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Summary

Following the fall/winter 2022 launch of the Langara Safe App, Safety, Security and Emergency Management (SSEM) identified a need to effectively and proactively notify students, employees, and non-Langara onsite workers or the public about emergency and non-emergency incidents of general interest to the College community.

In fall 2024, Privacy and Records Management, SSEM, and Information Technology (IT) collaborated to complete a Privacy Impact Assessment (PIA) of the Rave Alert - Mass Notification System (Rave Alert). This PIA assesses the privacy impacts of exporting student and employee personal information (name, Langara-issued email address and, when available, cell phone number) from the existing Banner (students) and Workday (employees) ERPs, importing it into Rave Alert, and using the information to deliver mass notifications over push SMS messaging, email, and the Langara Safe App. It also reviews the privacy impacts of collecting personal information directly from individuals, such as employees, students, non-Langara onsite workers, and the public when they subscribe to receiving notifications through the Rave Alert Self-service Portal.

Optionally, Rave Alert can be used to push notifications to the Langara website if desired.

Prior to implementing Rave Alert, Langara will build awareness of the initiative among students and employees through various communication channels to ensure that individuals understand the purpose and benefits of collecting and using personal information maintained in Banner and Workday to automatically subscribe them to receive mass notifications.

To mitigate privacy impacts, individuals will be able to unsubscribe from receiving further notifications to their cell phones, although employees using Langara-issued cell phones (and/or reimbursed for work-related service provider costs) will be directed to remain subscribed to receive SMS and emails.

The primary information resources used to complete this PIA were the IT Project Request Form (Intake Needs Assessment), Enterprise Architecture's Architecture Review Board (ARB) Review Gate 1 document, internal team meetings, and meetings with the service provider's representatives. The service provider's (Motorola Solutions Inc.) completed HECVAT (Higher Education Community Vendor Assessment Toolkit) questionnaire and its SaaS Shared Responsibility Model document were the primary sources for data security-related information.

This assessment identifies moderate risks related to the collection and use of high volumes of limited personal information of students, employees, non-Langara onsite workers, and the public. No personal information is disclosed. It also identifies moderate risks resulting from the transfer to and storage of personal information in S. 15 (1)(l) . S. 15 (1)(l) [redacted]

PART 1: GENERAL INFORMATION

Initiative title:	Rave Alert - Mass Notification System
Organization:	Langara College
Branch or unit:	Safety, Security and Emergency Management
Initiative Lead contact information:	Cynthia Fudgell, Manager, Safety, Security & Emergency Management department 605-323-5706; cfudgell@langara.ca
Privacy Officer:	Joanne Rajotte, Manager, Privacy and Records Management
Privacy Officer phone:	604-323-5660
Privacy Officer email:	jrajotte@langara.ca

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Related PIAs, if any:

No.

1. What is the initiative?

Langara College's Safety, Security and Emergency Management (SSEM) department has identified the need to supplement existing modes of communication with students, employees, and non-Langara onsite workers and the public about safety and emergency matters with an online mass notification and mobile safety tool. Currently, Strategic Communications and Marketing sends mass notifications by email and by publishing notices to Langara's public-facing website.

Following the 2022 launch of the Langara Safe App, and due in part to the low volume of app downloads, SSEM identified a need to more effectively and proactively notify as many students, employees, and non-Langara onsite workers and the public as possible about emergency and non-emergency incidents using various communication modes. SSEM will use Rave Alert to deliver mass notifications over push SMS messaging, email, and the Langara Safe App, and may use it to push notifications to the Langara website.

SSEM plans to enter into a subscription software agreement for the Rave Alert – Mass Notification System (Rave Alert) with Rave Wireless dba Rave Mobile Safety, a Motorola Solutions Company. Motorola is a US-based organization headquartered in Chicago, IL. [redacted] SSEM staff will manage Rave Alert using the app's dashboard feature, which is connected to the solution hosted in these data centres.

2. What is the scope of the PIA?

This PIA covers the collection and use of the personal information of students, employees, non-Langara onsite workers, and the public who will receive emergency and non-emergency notifications, such as campus closures, through Rave Alert. While personal information is collected and used, no personal information is disclosed as part of these mass notifications.

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

Department	Purpose	Data or Information Elements
• Safety, Security and Emergency Management	**Mass Notifications and Alerts:** Collect and use contact information of individuals to push notifications about emergencies and other important safety and security matters, e.g., active threats, snow days, etc. to individuals' mobile devices.	**Students and Employees:** **Auto-subscription:** • Name • Langara-issued email address • Unique Active Directory UPN also known as the Langara federated login ID or M365 login ID • Cell phone number (when available in Banner/Workday) **Rave Self-Service Portal:** • Cell phone number (when user chooses to provide the information) • Alternate email address (when user chooses to provide the information) **Non-Langara onsite workers/public:** • Cell phone number (when user chooses to provide the information) • Alternate email address (when user chooses to provide the information)
• Strategic Communication and Marketing	**Mass Notifications and Alerts:** Acting as a back-up to SSEM, use contact information of individuals to push notifications about emergencies and other important safety and security matters, e.g., active threats, snow days, etc. to individuals' mobile devices.	**Students and Employees:** • Name • Langara-issued email address • Unique Active Directory UPN also known as the Langara federated login ID or M365 login ID • Cell phone number (if available) • Alternate email address (when user chooses to provide the information)

		Non-Langara onsite workers/public: • Cell phone number

3.1 Did you list personal information in question 3?

Yes.

