



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSRING]

PIA#[2021-01(r)]

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.

3

Part 1 – General

Name of Institution:	Northern Lights College		
PIA Drafter:	Ryan Moran, Chief Information Officer		
Email:	rmoran@nlc.bc.ca	Phone:	250-784-7505
Program Manager:	Lindsey Borek, Executive Director of the NLC Foundation		
Email:	lborek@nlc.bc.ca	Phone:	250-784-7543

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

1. Description of the Initiative

Northern Lights College Foundation has been issuing scholarships and awards utilizing a process whereby the students fill out an application for each award of which we have 229 awards and then submits them to the Financial Aid Officer (FAO). The FAO then assesses the eligibility of that student for the award and enters them into colleague as eligible or ineligible and then forwards the application to the Foundation. At time of award a report is printed from Colleague with students’ names and ID numbers and the award applications are printed and assessed based on award criteria and awarded. Once awarded a letter or email is issued to the student along with an EFT, cheque or tuition credit advising them of their award.



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSRING]

PIA#[2021-01(r)]

This AwardSpring platform once built out with all the awards and donor information would allow us to integrate with the website and create a unique student experience in turn alleviating the margin of error and increasing our applications received.

It would also allow us to utilize information such as GPA, program, birthdate etc. by pulling from Colleague which will decrease self reporting and follow up time. All awards we offer will be built into AwardSpring and students will be auto matched with awards based on the information that is on their application through the program.

With this program there will be an auto schedule for information to come from Colleague to AwardSpring to ensure the information is accurate and up to date. This software will only allow students and staff with a single sign on to gain access and it won't be a public facing portal. Once built the software will go through a testing phase to ensure that all the data that is collected is matched accordingly to the awards and that the Foundation Staff and the FAO's are comfortable with the process and the software.

All data in the AwardSpring system remains in the custody and control of Northern Lights College. Only employees of NLC and award applicants will have access to confidential information.

2. Scope of this PIA

This covers the entirety of the data transaction between NLC and AwardSpring and access to the AwardSpring system.

3. Related Privacy Impact Assessments

Not applicable

4. Elements of Information or Data

Student ID, first name, last name, birth date, program, email address, GPA, grade, status (full-time/part-time/active) credits, hours.

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.



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

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

AwardSpring hosts all data for its Canadian partners on Canadian soil using Microsoft Azure’s Canada-based datacenters. No production, development or test data is stored in non-Canada datacenters. It is possible that a US-based AwardSpring employee accesses Northern Lights College data from a US location, but that data will not be stored outside of Canada.

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.	



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

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
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.	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.



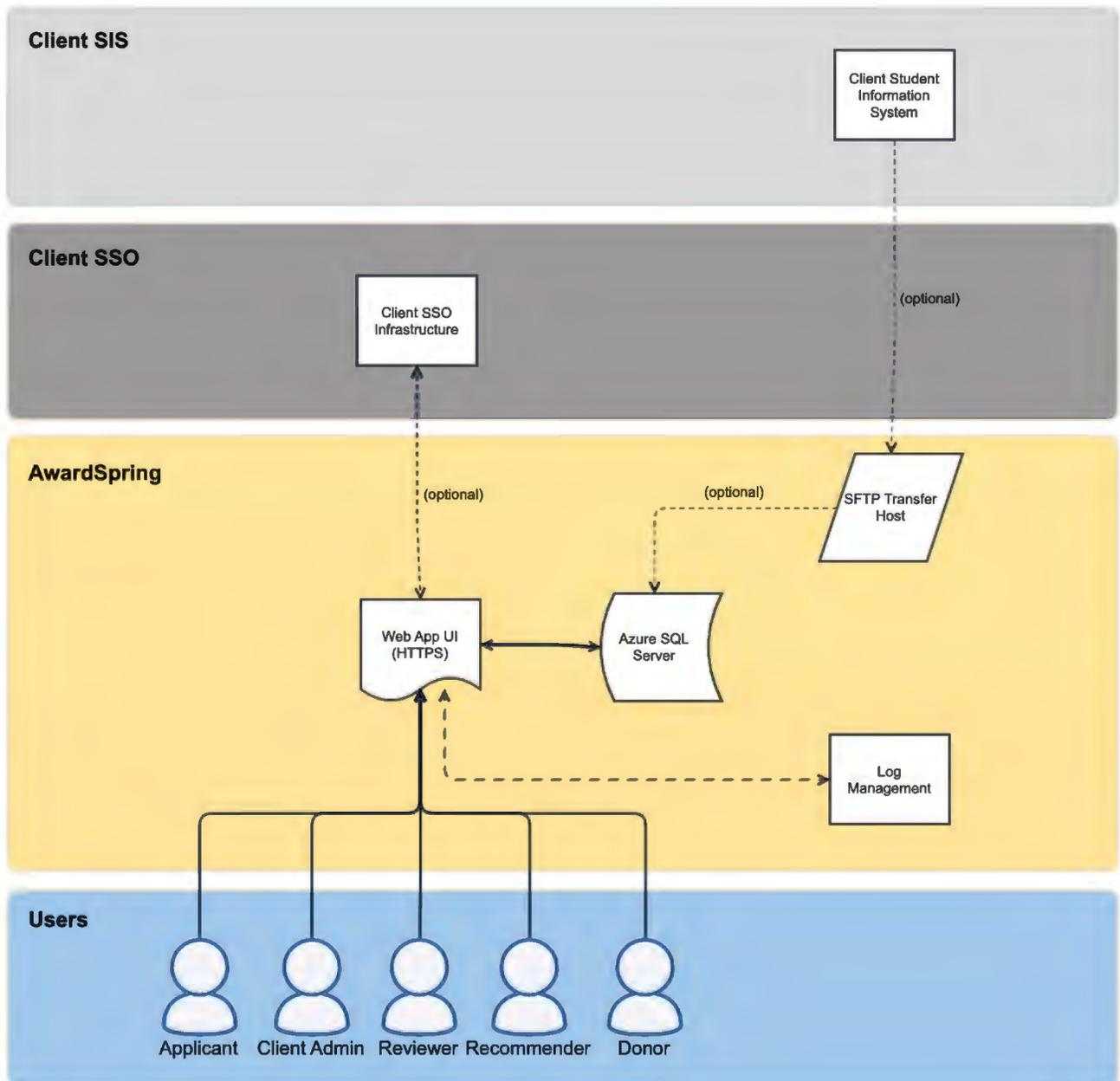
Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSRING]

