

Part 1 – General

Name of Department/Branch:	Langara College Office for Student Engagement		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
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1. Description of the Initiative

Since 2010, the Office for Student Engagement’s VOLT (Student Volunteer) Program aka VOLT has been responsible for assisting Langara students to gain rewarding volunteer experiences on- and off-campus and obtain formal recognition for their volunteer hours. Student participation in VOLT has increased significantly over the years and administering the program by using a hybrid system of paper and an outdated Microsoft Access database has become untenable. VOLT desires to implement an electronic, cloud-based volunteer management model to improve the student user’s experience, reduce staff time spent on document and data management, and obtain better statistical analysis and reporting.

VOLT is planning to use Better Impact’s volunteer management software under a service agreement between Langara College and Better Impact Inc., a Canadian company with headquarters in Toronto, Ontario. Specifically, VOLT will use Better Impact’s Volunteer Impact product. Better Impact contracts with Aptum Technologies to host its software and store live and backup data in Aptum’s data centre located in **s.15(1)(l)** Better Impact contracts with StoragePipe to store backup data in StoragePipe’s data centre, which is also located in **s.15(1)(l)**.

2. Scope of this PIA

This PIA covers the collection, use and disclosure of the personal information of students who participate in VOLT that is stored in the Better Impact cloud-based volunteer management software application.

3. Related Privacy Impact Assessments

None.

4. Elements of Information or Data

Required elements:

- First name
- Last name
- Student ID
- Email address
- Type of volunteer activity undertaken
- Number of volunteer hours completed
- Name and location of organization volunteered at

Optional elements:

- Preferred Name/Pronouns
- Telephone number
- Skills, interests, experience, etc.
- Photographic image

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

No. According to the service agreement between the College and Better Impact, the service provider will host its software and store live and backup data, including personal information, in a data centre managed by Aptum Technologies located in **s.15(1)(l)**. Backup data, including personal information, are also stored in a second data centre managed by StoragePipe that is also located in **s.15(1)(l)**. The service provider may access and use the personal information only for the purposes specified in the agreement, such as resolving technical issues or responding to service-related issues.

6. Data-linking Initiative*

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

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>	<p>Yes</p>
<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>	<p>No</p>
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	<p>No</p>
<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>	

8. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	<p>VOLT collects demographic personal information from students when a student creates an account in Better Impact to register to participate in the Program.</p> <p>VOLT collects personal information about volunteer activities when students enter details about their activities, such as activity type, hours completed and organization, or scan a QR code to confirm arrival at the volunteer activity location.</p>	Collection	26(c)
2.	<p>VOLT Program administrators, including student workers, will use personal information about student volunteers to communicate with them by email about current and upcoming volunteer activities.</p> <p>VOLT Program administrators may use for promotional purposes the images or videos of students who have given written consent to do so.</p> <p>Students contact organizations or College departments directly to sign up for volunteer opportunities. VOLT Program administrators may promote opportunities, but students initiate contact themselves.</p>	Use	32(a)
3.	<p>VOLT Program administrators disclose student information to supervisors in organizations or College departments to verify the number of volunteer hours that students report as completed.</p> <p>VOLT Program administrators disclose limited student information to Registrar and Enrolment Services (RES) and Continuing Studies for those students who opt to have their volunteer activity recognized on a transcript.</p>	Disclosure	33.2(a)

9. Risk Mitigation

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	College employees and student workers could access personal information and use or disclose it for purposes other than the reason it was collected.	Access to Better Impact is restricted to authorized Office of Student Engagement employees and authorized student workers who use personal information to facilitate volunteer activity.	Low	Medium
2.	Software provider's employees could access personal information and use or disclose it for purposes other than the reason it was collected.	Clauses in agreement with software provider state that the vendor will protect data, including personal information, from unauthorized access, use or disclosure, and protect its confidentiality, integrity, and availability.	Low	Medium
3.	Personal information could be compromised during transmission between the College and Aptum Technologies' data centre.	Service provider documentation states s.15(1)(l); s.21(1) .	Low	Medium
4.	Personal information stored in the Aptum Technologies' and StoragePipe data centres used by the service provider could be compromised.	Service provider documentation states that personal information stored in the third-party data centre it uses is s.15(1)(l); s.21(1)	Low	Medium

10. Collection Notice

Langara College's VOLT (Student Volunteer) Program collects this personal information under the authority of the *Freedom of Information and Protection of Privacy Act*, section 26(c) for the purpose of registering student volunteers, facilitating volunteer activities, and documenting and verifying volunteer hours completed, and will use the information only for these purposes. Information is stored in an online volunteer management system located in Canada. For questions about the collection, use and disclosure of your personal information, contact the VOLT Program Coordinator at 604-323-5700.

