



Privacy Impact Assessment for:

International Student Application Attestation Letter Process

Name of Department:	International	
PIA Drafter(s):		
Email:		Phone:
Program Manager:		
Email:		Phone:
Privacy Officer:	Mike Culbertson	
Email	Privacy.officer@viu.ca	Phone:

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Part 1 – General

1. What is the Initiative?

Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs.

- The Government of Canada has introduced a cap on the number of students who may enter Canada on a study permit for two years, which results in a 35% reduction in international student applicants from 2023 Canada-wide.
- Immigration, Refugee, and Citizenship Canada (IRCC) has allocated a portion of the cap to each province and territory, who must then distribute the allocation among their designated learning institutions. To implement the cap, effective January 22, 2024, every study permit application submitted to IRCC will also require an **attestation letter** from a province or territory. Provinces and territories are expected to establish a process for issuing attestation letters to students by no later than March 31, 2024.
- In turn, the BC Ministry of Post-Secondary Education and Future Skills is working to establish a process to issue Provincial Attestation Letters (PALs) to BC post-secondary institutions so they can provide the Attestation Letters to their applicants.
- To generate unique Attestation Letters, the BC Government needs sensitive personal information about each international applicant. This responsibility to collect this information falls on post-secondary institutions, so VIU will have to collect this information and share it with the BC Government for the purpose of obtaining Attestation Letters for their students.
- To facilitate the collection, use, and disclosure of this information between post-secondary institutions and the government, an Information Sharing Agreement (ISA) will be signed (see attached).



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1a. Is this initiative a data-linking program under FIPPA?

See [Appendix A](#) to determine if your project is a data-linking program.

- No

1b. Is this initiative a common or integrated program or activity?

See [Appendix B](#) to determine if your project is a common or integrated program or activity.

- No

2. What is the scope of the PIA?

Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?

- The scope of this PIA covers the information flow from point of application through to students receiving their Provincial Attestation Letters, and all internal VIU procedures for managing the electronic and physical records and personal information of applicants.

3. Are there any related Privacy Impact Assessments?

Please indicate if this an update on an existing PIA or an additional module that was not covered in the original PIA.

- This is a new PIA for the new Attestation Letter process.

4. What are the data or information elements involved in your initiative?

In the table below, please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in an appendix.

Information Type	Information Collected
Personal Information	<p>From students:</p> <p>Application includes: Applications are digital and collected through Education Planner BC (EPBC).</p> <ul style="list-style-type: none"> • Name: family, middle, first • Phone, email • Mailing address • DOB • Place of birth • Gender • Citizenship • First language • Country of issue • Emergency contact (name, phone, email, preferred language, relation to student) • Program choice • Educational background • Payment info <p>Supporting documents include:</p> <ul style="list-style-type: none"> • Official transcripts



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	<ul style="list-style-type: none"> • Proof of English language proficiency • Certified English translation* of any documents issued in a language other than English • Passport/Travel document number • copy of passport (photo page) to ensure VIU has legal spelling and date of birth information and for identity verification • Copy of High School Graduation Diploma (if available) • Copy of University Degree (If available) <p>Personal info disclosed to BC Gov for PAL purposes:</p> <ul style="list-style-type: none"> • Student name: first, last • Program • PSI student number • Student email • Student address, city, postal code, province/state, country • Travel doc number and expiry date <p>From Third Parties: English-language test score verifications From VIU Employees: N/A</p>
Contact details	<p>From Students: From Third Parties: From VIU Employees:</p>
Account information	<p>From students: Credit card information for tuition deposits.</p>



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Commercial information	
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4a. Did you list personal information in question 4?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.

- Yes

If yes, go to Part 2

If no, answer question 5 and submit questions 1 to 5 to privacy.officer@viu.ca. You do not need to complete the rest of the PIA template.

5. How will you reduce the risk of unintentionally collecting personal information?

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.

Part 2 – Collection, Use, and Disclosure

This section will help you identify the legal authority for collecting, using, and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

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

In the table below, list the personal information from question four. Think about how each element of information flows through your project. Your Privacy Officer can help you figure out whether each step is a collection, use, or disclosure, and whether you have the legal authority for the way you're working with the information. Alternatively, you can attach a flow diagram to this PIA.

