

Part 1 – General

Name of Department/Branch:	Langara College, College Advancement		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
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Program Manager:	Moira Gookstetter, Executive Director, College Foundation and Director, College Advancement		
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1. Description of the Initiative

Raiser's Edge NXT (RE NXT) is a cloud-based software application used by Langara's College Advancement department and the College Foundation to:

- Manage relationships with constituents, including current donors, potential donors and alumni; and
- Manage fundraising activities, track gifts, manage online giving, and produce tax receipts and thank you letters.

Financial Edge NXT (FE NXT) is a cloud-based software application that the College Advancement department and the College Foundation will use for the financial management aspects of its fund-raising activities currently undertaken in the finance module of the College's Banner system. In early 2020, Banner Finance will be replaced by the Workday ERP, which does not support Foundation-related activities. Additionally, the College's senior leadership recognizes the need for College Advancement and the Foundation to maintain operations independent of Langara College.

Raiser's Edge NXT and Financial Edge NXT are used under a software solutions agreement between Langara College and Blackbaud Canada, a subsidiary of a U.S.-based company with an office in Toronto, Ontario. Both applications are hosted in the Microsoft Azure data centre located in Toronto.

2. Scope of this PIA

This PIA covers the collection, use and disclosure of donor and potential donor (including Langara alumni) personal information that is stored in the Raiser's Edge NXT fundraising and relationship management system.

This PIA covers the use of personal information (specifically donor name) batch imported from Raiser's Edge and stored in Financial Edge NXT.

3. Related Privacy Impact Assessments

A Privacy Impact Assessment on Raiser's Edge NXT was drafted in April 2017 (PIA2017-0001), but was not finalized or approved. With the planned use of Financial Edge NXT in addition to Raiser's Edge NXT, College Advancement decided to issue a new PIA.

4. Elements of Information or Data

- Name*
- Constituent Identification Number. This number is generated by RE NXT or is the Langara-assigned student or employee identification number (in the case of current or former Langara students or employees).
- Date of Birth
- Gender
- Marital Status
- Contact information (email address, telephone number, physical address)
- Donation activity (fund name and number)
- Donation status (inactive, gives anonymously, requests no emails)

*Also stored in Financial Edge NXT.

May include:

- Notes relating to contact and communication with donors or potential donors
- Name of spouse
- Relationship with other individuals or organizations

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

Blackbaud Canada stores information in Raiser's Edge NXT and Financial Edge NXT in Microsoft Corporation's Canadian Geographic Region data centre located in Toronto, Ontario, and may access and use the personal information only for the purposes specified in the agreement and the Privacy Protection Schedule appended to the agreement.

As noted in the Privacy Impact Assessment on Microsoft Azure completed by BCNET in March 2018, Azure has two regions in Canada with data centres in Canada Central (Toronto) and Canada East (Quebec City).

s.15(1)(l)
s.15(1)(l)

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;	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
<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.	Data from the student information system (Banner Student) is batch exported to RE NXT once per year. Names of donors are regularly batch imported to FE NXT from RE NXT. No other personal information is shared between the applications.	Collection	26(c)
2.	College Advancement collects personal information directly from individuals when they donate to the College Foundation in-person, by mail or by completing an online form, or participate in an event. The department manually enters donor information into RE NXT. Donors who make online donations or use mobile payment devices at events are re-directed to the secure Blackbaud Payment Services application to enter cardholder payment information (cardholder name, credit card number, expiry date and security code).	Collection	26(c)
3.	College Advancement uses personal information about students to contact them about alumni-oriented events and fundraising campaigns.	Use	32(a)
4.	College Advancement uses personal information about donors and potential donors (other than students) to contact them regarding fund administration, fundraising campaigns and College events.	Use	32(a)
5.	College Advancement publishes the names of donors in the College Foundation's annual report (other than those who have given anonymously).	Disclosure	33.2(a)
6.	College Advancement may disclose the names of donors or potential donors to the College President, Board members or senior executive to support ad hoc fundraising activities.	Disclosure	33.2(a)

