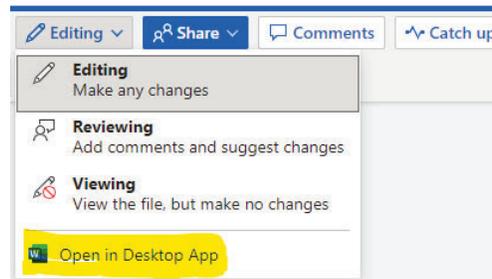


## INSTRUCTIONS (READ BEFORE STARTING)

Use the Microsoft Word desktop app rather than the SharePoint online version of Word. Access the Desktop App from the Editing button drop down on the main ribbon beside Help on the upper right side of your screen. Checkbox functionality does not work reliably on the web-based versions of Word.



Submit a completed privacy impact assessment (PIA) before starting a new College Initiative or significantly changing an existing College Initiative that directly collects Personal Information, or results in the collection of Personal Information by CNC or a CNC service provider.

BC's Freedom of Information and Protection of Privacy Act (FIPPA) defines an "Initiative" as any enactment ("policy/procedure"), system (conceptual or technical), project, program, or activity.

Contact the Privacy Office at [foipp@cnc.bc.ca](mailto:foipp@cnc.bc.ca) to receive support determining whether any change in how College employees are completing their duties to the College may require a Privacy Impact Assessment.

**Read through this form entirely before starting to populate it. Each question is designed to capture specific information for review.**

**Some information recorded in the PIA may be confidential or proprietary and not intended for distribution. Before you share the draft or completed PIA (internally or externally), please contact CNC's privacy office at [foipp@cnc.bc.ca](mailto:foipp@cnc.bc.ca) for guidance.**

**PART 1: GENERAL INFORMATION**

<b>Initiative Title:</b>	Desire2Learn Brightspace
<b>Department:</b>	Human Resources
<b>Initiative Lead (PIA Drafter) Name and CNC Email Address:</b>	s. 22(3)(d)
<b>Dean or Director Name, Title, and Email:</b>	Evelyn Watt – Director, Human Resources watt@cnc.bc.ca
<b>Privacy Officer Assigned:</b>	Adam Cullum – Manager, Privacy & Records
<b>If initiative involves a third-party (i.e. vendor, consultant, partner), provide</b>	
<b>Third Party Name:</b>	Desire2Learn
<b>Product Name (if applicable):</b>	Brightspace
<b>Third Party Contact Name and Email:</b>	s. 22(3)(d)
<b>Third Party URL:</b>	<a href="https://www.d2l.com/brightspace/">https://www.d2l.com/brightspace/</a>

1. In three to five sentences, describe the Initiative including:
  - a) what you are doing,
  - b) an overview of the process,
  - c) who is involved,
  - d) and when and/or how long your Initiative runs.

D2L’s Brightspace (Brightspace) is a digital learning management platform that delivers personalized learning experiences. Brightspace is cloud-based, and offers multimedia to increase engagement, productivity and knowledge retention. The platform makes it easy to design courses and create content. It supports the learning experience through course content management, assessment, collaboration, and communications. CNC can utilize analytic reports s. 17(1)(a)

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at CNC? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the Initiative will be implemented?

D2L Brightspace will be used as a platform to deliver employee education throughout CNC to meet compliance requirements and provide affordable professional development.

3. Is this an administrative/operational, teaching and learning, or research Initiative? Select all that apply.

- Administrative/Operational  Research (**Contact Privacy Office before continuing this PIA**)  
 Teaching and Learning

4. Has a PIA previously been completed for this Initiative?

- Yes  No  Not sure

5. What activities will occur within the Initiative? Use the bullet points below to make action statements. Replace the example action statement. Add or delete bullets as necessary.

- Employee business contact information is exported **s. 17(1)(a)**.
- Employees are assigned training modules to complete based on their role in the college
- Employees complete the training including any assessments
- Employees training completion and assessment results are stored on the Desire2Learn platform.
- CNC may create reports that show the employees that have completed specific training.

6. In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your Initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.

- Employee name
- Employee position
- Employee department
- Employee email address
- Assessment completion indicator
- Assessment result (when relevant)
- **s. 17(1)(a)**

7. Did you list Personal Information in question 6? [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  No

8. If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information?

N/A



9. Does the Initiative involve integration between CNC IT systems and Third-Party systems?

Yes

No

N/A

If yes, list below: (put N/A on the first row if you answered No or N/A above. Add or delete rows)

CNC IT system: N/A

Third party system integrated: N/A

If there is Personal Information involved in this Initiative, continue to complete the remaining sections of the PIA. If there is not any Personal Information involved in this Initiative, please submit questions 1-9 to the Privacy Officer along with the completed signatures page.

## PART 2: COLLECTION

FIPPA sets out rules for public bodies and their employees to collect of Personal Information. Unauthorized collection is prohibited. This section will help you identify the legal authority for **collecting** Personal Information and confirm that all Personal Information elements collected are necessary for the purpose of the initiative.

**10.** Whose Personal Information is collected in this initiative? Check all that apply.

- |   |  |
|---|--|
| <input type="checkbox"/> Students             | <input type="checkbox"/> Former employees                      |
| <input type="checkbox"/> Prospective students | <input checked="" type="checkbox"/> Service provider employees |
| <input type="checkbox"/> Former students      | <input type="checkbox"/> Donors or other constituents          |
| <input type="checkbox"/> Alumni               | <input type="checkbox"/> Volunteers                            |
| <input checked="" type="checkbox"/> Employees | <input type="checkbox"/> Other community members               |

**11.** How frequently will the Initiative collect Personal Information?

- Single instance of collection within one semester or quarter
- Ongoing collection up to a single year
- Ongoing collection over more than one year

**12.** How many individuals' Personal Information will be collected?

- 1 - 50                       51 - 500                       Over 500

**13.** If the Initiative involves a Third Party, are you able to test the product to see what personal information it collects?

