



Privacy Impact Assessment for Non-Ministry Public Bodies

Early Alert Initiative (Pharos 360)

PIA#001

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:	Student Services		
PIA Drafter:	Chelsea Mackay		
Email:	cmackay@nlc.bc.ca	Phone:	250-784-7552
Program Manager:	Lorelee Mathias		
Email:	lmathias@nlc.bc.ca	Phone:	250-784-7555

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

1. Description of the Initiative

To acquire and implement Pharos 360 as our retention alert and case management system.



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2. Scope of this PIA

This PIA applies to the software-as-a-service provided through Pharos 360.

This PIA will not extend to include our current Colleague student information system.

3. Related Privacy Impact Assessments

N/A

4. Elements of Information or Data

Institutions collect personal information on students for the purpose of student admittance, management of financial services, administering the delivery of education, managing student safety, administering the education system, complying with laws and regulations, conducting research and compiling statistics. The primary categories of information stored in Pharos 360 include:

Detailed Class Information:

- | | |
|--------------------------|------------------------|
| • Section name | • Semester |
| • Title | • Start Date |
| • Faculty Identifier | • End Date |
| • Number of Course Hours | • Campus |
| • Days of the Weeks | • Building |
| • Start time | • Room |
| • End time | • Instructional method |

Student Basic Data:

- | | |
|------------------|------------------|
| • Student ID | • Date of Birth |
| • Preferred Name | • E-mail Address |
| • First Name | • Phone |
| • Middle Name | • Address |
| • Last Name | |



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Student Extended Data:

- Gender
- Currently Enrolled
- Enrollment Status (F/T, P/T)
- Enrollment Date/Start Term/Date First Enrolled
- Admission Status
- Ethnicity
- Race
- Program
- Primary Advisor
- Student Cohort
- Holds
- Home campus
- Credits Completed
- Credits Attempted
- Cumulative Credits
- Cumulative GPA
- Previous Term GPA/Last Term GPA
- Credits for (the semester)/Current Tem Credits
- Anticipated Completion Date/Expected Graduation Date
- Student Type
- Academic Standing
- Awards
- Scholarships
- Grants
- Judicial History
- Past Early Alert Referral, with date range
- Postal Code
- LMS Syllabus Download
- LMS Last Login
- LMS Discussion Posts

Student Log Information:

- Log Date

Faculty / Staff Data:

- Faculty Identifier
- First Name



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- Last Name

- NLC Email Address

Extended Grade Data:

- Midterm Grade
- Current Grade

- Absences
- Last Absences

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

No institutional (student or employee) data is being stored outside of Canada. Production data for Pharos 360 is stored in a secure data centre located in Montreal, QC and/or Toronto, ON. The hosted server is managed by Pharos and hosted by Amazon Web Services.

Pharos 360 is accessed via web browser using 128-bit SSL encryption from all locations. Connections between data centres and the institution use dedicated circuits that are routed entirely through Canada.

AWS customers designate in which physical region their data and their servers will be located. Data replication for S3 data objects is done within the regional cluster in which the data is stored and is not replicated to other data center clusters in other regions. AWS customers designate in which physical region their data and their servers will be located. AWS will not move customers' content from the selected Regions without notifying the customer unless required to comply with the law or requests of governmental entities.

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;	No
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.	



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7. 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.	no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	

**** 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.	Personal information is collected directly from students or guardians for enrolment and the management of the student throughout their time at the institution.	Collection	26(c)
2.	Academic information is collected from faculty for the purposes of assessing students' academic standing and progress.	Collection	C&IA 41.1(2)
3.	Information is collected from students during their term in college for the purposes of providing academic advising or other services necessary for the student.	Collection	26(c)
4.	Student Information is used by employees of the institution when the information is necessary to perform their duties.	Use	26(c)
5.	Information in the Pharos 360 system can be disclosed to Pharos Resources in order to install, implement, maintain, repair, troubleshoot, or upgrade the Pharos 360 system.	Disclosure	33.1(e.1)
6.	Information stored in Pharos 360 is external to the College, hosted by Amazon Web Services.	Disclosure	33.1(e.1)

9. Risk Mitigation Table

Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact
1.			
2.			



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3.	
4.	
5.	

10. Collection Notice

As stated in the NLC Application Form.

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).

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

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?



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Pharos is not the authoritative source for information. Information imported from the system of record cannot be changed in our system. The information kept in the system of record cannot be changed by Pharos.

For information generated by or through Pharos, it will be corrected in Pharos by the custodian.

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

Yes, this initiative uses student information to recommend services and supports to students.

- 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.**

Case triage will include appropriate verification of the details of any submitted case.

- 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. The Records Management and Retention policy states that student information is kept in perpetuity.

Part 5 – Further Information

- 20. 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).

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

No.



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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).

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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).

Privacy Officer/Privacy Office
Representative

Signature

Date



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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.