



COLLEGE OF
THE ROCKIES

Privacy Impact Assessment

Name of Initiative:

RT-PCR Device – Thermo
Fisher Scientific

PIA Number:

2024.07-19

INSTRUCTIONS (READ BEFORE STARTING)

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 COTR or a COTR 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 COTR Privacy Officer (PrivacyOfficer@cotr.bc.ca) to receive support determining whether any change in how COTR 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 COTR'S Privacy Officer, at PrivacyOfficer@cotr.bc.ca for guidance.

PART 1: GENERAL INFORMATION

Initiative Title:	RT-PCR Device – Thermo Fisher Scientific
Department:	Science/Biology Department
Initiative Lead (PIA Drafter) Name and COTR Email Address:	Heather Sharpe
Dean or Director Name, Title, and Email:	Erin Aasland Hall
Privacy Officer Assigned:	Nathan Skretting, delegated by Dianne Teslak
If initiative involves a third-party (i.e. vendor, consultant, partner), provide	
Third Party Name:	Fisher Scientific
Product Name (if applicable):	RT-PCR Device & Quant Studio/Fisher Connect
Third Party Contact Name and Email:	
Third Party URL:	QuantStudio Real-Time PCR Systems Thermo Fisher Scientific - CA

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 Biology Professors and Lab Technician will be running RT-PCR on a variety of samples collected by students during COTR Biology Labs. These samples will include environmental DNA, genomic DNA, microbial DNA and other types of DNA and RNA. The RT-PCR amplifies and quantifies the amount and types of DNA/RNA present using fluorescence combined with PCR amplification. The software provided standards for the levels of fluorescence and standard types of runs to properly assess the DNA/RNA. This equipment and software will become a staple in the Biology Labs and will be used throughout the

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments of COTR? 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 PIA is limited to the Biology department. It will be used by students but no input of personal information from the student will be required to use the device or software. Students will always be using the RT-PCR under supervision of on COTR instructor or the COTR Lab Technician. This PIA covers the full initiative and is not part of any other project.

Materials collected/analyzed by the RTPCR for will be uploaded for final analysis to the Fisher connect platform using Quant Studio companion software – collected samples are to be of purchased/reference samples and/or environmental samples not associated with individuals.

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

- Administrative/Operational Research (**Contact COTR Privacy Officer 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 will collect and test genetic material
- Amplification of genetic material to assess environmental presence of species
- Determining Microbial species by genetic material
- Learning to use real world biological instruments for future careers

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.

- RT-PCR Graphs
- RT-PCR templates
- RT-PCR Primer sequences
- RT-PCR Well plate labels

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?

All the information collected by the RT-PCR will be performed by a COTR instructor or lab tech and will be labeled based on the class and experiment rather than individuals.

9. Does the Initiative involve integration between COTR 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)

COTR IT system: Data network/Internet access

Third party system integrated: Quant Studio/Fisher Connect

COTR IT system: Data storage

Third party system integrated: Quant Studio results

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: PRIVACY OFFICE(R) COMMENTS

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):

Materials collected/analyzed by the RTPCR for will be uploaded to the Fisher connect platform using Quont Studio companion software – collected samples are to be of purchased/reference samples and/or environmental samples. Those using the RTPCR device are not to analyze samples from individuals (staff, students, or members of the public), as this would potentially generate Personal Information.

This PIA is based on a review of the material provided to the COTR Privacy Office(r) as of **(October 16th, 2024)**.

The details provided in this PIA, indicates that the application to be developed and uploaded onto the COTR website can be delivered in compliance with FIPPA legislation.

Should there be a change in scope to this part of the initiative, further assessment and/or a PIA update may be required as new related or expanded service is considered, or the privacy policies for the College change in the future.

Any substantive changes made to the scope of this PIA would need to be included in a PIA update and submitted to the Privacy Office(r).

- https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_00
- https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/96165_03#section26

Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Officer as at the date in Part 2 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Nathan Skretting, CIO	[Redacted Signature]	10/16/2024

S. 22(1)

PART 3: 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 COTR Privacy Officer, 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 COTR Privacy Officer 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 COTR Privacy Officer recommendations relative to this Initiative.

Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
Heather Sharpe, Biology Lab Technician	[REDACTED]	10/16/2024

S. 22(1)

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 COTR Privacy Officer recommendations relative to this Initiative.

Signature of Dean / Director

Name and Title	Signature	Date signed
Erin Aasland Hall, Department Head	[REDACTED]	2024/10/16

S. 22(1)

Privacy Impact Assessment

Name of Initiative:

PIA Number:

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 COTR 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

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

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

Name and Title	Signature	Date signed
Nathan Skretting, Chief Information Officer		10/24/2024

S. 22(1)

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
