

Part 1 – General

Name of Department/Branch:	Langara College, Accessibility Services		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
Email:	jrajotte@langara.bc.ca	Phone:	604-323-5660
Program Manager:	Suzanne Munson, Manager, Accessibility Services		
Email:	smunson@langara.ca	Phone:	604-323-5998

1. Description of the Initiative

As stated in the project request document, Symplicity Accommodate Case Management System (Accommodate) is a cloud-based software system which will provide Langara College’s Accessibility Services department with an integrated, flexible and comprehensive solution that enables online accommodation request forms, electronic letters and notifications, online appointment and examination room management, online equipment check-out and electronic case notes.

Accessibility Services’ primary use of Accommodate will be electronic case management, replacing the existing combination of paper, electronic documents and database data. Accommodate will:

- improve data collection, data entry, workflow and communication in managing student accommodations;
- enhance the student experience by streamlining interactions with the department;
- reduce the effort associated with reviewing and approving accommodation letters; and
- provide unlimited data tracking and reporting.

Accommodate will be used under a software license agreement between Langara College and Symplicity Corporation, a U.S.-based company with a server in Canada. Symplicity provides web hosting services and support services for the Accommodate Case Management System.

2. Scope of this PIA

This PIA covers the collection, use and disclosure of students’ personal information stored in the Symplicity Accommodate Case Management System.

4. Elements of Information or Data

- Name
- Preferred first name
- Langara student identification number
- Date of Birth
- Contact information: email address, telephone number, physical address
- Gender
- Citizenship status (Canadian citizen, permanent resident, international student)
- Intake data:
 - Nature of Disability
 - Type of accommodation requested
 - Previously accessed accommodations (e.g. IEP information from secondary school)
 - Documentation list (i.e. Verification of Permanent Disability Form, Psycho-educational Assessment, etc.)
- Consent form
- Financial Assistance information and relevant applications
- Approved Accommodations
- Registration status
- Course schedule
- Case notes

May include:

- Name and contact information of parents, guardians, case worker, medical professionals, community agency representative or other support workers

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

According to the software license agreement between Langara College and Symlicity Corporation, the vendor must store student personal information in the Accommodate Case Management System only within Canada, 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.

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

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>	No
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	No
<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>Accessibility Services department employees will collect personal information directly from students when students:</p> <ul style="list-style-type: none"> a) make appointments in person, by phone or by email. Employees will enter appointment information into Accommodate or Microsoft Outlook Calendar; b) complete application, intake and consent forms; c) provide personal information during appointments and any other contact with staff; d) supply documentation from external healthcare professionals or other third parties in person, or have documentation sent on their behalf, and with their consent, from third parties; or e) complete financial assistance and Ministry program application forms. 	Collection	26(c)
2.	<p>Accessibility Services will import students' biographical data from the student information system (Banner Student) to the Accommodate Case Management System as a daily batch job.</p>	Collection	26(c)
3.	<p>Accessibility Services will use personal information about students to make appointments, process accommodation requests and provide support services.</p>	Use	32(a)
4.	<p>Accessibility Services will disclose relevant personal information about students, specific to provision of services, to College employees in instructional areas as well as in Financial Aid, Registrar and Enrolment Services, IT, CAPER-BC, Health Services or Counselling.</p> <p>In matters of student appeals or complaints, including complaints about a student's conduct, Accessibility Services will disclose relevant student information to the appropriate Langara College officials, such as Student Conduct and Judicial Affairs, as required.</p> <p>Accessibility Services will disclose relevant personal information about students, specific to provision of services and/or funding to the Ministry of Advanced Education and Assistive-Technology BC.</p> <p>Accessibility Services will disclose relevant personal information, specific to provision of services, with external medical professionals, educational institutions or community agency representative.</p>	Disclosure	33.2(a)

9. Risk Mitigation

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Accessibility Services employees could access personal information and use or disclose it for purposes other than the reason it was collected.	Access to the system is restricted to authorized employees who use personal information about students to review cases, book appointments and examinations, enter accommodation-related information and send emails.	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.	Contractual privacy clauses in the service agreement with Symplicity restrict access to personal information.	Low	High
3.	Student's personal information stored on service provider's server could be compromised.	s. 15(1)(l)	Low	High

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)(l)

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

s. 15(1)(l)

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

Langara College has a Privacy, Access and Confidentiality 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.