PIA#[2021-01(r)]

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

AwardSpring is a cloud-based software as a service. All servers, production and otherwise, are hosted within Canada. Access to the system by technical personnel located outside of Canada may occur.





Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Email received from client requesting service	Collection	26(c)
2.	Email client back requesting more information	Disclosure	33.1(7)
3.	Service request transferred to service provider contracted by public body	Disclosure & Use	33.2(c) and 32(a)

9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	[REDACTED]	[REDACTED]	■	■
2.	[REDACTED]	[REDACTED]	■	■
3.	[REDACTED]	[REDACTED]	■	■
4.	[REDACTED]	[REDACTED]	■	■



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

10. Collection Notice

If your initiative is collecting personal information directly from individuals you must ensure that all individuals involved are told the following:

- 1. The purpose for which the information is being collected*
- 2. The legal authority for collecting it, and*
- 3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.*

This information is collected by Northern Lights College under section 27(2) of the Freedom of Information and Protection of Privacy Act and will be used to match you with the associated awards in which you qualify. Should you have any questions about the collection of this personal information please contact:

Ryan Moran, CIO

rmoran@nlc.bc.ca

250-784-7505

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).



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



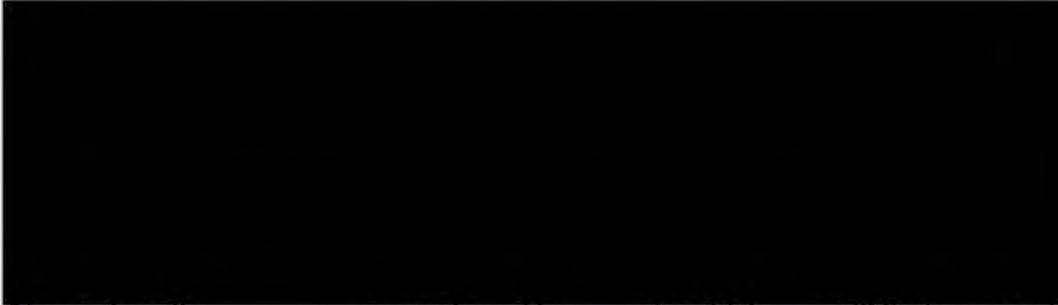


Privacy Impact Assessment for Non-Ministry Public Bodies

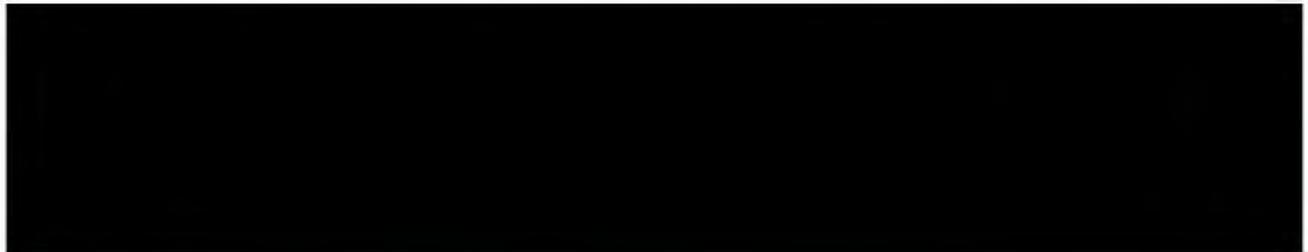
[AWARDSRING]

PIA#[2021-01(r)]

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



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.



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



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?

Data will be populated via one way, automated and scheduled daily transfer from SIS. Students will correct their information by notifying the NLC Registrar.

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

Yes. This information provided will be used to score each applicant against the criteria for the specific award, bursary or scholarship. Once they are scored in the software the adjudication



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

committee consisting of NLC Foundation Staff and NLC staff will then review against the criteria and make their selection of the recipient for the specific award.

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.

Having the integration with our colleague system will be one effort that will ensure the personal information is accurate and complete as well as attaining records from other government agencies if needed.

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. We would follow the NLC Records Management and Retention Policy.

Part 5 – Further Information

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

No

<i>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).</i>	
--	--

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

No

<i>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).</i>	
--	--

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.



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

no

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



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

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).

Privacy Officer/Privacy Office
Representative

Signature

Date



Privacy Impact Assessment for Non-Ministry Public Bodies

[AWARDSPRING]

PIA#[2021-01(r)]

Part 7 – Program Area Signatures

_____ 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
_____ 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.