- Yes                       No                       N/A (No Third-Party product involved)

**14.** Why is the Personal Information being collected? (check all that apply)

- The Personal Information is necessary and directly related to college operations. The collection of this Personal Information is directly related to the college's documented strategic directives, goals, or mandate letter directions.
- The Personal Information is necessary and directly related to requirements explicitly stated in college bylaws, policy, and procedure.
- The Personal Information is collected because collection is required or authorized under local, provincial, or federal law. Be prepared to directly cite the section of a particular law that applies if asked.
- The Personal Information is collected for determining suitability for an honour or award including a scholarship, prize, or bursary.
- The Personal Information is being collected for a quality assurance or improvement Initiative that has been approved by the college Executive.

15. How will you reduce the risk of collecting unnecessary Personal Information? (Check all that apply.)

- The Initiative will only collect specific information deemed necessary for and directly related to the initiative
- The Initiative will use forms with primarily closed-ended questions and minimal open-ended questions
- The Initiative will use forms with drop-down menus
- The Initiative will have documented data gathering and aggregation processes for open ended submissions or fields
- The Department needs Privacy Officer review and support because none of the above apply

16. FIPPA Collection Notice: When collecting Personal Information, FIPPA requires that you provide a collection notice (except in limited circumstances). Please fill in the template collection notice below and remove bold and square brackets.

The College of New Caledonia ("CNC") collects your Personal Information in accordance with section 26 of the Freedom of Information and Protection of Privacy Act ("FIPPA"), R.S.B.C. 1996, c.165 for the purposes of **ensuring that employees receive training to meet compliance requirements and to improve the work they do at CNC. Information about completion rates of training offerings will be used for quality assurance and improvement purposes to ensure training is regularly updated for optimal delivery.** If you have any questions about the processing of your Personal Information, please contact **human resources** at **hr@cnc.bc.ca**

Please ask the Privacy Office for assistance drafting your collection notice if your Initiative requires indirect collection of Personal Information (i.e. if a service provider collects Personal Information from students or employees on behalf of CNC). The Privacy Office may recommend changes to the FIPPA Collection Notice that you draft above.

### PART 3: USE

FIPPA sets out requirements and restrictions related to use of Personal Information. This section will help you identify the legal authority for **using** Personal Information and ensure that the use of Personal Information is limited to the original purpose for collection.

17. What is the intended use of the Personal Information collected? (check all that apply)

- The Personal Information will be used for the purposes checked off in Question 14
- The Personal Information will be used for secondary purposes, and I have a consent notice attached as an appendix to this PIA that meets the requirements found in FIPPA regulations. I will work with the Privacy Office to determine if secondary use is appropriate and compliant with FIPPA.
- The Personal Information will be used for a purpose for which the information may be disclosed to the public body under [section 33](#). The Privacy Office will attach the relevant section number to this selection if it applies.

**Privacy Office Note:** s. 13(1)

18. How will you ensure that parties using the Personal Information will use it only for the purposes stated in 17 above? Check all that apply.

- Documented department information management practices and training
- Documented use restrictions communicated from your department to another CNC department
- Written contract between CNC and a Third Party including explicit conditions
- The Department needs Privacy Officer review and support because none of the above apply

19. Does your Initiative use Personal Information to make decisions that directly affect an individual?

- Yes  No

20. What is the intended impact of the decisions that are being made that directly affect an individual? (check all that apply).

- Directly affects academic status or grades
- Directly affects how an individual accesses their courses, campus activities, or student supports
- Directly affects employment status, employee remuneration, or contract opportunities, and pay
- Directly affects how employees and service providers will complete their work
- Directly affects how employees access campus activities and support services
- Directly affects the College's capacity to protect individuals from harm
- Directly affects the College's capacity to interact with and support external parties
- N/A – The decisions are not intended to have a direct impact on individuals



21. Who will be using the Personal Information collected by this Initiative? (Check all that apply and provide details.)

<b>Your department:</b>	Human Resources
<b>Other Departments at CNC</b>	<b>External Partners and Service Providers</b>
Executive Office	Desire2Learn
Course Administrator (vary by department responsible)	s. 15(1)(l)

## PART 4: STORAGE

22. Is all Personal Information involved in your Initiative stored within standard CNC storage locations, technologies, or services?

- Yes  No

If you answered yes, please list the approved standard CNC storage locations, technologies and/or services.

- Microsoft 365 (Teams, SharePoint, OneDrive)
- Other Microsoft 365 Apps Approved by CNC. Specify: \_\_\_\_\_
- Colleague
- CNC Local Servers (S: Drive, R: Drive) [check with IT for accuracy]
- Moodle
- Sitefinity
- Team Dynamix
- Direct Line Web

23. Is any Personal Information involved in your Initiative stored outside of Canada?

- Yes  No

24. Where is the Personal Information stored? Please identify applicable geographic locations for primary storage and backups. If Personal Information is stored in more than one primary location, the Privacy Office can expand the response field in this question.

**Primary Storage**

City (if applicable): s. 15(1)(l)

Province, Region, or State: s. 15(1)(l)

Country: Canada

**Back-up Storage (if applicable)**

City (if applicable): s. 15(1)(l)

Province, Region, or State: s. 15(1)(l)

Country: Canada

25. Does your Initiative involve Sensitive Personal Information? (Any Personal Information can be Sensitive Personal Information in different contexts. Please contact the Privacy Office to discuss.)

- Yes  No

26. Is any of the Sensitive Personal Information stored outside of Canada?

- Yes  No

27. Where is the Sensitive Personal Information stored? Please identify applicable geographic locations for primary storage and backups. **Type N/A in the cells on the first row if Sensitive Personal Information is not stored outside of Canada as indicated in Question 26.**

Name of Third Party	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the Sensitive Personal Information stored (including backups)?
N/A	N/A	N/A

**PART 5: DISCLOSURE**

FIPPA sets out requirements and restrictions related to disclosure of Personal Information. This section will help identify the legal authority for **disclosing** Personal Information, and consider risks related to that disclosure. **Fill out this section if Question 26 was answered “Yes”**

Complete this section if you are disclosing Sensitive Personal Information to be stored outside of Canada. You may need help from the Privacy Office.