	Describe the way personal information moves through your initiative, step by step, as if you were explaining it to someone who does not know about your initiative.	Type (Collection, Use or Disclosure)	FIPPA or other legal authority
1	International student applications come into VIU Student Record System (SRS) through the Education Planner BC (EPBC) portal.	Collection	FIPPA 26(c)
2	VIU International Admissions Assistants check to ensure the application package (all documentation + fees) are complete.	Use	FIPPA 32(a)
	If incomplete, VIU Admission staff (assistants and/or admissions specialists) will reach out to applicant via email to ask for missing documents.	Collection, Use	FIPPA 26(c); 32(a)
3	Supplemental documents are sent by applicant via email to VIU- and received through a centralized shared email and/or personal work emails. Emails that contain docs are deleted once uploaded to student's record. If it is a complex scenario, however, these emails will be archived for future reference.		
3	Admission Specialist checks qualifications; if sufficient, makes offer of admission	Use	FIPPA 32(a)
4	Students have four weeks to accept in student record and make ██████ deposit.	Collection	FIPPA 26(c)
5	Int. Student signs document that they understand policies.	Collection	FIPPA 26(c)
6	Student accepts offer in their password protected SRS account.	Collection	FIPPA 26(c)
7	VIU personnel (six admissions specialists, two assistants, the Associate Registrar International, Director International, VP International) will be	Use, Disclosure	FIPPA 32(a); 33.2(d)

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	given access to a “PAL portal” to request letters of attestation from the Ministry. To make the request, authorized VIU personnel manually enter: student number, program, passport/expiry date/travel document ID number, first and last name, full address, DOB, and email address. See image below of PAL portal interface.		
8	Ministry prepares file for VIU to download with Attestation Letter and unique identifier	Collection	FIPPA 26(c)
9	VIU prepares document package and sends to student		
10	VIU International Admissions department tracks status of applications by codes, such as Under Review, Offered, Accepted, etc.	Use	FIPPA 32(a)
11	Attestation Letters will be stored on the student’s file in the SRS.	Collection, Use, Disclosure	FIPPA 26(c); 32(a); 33.2(d)

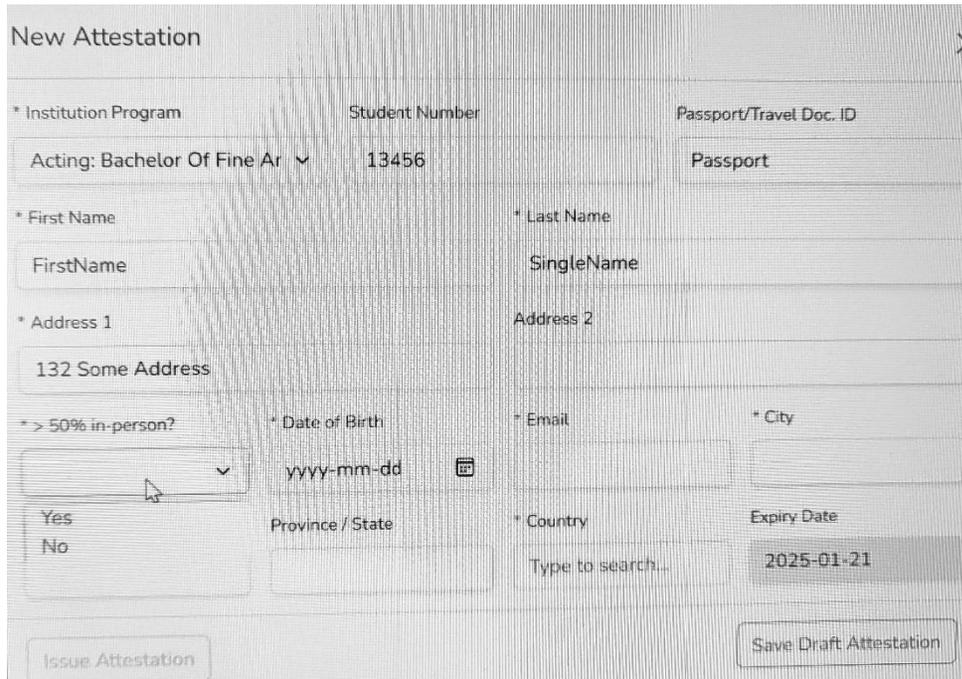


Image: Provincial Attestation Letter Portal interface prototype provided by the Ministry to VIU.

