

Part 1 – General

Name of Department/Branch:	Langara College, Counselling Department		
PIA Drafter:	Joanne Rajotte, Manager, Records Management and Privacy		
Email:	irajotte@langara.ca	Phone:	604-323-5660
Program Manager:	Kerri Janota, Department Chair, Counselling		
Email:	kjanota@langara.ca	Phone:	604-323-5221

1. Description of the Initiative

The briefing note produced in November 2016 by Counselling and IT for review by Langara College’s Senior Leadership Team describes Titanium Schedule (TS) as an electronic medical records system designed specifically for college and university counselling centres to:

- track and manage appointments and activities
- enable clinical risk alert notification
- identify students of concern
- enable clinical note taking and storage
- provide on-demand shared access to student and clinical information for select users
- upload clinical data from intake forms completed by students
- provide efficient data analysis and reporting.

Titanium Schedule is a client-server, Windows-based application which was deployed on premise in 2019 with the data stored on the College’s equipment. TS supports on-demand shared access to clinical notes and risk notifications, which has improved the care provided to students and mitigated the liability risk to the College in cases of high-risk mental health crises. TS replaced Counselling’s current Self-Service Banner scheduling system because it was outdated and was not sufficient for documenting complex counselling issues for statistical purposes.

Counselling’s primary use of Titanium Schedule is for electronic case management. It has replaced the existing paper-based clinical note-taking process. Counsellors have read and update access to all client case files. In addition, the department plans on implementing the Calendar Sync function which allows synchronization between TS and Office 365 by copying TS appointments to the counsellors’ Outlook calendar. Students’ personal information, such as name or Student ID, will not be copied to the Outlook calendars.

The department has been using electronic intake forms. Prior to their first appointment, students complete intake forms on tablets provided by the Counselling Department. Upon completion, students hand the tablet to the department assistant who uploads the forms to Titanium Schedule for later review by counsellors during appointments. No information is retained on the tablet.

Due to the COVID-19 crisis, the Counselling department has had to replace in-person counselling sessions with virtual sessions held by telephone or a web conference app such as Zoom. Students also cannot complete or submit their intake forms in-person.

2. Scope of this PIA

This PIA covers the extended use of Titanium Schedule, specifically its Hosted Web Component, to collect, use and disclose the personal information of students on intake forms they will complete and submit in order to make appointments with Langara College Counsellors for virtual personal, academic and career counselling appointments. Personal information entered on the intake forms will form part of the student case file in Titanium Schedule.

NOTE: Some information included in the original PIA and its first revision has not been included to focus instead on changes resulting from the intended use of the Hosted Web Component.

3. Related Privacy Impact Assessments

A PIA on Titanium Schedule was completed in November 2017 and approved in early 2018 (PIA2017-0003). It was revised and approved in July/August 2019 (PIA2017-0003R1) to capture the Counselling department's decision to expand use of the system to maintain notes on academic and career counselling sessions in addition to personal counselling session notes.

4. Elements of Information or Data

Required data elements:

- First and Last name (students may provide their preferred first name, if desired)
- Langara student identification number
- Date of birth
- Preferred pronoun (She, He, They)
- Physical address
- Telephone number
- Registration information
- Email address
- Emergency contact name
- Emergency contact telephone number
- Emergency contact relationship to student
- Personal, educational and/or career topics of interest
- Risk Questionnaire about mental health status

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

According to Titanium Schedule’s Hosted Web Component Technical Guide, the Hosted Web Component is a combination of a website and web services that runs on the Microsoft Azure cloud and is installed and maintained by Titanium Schedule.

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

s. 15(1)(l) . There is no access, intentional or otherwise, by an individual during processing.

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;	N/A
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.	N/A
<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>	

