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PART 1: GENERAL INFORMATION

Initiative title:	Symplicity Advocate Case Management System
Organization:	Langara College
Branch or unit:	Office of Student Conduct and Academic Integrity
Initiative Lead contact information:	Maggie Ross, Director, Office of Student Conduct and Academic Integrity 605-323-5151; maggieross@langara.ca
Privacy Officer:	Joanne Rajotte, Manager, Records Management and Privacy
Privacy Officer phone:	604-323-5660
Privacy Officer email:	jrajotte@langara.ca

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Related PIAs, if any:

Prior to the implementation of Symplicity Advocate in 2017, Langara College completed and approved PIA2016-001. This document updates the original assessment.

1. What is the initiative?

The Symplicity Advocate Case Management System (Advocate) is a cloud-based software system used by Langara College's Office of Student Conduct and Academic Integrity (SCAI) to:

- Improve workflow and data collection in managing student academic and non-academic conduct and other behavioural concerns;
- Facilitate online incident reporting, statistical analysis, and on-demand access to student information; and
- Enable the College to meet its obligations for responding to, managing, and tracking student incidents of sexual violence or misconduct and of violence/threat/risk.

Advocate is used under a software license agreement between Langara College and Symplicity Corporation, a US-based company headquartered in Arlington, Virginia. Symplicity uses Amazon Web Services (AWS) data centres located in the Canadian Geographic Region to host its system and store Langara's data and information.

2. What is the scope of the PIA?

This PIA covers the collection, use, and disclosure of the personal information of students involved in academic and non-academic conduct or other concerning behaviour that is stored in the Symplicity Advocate Case Management System. It may also include the personal information of other individuals involved in incidents such as complainants and witnesses, and the contact information of students' emergency contacts.

3. What are the data or information elements involved in your initiative?

Department	Purpose	Data or Information Elements
• Office of Student Conduct and Academic Integrity	**Case Management:** Collect, use, and disclose information about incidents of academic and non-academic conduct or concerning behaviour involving students.	**Required:** • Name • Langara Student Identification Number • Date of birth • Contact information (email address, phone number, physical address) • Description of incident(s) and/or behaviour • Registration status • Course schedule **Optional:** • Selected biographical data, e. g., Indigenous status, gender, citizenship • Student account status • Standing, e. g., temporary suspension, registration restrictions • Academic history • Student photograph • Emergency contact • Internal and/or external assessment of behaviour • Medical or health history • Name, contact information and/or student identification number of complainants or witnesses
• Associate Vice-President, Students (or delegate)	**Case Review and Update:** Authorized employees use personal information about students of concern to review basic incident-related information, enter incident-related information, and manage student appeals	• Name • Langara Student Identification Number • Contact information (email address, phone number, physical address) • Description of incident(s) and/or behaviour
• Behavioural Intervention Team • Student Support Team	Authorized employees use personal information about students of concern to review basic incident-related	• Name • Langara Student Identification Number

	information and enter incident-related information	• Description of incident(s) and/or behaviour
• Academic Deans • Division Chairs • Continuing Studies Program Directors	**Case Review and Update:** Authorized employees use personal information to review academic integrity cases and enter information about academic integrity incidents.	• Name • Langara Student Identification Number • Contact information (email address, phone number, physical address) • Description of incident(s) and/or behaviour
• Safety, Security and Emergency Management	**Incident Response:** Use information about students involved in incidents relating to the safety and/or security of people and property.	Some or all elements as needed: • Name • Langara Student Identification Number • Date of birth • Contact information (email address, phone number, physical address) • Emergency contact information • Description of incident(s) and/or behaviour • Registration status • Course schedule

3.1 Did you list personal information in question 3?

Yes.