**28.** Is any Personal Information being disclosed outside of Canada under FIPPA section 33(2)(f)? This section allows for information to be made available to the public under an enactment that authorizes or requires the information to be made public.

- Yes  No

**29.** Is any of the Personal Information being disclosed outside of Canada under FIPPA section 33(2)(p)? This section allows disclosure for the purposes of (i) a payment to be made to or by CNC, (ii) authorizing, administering, processing, verifying, or cancelling a payment, or (iii) resolving an issue regarding a payment.

- Yes  No  
 The payment processor is out of scope of this PIA

**30.** Describe the privacy risks for disclosure of Personal Information outside of Canada.

**Use the table to indicate the privacy risks. For each privacy risk you identify, describe the potential impact to individuals or CNC, and describe a privacy risk response that is proportionate to the level of risk posed.**

This may include reference to the measures to protect the Sensitive Personal Information (contractual, physical, technical, administrative measures) you outline elsewhere in this PIA. Privacy risks below are examples only; add new rows if necessary.

Privacy risk	Impact to individuals or CNC	Risk response
N/A	N/A	N/A

**PART 6: PROTECTION**

Please share how the initiative will secure Personal Information to protect personal privacy. 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.

31. Does your Initiative involve digital tools, databases, or information systems?

- Yes  No

32. What physical security safeguards are in place to protect Personal Information in this Initiative?

Identify the elements of physical security that protect where the records for your Initiative are stored (Check all that apply. Specify, "Other" if applicable)

Safeguard	At CNC	At Third Party
s. 15(1)(l)	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>

33. What technical security safeguards are in place to protect Personal Information in this Initiative?

Describe the elements of technical security that protect where the records for your Initiative are stored (e.g. secure passwords, encryption, firewalls, etc.) (More options on the following page)

Safeguard	At CNC	At Third Party
s. 15(1)(l)	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>

s. 15(1)(l) [Redacted] [ ] [ ]

34. What administrative safeguards are in place to protect Personal Information?

Describe the elements of administrative security that protect where the records for your Initiative are stored (e.g. aliasing, aggregation, policies/procedures, standards of practice, etc.)

Safeguard	At CNC	At Third Party
s. 15(1)(l) [Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]
[Redacted]	[ ]	[ ]

35. If the Initiative involves a Third Party, please indicate what type of Agreement governs the relationship between CNC and the Third Party. Please select one.

- CNC's GSA (negotiated Agreement between CNC and the Third Party)
- Vendor's Agreement (negotiated Agreement between CNC and the Third Party)
- Online "Terms of Service" or "Terms of Use" (often non-negotiable)
- Memorandum of Understanding/Memorandum of Agreement ("MOU"/"MOA")
- Other (specify): BCNet Agreement
- No Agreement

36. If the Initiative involves a Third Party, does an End User License Agreement ("EULA") apply to the individuals whose Personal Information is involved?

- Yes  No

37. The Privacy Officer will need to review all draft/proposed Contracts/Agreements (and related materials, i.e. contract appendices/schedules; Third Party privacy policies or online terms and conditions, if any) involved in the Initiative. Have you ensured these have been provided? Check only one.

- Yes  No  N/A (No Third Party involved)

**Privacy Office Note:** s. 13(1) [Redacted]

**38.** Where are the privacy related terms referenced in the contract or agreement if applicable? (Check all that apply)

- In the body of the contract or agreement
- Third Party will sign CNC's Privacy Protection Schedule
- Third Party will sign CNC's Data Security Schedule
- In the Third Party's privacy or data protection policy or appended schedules
- In a separate Information Sharing Agreement
- There are no privacy related terms in the contract or agreement (or related documentation)
- There is no contract or agreement for this Initiative

**39.** Controlling and tracking access

Review each strategy below that describes how to limit or restrict who can access Personal Information and how to keep track of who has accessed Personal Information in the past. Check all that apply. Specify "Other" if applicable.

- Managed role-based access to Personal Information for CNC employees
- Managed role-based access to Personal Information for Third Party
- Third Party access is time limited for installing, implementing, maintaining, repairing, troubleshooting, or upgrading an electronic system
- Third Party access escorted by authorized CNC employee
- Audit logs at CNC
- Audit logs from Third Party
- Other: *(fill in details)*

## PART 7: ACCURACY AND CORRECTION

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. FIPPA also gives an individual the right to request correction of errors or omissions to their Personal Information.

In this section, please demonstrate how you will make a reasonable effort to ensure the Personal Information you have on file is accurate and complete.

**40.** How will CNC ensure that the Personal Information is accurate and complete? (Check all that apply)

- Individuals input their own Personal Information
- Individuals update their own Personal Information
- Employee verifies that information is accurate and complete before processing
- Documented processes to ensure accurate and complete data entry and maintenance
- The Third Party manages the accuracy and completeness of Personal Information under the direction of CNC
- Software or service uses automated processes to enter and manage Personal Information
- Other: *(fill in details)*
- Other: *(fill in details)*

**41.** Is there a documented process in place to correct Personal Information?

- Yes  No

**42.** Sometimes it is not possible to correct the Personal Information. FIPPA requires a process to make a note on the record about the request for correction if it isn't possible to correct the record itself. Is there a documented process in place to annotate the record?

- Yes  No  N/A (Corrections possible)

**43.** If there is a request for correction from an individual and CNC or the Third Party disclosed that individual's Personal Information in the last year, FIPPA requires that CNC or the Third Party provide the applicable other public body or Third Party about the request for correction. Will CNC or the Third Party ensure that these notifications are done when necessary?

- CNC will forward correction notifications
- Third Party will forward correction notifications
- CNC and Third Party will split responsibility based on who was authorized to disclose Personal Information to third parties before a correction request was made.

## PART 8: RETENTION AND DISPOSITION

FIPPA requires that public bodies keep Personal Information for a minimum of one year after it is used to make a decision. Personal Information needs to be disposed of to limit privacy risk after legal retention timelines.

