PRIVACY IMPACT ASSESSMENT
for
PD&T Cowichan

1. Purpose of the Privacy Impact Assessment (PIA)

This form is used by VIU to determine if a current or proposed policy, system, project, program or activity meets or will meet the protection of privacy requirements under Part 3 of the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA). The Act makes it a legal requirement that VIU conduct a PIA in accordance with the directions of the minister responsible for the Act. The PIA is a risk management tool to identify potential privacy issues and impacts, allowing correction and mitigation, thus avoiding costly system, program, service, or process redesign; privacy complaints or breaches; and harm to personal, professional and institutional reputation.

See Schedule A for definition of terms.

2. General Information

2.1. Unit and Program Area

Identify the Department and Program submitting this PIA

Department:	Professional Development & Training, Cowichan campus
Program:	MS Office computer skills

2.2. Contact

Identify the individuals best positioned to speak to the contents of this PIA

Name of PIA Drafter:	Niki Scarfo		
Position Title:	PD&T Program Coordinator		
Phone:	778 580-8811	E-Mail:	niki.scarfo@viu.ca
Name of Program Manager:	Nancy Hamilton		
Position Title:	Manager, PD&T		
Phone:	250 746-3573	E-Mail:	nancy.hamilton@viu.ca

2.3. Description of the Current or Proposed Policy, System, Project or Program

Provide as background a general description of the initiative and the context in which it functions. This could include the purpose of the initiative and its benefits, what larger process it is part of, how it functions, how it integrates with or consolidates other information systems, how it aggregates and stores together information that was previously maintained separately, how it converges different record keeping systems, the parties involved, how it will automate or otherwise change the existing business workflow, etc. Describe in the sections immediately following the background (if applicable) specific details with respect to the individual actors involved in the business process, focusing on how their personal information will be collected, accessed, used, disclosed and retained.

Include copies of documentation (if it exists) that describe the business requirements, functional analysis, conceptual overview, etc. that helps explain the initiative.

2.3.1. Background

VIU's Professional Development and Training Department would like to offer online MS computer training courses using online software called Jasperactive through CCI Learning. We have many potential students requesting computer upgrading courses, and by offering them as fully asynchronous online offerings we will be able to continue uninterrupted by COVID. Also online classes are currently in high demand.

The students will need to provide their personal email address to access the Jasperactive software and use its functions. The university will store the usual student information in our SRS system. Only emails will be used in Jasperactive software. CCI Learning will store this information in British Columbia, Canada

2.3.2. Student Information

Collection: email address

Access: Students will use their email to log in to Jasperactive.

Use: to send online access to the student

Disclosure:

Retention:

2.3.3. Instructor (Employee) Information **No instructor required**

Collection: N/A

Access:

Use:

Disclosure:

Retention:

2.3.4. Administrator / Supervisor (Employee) Information **My contact information will be shared with CCI Learning as a business client but not on the software**

Collection:

Access:

Use:

Disclosure:

Retention:

2.4. Scope of this PIA

Explain exactly what the PIA covers and conversely what it does not.

This PIA covers:

1. VIU students accessing Jasperactive

This PIA does not cover:

    1.

2.5. Related PIAs **N/A**

Identify PIAs for other parts of the initiative or any PIAs that were previously completed for this initiative.

2.6. Elements of Information or Data

List the types of personal information involved in the initiative (if applicable). This could include the individual's name, age, address, work/home email, work/home phone number, educational history, employment history, work status, health information, financial information, photos, comments, or opinions about third parties. See Schedule A for a partial list of types of personal information.

2.6.1. Student Data Elements

    1. Home email

2.6.2. Employee Data Elements

1.

2.7. Storage or Access outside Canada

Provide a brief description of whether the personal information can be accessed from outside Canada. For example, by a service provider that is repairing a system, or if the information is being stored outside Canada, for example, in the "cloud"'. If the data is stored within Canada and accessible only within Canada, please indicate this and describe with whom and where it is stored.

Jasperactive is a global company with partners situated around the world. Partners in various countries are limited to just country specific information and don't have the ability to see students from either other partners or other countries. Jasperactive databases are stored using Microsoft Azure Canada – Canada Central location. All databases are securely firewalled by Microsoft directly with limited access to direct IP addresses of just the programmers and database administrators. – *Ray Tellili, CCI Learning*

2.8. Data-linking Initiative

In FIPPA, "data linking" and a "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 must comply with requirements under the Act for a data-linking initiative.	
1. Personal information from one database is linked or combined with personal information from another database	☐ Yes X☐ No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or	☐ Yes X☐ No

	compiled	
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 X☐ No
If you answered "yes" to all three questions, please contact the Information and Privacy Coordinator or Officer to discuss the requirements of a data-linking initiative.		