7. Risk Mitigation Table

Thinking through the information flow, identify where there are risks for privacy incidents or information breaches. For each risk, identify a mitigation strategy, as well as the likelihood of an incident, and level of impact on those if their information was breached.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact

1	Unauthorized individuals could access the personal information in the system	VIU employee code of conduct; VIU employee confidentiality agreement; Role-based access to PAL portal; Managing user access – removing those on leaves or no longer working in unit; Multi-factor authentication Password protected computers and access to SRS/PAL portal	medium	medium
2	Student PI is compromised in email sent to wrong person	Email best practices: -VIU employees will share file locations instead of email attachments; -VIU employees will delete emails with personal information as soon as they are saved on a secure drive or deleted permanently. -VIU employees will follow well-documented data breach protocols .	Medium	Medium
3	VIU employee enters wrong information in PAL portal, or mixes up student info	-VIU International Management team will work with BC Ministry to correct mistake and ensure accuracy of personal information.	Medium	Medium
4	Personal Information about International applicants/students could be saved on a non-VIU device, such as a home device, that could be accessed by others, less secure, and more vulnerable to breach.	-It is not yet known if the PAL portal will be available outside of VIU, so waiting for more information to mitigate this risk.	Medium	Medium
5				

8. Collection or Privacy Notice

If you are collecting personal information directly from an individual the information is about, FIPPA requires that you provide a collection notice, also known as a privacy notification.



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A collection notice must contain the following elements:

- The legal authority and section under FIPPA under which you are collecting personal information.
- The purpose for which you are collecting the personal information and how it will be used.
- The contact information of an employee or officer at VIU who can answer questions about the collection of personal information.

Contact the privacy office for a collection/privacy notice template.

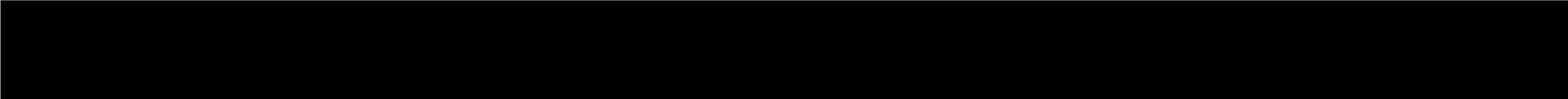
Part 3: Storing Personal Information

9. Is any personal information being stored outside of Canada?

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

- No

9a. Where is the personal information stored?

- 

s. 15(1)(l)

10. Does your initiative involve sensitive personal information?

*Examples of sensitive personal information include personal health information, genetic and biometric data, personal finances, geolocation data, criminal records, counselling records, HR records and payroll records, racial or ethnic origin, sexual orientation, religious, philosophical, or political beliefs, etc. **If so, will the sensitive personal information collected be stored outside of Canada?***

- Yes, the initiative involves sensitive personal info but it is not being stored outside of Canada.

If yes, please complete Part 4: Assessment for Disclosures Outside of Canada.



If **no**, skip to [Part 5: Security of Personal Information](#)

Part 4: Assessment for Disclosures Outside of Canada

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You may need help from your organization's Privacy Officer.

11. Is the sensitive personal information stored by a service provider?

- N/A

If yes, fill out the table below, then go to question 13. If no, continue to [question 12](#).

Information about Service Provider		
Name of service provider	Name of cloud infrastructure and/or platform provider(s) (If applicable)	Where is the sensitive personal information stored (including backups)?

12. Provide details on the disclosure, including where and how the personal information is stored.

Answer this if question 11 does not apply. Be specific about where and how the information is being stored.

- N/A

13. Is there a contract that includes privacy-related terms?



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If there is a contract with the provider, please describe any privacy-related terms in the contract.