PART 2: COLLECTION, USE AND DISCLOSURE

4. Collection, use and disclosure

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	Student Conduct and Academic Integrity exports data from the student information system (Banner Student) to the Advocate Case Management System weekly.	Collection	26(c)
2.	Student Conduct and Academic Integrity collects personal information about students of interest directly from interaction with students or indirectly from members of the Langara College community, including students, faculty and staff, students' emergency contact person, Internet profiles and postings, and/or external support services or agencies, such as mental health professionals or law enforcement. Communication may be in the form of email correspondence, telephone calls, text messages, social media communications, or in-person conversations.	Collection	26(c); 27()(a)(i)
3.	Student Conduct and Academic Integrity uses personal information about students of concern to identify and assess the concerning behaviour and do some or all of the following: • provide or recommend services, supports or resources • identify expectations for student follow-up • manage student behaviour incidents • apply disciplinary measures.	Use	32(a)
4.	Authorized employees in certain College areas use personal information about students of concern to review basic incident-related information and enter incident-related information.	Use	32(a)
5.	Student Conduct and Academic Integrity may disclose personal information about students of concern to other College employees other than those listed above as needed to manage incidents.	Disclosure	33.2(a)
6.	Student Conduct and Academic Integrity may disclose personal information about students of concern to mental health professionals for third-party assessments, usually with the student's consent, but may disclose without consent if the student's behaviour is very concerning or threatens the safety of	Disclosure	33.2(a)

	the student or others.		
7.	Student Conduct and Academic Integrity may disclose personal information about students of concern without the student's consent to external agencies such as law enforcement and other enforcement organizations for wellness interventions or investigations.	Disclosure	33.2(i)

Risk Mitigation Table

	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for a purpose other than the reason it was collected.	Physical and technical access to the system is restricted to authorized employees who use personal information about students of concern to review cases and enter incident-related information. User rights are set to control and limit access to information unrelated to specific duties. • Associate Vice-President, Students (or designate) • Behavioural Intervention/Student Support Team (limited access) • Safety, Security and Emergency Management (limited access) • Academic Deans, Division Chairs, CS Program Directors (limited access) In addition, employees are expected to abide by College policies related to ethical conduct, computer and computing use, and access to information and privacy.	Low	High
2.	The service provider's (Symplicity Corporation's) employees could access personal information and use or disclose it for purposes other than the reason it was collected.	Contractual privacy clauses in agreement with the service provider restrict access to personal information.	Low	High
3.	Personal information could be compromised during transmission from Langara College to the AWS 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.	s.15(1)(l)	Low	High

5. Collection Notice

The Office of Student Conduct and Academic Integrity collects personal information under the authority of the *Freedom of Information and Protection of Privacy Act*, section 26(c) for the purpose of addressing academic and non-academic student behaviour and will use it for this purpose. Information is maintained in an online case management system located in Canada. For questions about the collection, use and disclosure of your personal information, contact the department at studentconduct@langara.ca.

PART 3: STORING PERSONAL INFORMATION

6. Is any personal information stored outside of Canada?

No. According to the software license agreement between Langara College and Symplicity Corporation, the vendor must store student personal information in the Advocate Case Management System only within Canada, and may access and use the personal information only for the purposes specified in the agreement.

7. Does your initiative involve sensitive personal information?

Yes. The following categories of sensitive personal information may be collected, used, and disclosed during any phase of managing student conduct incidents:

- Gender orientation or expression
- Race or ancestry
- Medical/Health information
- Citizen status
- Criminal charges and convictions

8. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

No.

9. Where are you storing the [sensitive] personal information involved in your initiative?

Information will be stored in Canada (see #6 for details).

PART 4: ASSESSMENT FOR DISCLOSURES OF SENSITIVE PERSONAL INFORMATION OUTSIDE OF CANADA

10. Is the sensitive personal information stored by a service provider?

Not applicable.

11. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

Not applicable

12. Does the contract you rely on include privacy-related terms?

Not applicable.

13. What controls are in place to prevent unauthorized access to sensitive personal information?

Not applicable.

14. Provide details about how you will track access to sensitive personal information.

Not applicable.

15. Describe the privacy risks for disclosure outside of Canada.

Not applicable.

PART 5: SECURITY OF PERSONAL INFORMATION

16. Does your initiative involve digital tools, databases or information systems?

Yes, Symplicity Advocate is a cloud-based case management system.

16.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

No.

16.2 Security and Privacy Certifications

Unknown.

17. What technical and physical security do you have in place to protect personal information?

As stated in its Privacy Policy https://www.symplicity.com/support/privacy-policy, [Symplicity] uses a variety of physical, administrative and technical safeguards designed to help protect it from unauthorized access, use and disclosure. [It has] implemented best-practice standards and controls in compliance with internationally recognized security frameworks. [It uses] encryption technologies to protect data at rest and in transit.