44. How long will CNC need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

Record Type: Training Completion Records      Retention Period (in years/months): 5 years

**Privacy Officer Notes:** s. 13(1)

45. How long will the Third Party need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

Record Type: Employee User Information      Retention Period (in years/months): s. 21(1)  
(.csv)

Record Type: Training Completion Records      Retention Period (in years/months): s. 21(1)

46. How will you ensure that the records containing Personal Information are disposed of in accordance with the retention schedule noted in questions above? (Check all that apply)

- Schedule records review and disposition dates in Outlook calendars
- Build conditions for disposal into department Standard Operating Procedures
- Send direct written communication to staff or service providers.
- Other (explain): **Vendor note:** s. 21(1)

47. What methods will be used to dispose of Personal Information following retention period? (Check all that apply.)

- CNC business unit shredding on campus
- CNC contracted shredding service provider
- CNC deletion of electronic record(s)
- Service Provider shredding/deletion of record(s) under CNC contract
- Service Provider shredding/deletion of record(s) under CNC written instruction
- Other (explain): Setting automated complete purging of records s. 21(1)
- Other (explain):

## PART 9: INFORMATION FLOW

### 48. Complete the Information Flow Table

Use column 1 to describe the way Personal Information moves through your Initiative step by step. Describe the steps as if you were explaining it to someone who does not know about your Initiative.

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of Personal Information.

The Privacy Officer will complete column 3 to identify the legal authority you have for the collection, use or disclosure.

Information Management Steps	Collection, use or disclosure	FIPPA and other legal authorities
Assign training modules to positions in departments within D2L Brightspace	N/A	N/A
Export data s. 21(1) [REDACTED] to upload manually into the D2L Brightspace platform s.21(1) [REDACTED]	Use	32(c) → 33(2)(h)
Import data into D2L Brightspace defined above.	Use	32(c) → 33(2)(h)
Employee logs into the system and can access training assigned to them based on their role and may have access to optional offerings.	Use	32(c) → 33(2)(h)
Employee completes the assigned training modules. An indicator appears that shows the employee has completed assigned modules.	Collection	26(c), 26(e)
Certificates are processed and made available to the employees.	Use	32(a)
Supervisors are able to check the progress of their employees' completion of mandatory and optional training. HR also has the same access.	Use	32(a)
Training administrator and Human Resources can run reports of participants' completion of training modules.	Use	32(a)

**Optional:** Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

**PART 10: TRAINING**

49. Identify which of the following activities all employees and Third Party (as applicable), will be trained on when collecting and managing the Personal Information for the College Initiative.
- Collection: Limit the collection to only what is explicitly necessary
  - Use: Use the Personal Information only for the purpose for which it was originally collected
  - Access: Only authorized employees (and, where applicable, service providers) may access the Personal Information
  - Disclosure: Not to disclose the Personal Information inside or outside CNC unless authorized under FIPPA
  - Storage: To store the Personal Information only in CNC-provided or approved storage locations and not to store unnecessarily in multiple locations
  - Retention: to keep the Personal Information for a minimum of one year – with longer retention periods only when necessary
  - Disposal: To dispose, when applicable, in a secure method that renders the Personal Information permanently irretrievable

**PART 11: PERSONAL INFORMATION BANKS**

50. Will your Initiative result in a Personal Information Bank (“PIB”)? A PIB is a collection of Personal Information searchable by name or unique identifier. If yes, please complete the table below. If more than one PIB will result, copy and paste an additional copy of the table below and fill out a separate table for each PIB.

Yes  No

<b>Title</b>	Employee Training Record
<b>Location</b>	D2L Brightspace
<b>Personal Information Types</b>	Assessment completion indicator, Assessment result (when relevant), s. 21(1)
<b>Categories of Individuals Included</b>	CNC employees, CNC service providers (as needed)
<b>Collection Authority</b>	26(c), 26(e)
<b>Purpose of Personal Information</b>	Provide online mandatory compliance training and track completion of training modules. Track the type of training format provided as well.
<b>Categories of Persons Managing Information</b>	CNC Employees

## PART 12: OIPC REVIEW REQUIREMENTS (Privacy Officer to Complete)

51. Is this Initiative a data-linking program under FIPPA? If this PIA addresses a data-linking program, this PIA must be submitted to the Office of the Information and Privacy Commissioner.

Yes  No

52. Is this Initiative a common or integrated program or activity? If this PIA addresses a common or integrated program, this PIA must be submitted to the Office of the Information and Privacy Commissioner.

Yes  No

## PART 13: PRIVACY OFFICE(R) COMMENTS

This PIA is based on a review of the material provided to the Privacy Office(r) as of **March 3, 2025**. If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).

s. 13(1)

[Redacted content]

### Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Office as at the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Adam Cullum – Manager, Privacy & Records	As per email chain	March 4, 2025

## PART 14: APPROVAL SIGNATURES

### Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices 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 Department will inform the Privacy Office, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

**Declaration of Initiative Lead:** I confirm that I understand the privacy impacts of this College Initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the Initiative. If there are any changes to the Initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the Privacy Office and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and CNC Privacy Office recommendations relative to this Initiative.

#### Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
s. 22(3)(d)		4 March 2025

**Declaration of Dean / Director / One-Over-One Signatory:** I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and CNC Privacy Office recommendations relative to this Initiative.

#### Signature of Dean / Director

Name and Title	Signature	Date signed
Julie Wessel – Associate Director Human Resources signing on behalf of Evelyn Watt – Director, Human Resources	Julie Wessel	March 4, 2025

**Declaration of Information Security:** I confirm that I am satisfied that the Information Security safeguards employed in this college Initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or CNC business information described in this PIA.

**Signature of Information Security** (Required only when college Initiative involves Information Security considerations)

Name and Title	Signature	Date signed
Hawkeye Fyvie – Cybersecurity Analyst	Based on review with Privacy Office	03-06-2025

**Declaration of Information Technology:** I confirm that I understand and approve of the proposed use-case of CNC IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with CNC's IT systems for the College Initiative described in this PIA, where applicable.

**Signature of Information Technology** (Required when College Initiative involves use of CNC IT systems or integration of Third-Party technology with CNC IT systems.)