Part 3 – Security of Personal Information

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

According to its service agreement, Better Impact contracts with Aptum Technologies to provide cloud-based hosting and data storage. The following information regarding physical security measures has been provided by Better Impact, not by Aptum Technologies directly:

- **s.15(1)(l); s.21(1)**
-
-
-
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12. Please describe the technical security measures related to the initiative (if applicable).

According to its service agreement, Better Impact contracts with Aptum Technologies to provide cloud-based hosting and data storage. The following information regarding technical security measures has been provided by Better Impact, not by Aptum Technologies directly:

- **s.15(1)(l); s.21(1)**
-
-
-
-

13. Does your branch/department rely on any security policies?

Langara College has a policy and associated procedures that govern the collection, use, access, storage, disclosure, and disposal of personal information as well as a computer and computing use policy.

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.

The VOLT Program Coordinator, as well as other authorized department staff and student workers, will be required **s.15(1)(l)**

s.15(1)(l)

account **s.15(1)(l)**

s.15(1)(l)

. Volunteers will create an

s.15(1)(l)

. Student workers

will have s.15(1)(l)

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

Better Impact s.15(1)(l)

s.15(1)(l)

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?

Students can update or correct their own personal information.

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

Yes. Personal information is used to record and confirm volunteer activity (number of hours; type of activity, etc.) to enable students to receive recognition for volunteer hours that have been confirmed as completed.

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.

Personal information is collected directly from individuals. Information about the number of volunteer hours completed is later verified by an internal or external supervisor.

19. If you answered "yes" to question 18, 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?

Student information is retained in an archived form once the student becomes inactive and will remain in the archive for at least one year or until removed by request or administrator choice.

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 your privacy office(r).

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

No. Only aggregated, non-personally-identifying information is used for statistical analysis and reporting.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

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.

Yes, there will be an information bank containing student names and other personal identifiers. Authorized VOLT Program administrators will be able to search and retrieve this information.

Personal Information Bank Name:

Student Volunteer Registration and Activity

Personal Information Location:

Live and backup data are stored in data centres located in Toronto, Ontario.

Purpose for the Collection, Use and Disclosure of Personal Information:

To register students into the VOLT Program and document and verify students' volunteer activities over time.

Authority for Collection of Personal Information:

Freedom of Information and Protection of Privacy Act [RSBC 1996] c. 165,
Section 26(c) – the information relates directly to and is necessary for a program or activity of the public body

Collected Personal Information is About:

Current and former student volunteers.

Type(s) of Personal Information Collected:

Biographical
Volunteer activity

Persons Information is Used By and/or Disclosed To:

Used by:
VOLT Program administrators

Disclosed to:

Limited personal information is disclosed to:

- Registrar and Enrolment Services and Continuing Studies for entry into the student information system to enable self-selected students to receive recognition for volunteer hours that have been confirmed as completed;
- Supervisors in organizations or College departments to verify the number of volunteer hours completed that students report.

Record Classification and Retention Schedule:

SS-520-004 Student Services : VOLT (Student Volunteer Program) Administration : Student Volunteer Registration and Activity

Delete electronic records after date of last activity plus 12 years.

Part 6 – Privacy Officer Comments

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by the VOLT Program Coordinator in the Office for Student Engagement and Better Impact as of the date below. If in future any substantive changes are made to the scope of this PIA, the Office for Student Engagement will contact the Manager, Records Management and Privacy who will complete a PIA Update.

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

MAY 27, 2021
Date

Part 7 – Program Area Signatures

s.22(1)

Elise Le Brun, Manager
Office for Student Engagement

May 28, 2021

Date

s.22(1)

Jody Gordon, Associate Vice-President, Students

May 28, 2021

Date