



Privacy Impact Assessment for Non-Ministry Public Bodies

Clockwork Software Program

NIC PIA 052019CW

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch:	Accessible Learning Services		
PIA Drafter:	Lisa Richard / Melanie Allison		
Email:	melanie.allison@nic.bc.ca	Phone:	250-334-5058
Program Manager:	Felicity Blaiklock, Director Student Affairs		
Email:	Felicity.blaiklock@nic.bc.ca	Phone:	250-724-8704

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

ClockWork is a software management tool used by the Department of Accessible Learning Services for the purposes of communicating and tracking student accommodation needs. This software is hosted directly on North Island College servers and security for the Clockwork software is reliant on NIC’s internal security systems. Access can be limited to specific users by using its advanced permission systems.

Data Sync

The Clockwork Data Sync module allows integration with NIC’s ERP (Ellucian Colleague). The module can be configured to connect to a variety of data sources and retrieve data. When a student first comes to the Department of Accessible Learning, Clockwork will pull in their data from the



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existing system. Each night a sync runs that will update any information that has changed in Ellucian Colleague for all active students in Clockwork. Currently the data sync is a one-way operation; Clockwork will not attempt to change data in Ellucian Colleague. All data fields that are being pulled into Clockwork will become read-only fields in Clockwork, since the nightly sync will always revert the data back to what is in Ellucian Colleague. Example: Student name, phone, address, email, emergency contact, academic information, registered courses, etc.

Appointment Sync

Clockwork features a two-way sync for NIC's on premise MS Exchange system. All appointments scheduled in MS Exchange system will import into Clockwork and vice-versa on a continuous basis. Users have the option to set appointments as private to limit the information that is sent to the on-premise MS Exchange system.

2. Related Privacy Impact Assessments

None

3. Elements of Information or Data

Data includes: Student's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information (including medical documentation and diagnoses, psychological assessments, psychiatric assessments, neuropsychological assessments, psycho-vocational assessments, psychoeducational assessments, speech and language assessments, audiograms, forensic assessments, optometry reports), financial information, instructor emails, educational progress information, student concerns, signed consent forms for outside agencies, meeting notes, exam information.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.



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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

4. Storage or Access outside Canada

Clockwork is a software program run on NIC’s on premise server infrastructure.

5. 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;	yes
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>	



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6. Common or Integrated Program or Activity*

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.

1. This initiative involves a program or activity that provides a service (or services);	yes
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;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

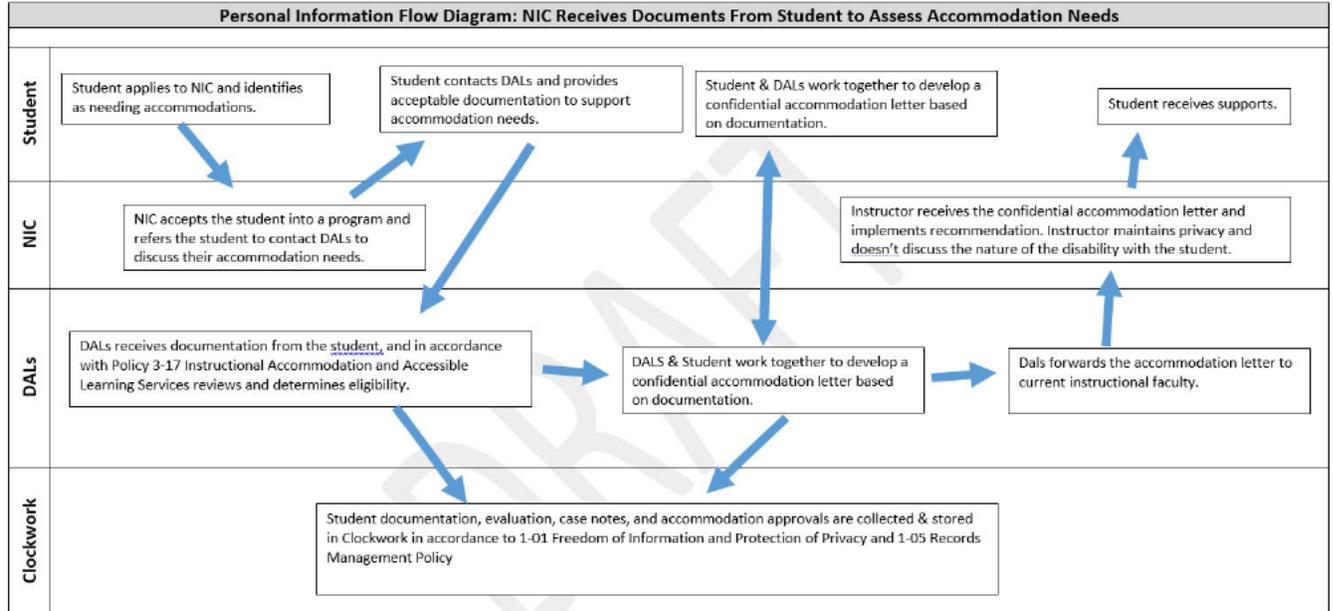


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7. Personal Information Flow Diagram and/or Personal Information Flow Table