2.9. Common or Integrated Program or Activity

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 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)	X☐ Yes ☐ No
2.	Those services are provided through: 1) a public body and at least one other public body or agency working collaboratively to provide that service; or 2) one public body working on behalf of one or more other public bodies or agencies	☐ Yes X☐ No
3.	The common or integrated program or activity is confirmed by a written agreement that meets the requirements set out in section 12 of the FIPPA Regulation (link to the Regulation and read section 12)	☐ Yes ☐ No
If you answered "yes" to all three questions, please contact the Information and Privacy Coordinator or Officer to discuss the requirements of a common or integrated program or activity.		

3.   Collection, Use and Disclosure of Personal Information

3.1. Personal Information Flow Diagram / Table

Complete the table(s) below (if applicable). Include a personal data flow diagram (if one exists) as well as completing the table(s).

3.1.1.   Student Data Flow

Personal Information Flow Table			
	Description/Purpose of Activity	Privacy Rule	Legal Authority
1.	Student access to online software account	Collection	
2.		Use	
3.		Disclosure	

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3.1.2. Instructor Data Flow **N/A**

Personal Information Flow Table			
	Description/Purpose of Activity	**Privacy Rule**	**Legal Authority**
1.		Collection	
2.		Use	
3.		Disclosure	

3.1.3. Administrator / Supervisor (Employee) Information **N/A**

Personal Information Flow Table			
	Description/Purpose of Activity	**Privacy Rule**	**Legal Authority**
1.		Collection	
2.		Use	
3.		Disclosure	

3.2. Risk Mitigation Table

Complete the table(s) below. Describe the risk and the mitigation strategy. Use the terms "High", "Medium" or "Low" to rate the "Likelihood" and "Impact" of each risk. In cases where the risks are substantially different for the individuals whose personal information is in VIU's custody or under its control, complete a table for each group. In cases where the risks are substantially similar or the same, complete only one table.

3.2.1. Risks to Student Data

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.		1.		
2.		3.		
4.		5.		
6.		7.		
8.		9.		

3.2.2. Risks to Instructor and Administrator (Employee) Data

Risk Mitigation Table

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	Risk	Mitigation Strategy	Likelihood	Impact
1.		2.		
3.		4.		
5.		6.		
7.		8.		
9.		10.		

3.3. Collection Notice

In order to allow individuals the ability to exercise their information rights with knowledge of how their information will be used, they must be notified at or prior to the time of collection. Section 27(2) of the Act requires that the individual from whom personal information is collected be told: a) the purpose for collecting it, b) the legal authority for collecting it, and c) the title, business address and business telephone number of an officer or employee of the public body who can answer the individual's questions about the collection.

Describe below how and when notice will be given to individuals. Include the specific collection notice(s) that will be used.

3.3.1. Student Collection Notice

4. During the registration process students will be prompted to accept an End User License Agreement – Jasperactive does not directly market or send emails to any students at any time. Teachers and Center Administrators will receive update emails from Jasperactive. Jasperactive also updates a Change Log located on our support site. https://support.jasperactive.com with relevant information and updates to the systems. (Direct Link: https://support.jasperactive.com/support/discussions/forums/36000211196) - *Ray Tellili, CCI Learning*

4.1.1. Instructor and Administrator (Employee) Collection Notice

5. Security of Personal Information

Describe below the specific measures that will be used to protect the personal information from unauthorized collection, access, use, disclosure, retention and disposal.

5.1. Physical Security Measures

1.

5.2. Technical Security Measures

1.

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5.3. Security Policies, Procedures and Standards

Access Control is described in great detail on Page 9 of our Jasperactive Information Security Policy Document – please find it attached. - *Ray Tellili, CCI Learning*

6. Accuracy, Correction and Retention of Personal Information

6.1. Updating and Correcting Personal Information

> Describe here (if applicable) the procedure to allow individuals to routinely update or correct their personal information using regular channels (e.g., a student uses the SIS to update a home address or telephone number, an employee uses the HAP system to update emergency contact information, etc.).

1.

6.2. Decisions That Directly Affect an Individual

> Describe here (if applicable) how the information will be used to make decisions that directly affect an individual.