PART 2: COLLECTION, USE AND DISCLOSURE

4. Collection, use and disclosure

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	SSEM will automatically subscribe currently registered students and current employees into Rave Alert to allow the department to push notifications by SMS messaging and email by collecting personal information (name, Langara-issued email address, the unique Active Directory UPN also known as the Langara federated login ID or M365 login ID and, when available, cell phone number) through an export by IT from Banner (students) and Workday (employees) and subsequent import of a file into the solution. SSEM will collect the cell phone numbers of non-Langara onsite workers and members of the public when these individuals choose to subscribe to Rave Alert. SSEM will collect the alternate email addresses of students and employees when individuals choose to enter this information in the Rave Alert Self-service Portal. Rave Alert will review the personal opt-out settings in the solution whenever SSEM or SCM sends a notification to the College community to ensure that individuals who have opted out do not receive the notification. Although opt-out turns off the notification flags so individuals will no longer receive notifications, their personal information is maintained in the solution until Langara removes the individual's data in Banner or Workday when employment ceases or the student is no longer registered. When IT uploads the next file, these data will not be included. Rave Alert will update data in the solution to match the data in the IT file.	Collection	26(c)
2.	SSEM will collect personal information from any individuals who previously opted-out of receiving notifications and now wish to subscribe to receive notifications when these individuals enter their personal	Collection	26(c)

	contact information (name, Langara-issued email address and/or alternate email address, and cell phone number (optional)) into the Rave Alert Self-service Portal. This information will then be imported into Rave Alert during a subsequent file import.		
3.	SSEM and Strategic Communication and Marketing (acting as a backup to SSEM) will use personal information in Rave Alert to send mass notifications about safety and security matters to students, employees, and non-Langara onsite workers and members of the public. **Note:** The departments will also publish notifications to the Langara College website as another communication mode, but this mode does not use personal information.	Use	32(a)
4.	SSEM will not disclose any personal information through the use of the Rave Alert app.	Disclosure	Not applicable

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	Employees could access personal information and use or disclose it for a purpose other than the reason it was collected.	Physical and technical access to the app is restricted to authorized employees who use personal information about individuals to notify them of incidents. In addition, employees are expected to abide by College policies related to ethical conduct, computer and computing use, and access to information and privacy.	Low	Medium
2.	The service provider's (Rave Alert Mobile / Motorola) employees could access personal information and use or disclose it for purposes other than the reason it was collected or disclosed.	S. 15 (1)(l) [redacted]	Low	Medium

		• S. 15 (1)(l) [redacted]		
3.	Personal information could be compromised during transmission from Langara College to the co-located Motorola data centres.	S. 15 (1)(l) [redacted]	Low	Medium
4.	Personal information stored in the co-located data centres used by the service provider could be compromised.	S. 15 (1)(l) [redacted]	Low	Medium

5. Collection Notice

Langara College collects personal information stored on and entered into Rave Alert under the statutory authority of the *Freedom of Information and Protection of Privacy Act*, s. 26 (c) for the purpose of providing safety and security-related services and information to subscribed individuals. Personal information in Rave Alert is stored in Canada. For questions about the collection, use and disclosure of your personal information, contact the Manager, Safety, Security and Emergency Management at safety@langara.ca.

Opting Out of Receiving Notifications

Students and employees may choose to opt out of having notifications delivered to their Langara-issued email address.

Any individual may unsubscribe their phone by logging into the Rave Alert system and deleting the subscription.

Individuals may also stop messages directly through their phone by texting the word STOP to a number to be determined.

PART 3: STORING PERSONAL INFORMATION

6. Is any personal information stored outside of Canada?

No. Personal information in Rave Alert will only be stored and accessed in Canada in two co-located Hut 8 data centres in Ontario (Mississauga) and British Columbia (Kelowna). The service may access and use the personal information only for the purposes specified in its Subscription Software Agreement with Langara College, such as providing customer support or trouble-shooting the system.

7. Does your initiative involve sensitive personal information?

No.

8. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

Not applicable.

9. Where are you storing the [sensitive] personal information involved in your initiative?

Information will be stored in Canada (see #6 for details).

PART 4: ASSESSMENT FOR DISCLOSURES OF SENSITIVE PERSONAL INFORMATION OUTSIDE OF CANADA

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

Not applicable.

11. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

Not applicable

12. Does the contract you rely on include privacy-related terms?

Not applicable.