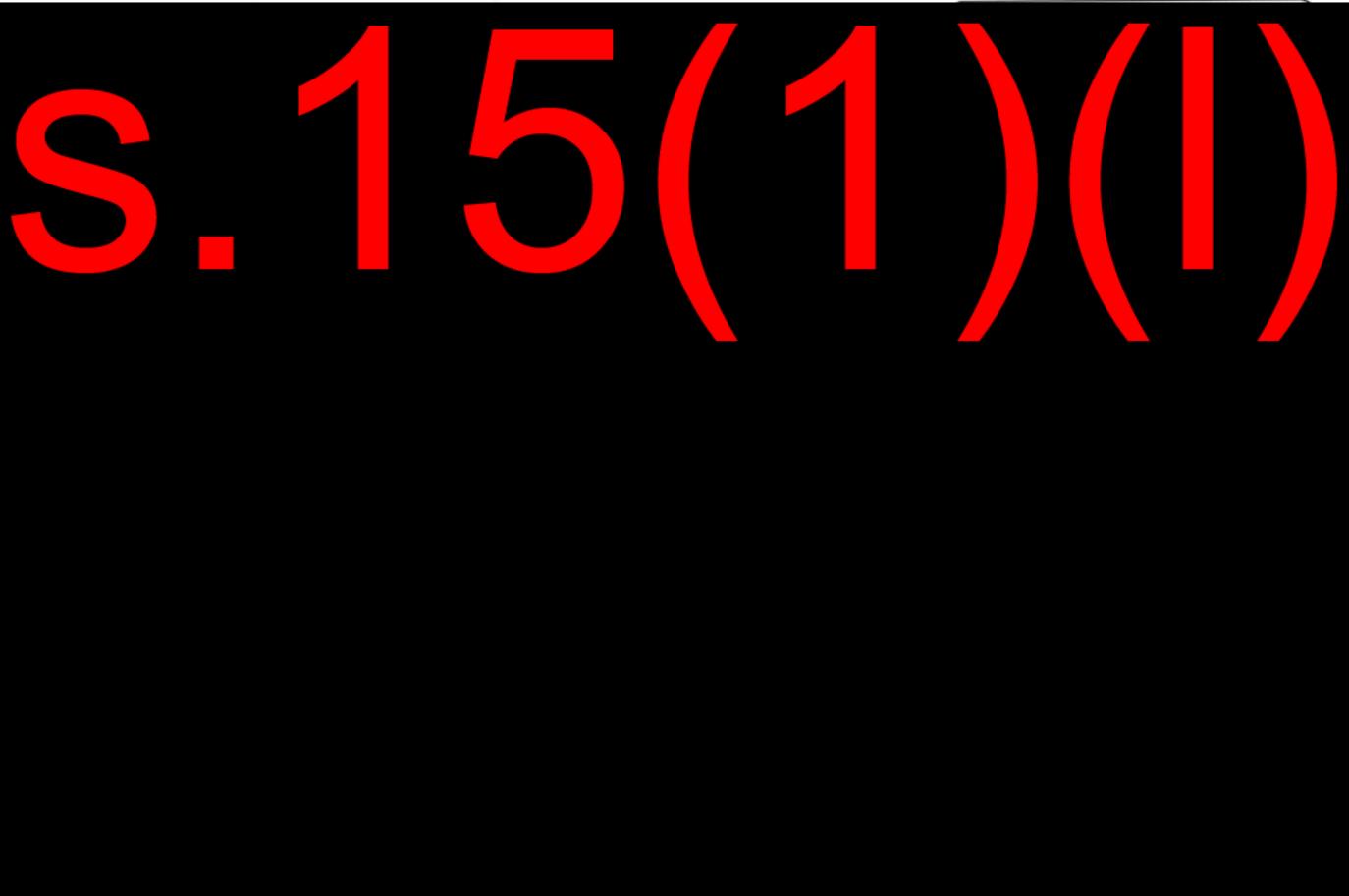
7. Common or Integrated Program or Activity*

<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>N/A</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.	Counsellors will collect personal information directly from students, i.e., student clients when they enter information in the data entry screens of Titanium Schedule's Hosted Web Component.	Collection	26(c)
2.	Counsellors will use personal information collected from students to arrange and hold virtual counselling appointments, with their consent.	Use	32(a)

Data Flow Diagram



Risk Mitigation Table

Given the sensitive and high impact nature of the personal information maintained in Titanium Schedule, this risk assessment assumes that Langara will continue to follow the vendor’s Security Guide, Installation Guide and other security and privacy-related recommendations. Recommendations include licensing, building and maintaining an Enterprise version of SQL Server with multiple layers of encryption configured and activated.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Students’ personal information could be compromised during transmission to and from the Hosted Web Component, and while stored temporarily in Microsoft Azure data centres located in the United States.	Data encrypted in transit and at rest.	Low	High

9. Collection Notice

Langara College’s Counselling Department collects the information on this form under the authority of the Freedom of Information and Protection of Privacy Act, section 26(c) for the purpose of scheduling virtual appointments and providing personal, academic and career counselling services to students, and will use it only to provide these services. Personal information on intake forms is stored temporarily outside of Canada in an online scheduling system. For questions about the collection and use of personal information, contact the Department Chair by e-mailing counselling@langara.ca.

Part 3 – Security of Personal Information

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

The College's IT department s.15(1)(l)

s.15(1)(l)

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

s.15(1)(l)

s.15(1)(l)

s.15(1)(l)

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 (Access to Information, B5001) as well as a Computer and Computing Use Policy, B5002 and its associated procedures.

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.

Employees in the Counselling department authorized to use Titanium Schedule must enter a valid user login and a password to access the system. Only the designated Super Users within the department are authorized to add new users, delete users and set user access privileges. All Counsellors can view and print the content of student client case files and delete some content.

Counsellors can add to the content of case files, but once the Counsellor has electronically signed-off on the content it cannot be modified. Only the Department Chair or designate can delete entire files when they reach their approved disposition date. Department Assistants (Advising Assistants) upload intake forms into the system and schedule appointments, but do not have any access to student files. They are only able to view the data forms for issues, i.e., omissions, before approving the forms into the system at which point they no longer retain access.

