

**Part 1 – General**

Name of Department/Branch:	Langara College, Registrar and Enrolment Services		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
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Program Manager:	<b>Jan Smith, Registrar</b>		
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**1. Description of the Initiative**

In early 2019, the Department of Registrar and Enrolment Services (RES) identified a need to replace the College’s in-house election management software, which was nearing the end of its life, with a cloud-based system. The Registrar and designated department administrators are responsible for conducting elections for student, faculty and staff representatives on Education Council, Education Council’s standing committees, and the Langara Board of Governors, as well as elections for Education Council Chair and Vice-Chair positions. RES typically conducts six elections each year with the number of eligible voters ranging from 20 – 15,000 depending on the position and its applicable voter group.

Registrar and Enrolment Services will use the Simply Voting online election management system under a Memorandum of Agreement between Langara College and Simply Voting Inc., a Canadian company headquartered in Montreal, Quebec with self-hosted servers in Kelowna, BC and Mississauga, ON.

**2. Scope of this PIA**

This PIA covers the collection, use and disclosure of the personal information of students, faculty and staff who vote in elections and/or who are candidates for election, which will be stored in the Simply Voting cloud-based election management system.

**3. Related Privacy Impact Assessments**

None.

#### 4. Elements of Information or Data

**Voters:**

- Langara Student Identification Number
- Langara Employee Identification Number
- First name
- Last name
- Department/Faculty (for employees, if applicable)
- Email address

**Candidates:**

- First name
- Last name
- Representative category (student, faculty or staff)
- Candidate statement

**Part 2 – Protection of Personal Information**

**5. Storage or Access outside Canada**

No. According to the Memorandum of Agreement between Langara College and Simply Voting Inc., the service provider will store personal information in the Simply Voting online election management system on its primary servers in **s.15(1)(l)**

**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 complaints.

**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><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></p>	

**8. Personal Information Flow Table**

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Prior to each election, election administrators in RES will collect the personal information of students and/or employees by generating an electronic file of names, departments, identification numbers and email addresses from the College's ERP system to create a list of voters eligible to vote in that particular election.	Collection	26(c)
2.	Prior to each election, election administrators in RES will use the personal information of students and/or employees to upload the list of eligible voters to Simply Voting in CSV file format. Election administrators can see the voting results for each election, but cannot see the names or other identifiers of voters.	Use	32(a)
3.	Prior to each election, election administrators in RES will disclose the personal information of student, faculty or staff who have identified themselves as candidates for representative positions to the internal College community and to the general public on the College's website.	Disclosure	33.2(a)
4.	After each election, election administrators will disclose the personal information of the winner(s) in internal College communications, such as The Langara Post, as well as webpages viewable by the public.	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 Simply Voting is restricted to authorized RES employees who use personal information to administer elections.	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 only authorized employees, agents and contractors who have agreed to keep personal information secure and confidential are given access to the information.	Low	Medium
3.	Personal information could be compromised during transmission from Registrar and Enrolment Services to the software provider's data servers.	<b>s.15(1)(I)</b>	Low	Medium

**10. Collection Notice**

**COLLECTION, USE AND DISCLOSURE OF STUDENT INFORMATION**

Langara College collects the personal information on this form under the authority of the College and Institute Act [RSBC 1996, Chapter 52, Section 41.1]. This information is needed to review nominations for representatives on the Education Council, and the Board of Governors, to verify eligibility to run for election and hold office, and to administer elections using a cloud-based online election management system. The information will be used only for this purpose in compliance with the Freedom of Information and Protection of Privacy Act [RSBC 1996, Chapter 165]. Contact Registrar and Enrolment Services at 604-323-5241 for questions about the collection, use or disclosure of personal information.

**Part 3 – Security of Personal Information**

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

According to information provided by Simply Voting Inc., s. 15(1)(l)

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

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

According to information provided by Simply Voting Inc., s. 15(1)(l); s. 21(1)

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

The following information is from Simply Voting Inc.’s proposal to Langara College for election management software.

Third-Party Organizations	Simply Voting Certifications
	<p>Simply Voting received the highest CloudTrust Rating from Skyhigh Networks. Skyhigh performs objective and thorough evaluations of cloud services based on a detailed set of criteria developed in conjunction with the Cloud Security Alliance (CSA). Services designated as Skyhigh Enterprise-Ready fully satisfy the most stringent requirements for data protection, identity verification, service security, business practices, and legal protection.</p>
	<p>Simply Voting takes secrecy of the vote very seriously. It is impossible for election organizers to determine what a particular voter has voted as the results are anonymous. All voter information is removed from our servers if you choose to have the election deleted. We never make use of voter information for anything other than voting and never share such information with third parties. Our privacy policy (available on the Simply Voting website) and voting system have been independently certified by TRUSTe for compliance with their Privacy Certification and Trusted Cloud requirements.</p>
	<p>Simply Voting is SOC 2 Type I certified. The SOC 2 is a widely recognized auditing standard issued by the American Institute of Certified Public Accountants (AICPA). An auditor's report details a service provider's ability to offer adequate controls and safeguards when they host or process data belonging to their customers. The audit focuses heavily in the areas of security, availability and confidentiality. It addresses important topics such as backup and recovery, computer operations, and human resources. The data centers where Simply Voting servers are located are similarly SOC 2 Type II certified. These certifications are an independent validation of the quality, integrity and reliability of Simply Voting's infrastructure and services.</p>

**12. 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.

**13. 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)(I))**

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

**s. 15(1)(I))**

#### **Part 4 – Accuracy/Correction/Retention of Personal Information**

- 15. 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?**

Once the personal information of voters eligible to participate in an election is uploaded to Simply Voting from a CSV file extracted from the College's ERP system, it can be updated until a voter has voted. That is, new voters can be added and voters who have not yet voted can be deleted. Additionally, personal information about each voter (e.g. their email address or department) can be edited as well.

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

Yes. The system is used to elect representatives to faculty, staff and student positions on Education Council and the Board of Governors.

- 17. 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.

- 18. 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?**

While the College has not established a records retention schedule for election results, RES will maintain election-related data online until one year has elapsed, and then until reference use is ended.

**Part 5 – Further Information**

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

Yes. Notices of elections contain candidates' personal information and election results contain winners' personal information. Both are routinely disclosed/announced to the College community, and are also published on the College's public-facing website.

*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).*

**20. 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).*

**21. 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.

**Part 6 – Privacy Officer Comments**

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by Registrar and Enrolment Services, Information Technology and Simply Voting Inc. as of the date below. If, in future any substantive changes are made to the scope of this PIA, Registrar and Enrolment Services will contact the Manager, Records Management and Privacy who will complete a PIA Update.

**s.22(1)**

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Joanne Rajotte, Manager  
Records Management and Privacy

FEB. 14, 2020  
Date

**Part 7 – Program Area Signatures**

**s.22(1)**

\_\_\_\_\_  
Jan Smith, Registrar  
Registrar and Enrolment Services

Feb 28, 2020

Date

**s.21(1)**

\_\_\_\_\_  
Ben Cecil, Provost and Vice-President Academic and  
Students

02/28/2020

Date