- N/A

14. What controls are in place to prevent unauthorized access to sensitive personal information?

Describe technical, administrative, and/or policy measures in place to protect PI. If using a cloud-based service provider, include a description of controls in each layer of the stack: software level, platform level, infrastructure level.

- N/A

15. How will you track access to sensitive personal information?

How will you know if sensitive personal information is accessed, including access by service providers? This should include a description of what information is available through logs.

- N/A

16. What are the privacy risks for disclosures outside of Canada?

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

- N/A

Privacy risk	Impact to individuals	Likelihood of unauthorized collection, use, disclosure or storage	Level of privacy risk (low, medium, high, considering the	Risk response (This may include contractual mitigations, technical controls,	Is there any outstanding risk? If yes, please describe.



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		of the sensitive personal information (low, medium, high)	impact and likelihood)	and/or procedural and policy barriers)	

Part 5: Security of Personal Information

In Part 5, you will share information about the privacy aspect of securing personal information. People, organizations, or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You need to make sure that the personal information is safely secured in both physical and technical environments.

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

- [Redacted]
- [Redacted] s and office doors

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

- [Redacted]
- [Redacted]
- [Redacted]

19. 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.

- [Redacted]
- [Redacted]
 - [Redacted]
 - [Redacted]
 - [Redacted]
 - [Redacted]
- [Redacted]
- [Redacted]

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

- [REDACTED]
- [REDACTED]

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Part 6: Accuracy/Correction/Retention of Personal Information

FIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete. In this section, you will demonstrate how you intend to keep personal information on file accurate and complete.

21. How is an individual's information updated or corrected?

FIPPA section 29 states that a person can ask you to correct their personal information in your custody or control. If it is not possible to update or correct (for physical, procedural or other reasons) it must be noted on the record. Please explain how it will be annotated. If personal information will be disclosed to others, how will VIU notify them of the update, correction, or annotation?

- Once issued a student number, students can login to their account and update their personal information.
- For items they cannot update, such as scanned in documents, they can contact registration or international admissions and request an update.
-

22. Does your initiative use personal information to make decisions that directly affect an individual(s)? *FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision about and individual.*

- Yes

22a. If you answered "yes" to question 22, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

23. If you answered “yes” to question 22, do you have an information schedule in place related to personal information used to make a decision?

FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

24. Do you have a records management schedule in place?

How long will you keep the personal information collected? Is there a plan in place for retention and deletion? Please also use this question to note how long it will be stored by the service provider (if applicable).

Part 7 – Personal Information Banks

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

25. Will your initiative result in a personal information bank?

If yes, please complete the table below:

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the Personal Information Bank

Part 8 – Further Information

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

- No

27. Will the information collected be used for research or statistical purposes?

- VIU will not be using for research or statistical purposes, other than reporting out on number of applicants vs. number of Attestation letters issued, for example.

Part 9 – Summary and Proponent Responsibility

This section is for Privacy Office recommendations as well as any limitations due to privacy concerns.

Part 10: Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Role	Name	Electronic signature
Initiative lead		



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Role	Name	Electronic signature
Program/Department Manager (if different from initiative lead)		
Privacy Officer / Privacy Office Representative	Mike Culbertson FOI & Privacy Officer	

Appendix A: Assessments for Data-linking initiatives and Integrated Programs

Determine whether this program is a “Data linking Initiative.”

<p>In FIPPA, "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. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.</p>	
<p>Personal information from one database is linked or combined with personal information from another database;</p>	<p>Y/N</p>
<p>The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	<p>Y/N</p>
<p>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.</p>	<p>Y/N</p>
<p>If you have answered "yes" to all three questions, please contact a PCT Privacy Advisor to discuss the requirements of a data-linking initiative.</p>	

Determine if this program is a “common or integrated program or activity.”

<p>In FIPPA, "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>This initiative involves a program or activity that provides a service (or services);</p>	<p>Y/N</p>
<p>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>Y/N</p>
<p>The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	<p>Y/N</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>	<p>Y/N</p>



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Appendix B: BC Study Permit Attestation Process for Enrolling International Students in B.C.'s Post-Secondary System

s. 15(1)(l)