Name and Title	Signature	Date signed
N/A	N/A	N/A

**Declaration of Head of Public Body or Designate:** I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College Initiative. I am satisfied with the completion of this PIA under FIPPA.

**Signature of Head of Public Body or Designate Under FIPPA** (Required only if Personal Information is involved in the Initiative as indicated in Question 7.)

Name and Title	Signature	Date signed
Tara Szerencsi – Vice President Finance and Corporate Services	Tara Szerencsi	March 6, 2025

## PART 1: GENERAL INFORMATION

Initiative Title:	Clover Learning Platform
Department:	MRAD
Initiative Lead (PIA Drafter) Name and CNC Email Address:	Alysha Zanette <a href="mailto:zanettea1@cnc.bc.ca">zanettea1@cnc.bc.ca</a>
Dean or Director Name, Title, and Email:	Jenn Scott, Dean of School of Health Sciences <a href="mailto:scottj20@cnc.bc.ca">scottj20@cnc.bc.ca</a>
Privacy Officer Assigned:	Adam Cullum – Manager, Privacy and Records
<b>If initiative involves a third-party (i.e. vendor, consultant, partner), provide</b>	
Third Party Name:	Clover Learning
Product Name (if applicable):	Standard Radiography Training Course
Third Party Contact Name and Email:	s.22(3)(d) [Redacted]
Third Party URL:	<a href="https://cloverlearning.com/">https://cloverlearning.com/</a>

1. In three to five sentences, describe the Initiative including:
  - a) what you are doing,
  - b) an overview of the process,
  - c) who is involved,
  - d) and when and/or how long your Initiative runs.

The MRAD department is interested in adding additional resources that would support MRAD 255 Capstone in preparing our students to write the CAMRT competency exam. The Clover Learning platform has an appealing “exam prep” aspect where we can assign a customized simulated registry exam from a robust question bank easily controlling the exam category weightings to have an extremely close match to the CAMRT exam blueprint. We can also assign additional learning resources that Clover Learning has. The instructor and each student can see exactly what areas may require more focus during their studies; the instructor can also then customize individual practice exams for each student including topics specific to individual students learning needs. The simulated exams would be about as close as our students can get to a simulated online registry exam. The Capstone instructor(s) and the enrolled students would be the only individuals involved. Ideally, we want to do a trial for intersession 2025 that didn’t require any additional cost to the students, before deciding if this was a resource we could incorporate permanently where the students would then need to pay through an access code purchased through the bookstore, or potentially the School of Health Sciences can use operational funding to fund this purchase



2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at CNC? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the Initiative will be implemented?

This initiative would be limited to the Medical Radiography Department and enrolled students. Clover Learning is specifically designed for radiography. Depending on how the trial in Capstone goes and when we have had a chance to fully dive into the many resources, we may find value in incorporating Clover Learning into other MRAD courses.

3. Is this an administrative/operational, teaching and learning, or research Initiative? Select all that apply.
- Administrative/Operational  Research (**Contact Privacy Office before continuing this PIA**)
- Teaching and Learning
4. Has a PIA previously been completed for this Initiative?
- Yes  No  Not sure
5. What activities will occur within the Initiative? Use the bullet points below to make action statements. Replace the example action statement. Add or delete bullets as necessary.
- Students are creating accounts to access the service.
  - Students complete customized simulation competency/registry exam simulation and additional practice exams
  - Instructor assigns of various learning activities
  - Instructor reviews student progress, activity and test grades
6. In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your Initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.
- Student first and last name
  - Usage/activity tracking data
  - Individual grades and class averages
  - Documentation of strengths and weaknesses (predefined in the platform as closed ended statements)
  - Platform content and learning resources such as videos, activities, exam questions provided by Clover
7. Did you list Personal Information in question 6? [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  No
8. If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information?

N/A



## PART 2: COLLECTION

FIPPA sets out rules for public bodies and their employees to collect of Personal Information. Unauthorized collection is prohibited. This section will help you identify the legal authority for **collecting** Personal Information and confirm that all Personal Information elements collected are necessary for the purpose of the initiative.

10. Whose Personal Information is collected in this initiative? Check all that apply.

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Students  | <input type="checkbox"/> Former employees             |
| <input type="checkbox"/> Prospective students | <input type="checkbox"/> Service provider employees   |
| <input type="checkbox"/> Former students      | <input type="checkbox"/> Donors or other constituents |
| <input type="checkbox"/> Alumni               | <input type="checkbox"/> Volunteers                   |
| <input type="checkbox"/> Employees            | <input type="checkbox"/> Other community members      |

11. How frequently will the Initiative collect Personal Information?

- Single instance of collection within one semester or quarter
- Ongoing collection up to a single year
- Ongoing collection over more than one year

12. How many individuals' Personal Information will be collected?

- 1 - 50                       51 - 500                       Over 500

13. If the Initiative involves a Third Party, are you able to test the product to see what personal information it collects?

- Yes                       No                       N/A (No Third-Party product involved)

14. Why is the Personal Information being collected? (check all that apply)

- The Personal Information is necessary and directly related to college operations. The collection of this Personal Information is directly related to the college's documented strategic directives, goals, or mandate letter directions.
- The Personal Information is necessary and directly related to requirements explicitly stated in college bylaws, policy, and procedure.
- The Personal Information is collected because collection is required or authorized under local, provincial, or federal law. Be prepared to directly cite the section of a particular law that applies if asked.
- The Personal Information is collected for determining suitability for an honour or award including a scholarship, prize, or bursary.
- The Personal Information is being collected for a quality assurance or improvement Initiative that has been approved by the college Executive.

15. How will you reduce the risk of collecting unnecessary Personal Information? (Check all that apply.)
- The Initiative will only collect specific information deemed necessary for and directly related to the initiative
  - The Initiative will use forms with primarily closed-ended questions and minimal open-ended questions
  - The Initiative will use forms with drop-down menus
  - The Initiative will have documented data gathering and aggregation processes for open ended submissions or fields
  - The Department needs Privacy Officer review and support because none of the above apply
16. FIPPA Collection Notice: When collecting Personal Information, FIPPA requires that you provide a collection notice (except in limited circumstances). Please fill in the template collection notice below and remove bold and square brackets.