7. Further Information

7.1. Systematic Disclosures of Personal Information

> Describe here (if applicable) any usual disclosures inside the University between the office with primary responsibility for the personal information and other VIU departments and programs. Also describe any usual disclosures outside the University between VIU and another public or private body (e.g., provincial, territorial or federal government ministry, department or agency; university or college; transit authority; law enforcement agency).
>
> If VIU and one or more other parties have signed an Information Sharing Agreement, include a copy with this completed PIA. An Information Sharing Agreement sets terms and conditions on the collection, use, disclosure and protection of personal information by the parties to the agreement.

Usual disclosures are:

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      1.

7.2. Access for Research or Statistical Purposes

> Describe here (if applicable) any usual disclosures of the personal information made by your department for a research purpose, including statistical research, and how you comply with section 35 of the Act.

8. Information and Privacy Comments

8.1. Information or Materials Reviewed

> The Privacy Officer will describe here any additional resources and authorities consulted when reviewing and commenting on the completed PIA.

I reviewed and considered:

8.2. Conditions of Approval

> The Privacy Officer will describe here any recommended conditions to be considered by the University officer with delegated decision-making authority under the Act, who approves the completed PIA.

Recommended conditions are:

1.

9. Approval and Signatures

The undersigned confirm that they have taken reasonable steps to confirm that the contents of this PIA are accurate and complete.

William Boyte		
VIU Privacy Officer	Signature	Date
Niki Scarfo		Feb 11, 2022
Program Coordinator, PD&T	Signature	Date

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Insert Name
Insert position title of Project
Manager, Information
Technology Services (if
applicable)

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Schedule A

Definition of terms

Access	Disclosure of personal information by the provision of access to personal information.
Anonymize	Present the results of a process in such a way that individuals whose personal information is contained in the records cannot be identified, and no linkages can be made between any personal information found in the records and personal information that is publicly available from other sources.
Authorized access	Occurs when a person has access to personal information in the custody or control of the University that is authorized by the Act.
Consistent purpose	A use of personal information is consistent with the purpose for which the information was obtained or compiled if the use:

1. has a reasonable and direct connection to that purpose, and

2. is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Contact information	Information that enables an individual at a place of business to be contacted; includes name, position title, business telephone number, business address, business email or business fax number of the individual.
Data linking	The linking or combining of personal information in one source with personal information in one or more other sources if the purpose of the linking or combining is different from:

1. the purpose for which the information in each database was originally obtained or compiled, and

2. every purpose that is consistent with each purpose referred to in paragraph (a).

Disclose	Reveal, show, expose, provide copies of, sell, give or tell.
	VIU may disclose personal information in its custody or under its control only as permitted under section 33.1, 33.2 or 33.3 of the Act.
Employee	A person employed for wages or salary by the University. In relation to VIU, includes: (a) a volunteer and (b) a service provider (see also the definitions for each of the latter terms).
Individual identifier	Information that would enable a third party to deduce the identity of the person concerned; examples include a person's name, Social Insurance Number, student number, employee number, address, date of birth (usually used in combination with other identifiers).

Instructor	Individuals responsible for the teaching of credit and non-credit courses including professors, associate professors, assistant professors, professors emeritus, adjunct professors, visiting faculty, practitioner faculty, post-retirement appointees, lecturers, instructors, teaching assistants, tutors and markers, faculty associates, in-service associates, associate members and program coordinators.
Personal information	Recorded information about an identifiable individual, other than business contact information, including but not limited to:

1. names, home addresses and telephone numbers;
2. age;
3. sex;
4. marital or family status;
5. identifying number;
6. race, national or ethnic origin;
7. colour;
8. religious or political beliefs or associations;
9. educational history;
10. medical history;
11. disabilities;
12. blood type;
13. employment history;
14. financial history;
15. criminal history;
16. images;
17. anyone else's opinions about an individual;
18. an individual's personal views or opinions; and,
19. name, address and phone number of parent, guardian, spouse or next of kin.

Record	Includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records.
Service provider	A person retained under contract to perform services for VIU or a person with whom an employee automatically enters into an agreement by virtue of using their product or service and in so doing accepts the service provider's terms of use.
Unauthorized collection, use, disclosure and disposal	Occurs when a person who has access, whether authorized or unauthorized, to personal information in the custody or control of the University, collects, uses, discloses and disposes of that information and it is not authorized by the Act.
Use	Employ information to accomplish a specific purpose.
Volunteer	A person who provides a service to the University without being paid.

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