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

Not applicable.

14. Provide details about how you will track access to sensitive personal information.

Not applicable.

15. Describe the privacy risks for disclosure outside of Canada.

Not applicable.

PART 5: SECURITY OF PERSONAL INFORMATION

16. Does your initiative involve digital tools, databases or information systems?

Yes, Rave Alert is a cloud-based mass notification system.

16.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Langara's Associate Director, Cyber Security has reviewed the service provider's completed HECVAT questionnaire.

16.2 Security and Privacy Certifications

Motorola claims the following for the Rave Alert app:

- **SOC 2 (Type II)** – a widely recognized auditing standard issued by the American Institute of Certified Public Accountants (AICPA).
- **ISO 27001** – standard for information security management
- **NIST 800-53, Revision 5** – Moderate Baseline Controls implementation
- **Canadian Centre for Cyber Security (CCCS)** - security assessment completion (up to and including Protected B Data) by CCCS on its cloud services for the government of Canada.

17. What technical and physical security do you have in place to protect personal information?

The service provider's completed HECVAT questionnaire provides detailed information about the technical and physical safeguards implemented to protect customer data, including personal information, against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use, S. 15 (1)(l) [redacted]

The service provider's SaaS Shared Responsibility Model document provides high-level information about technical safeguards.

17.1 Technical security measures related to this initiative consist of:

According to information in Motorola's completed HECVAT questionnaire, technical security controls include:

- S. 15 (1)(l) [redacted]

- S. 15 (1)(l) [redacted]

S. 15 (1)(l) [redacted]

17.2 Physical security measures related to this initiative consist of:

According to Rave Alert's Privacy Policy, the service provider maintains physical safeguards designed to protect personal data and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

According to information in Motorola's completed HECVAT questionnaire, physical security controls include:

S. 15 (1)(l) [redacted]

18. Controlling and tracking access

Strategy	
We only allow employees in certain roles to have access to information	Yes. Only designated employees in the Safety, Security and Emergency Management and Strategic Communication and Marketing departments will be authorized to access the Rave Alert Cloud Dashboard administrative module to send notifications.
Employees that need standing or recurring access to personal information must be approved by executive lead	No. See above.
We use audit logs to see who accesses a file and when	Yes. S. 15 (1)(l) [redacted]

PART 6: ACCURACY, CORRECTION AND RETENTION

19. How will you make sure that the personal information is accurate and complete?

Personal contact information exported to the Rave Alert server from Banner and Workday will have been collected directly from students and employees. When individuals update their information in these repositories (such as a telephone number or name) subsequent export files will include the updated data. Personal contact information, i.e., cell phone numbers, will have been collected directly from non-Langara onsite workers and members of the public when they subscribed to the app. Neither SSEM nor IT will confirm the accuracy of personal contact information provided by individuals.

20. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

20.1 Do you have a process in place to correct personal information?

No. As noted in #19 above, individuals are responsible for providing accurate and current contact information.

20.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Not applicable.

20.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third party of the request for correction. Will you ensure that you conduct these notifications when necessary?

Not applicable.

21. Does your initiative use personal information to make decisions that directly affect an individual?

No.

22. Do you have an information schedule in place related to personal information used to make a decision?

No.

PART 7: AGREEMENTS AND INFORMATION BANKS

23. Does your initiative involve an information sharing agreement?

No.

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

Yes. FIPPA-required personal information bank descriptors consist of:

Name: Rave Alert – Mass Notification System
Data elements: Use of Rave Alert includes all data and personal information as outlined in Section 3 (see page 5)
Authority: FIPPA section 26(c)
Purpose: Used to push mass notifications of emergency and other incidents from Rave Alert by SMS and/or email to students, employees, and non-Langara onsite workers and members of the public.
Users: Used by employees the Safety, Security and Emergency Management and the Strategic Communication and Marketing departments.

PART 8: ADDITIONAL RISKS

25. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Not applicable.

PART 9: SIGNATURES

Privacy Office Comments

This PIA is based on a review of the material provided to the Manager, Privacy and Records Management by Safety, Security and Emergency Management and Information Technology or obtained from Motorola Solutions as of the date below. If in future any substantive changes are made to the scope of this PIA, Safety, Security and Emergency Management will contact the Manager, Privacy and Records Management who will complete a PIA Update.

S. 22 (1) _____ July 7, 2025

Joanne Rajotte, Manager
Privacy and Records Management

Date

Program Area Signatures:

Role	S gn_ _ _re	Date signed
Initiative Lead & Department Manager: Cynthia Fudgell, Manager, Safety, Security and Emergency Management	S. 22 (1)	July 7, 2025
Contact Responsible for Systems Maintenance and/or Security: Charles Boname, Associate Director, Cyber Security	S. 22 (1)	July 8, 2025
Head of public body, or designate: Michael Koke, Vice-President, Administration and Finance	S. 22 (1)	July 10, 2025