9. Risk Mitigation

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	College employees could access personal information and use or disclose it for purposes other than the reason it was collected.	Access to RE NXT is restricted to authorized employees who use personal information to communicate with alumni, donors or potential non-student donors.	Low	High
2.	Service provider's employees could access personal information and use or disclose it for purposes other than the reason it was collected.	Confidential Information clause in agreement with service provider and the provider's Information Security Program restrict unauthorized access and use of personal information.	Low	High
3.	Personal information could be compromised during transmission from College Advancement to the Microsoft Azure data centre.	s.15(1)(l)	Low	High
4.	Personal information stored in the Microsoft Azure data centre used by the service provider could be compromised.	Agreement between service provider and Langara requires the service provider to ensure that personal information stored in the third-party data centre it uses is protected by appropriate physical, technical and administrative security measures. Microsoft employs breach mitigation strategies and remediation protocols.*	Low	High

***Per the Microsoft Azure PIA completed by BCNET in March 2018.**

10. Collection Notice

See collection notice appended to this PIA as Appendix I.

Part 3 – Security of Personal Information

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

S. 15(1)(I)

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

S. 15(1)(I)

s.15(1)(l)

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.

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.

s.15(1)(l)

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

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 may request their information to be updated or corrected by submitting a written request to Registrar and Enrolment Services, which will then update the student information system. The information in Raiser's Edge NXT is updated automatically when data from the student information system is next imported. Constituents other than students may request their personal information to be updated either verbally or in writing.

- 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 16, 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.

- 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?**

Although personal information in Raiser's Edge NXT and Financial Edge NXT is not used to make a decision about an individual, the College has established a records retention and disposition schedule that ensures that personal information is maintained for at least one year.

Part 5 – Further Information

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

Yes. The names, identification numbers and contact information of students are imported to Raiser's Edge NXT from the student module of the College's Banner system on an annually basis.

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).

In April 2017, Langara College and the Langara College Foundation entered into an Information Sharing Agreement. The signed original is filed in the office of the Vice-President, Administration and Finance.

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 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.

Personal Information Bank Name:

Fundraising and Donor Management System

Personal Information Location:

Microsoft Azure hosted cloud server located in Toronto, Ontario.

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

To support fundraising and financial management activities and manage donor relationships.

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 donors as well as potential donors, including Langara College alumni

Type(s) of Personal Information Collected:

Biographical
Donor status
Donor activity

Persons Information is Used By and/or Disclosed To:

Used by:
College Advancement and the Langara College Foundation

Limited personal information may be disclosed to the College President, Board members and senior executive for ad hoc fundraising purposes.

Record Classification and Retention Schedule:

SS-235-005 Student Services : College Advancement – Giving and Alumni : Fundraising and Donor Management System

Retain electronic records online indefinitely.

Part 6 – Privacy Officer Comments

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by College Advancement as of the date below. If, in future any substantive changes are made to the scope of this PIA, College Advancement will contact the Manager, Records Management and Privacy who will complete a PIA Update.

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

Aug. 15, 2019
Date

Part 7 – Program Area Signatures

s.22(1)

Moira Gookstetter, Executive Director,
College Foundation and Director, College
Advancement

August 16/19
Date

s.22(1)

David Cresswell, Chief Information Office
Information Technology

Aug 16/2019
Date

s.22(1)

Lisa Fisher, Acting Vice-President
External Development
Viktor Sukha

August 16/2019
Date

Appendix I – Collection Notice

Langara College Application for Admission Form:

COLLECTION, USE AND DISCLOSURE OF STUDENT INFORMATION

Langara College collects the information on this form under the authority of the College and Institute Act [RSBC 1996, Chapter 52, Section 41.1]. This information is needed, and will be used, for purposes that are consistent with activity necessary to the operation of the College and in compliance with the provisions of the Freedom of Information and Protection of Privacy Act [RSBC 1996, Chapter 165]. This information will be used for admission, registration, and maintenance of your student record. Information is shared with College Advancement, Alumni Relations, and the Langara Students' Union.

The personal information you provide on this form may be shared with the Ministry of Education and will be used to verify your British Columbia Personal Education Number (PEN) or assign one to you. The personal information you provide and your PEN are used for authorized statistical and research purposes only.

Some courses may require students to use electronic instructional resources where students log in by entering personal information, such as name and email address, which is then stored on servers located outside Canada.

For questions about the collection, use and disclosure of your personal information, contact the Registrar at 604-323-5241.

ⁱ BCNET Privacy Impact Assessment, *supra* note 14, at 10.

ⁱⁱ BCNET Privacy Impact Assessment, *supra* note 14, at 11.