The College of New Caledonia ("CNC") collects your Personal Information in accordance with section 26(c) and 26(e) of the Freedom of Information and Protection of Privacy Act ("FIPPA"), R.S.B.C. 1996, c.165 for the purposes of supporting student success in assessments with supplementary tools and for quality assurance and improvement purposes. If you have any questions about the processing of your Personal Information, please contact the Medical Radiography Department at [mrtfaculty@cnc.bc.ca](mailto:mrtfaculty@cnc.bc.ca).

Please ask the Privacy Office for assistance drafting your collection notice if your Initiative requires indirect collection of Personal Information (i.e. if a service provider collects Personal Information from students or employees on behalf of CNC). The Privacy Office may recommend changes to the FIPPA Collection Notice that you draft above.

## PART 3: USE

FIPPA sets out requirements and restrictions related to use of Personal Information. This section will help you identify the legal authority for **using** Personal Information and ensure that the use of Personal Information is limited to the original purpose for collection.

17. What is the intended use of the Personal Information collected? (check all that apply)
- The Personal Information will be used for the purposes checked off in Question 14
  - The Personal Information will be used for secondary purposes, and I have a consent notice attached as an appendix to this PIA that meets the requirements found in FIPPA regulations. I will work with the Privacy Office to determine if secondary use is appropriate and compliant with FIPPA.
  - The Personal Information will be used for a purpose for which the information may be disclosed to the public body under [section 33](#). The Privacy Office will attach the relevant section number to this selection if it applies.
18. How will you ensure that parties using the Personal Information will use it only for the purposes stated in 17 above? Check all that apply.
- Documented department information management practices and training
  - Documented use restrictions communicated from your department to another CNC department
  - Written contract between CNC and a Third Party including explicit conditions
  - The Department needs Privacy Officer review and support because none of the above apply
19. Does your Initiative use Personal Information to make decisions that directly affect an individual?
- Yes  No
20. What is the intended impact of the decisions that are being made that directly affect an individual? (check all that apply).
- Directly affects academic status or grades
  - Directly affects how an individual accesses their courses, campus activities, or student supports
  - Directly affects employment status, employee remuneration, or contract opportunities, and pay
  - Directly affects how employees and service providers will complete their work
  - Directly affects how employees access campus activities and support services
  - Directly affects the College's capacity to protect individuals from harm
  - Directly affects the College's capacity to interact with and support external parties
  - N/A – The decisions are not intended to have a direct impact on individuals



21. Who will be using the Personal Information collected by this Initiative? (Check all that apply and provide details.)

<b>Your department:</b>	MRAD
<b>Other Departments at CNC</b>	<b>External Partners and Service Providers</b>
N/A	Clover Learning

## PART 4: STORAGE

22. Is all Personal Information involved in your Initiative stored within standard CNC storage locations, technologies, or services?

- Yes  No

If you answered yes, please list the approved standard CNC storage locations, technologies and/or services.

- Microsoft 365 (Teams, SharePoint, OneDrive)
- Other Microsoft 365 Apps Approved by CNC. Specify: \_\_\_\_\_
- Colleague
- CNC Local Servers (S: Drive, R: Drive) [check with IT for accuracy]
- Moodle
- Sitefinity
- Team Dynamix
- Direct Line Web

23. Is any Personal Information involved in your Initiative stored outside of Canada?

- Yes  No

24. Where is the Personal Information stored? Please identify applicable geographic locations for primary storage and backups. If Personal Information is stored in more than one primary location, the Privacy Office can expand the response field in this question.

**Primary Storage**

City (if applicable): s. 15(1)(l)

Province, Region, or State: s. 15(1)(l)

Country: United States

**Back-up Storage (if applicable)**

City (if applicable): Same as primary

Province, Region, or State: Same as primary

Country: United States

25. Does your Initiative involve Sensitive Personal Information? (Any Personal Information can be Sensitive Personal Information in different contexts. Please contact the Privacy Office to discuss.)

- Yes  No

26. Is any of the Sensitive Personal Information stored outside of Canada?

- Yes  No

27. Where is the Sensitive Personal Information stored? Please identify applicable geographic locations for primary storage and backups. Type N/A in the cells on the first row if Sensitive Personal Information is not stored outside of Canada as indicated in Question 26.

Name of Third Party	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the Sensitive Personal Information stored (including backups)?
Clover Learning	s. 15(1)(l) [REDACTED]	[REDACTED] [REDACTED]

## PART 5: DISCLOSURE

FIPPA sets out requirements and restrictions related to disclosure of Personal Information. This section will help identify the legal authority for **disclosing** Personal Information, and consider risks related to that disclosure. **Fill out this section if Question 26 was answered "Yes"**

Complete this section if you are disclosing Sensitive Personal Information to be stored outside of Canada. You may need help from the Privacy Office.

28. Is any Personal Information being disclosed outside of Canada under FIPPA section 33(2)(f)? This section allows for information to be made available to the public under an enactment that authorizes or requires the information to be made public.
- Yes  No
29. Is any of the Personal Information being disclosed outside of Canada under FIPPA section 33(2)(p)? This section allows disclosure for the purposes of (i) a payment to be made to or by CNC, (ii) authorizing, administering, processing, verifying, or cancelling a payment, or (iii) resolving an issue regarding a payment.
- Yes  No  
 The payment processor is out of scope of this PIA

30. Describe the privacy risks for disclosure of Personal Information outside of Canada.

Use the table to indicate the privacy risks. For each privacy risk you identify, describe the potential impact to individuals or CNC, and describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the Sensitive Personal Information (contractual, physical, technical, administrative measures) you outline elsewhere in this PIA. Privacy risks below are examples only; add new rows if necessary.

