

**PRIVACY IMPACT ASSESSMENT (PIA)
CLOSURE SUMMARY**

Initiative	Micro-Credential for Geospatial Technology
PIA Reference #	2025-005
PIA Completion Date	August 5, 2025
Project Sponsor	Darren Blackburn – Dean, School of Public Safety
Unit	Technology Services

The purpose of a PIA is to determine whether an initiative complies with the *Freedom of Information and Protection of Privacy Act* (“**FIPPA**”) and JIBC’s policies and procedures. This document is to advise that the PIA review of this initiative has been completed. The following outlines the scope, issues, legal basis and conclusions associated with this PIA.

Initiative Description & Scope

This initiative involves automating the assignment and revocation of student software licenses through a Workato integration. The integration interacts with existing systems to identify eligible students and assign appropriate license access via a potential new group in Active Directory. The process is internal in scope and does not involve collection of new personal information, but modifies existing workflows to improve efficiency and reduce manual effort.

Information Reviewed

This review is based on the completed PIA Questionnaire (attached as Schedule A), with additional context provided through Technology Services regarding system access, automation routines, and use of Active Directory.

Legal Basis - Privacy

The initiative involves the use of limited personal information, primarily student email addresses, usernames, and student IDs, in support of internal license provisioning. The use of this information is authorized under section 26(c) and 32 of FIPPA, as it relates directly to and is necessary for administering student access to licensed platforms, and is being used for that purpose or for a use consistent with that purpose.

All personal information remains under JIBC custody and control, and will only be accessed by a limited number of authorized faculty and Technology Services staff.

No new collection, disclosure, or use of personal information for unrelated purposes is contemplated, and there is no contact with individuals that could reasonably be considered intrusive. The initiative does not aggregate personal data from separate systems or introduce new uses of sensitive personal information.

Where personal information is used to make a decision that directly affects an individual, the following provisions of FIPPA must also be observed:

- Section 28 – JIBC must make reasonable efforts to ensure the personal information is accurate and complete before using it for such decisions.
- Section 31 – JIBC must retain the personal information for at least one year after it is used in such a decision to allow the individual to access it.

Legal Basis - Security

Under section 30 of FIPPA, JIBC must ensure reasonable security measures are in place. Personal information used in this process will remain stored on JIBC's internal servers. Role-based access restrictions will continue to apply within Active Directory and Workato. No information is accessed from or transmitted outside of Canada.

Only a small group of authorized personnel (fewer than 10) will have access to the system components involved. The process is embedded within existing, secured environments and uses established authentication protocols.

Conclusions

Based on the information provided, our review has concluded that this proposed integration may proceed as planned, provided that:

- Role-based access controls are properly configured
- Any material changes to scope or data sensitivity trigger a renewed PIA review

Responsibilities

Technology Services is responsible for ensuring that the use of personal information remains consistent with the purposes described in this PIA. Any material change in system scope or data classification should be reported to the General Counsel, and a new or updated PIA should be submitted if required.

If you have any questions or concerns about this PIA, please contact the General Counsel.

**SCHEDULE A
PIA QUESTIONNAIRE**

Please see attached.

PRIVACY IMPACT ASSESSMENT QUESTIONNAIRE

for

Micro credentials for Geospatial Technology

1. Purpose of the Privacy Impact Assessment Questionnaire

This form is used by JIBC to provide a high-level overview of the potential privacy risks of a current or proposed policy, system, project, program or activity. The results of these screening questions help judge the level of potential risk, the extent to which risk mitigation strategies may be needed and when completion of a privacy impact assessment is required under the *Freedom of Information and Protection of Privacy Act* (British Columbia) (the “Act”).

2. Privacy Questions

Questions	Answers
Does the program involve personally identifiable information (PII) (as defined by the Act)? [Y/N]	Y (email, username and/or student ID)
Will the program involve the collection or creation of new information about individuals? [Y/N]	N
Will personal information about individuals be disclosed to organizations, programs, processes or people who have not previously had routine access to the information? [Y/N]	N
Will personal information about individuals be used for a purpose it is not currently used for, or in a way it is not currently used? [Y/N]	N
Will the program require contacting individuals in ways that they may find intrusive? [Y/N]	N
Does the program have a collection notice or use policy? [Y/N]	Y

3. Technology Questions

Questions	Answers
Does this program involve the implementation of a new electronic system or use of a new application or software to support the creation, collection, updating or storing, backing-up or disposition of personal information? [Y/N]	N, existing systems (Workato recipe needs to fetch student license data)
Does this program require any modifications to existing information technology (IT) systems (e.g., integration with or consolidation of other IT systems)? [Y/N]	Y, potential new group in AD
Will a new or modified electronic system change the existing business workflow? [Y/N]	Y, new process to assign/revoke the license to students

Does the program involve the use of new technology that might be perceived as being privacy intrusive? [Y/N]	N
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4. Impact Questions

Questions	Answers
What are the purpose of collection, use and/or disclosure of the personal information? [Internal/External/Both]	Internal assignment of the licenses to students and revocation
Will personal information about the same individual that was previously maintained separately now be aggregated and stored together? [Y/N]	N
How would you describe the information classification level of the personal information? (Select all that apply) <ul style="list-style-type: none"> • Highly Confidential • Confidential • Public 	Confidential (only faculty and Tech Service support staff might access the data)
What are the type(s) of personal information? (Select all that apply) <ul style="list-style-type: none"> • Bio/demographic information • Academic/education Information • Employment information • Medical/health Information • Financial Information • Criminal information • Images • Opinions about individuals • Individuals' personal views and opinions • Business contact information • Personal contact information • Other 	Academic/education Potential personal contact
What are the type(s) of individuals? (Select all that apply) <ul style="list-style-type: none"> • Prospects • Applicants • Students • Employees • Donors/alumni/other 3rd parties • Volunteers 	Students Employees

<ul style="list-style-type: none"> • Service providers • Other 	
<p>How many records documenting individuals will be stored, accessed, used or disclosed?</p> <p>[1-1000], [1001-5000], [5,001-50,000], [50,001-100,000], [100,000+]</p>	1-1000
<p>How many JIBC employees, volunteers and service provider employees will be able to access, collect, use or disclose the information?</p> <p>[1-10], [11-50], [51-100], [101-250], [251-500], [501-1,000], [1,000+]</p>	1-10??
Is any of the information owned by another organization? [Y/N]	N

5. Probability Questions

Questions	Answers
<p>Where will the information be stored? (Select all that apply)</p> <ul style="list-style-type: none"> • On campus – JIBC servers • On campus – other • Off-campus – inside Canada • Off-campus – outside Canada 	On campus – JI Servers
Is any of the information accessed from outside of Canada? [Y/N]	N
<p>Will personal information be transmitted? (Select only one)</p> <ul style="list-style-type: none"> • Personal information is used in a closed system (i.e., no connections to the Internet, Intranet or any other system and the circulation of hardcopy documents is controlled) • Personal information is used in a system that has connections to at least one other system • Personal information is transferred to a portable device (i.e., USB key, diskette, laptop computer), transferred to a different medium or is printed • Personal information is transmitted using wireless technologies 	Personal information is used in a system that has connections to at least one other system (Workato)
Will a third party (e.g., vendor or service provider) have access to the information? [Y/N]	N
Will the program result in different record keeping systems converging? [Y/N]	N