advanced Education, Skills & Training's involvement with this survey.

4. Elements of Information or Data

North Island College creates a table to associate a student's email address with one of the survey's unique identifiers. Students are sent an individualized email invitation to participate in the survey, and may send further reminder survey invitation emails to the student unless they complete the survey or explicitly opt out from it.

If one of the students at North Island College is selected as a draw winner North Island College will receive the winning unique identifier, cross reference it to their winning student, and contact the student and give them their prize.



Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

All data remains in Canada.

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;	N/A
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.	N/A
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	



Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

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>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	No
<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>	N/A
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	N/A
<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>	

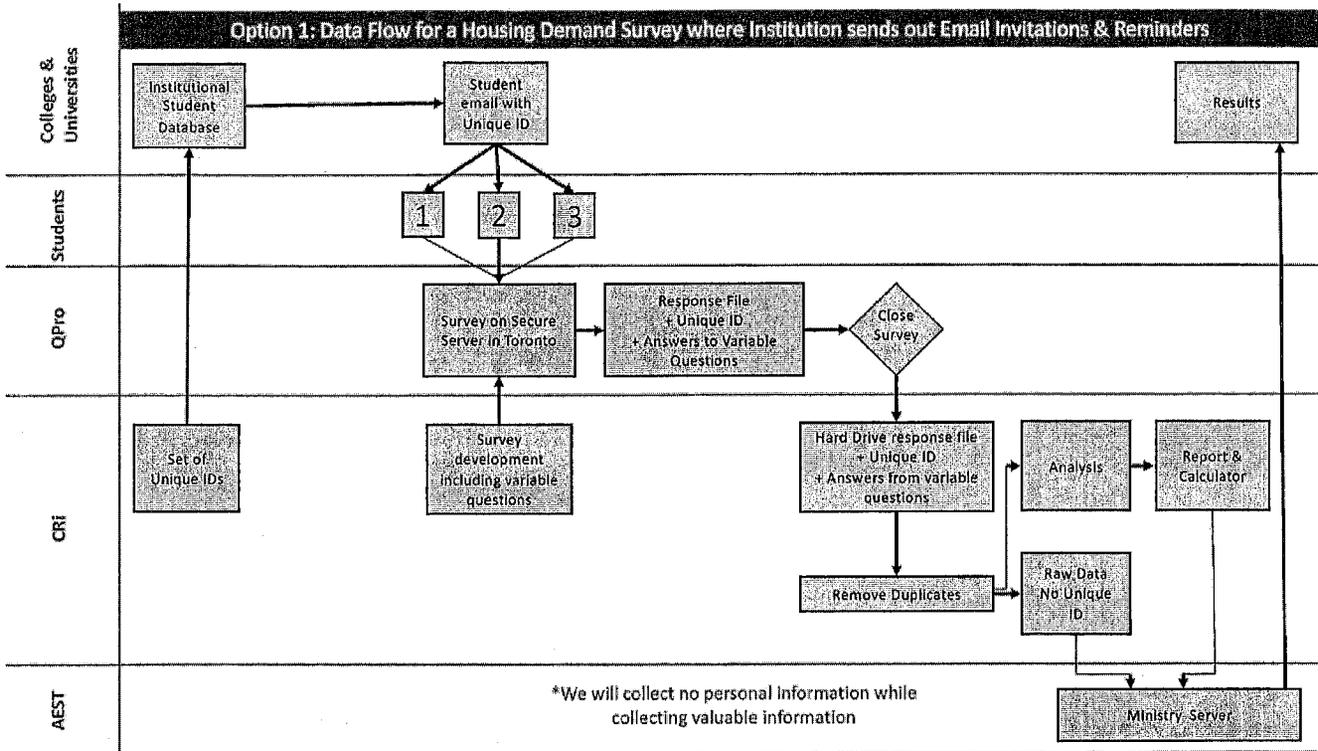


Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

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



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	North Island College receives a pool of unique IDs from CRI	Information only – no PI	N/A
2.	North Island College creates a table of student email addresses with a paired unique ID for the survey	Use	32(a)
3.	North Island College sends an individualized survey invitation email to their students based on enrolment/registration agreement	Disclosure & Use	33.1(1)(b) and 32(a)
4.	If North Island College is notified with a prize winning Unique ID, North Island College will email the prize to the student (by referring to their confidential table).	Disclosure	33.1(1)(i.1)(i)



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Student Housing Demand Survey

PIA# 012019AEST

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	Oath of Employment; contractual terms, etc.	Low	High
2.	Table containing student email addresses (and unique IDs for survey purposes) could be exposed, resulting in student emails being exposed	Normal institution access controls limit who can access the table	Low	High

10. Collection Notice

Collection Notice

The information included in your survey responses is collected under Section 26(e) of the Freedom of Information and Protection of Privacy Act. The information you provide is collected *anonymously*. It will contribute to the assessment of the need for student housing resources. Please do not enter personal information about yourself or others in any free text fields. In the event a student has been randomly selected for a prize, North Island College will identify the student (name & contact only) for the purpose of awarding the prize. At no time during this process will a student's survey responses be linked back to an individual.

If you have any questions about the collection, use and disclosure of this information contact:

FIPPA Analysis
 North Island College
Foipp@nic.bc.ca
 (250)0334-5058
 2300 Ryan Road
 Courtney, BC V9N 8N6



Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

Part 3 – Security of Personal Information

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

Section 15(1)(I)

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

Section 15(1)(I)

Part 4 – Accuracy/Correction/Retention of Personal Information

13. 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?

PSI can update a student's email address upon their request.

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

No. (There is no decision, though there is a random draw for a prize.)

15. 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.

16. 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.



Privacy Impact Assessment for Non-Ministry Public Bodies

Student Housing Demand Survey

PIA# 012019AEST

Part 5 – Further Information

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

No.

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

No.

19. 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.

No.



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Student Housing Demand Survey

PIA# 012019AEST

Part 6 – Privacy Office(r) Comments

This Privacy Impact Assessment was developed in response to the Minister of Advanced Education, Skills & Training (AEST) - PIA # AEST 19002 Student Housing Demand Survey. North Island College is responsible for encouraging its student body to participate in the Provincial Student Housing Demand Survey in collaborating with provincial PSI's. NIC acknowledges that at no time are individual students identified or their survey questions matched to the respondent. In the event a student has been randomly selected for a prize, NIC will identify the student (name & contact only) for the purpose of awarding the prize. At no time during this process will a student's survey responses be linked back to an individual. All survey questions have been supplied by the Minister of Advanced Education, Skills & Technology (AEST) and are used by all BC PSIs for the purposes of assessing a provincial need for student housing resources.

Lisa Richard.

Privacy Officer/Privacy Office
Representative

Lisa Richard.

Signature

Feb. 01 / 19.

Date



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Student Housing Demand Survey

PIA# 012019AEST

Part 7 – Program Area Signatures

Wes Skulmaski
 Manager Institutional Research & Planning

Signature

Feb. 01 / 19
 Date

 Director, IT Infrastructure

Signature

 Date

Lisa Dornae
 Vice President Academic & COO

Signature

Feb. 01 / 19.
 Date

A final copy of this PIA (with all signatures) must be kept on record.

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.