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Student requests accommodations and provides supporting documentation in accordance with Policy 3-17 Instructional Accommodation and Accessible Learning Services.	Consent	Section 26 Section 27
2.	Department of Accessible Services (DALs) uses the Clockwork Software to organize and store student documents, and further inputs case notes regarding evaluation and recommendation in accordance with Policy 1-01 Freedom of Information and Protection of Privacy & 1-05 Records Management Policy.	Collection	Section 26 Section 27
3.	Working together with the students, DALs creates an accommodation letter, reviews, and obtains signed consent from the student to release the confidential letter to the current instructional faculty.	Disclosure & Consent	Section 26 Section 27 Section 32



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8. Risk Mitigation Table

Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	<i>Employees could access personal information and use or disclose it for personal purposes</i>	<i>Oath of Employment; contractual terms, etc.</i>	<i>Low</i>	<i>High</i>
2.	<i>Request may not actually be from client (i.e. their email address may be compromised)</i>	<i>Implementation of identification verification procedures</i>	<i>Low</i>	<i>High</i>
3.	<i>Client's personal information is compromised when transferred to the service provider</i>	Section 15(1)(l)	<i>Low</i>	<i>High</i>
4.	<i>Inherent risks in sending personal information to a client via email</i>	<i>Policy developed to inform clients of risk and ask if they would like the information via a different medium, such as through the mail</i>	<i>Medium</i>	<i>Medium</i>

9. Collection Notice

Appendix A: Update to Collection and Use of Personal Information

Appendix B: Update to Accommodation letter to instructor



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Part 3 – Security of Personal Information

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

Section 15(1)(I)

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

Section 15(1)(I)

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

An “Acceptable Use of Information Technology” Policy is currently under development. Several additional policies relating to the collection of student information for DALs include:

- #1-01 Freedom of Information and Protection of Privacy
- #1-05 Records Management
- #1-20 Code of Ethical Conduct
- #3-17 Instructional Accommodation and Accessible Learning Services

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.

User access is delegated through department chair.

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

Access is assigned to applicable staff via the department chair directly within the Clockwork software.

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?

Demographic and course information is updated automatically through student records systems syncing process. Medical and accommodation needs are updated through case notes.

16. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain. Yes. Student provides medical information to department in order to substantiate learning supports.

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.



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We meet every semester with students to discuss learning supports.

- 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. Policy 1-05 Records Management provides the following retention schedules:

Section 11 Student Records - Registration

Record	Description	OPR	Copy Holder
Student Records – Registration	Records relating to the process of registration of students for courses. Includes specific types of registration documents, such as approval forms, drop/add forms, which are used in the registration process	Current year plus 1 year, SR of summary data	Current year plus 1 year

Section 12 Student Services

Record	Description	OPR	Copy Holder
Personal Student Counseling	Records relating to the operations of counseling services provided to students. Records may include case files containing notes made by counselors concerning contacts with student clients, referral letters, letters to agencies or other counselors regarding student clients and related documentation and correspondence.	Current year plus 7 years. Student case records – last visit plus 6 years. High risk patients – RP	Current year plus 1 year.



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Part 5 – Further Information

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

Yes, the initiative involves disclosure at the institutional, provincial and federal levels. As an example, department members will send student's medical documentation to provincial government to determine permanent disability status.

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

No.



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Part 6 – Privacy Office(r) Comments

This privacy impact assessment has been developed in consultation with the Clockwork vendor, IT Services, Department of Accessible Learning and NIC Student Services. information contained within this PIA is current to the best of our knowledge as at February 11, 2020. This PIA is considered to be treated as a working document.

Melanie Allison

Melanie Allison

Feb 11, 2020

Privacy Officer / Privacy Office
Representative

Signature

Date



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Part 7 – Program Area Signatures

Felicity Blaiklock

Director, Student Affairs

Felicity Blaiklock

Signature

Feb 10, 2020

Date

Wendy Harris

Chair, Accessible Learning Services

Wendy Harris

Signature

Feb 10, 2020

Date

Lisa Domae

Executive Vice President Academic
& COO

Lisa Domae

Signature

Feb 12, 2020

Date

A final copy of this PIA (with all signatures) must be kept on record.