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

s.15(1)(l)

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?

The Counselling department will manually update or correct students' biographical/contact information at the student client's request.

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

Yes. Counsellors use student clients' personal information to determine the type of counselling services to provide, i.e., personal, academic and/or career counselling, and identify students at risk.

17. 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.

Counsellors use the information collected directly from student clients, as well as their professional expertise, to make decisions about the type of counselling to provide and to respond to students at risk.

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?

Yes. The Counselling department retains counselling session clinical notes and intake forms until age of majority is reached plus 7 years after date of last service.

Part 5 – Further Information

19. 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).

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

Yes. While Titanium Schedule has the capacity for running statistical summaries/analyses on the data collected from students, any statistical summaries/analyses or research reports generated with the data will not pair a student's identifying information with the personal data collected from them (i.e., gender, student status, presenting issue).

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.

Personal Information Bank Name:

Student Counselling Session Cases

Personal Information Location:

Data is stored on a server located on the Langara College campus with backups stored at a separate on-site location and at a remote datacentre.

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

To document interactions between counsellors and students who have sought assistance and advice on all issues discussed, i.e. personal, career and academic/educational matters.

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 students.

Type(s) of Personal Information Collected:

Biographical
Clinical record
System-assigned case file number

Persons Information is Used By and/or Disclosed To:

Used by:
Counselling

Personal information may be disclosed to Langara Student Health Services, Student Conduct and Judicial Affairs, external mental health professionals, external service providers and other third parties such as law enforcement agencies.

Record Classification and Retention Schedule:

SS-210-005 Student Services : Student Counselling Services – Student Counselling Session Cases

Delete electronic records when age of majority reached plus 7 years after date of last service.

Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by Counselling, Information Technology and the vendor as of the date below. If, in future any substantive changes are made to the scope of this PIA, Counselling 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

Nov. 17, 2020

Date

Part 7 – Program Area Signatures

Kerri Janota, Department Chair
Counselling

Date

David Cresswell, Chief Information
Office

Date

Jody Gordon, Associate Vice-
President, Students

Date

Joanne Rajotte

From: David Cresswell
Sent: Tuesday, November 17, 2020 3:30 PM
To: Terri Rear
Cc: Jody Gordon; Kerri Janota; Joanne Rajotte
Subject: Re: Counselling - Titanium Hosted Web Application

Approved

Thanks Terri!

Dave

David Cresswell
CIO - Langara College

On Nov 17, 2020, at 14:28, Terri Rear <trear@langara.ca> wrote:

Hello,

As you may know, we have found a solution for students to complete the Counselling Intake Form remotely. This is a solution offered by Titanium. Joanne has reviewed and revised the PIA that was done for the initial Titanium implementation.

Jody, David and Kerri – please review the attached PIA and provide your approval and e-signature by signing the document or providing approval by email. Your response by Thurs, Nov 19 is appreciated, as we want to get started on the implementation as soon as possible.

Jody – if you need any information about the PIA process or this project, I can set up a quick call to review with Joanne.

Thank you,

Terri Rear, PMP
Associate Director, Project Portfolio Management
Information Technology
Office: 604.323.5149 Cell: 778.837.7298
100 West 49th Avenue, Vancouver, BC, V5Y 2Z6
[Langara Logo]<<https://langara.ca/>>

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Joanne Rajotte

From: Kerri Janota
Sent: Tuesday, November 17, 2020 4:40 PM
To: Jody Gordon; Terri Rear; David Cresswell
Cc: Joanne Rajotte
Subject: RE: Counselling - Titanium Hosted Web Application

Probably goes without saying, but nonetheless approved on this end as well! Thanks so much everyone for your support on this!

Best,
Kerri

Kerri Janota, M.Ed.
Counsellor (she/her) / Department Chair
Counselling Services
For appointments: 604.323.5221
100 West 49th Avenue, Vancouver, BC, V5Y 2Z6

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Please be aware that email is not a confidential or secure form of communication. Email and voicemail are checked during office hours only. If this is not a crisis but you are concerned about your mental health, please contact Counselling Services at 604.323.5221. **If this is an emergency, please call 911 or 1.800.784.2433 (1.800.SUICIDE).** Crisis resources: <https://langara.ca/student-services/counselling/pdf/after-hours-emergency-resources.pdf>

From: Jody Gordon <jodygordon@langara.ca>
Sent: Tuesday, November 17, 2020 3:39 PM
To: Terri Rear <trear@langara.ca>; David Cresswell <dcresswell@langara.ca>; Kerri Janota <kjanota@langara.ca>
Cc: Joanne Rajotte <jrajotte@langara.ca>
Subject: RE: Counselling - Titanium Hosted Web Application

Approved with enthusiasm! Thanks Joanne, Terri, Kerri and David.

Jody

Jody Gordon, B.A. (Hons.), M.A.
(she, her, hers)
Associate Vice-President, Students
100 West 49th Avenue, Vancouver, BC, V5Y 2Z6

snəwəyət leləm. Langara.

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