In using Amazon Web Services (AWS) to store data, including personal information, Symplicity Corporation shares security and compliance responsibilities with AWS. Symplicity controls how it architects and secures the Advocate system and the data put on the infrastructure, while AWS is responsible for providing services on their highly secure and controlled platforms and providing a wide array of additional security features.

17.1 Technical security measures related to this initiative consist of:

According to its software license agreement, Symplicity s.15(1)(l)

s.15(1)(l)

According to information provided by AWS to BCNET for its AWS Privacy Impact Assessment completed in 2017:

- s.15(1)(l)

17.2 Physical security measures related to this initiative consist of:

According to its software license agreement, Symplicity restricts physical access to the system and website used to run Advocate, and any databases or other sensitive material generated from or used in conjunction with the program, to authorized employees.

According to information provided by AWS to BCNET for its AWS Privacy Impact Assessment completed in 2017:

- s.15(1)(l)

18. Controlling and tracking access

Strategy	
We only allow employees in certain roles to have access to information	Yes. Employees in the Office of Student Conduct and Academic Integrity and employees in other departments authorized to use the system have access to information based on their roles and need.
Employees that need standing or recurring access to personal information must be approved by executive lead	No. See above.
We use audit logs to see who accesses a file and when	Yes. [redacted] s.15(1)(l) s.15(1)(l)

PART 6: ACCURACY, CORRECTION AND RETENTION

19. How will you make sure that the personal information is accurate and complete?

Student Conduct and Academic Integrity collects personal information directly from individuals involved in incidents of academic or non-academic conduct (complainants, respondents, and witnesses) or from the student information system during its investigation of incidents.

20. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

20.1 Do you have a process in place to correct personal information?

Yes, students may request their information to be updated or corrected by submitting the request in writing to the Director, Student Conduct and Academic Integrity (or delegate) and identifying the specific information they wish updated or corrected.

20.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes, the Director (or delegate) will add a new document to the student's file with the request date and change requested, but will not edit the original document.

20.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes, Student Conduct and Academic Integrity will notify other public bodies or third parties that disclosed personal information was corrected.

21. Does your initiative use personal information to make decisions that directly affect an individual?

Yes, personal information is used to make decisions about students' academic standing or continued attendance at the College when the individuals engage in academic or non-academic conduct or display behaviours of concern.

22. Do you have an information schedule in place related to personal information used to make a decision?

Yes, according to the College's Recorded Information Management Policy B5010, departments must establish and adhere to retention and disposal schedules that ensure that they retain records used to make a decision about an individual for at least one year. Departments' retention schedules must also meet operational and legislative requirements, which typically results in their retaining such records longer than one year. At this time, Langara retains case management-related records for at least five years after date of last activity on the file.

PART 7: AGREEMENTS AND INFORMATION BANKS

23. Does your initiative involve an information sharing agreement?

No.

24. Will your initiative result in a personal information bank?

Yes. FIPPA-required personal information bank descriptors consist of:

Name: Symplicity Advocate case management system
Data elements: Use of Symplicity Advocate includes all data and personal information as outlined in section 3 (above)
Authority: FIPPA section 26(c)
Purpose: Collected, used, and disclosed to manage cases of student academic and non-academic conduct and behavioural concerns in the Symplicity Advocate system
Users: Used primarily by the Office of Student Conduct and Academic Integrity. Authorized employees in other departments as noted in section 3 (above) have access to personal information in the system as needed. In some cases, access to personal information is limited.

PART 8: ADDITIONAL RISKS

25. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Not applicable.

PART 9: SIGNATURES

Privacy Office Comments

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by Student Conduct and Academic Integrity or obtained from Symplicity Corporation and Amazon Web Services as of the date below. If in future any substantive changes are made to the scope of this PIA, Student Conduct and Academic Integrity will contact the Manager, Records Management and Privacy who will complete a PIA Update.

s.22(1) _____ Nov. 18, 2022

Joanne Rajotte, Manager
Records Management and Privacy

Date

Program Area Signatures:

Role	Signature	Date signed
Initiative Lead & Department Manager: Maggie Ross, Director, Office of Student Conduct and Academic Integrity	s.22(1)	Nov 22/22
Head of public body, or designate: Deborah Schachter, Associate Vice-President, Students	s.22(1)	Nov. 23/22