



Privacy Impact Assessment for Non-Ministry Public Bodies

iCent app OGE pilot

NIC PIA# 112020IC

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:	Office of Global Engagement/North Island College Comox Valley Campus		
PIA Drafter:	Jennifer Barth		
Email:	jennifer.barth@nic.bc.ca	Phone:	250-334-5021
Program Manager:	Mark Herringer		
Email:	mark.herringer@nic.bc.ca	Phone:	

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

1. Description of the Initiative

North Island College (NIC) welcomes international students through the Office of Global Engagement (OGE). OGE has identified the need for an efficient way to manage and communicate with students arriving to study at NIC. The use of an app streamlines the international student experience for a smooth pre-arrival and arrival experience.

iCent is a bespoke app that has been designed for Canadian institutions to support international students. The app is used widely by many institutions across Canada and in British Columbia, with lots



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of proven success. It has become an important tool for managing international student arrivals during the COVID-19 pandemic.

The iCent app will be used to provide a 24-hour International Student Remote Welcome Assistance Program to international students, including those beginning their studies at NIC and returning students. The app is useful because it doesn't just push information, it also pulls information which iCent sends to institutions so that the institutions can respond accordingly with online group sessions or individual additional support.

The app includes content that provides students with local, provincial and federal Covid-19 guidelines, institutional level information, as well as advice from Public Health. The information provided also includes instructions to international students about their legal quarantine obligations (under the Quarantine Act) and their mandated COVID-19 test (Ministry Health and/ Colleges and Universities). The app includes a detailed pre-arrival guide, self-serve tools, links to on-campus support, and post-arrival guide and more.

As a member of GuardMe network (international student health insurance provider) NIC can access a basic version of the app for no additional cost. OGE would like to pilot the app for one year starting with the Winter 2021 intake.

2. Scope of this PIA

Through the custom branded app provided by iCent, primarily an international student acclimatization tool used throughout the academic life cycle, OGE can support students virtually, 24-hours / 7-days per week. This is particularly useful during COVID-19 as there are additional requirements for students, including travel and quarantine requirements.

When downloading the app, students are required to input their email address and a PIN number that is emailed to their email address as part of the authentication process.

As part of the [COVID Safe Canada](#) initiative, the app also provides a secure, centralized portal for students to input information required by NIC (and local and provincial agencies/ministries).

Students can opt-out and do not have to use the iCent app, although it is recommended and especially for students that needs to quarantine. The Office of Global Engagement will provide alternative arrangements should a student not wish to use the iCent app.

Students can opt-out of using the iCent app at anytime, temporarily or permanently and can ask for deletion of their iCent account. In the instance of a student requesting to delete their account, iCent may report this to the relevant contact in OGE to ensure any essential information is recorded.



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3. Related Privacy Impact Assessments

N/A. New service provider to NIC.

4. Elements of Information or Data

The following is summary of the personal information collected using the app:

- Student Info: Name, email, phone #, citizenship, DOB, mailing address;
- Academic Info: enrolled program, campus, admit term, semester;
- Emergency Contact: Contact's Name, phone number, relationship, email address, home address;
- Quarantine Plan: Student #, Cell Phone #, Passport #, DOB, home address, country of origin, flight details/arrival date, Quarantine location (hotel);
- Day 14 Attestation: Declaration of a completed Covid-19 test.

The information outlined are personal details that are already handled by NIC's OGE employees in-line with FIPPA requirements and guidance.

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.

5. Storage or Access outside Canada

iCent data is stored in highly secured cloud data centre in Canada that is compliant to federal and provincial laws. iCent data is hosted by Amazon Web Services and Microsoft Azure. The cloud infrastructure team is in Canada and India. Canadian team manages the data whereas India team manages the server upgrades and patching at regular intervals.

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/no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	yes/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.	yes/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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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>	
1. This initiative involves a program or activity that provides a service (or services);	yes/no
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;	yes/no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes/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>	

**** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your public body’s privacy office(r) to determine how to proceed with this notification and consultation.***

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your public body’s privacy office(r) to determine how to proceed with this notification.

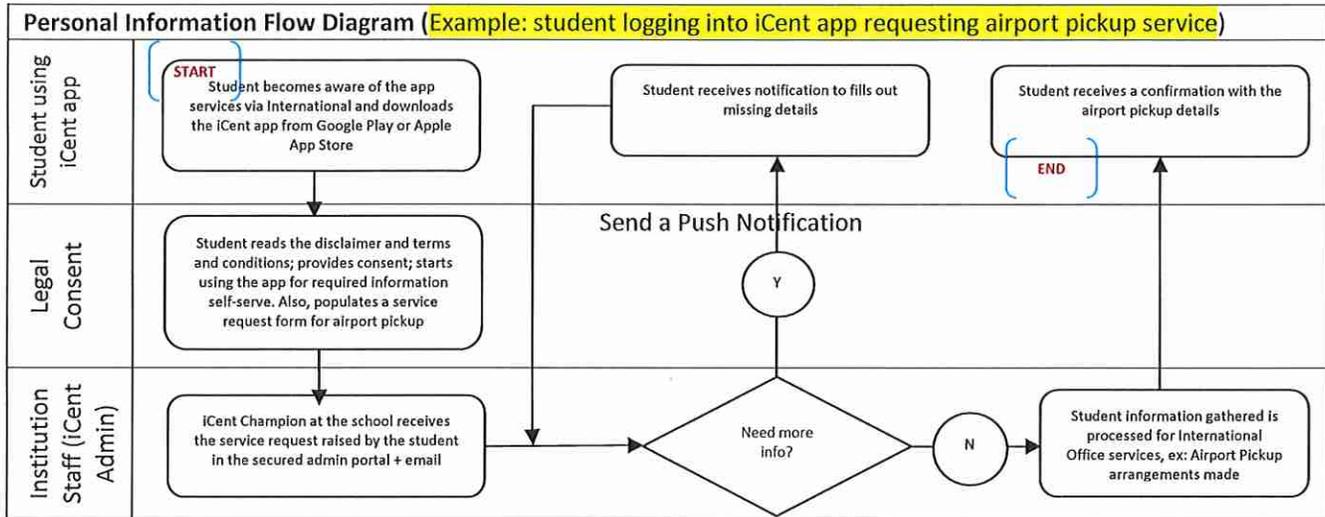


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8. Personal Information Flow Diagram and/or Personal Information Flow Table



Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Student becomes aware of the app services via International and downloads the iCent app from Google Play or Apple App Store; Student reads the disclaimer and terms and conditions; provides consent; starts using the app for required information self-serve. Also, populates a service request form for airport pickup (example)	Self-Consent Disclosure	33.1(7)
2.	iCent Champion at the school receives the service request raised by the student in the secured admin portal + an optional email notification	Information Collection	26(c)
3.	Student information gathered is processed for International Office services, ex: Airport Pickup arrangements made	Information Use	32(a)



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9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Service provider employees may misuse information collected	Employee background verification is conducted upon hiring. NDA, Trade Secret and employment contract is put in place. Plus, training on client information management and confidently is provided from time to time. Lastly, access to client data itself is limited (purpose & need basis)	Low	High
2.	Institution employees may misuse information collected	NIC policies apply; On iCent Admin platform when NIC staff/contractors gain access, they digitally sign an NDA and acknowledge to usage T&C	Low	High
3.	Data in transit may get compromised	Section 15(1)(I)	Medium	High
4.	Data at rest may get compromised	Section 15(1)(I) Data and servers are located in Canada. The network and servers Section 15(1)(I)	Low	High



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Section 15(1)(l)

5.	Authentication	<p>A secured email / PIN authentication method is used + institution SSO can be put in place as well.</p> <p>Users authenticate the use of their email and relevant identification information during the first point of engagement. i.e.: when signing up for the services and/or upon receiving secure login credentials and/or during first login.</p>	Low	Medium
6.	Authorization	Information is made available to authorized users only	Low	High



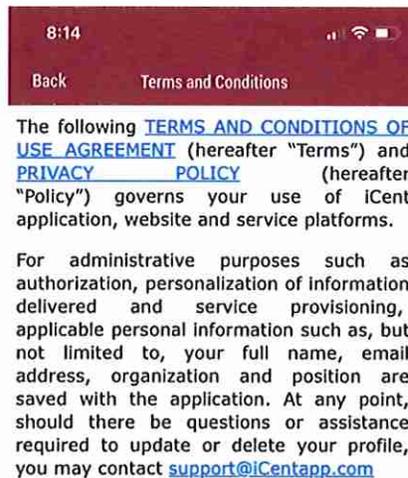
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10. Collection Notice

- Terms students agree to before gaining access to the app dashboard:



- Disclosure used in the login instructions email, even before students download the app:

Disclosure: Personal information such as, but not limited to, your full name and program of study may be shared with the application you are logging into for administrative purposes such as authorization and service provisioning. By logging into this application, you accept that some personal information may be shared with the application. For further information please refer to our [Privacy Policy](#) and [Terms & Conditions](#).



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Part 3 – Security of Personal Information

If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your public body's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.

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

iCent data security and compliancy information:

Section 21, Section 15(1)(I)

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

Section 21, Section 15(1)(I)

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

- Section 21, Section 15(1)(I): <https://www.icentapp.com/data-security.html>
- Section 21, Section 15(1)(I)
- Contact:
 - Name: Ganesh Neelanjanmath
 - Position: Founder, CTO
 - Phone: 905 266 0419
 - Email: founder@iCent.app

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.

Application security:



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Section 15(1)(I)

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

OGE employees are only authorized access to the system by sign-in and sign-out.

Users accessing the system are recorded into access and activity logs.

Importantly, employees are only given access to specific areas of the product/client information on a use-case basis.

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?

Students are in control of their own information; they have access to update/change their information anytime on the app.

Authorised OGE employees can check and verify student information based on NIC registration information. OGE employees can also notify the student via notifications to ask them to update their information on the app.



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

Yes

18. 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.

The information is obtained either directly from the student or from input by OGE employees. Additionally, both the student and OGE employees have access to make updates to the student records at anytime.

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?

The data retention policies are covered in the contract. NIC data retention policies apply since iCent is only providing platform as a service, it is OGE staff that will be managing and using the data for student support services.

Part 5 – Further Information

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

NIC policies apply including Policy #1-01 Freedom of Information and Protection of Privacy.

If iCent receives a request from a the government bodies to disclose information under the obligation of law then OGE employees will be informed.

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).



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21. 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).

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.

No

Please ensure Parts 6 and 7 are attached to your submitted PIA.



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Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA Update and submit it to Privacy Office(r).

Melanie Allison

Dec 04, 2020

Privacy Officer/Privacy Office
Representative

Signature

Date



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Part 7 – Program Area Signatures

Mark Herringer

Nov 30, 2020

Program/Department Manager

Signature

Date

Contact Responsible for Systems
Maintenance and/or Security
(Signature not required unless they
have been involved in this PIA.)

Signature

Date

Lisa Domae

Dec 4, 2020

Head of Public Body, or designate

Signature

Date

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

If you have any questions, please contact your public body's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.