College employees authorized to use Accommodate s. 15(1)(l)

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?**

Student information is updated based on information provided directly by the student, or provided by internal departments such as Registrar and Enrolment Services, medical healthcare professionals or external agencies.

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

Personal information in the Accommodate system will be used to make decisions about students' accommodations.

- 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.**

Accessibility Services employees will use the information collected directly from students and from the documentation they provide to make accommodation decisions, and will review the information with students to ensure that it is accurate and complete.

- 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?**

Yes. The College has established a records retention and disposition schedule that ensures that personal information is maintained for at least one year after it is used to make a decision that directly affects an individual.

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.

Accessibility Services will use personal information to provide the BC Government with annual figures on the number of students with disabilities serviced each year, the nature of disability, the program of study and, in some cases, the type of service provided. The department does not include personal identifiers in its reports.

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.

Personal Information Bank Name:

Students with Disabilities Cases

Personal Information Location:

Symlicity Accommodate hosted server

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

To document the nature of disability and the type of service required to accommodate the student and, when required, to assist students in providing information to the BC Government.

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:

Prospective, current and former students who have enquired about and/or received accommodations.

Type(s) of Personal Information Collected:

Biographical
Educational
Accommodation-related information

Persons Information is Used By and/or Disclosed To:

Used by:
Accessibility Services

Personal information about students' accommodations is disclosed to their instructors.

Record Classification and Retention Schedule:

SS-220-006 Student Services : Student Accessibility Services : Students with Disabilities Cases

Delete electronic records after date of last contact noted on the case file plus 5 years online.*

* NB: Although Accommodate can retain data online indefinitely, Accessibility Services can manually purge data according to the established retention schedule or, if desired, set up an automated purge schedule.

Part 6 – Privacy Officer Comments

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

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

March 19, 2018
Date

Part 7 – Program Area Signatures

s.22(1)

Suzanne Munson, Manager
Accessibility Services

March 22, 2018

Date

s.22(1)

Justin Yau, Associate Director,
Operations

April 18, 2018

Date

s.22(1)

Clayton Munro,
Dean, Student Services

March 29, 2018

Date

ACCESSIBILITY SERVICES
APPLICATION FORM DISCLOSURE AGREEMENT
Consent to Release and/or Receive Information

To be completed with a representative from Accessibility Services

Section one

In order to provide students with services, it is necessary for employees of Accessibility Services to receive, use, discuss, and disclose relevant information, specific to the provision of services, with various employees of Langara College, such as Instructors, Financial Aid, Information Technology, and CAPER -BC (Centre for Accessible Post-Secondary Education Resources). In matters of student appeals or complaints, or complaints made about students, Accessibility Services will disclose relevant student information to the appropriate Langara College officials, as required.

Personal information regarding a student's disability is collected, used, disclosed, secured, and disposed of in accordance with the BC Freedom of Information and Protection of Privacy (FIPPA) Act and other relevant legislation.

In accordance with relevant provincial legislation, such as the BC FIPPA Act and the Child, Family and Community Service Act, Accessibility Services has a duty to report incidents that relate to:

- a) The threat of harm to self or others, or
- b) Child abuse or neglect, or
- c) Court subpoena

I _____, understand the above disclosure agreement and consent to these uses of my personal information.

Signature: _____ **Date:** _____

Section two: Consent to receive/use/discuss/disclose personal information with other parties.

I understand that disclosure of my personal information is governed by the BC FIPPA Act and any applicable Information Sharing Agreements with authorized provincial public or private agencies.

I _____, give Accessibility Services permission to receive/use/discuss/disclose my personal information with the following:

- Assistive-Technology BC (AT- BC)
- Community Agency Representative _____
- Medical Practitioner _____
- Ministry of Advanced Education Representatives
- Other Educational Institutions _____
- Other _____

Signature: _____ **Date:** _____