Privacy risk	Impact to individuals or CNC	Risk response
Unauthorized collection/use/disclosure of student PI by CNC employees	Possible harm to students' security, integrity, and reputation (based on student academics) Loss of trust in CNC and/or instructor (after the fact)	Continue to follow all current privacy and security policies. Report the privacy incident and follow appropriate steps to remediate.
Unauthorized access to admin accounts.	Possible harm to students' security, integrity, and reputation (based on student academics) Modifications to student assignments/tests Loss of student progress Loss of trust in CNC and/or instructor (after the fact)	Continue to follow all current privacy and security policies. Report the privacy incident and follow appropriate steps to remediate.
Unauthorized access to student accounts by other students or contract cheating services.	Possible that the student did not complete their own assessments, Inaccurate documented grades/progress	Follow the CNC academic conduct policies and procedures. Request audit logs from third party for validation.
Unauthorized collection/use/disclosure of PI by Third Party/ies	Increased risk of identity theft for the student Possible harm to students' security, integrity, and reputation (if information is presented publicly or used to discriminate against future interactions with the student.)	In this assessment (PIA), third-party collection of information and security has been reviewed to ensure the Clover Learning platform is considered a reasonable risk. If this were to occur, termination of all user licenses could be submitted if necessary. Report the privacy incident and follow appropriate steps to remediate.

**PART 6: PROTECTION**

Please share how the initiative will secure Personal Information to protect personal privacy. 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.

31. Does your Initiative involve digital tools, databases, or information systems?

- Yes  No

32. What physical security safeguards are in place to protect Personal Information in this Initiative?

Identify the elements of physical security that protect where the records for your Initiative are stored (Check all that apply. Specify, "Other" if applicable)

Safeguard	At CNC	At Third Party
s. 15(1)(l)	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>

33. What technical security safeguards are in place to protect Personal Information in this Initiative?

Describe the elements of technical security that protect where the records for your Initiative are stored (e.g. secure passwords, encryption, firewalls, etc.) (More options on the following page)

Safeguard	At CNC	At Third Party
s. 15(1)(l)	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>
[Redacted]	<input type="checkbox"/>	<input type="checkbox"/>

34. What administrative safeguards are in place to protect Personal Information?

Describe the elements of administrative security that protect where the records for your Initiative are stored (e.g. aliasing, aggregation, policies/procedures, standards of practice, etc.)

Safeguard	At CNC	At Third Party
s. 15(1)(l)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
[Redacted]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

35. If the Initiative involves a Third Party, please indicate what type of Agreement governs the relationship between CNC and the Third Party. Please select one.

- CNC's GSA (negotiated Agreement between CNC and the Third Party)
- Vendor's Agreement (negotiated Agreement between CNC and the Third Party)
- Online "Terms of Service" or "Terms of Use" (often non-negotiable)
- Memorandum of Understanding/Memorandum of Agreement ("MOU"/"MOA")
- Other (specify):
- No Agreement

36. If the Initiative involves a Third Party, does an End User License Agreement ("EULA") apply to the individuals whose Personal Information is involved?

- Yes
- No

37. The Privacy Officer will need to review all draft/proposed Contracts/Agreements (and related materials, i.e. contract appendices/schedules; Third Party privacy policies or online terms and conditions, if any) involved in the Initiative. Have you ensured these have been provided? Check only one.

- Yes
- No
- N/A (No Third Party involved)

38. Where are the privacy related terms referenced in the contract or agreement if applicable? (Check all that apply)

- In the body of the contract or agreement
- Third Party will sign CNC's Privacy Protection Schedule
- Third Party will sign CNC's Data Security Schedule
- In the Third Party's privacy or data protection policy or appended schedules
- In a separate Information Sharing Agreement
- There are no privacy related terms in the contract or agreement (or related documentation)
- There is no contract or agreement for this Initiative

39. Controlling and tracking access

Review each strategy below that describes how to limit or restrict who can access Personal Information and how to keep track of who has accessed Personal Information in the past. Check all that apply. Specify "Other" if applicable.

- Managed role-based access to Personal Information for CNC employees
- Managed role-based access to Personal Information for Third Party
- Third Party access is time limited for installing, implementing, maintaining, repairing, troubleshooting, or upgrading an electronic system
- Third Party access escorted by authorized CNC employee
- Audit logs at CNC
- Audit logs from Third Party
- Other: *(fill in details)*

## PART 7: ACCURACY AND CORRECTION

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. FIPPA also gives an individual the right to request correction of errors or omissions to their Personal Information.

In this section, please demonstrate how you will make a reasonable effort to ensure the Personal Information you have on file is accurate and complete.

40. How will CNC ensure that the Personal Information is accurate and complete? (Check all that apply)

- Individuals input their own Personal Information
- Individuals update their own Personal Information
- Employee verifies that information is accurate and complete before processing
- Documented processes to ensure accurate and complete data entry and maintenance
- The Third Party manages the accuracy and completeness of Personal Information under the direction of CNC
- Software or service uses automated processes to enter and manage Personal Information
- Other: *(fill in details)*
- Other: *(fill in details)*

41. Is there a documented process in place to correct Personal Information?

- Yes  No

42. Sometimes it is not possible to correct the Personal Information. FIPPA requires a process to make a note on the record about the request for correction if it isn't possible to correct the record itself. Is there a documented process in place to annotate the record?

- Yes  No  N/A (Corrections possible)

43. If there is a request for correction from an individual and CNC or the Third Party disclosed that individual's Personal Information in the last year, FIPPA requires that CNC or the Third Party provide the applicable other public body or Third Party about the request for correction. Will CNC or the Third Party ensure that these notifications are done when necessary?

- CNC will forward correction notifications
- Third Party will forward correction notifications
- CNC and Third Party will split responsibility based on who was authorized to disclose Personal Information to third parties before a correction request was made.

## PART 8: RETENTION AND DISPOSITION

FIPPA requires that public bodies keep Personal Information for a minimum of one year after it is used to make a decision. Personal Information needs to be disposed of to limit privacy risk after legal retention timelines.

44. How long will CNC need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

Record Type: Assessment Practice Records      Retention Period (in years/months): 1 year after graduation

Record Type: Graded Assessment Records      Retention Period (in years/months): 1 year after graduation

45. How long will the Third Party need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

Record Type: Student Account and Submission Data      Retention Period (in years/months): s. 21(1)

46. How will you ensure that the records containing Personal Information are disposed of in accordance with the retention schedule noted in questions above? (Check all that apply)

- Schedule records review and disposition dates in Outlook calendars
- Build conditions for disposal into department Standard Operating Procedures
- Send direct written communication to staff or service providers.
- Other (explain):

47. What methods will be used to dispose of Personal Information following retention period? (Check all that apply.)

- CNC business unit shredding on campus
- CNC contracted shredding service provider
- CNC deletion of electronic record(s)
- Service Provider shredding/deletion of record(s) under CNC contract
- Service Provider shredding/deletion of record(s) under CNC written instruction
- Other (explain):
- Other (explain):

## PART 9: INFORMATION FLOW

### 48. Complete the Information Flow Table

Use column 1 to describe the way Personal Information moves through your Initiative step by step. Describe the steps as if you were explaining it to someone who does not know about your Initiative.

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of Personal Information.

The Privacy Officer will complete column 3 to identify the legal authority you have for the collection, use or disclosure.

Information Management Steps	Collection, use or disclosure	FIPPA and other legal authorities
Student redeems a provided access code and creates a Clover learning account	Collection	26(c), 26(e)
Student completes assigned activities on the Clover Learning Platform. Performance information is tracked to be able to highlight competencies that need further improvement and provide pre-built guidance based on the competencies needing improvement.	Collection, Use	26(c), 26(e)
Student can view their grade/completion report after completing each activity.	Use	32(a)
Instructor can also view individual student grade/completion report	Use	32(a)
Instructor can aggregate student competency performance information in Pulse Reporting within Clover Learning and direct more attention to teaching competencies in the program that more students struggle with.	Use	32(a), 32(c)
Instructor may document grade/completion into students CNC Moodle course gradebook	Disclosure	33(2)(h)

**Optional:** Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

## PART 10: TRAINING

49. Identify which of the following activities all employees and Third Party (as applicable), will be trained on when collecting and managing the Personal Information for the College Initiative.
- Collection: Limit the collection to only what is explicitly necessary
  - Use: Use the Personal Information only for the purpose for which it was originally collected
  - Access: Only authorized employees (and, where applicable, service providers) may access the Personal Information
  - Disclosure: Not to disclose the Personal Information inside or outside CNC unless authorized under FIPPA
  - Storage: To store the Personal Information only in CNC-provided or approved storage locations and not to store unnecessarily in multiple locations
  - Retention: to keep the Personal Information for a minimum of one year – with longer retention periods only when necessary
  - Disposal: To dispose, when applicable, in a secure method that renders the Personal Information permanently irretrievable

## PART 11: PERSONAL INFORMATION BANKS

50. Will your Initiative result in a Personal Information Bank (“PIB”)? A PIB is a collection of Personal Information searchable by name or unique identifier. If yes, please complete the table below. If more than one PIB will result, copy and paste an additional copy of the table below and fill out a separate table for each PIB.

Yes  No

<b>Title</b>	Clover student accounts
<b>Location</b>	s. 15(1)(l)
<b>Personal Information Types</b>	Grade and/or completion marker, performance information, competency profile indicators
<b>Categories of Individuals Included</b>	Students
<b>Collection Authority</b>	26(c), 26(e)
<b>Purpose of Personal Information</b>	To track student progress, and to improve the quality of the academic program by reviewing student performance successes and challenges.
<b>Categories of Persons Managing Information</b>	(Instructor, CTL Moodle Administrators [CNC employees]), Service Provider employees

## PART 12: OIPC REVIEW REQUIREMENTS (Privacy Officer to Complete)

51. Is this Initiative a data-linking program under FIPPA? If this PIA addresses a data-linking program, this PIA must be submitted to the Office of the Information and Privacy Commissioner.

Yes  No

52. Is this Initiative a common or integrated program or activity? If this PIA addresses a common or integrated program, this PIA must be submitted to the Office of the Information and Privacy Commissioner.

Yes  No

## PART 13: PRIVACY OFFICE(R) COMMENTS

This PIA is based on a review of the material provided to the Privacy Office(r) as of **June 18, 2025** If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).

s. 13(1)

[Redacted content]

### Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Office as at the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Adam Cullum – Manager, Privacy and Records	As per email chain	June 18, 2025

## PART 14: APPROVAL SIGNATURES

### Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices 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 Department will inform the Privacy Office, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

**Declaration of Initiative Lead:** I confirm that I understand the privacy impacts of this College Initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the Initiative. If there are any changes to the Initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the Privacy Office and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and CNC Privacy Office recommendations relative to this Initiative.

#### Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
Alysha Zanette – Instructor, Medical Radiography Technology	Alysha Zanette	June 18, 2025

**Declaration of Dean / Director / One-Over-One Signatory:** I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and CNC Privacy Office recommendations relative to this Initiative.

#### Signature of Dean / Director

Name and Title	Signature	Date signed
Jenn Scott – Dean, School of Health Sciences	s. 22(1)	June 26, 2025

**Declaration of Information Security:** I confirm that I am satisfied that the Information Security safeguards employed in this college Initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or CNC business information described in this PIA.

**Signature of Information Security** (Required only when college Initiative involves Information Security considerations)

Name and Title	Signature	Date signed
Liam Skelton – Cybersecurity Analyst	Liam Skelton	6/30/2025

**Note from Information security:** s. 13(1)

**Declaration of Information Technology:** I confirm that I understand and approve of the proposed use-case of CNC IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with CNC's IT systems for the College Initiative described in this PIA, where applicable.

**Signature of Information Technology** (Required when College Initiative involves use of CNC IT systems or integration of Third-Party technology with CNC IT systems.)

Name and Title	Signature	Date signed
N/A	N/A	N/A

**Declaration of Head of Public Body or Designate:** I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College Initiative. I am satisfied with the completion of this PIA under FIPPA.

**Signature of Head of Public Body or Designate Under FIPPA** (Required only if Personal Information is involved in the Initiative as indicated in Question 7.)

Name and Title	Signature	Date signed
Bruce McKay – Vice President, Academic	s. 22(1)	07/03/2025