PC0836- Gustavson Master of Management Database- Privacy Impact Assessment

Updated May 31, 2019 v 2.1

Project Code	PC0836
Submission Date	May 31, 2019
Administrative Authority	Saul Klein, Dean, Gustavson School of Business
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Reviewed By	[[The CIO or designate responsible for reviewing this PIA. Provide name, title, and contact information]]
Review Date	[[Date of review – can be filled in by PMO or Reviewer]]

Purpose: The purpose of the Privacy Impact Assessment (PIA) is to assess risks associated with how a project plans to handle personal information. There are policy and legislative requirements and the purpose of the PIA is to ensure the project approach will be compliant with these requirements, and that any risks to privacy are mitigated or, if they cannot be completely mitigated, understood and accepted by the appropriate Administrative Authority as defined in section 2.00 of Policy IM7800:

Administrative Authority means individuals with administrative responsibility for units (e.g., Vice-Presidents, Chief Information Officer, Executive Directors, Deans, Chairs, Directors and other unit heads) and individuals with functional stewardship of university Information Resources.

Roles:

The role of University Systems is to complete this document and provide guidance regarding security policy compliance and risks to the Administrative Authority.

The role of the Privacy Office is to review this document and provide guidance regarding privacy policy and legislative compliance and risks to the Administrative Authority.

The Administrative Authority is accountable for ensuring the Information Resource being implemented or changed as a result of this project is compliant with privacy and security policies and legislation and accepting risks associated with non-compliance on behalf of the institution.

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1.0 Privacy Context

1.1 Description

The Gustavson School of Business is launching a 12-month Master of Management (MM) program in May 2020. This project will deliver a secure APEX database solution for storing and reporting data relating to students that apply to and/or enroll in this program.

The other programs at Gustavson each use an APEX database developed in-house over the past five years. A similar database for this new program will help provide consistency in process across programs. It is also preferred over using multiple spreadsheets or MS Access to track and store student information.

The APEX student database pulls read-only data from Banner, eliminating duplication of basic student information and providing direct access to up-to-date data. Additional information collected by the program is also stored in the database, providing the program staff a one-stop source for much of the student information needed for day-to-day administration of the program.

How data is collected and used

There will be two separate APEX applications – two separate user interfaces - delivered as part of this project. Both will write and store data to the same underlying tables, but have different purposes, features, and users.

Student-facing	This online form enables current UVic undergraduate students to apply for "preferred access" to the Master of Management program.
Staff-facing	This is the APEX application used by Master of Management program staff. It pulls data from Banner and allows staff to enter additional information.

Some data will be collected directly from the student as staff interact with applicants to the program. Most personally identifiable information (PII) will be pulled from Banner and surfaced in the Staff-facing APEX application. A student record in the Master of Management database will have been initiated by the student in one of these ways:

a) the student applies to the Master of Management program through GARO, and this application data flows through to the Staff-facing APEX application; or
b) the student applies for the Preferred Access[1] program via the new Student-facing online form; or
c) the student contacts the Master of Management staff directly to apply for Preferred Access, prior to the Student-facing online form being made available.

Data collected in the Master of Management database will be used for the administration and management of the Master of Management program, and to support students throughout their association with the Master of Management program.

Location and access to data

Both applications	All information collected in this system is to be stored on UVic servers.
Student-facing	- CAS-authentication is required. - This is a one-way, one-time push application process: they will not have access to their data that is stored in APEX and will not be able to "log back in" to their Preferred Access application
Staff-facing	- This APEX application is available only on campus or through VPN connection. - CAS-authentication is required. - User access is further controlled by role-based privileges assigned by the administrator of the application. - Users are Master of Management program staff and administrators. - Master of Management staff also have access to Banner, and access to this APEX application will be limited to staff who already have access to Banner.

1.2 Privacy Issues Related to this Project
The information collected in this new APEX database is similar in nature and purpose to the data collected in Gustavson's other Program databases, but for a brand new degree program. The privacy considerations for this project relate mostly to ensuring that personal information is not unnecessarily collected - that the data collected is appropriate for the program's needs and for the users who will access it.

1.3 Privacy Impact Assessment Scope
See "2.4 Personal Information Flow Diagram and/or Personal Information Flow Table" for FIPPA context.

Project Scope	Privacy-Related Activities and Processes
Student Application data	- Student submits through current GARO application process, stored securely in Banner - Applications to Master of Management are passed through to new APEX database on UVic servers (GEN) - Current Banner data is shown read-only in APEX (ie this data is not duplicated and updates are made only in Banner) - Any additional data collected that pertains to a student's application to Master of Management is stored in the APEX database
Track Preferred Access UVic undergrads who are interested	UVic Students apply for Preferred Access on CAS-authenticated form to help ensure privacy and authenticity of application

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[1] "Preferred Access" is how the Masters of Management program refers to UVic students who essentially pre-apply to the program while they are still an undergraduate. The term does not relate to or infer access to the APEX database or data.

in Master of Management program	• Preferred Access request data flows directly to APEX database, and is connected to the student's Banner record by V# • Preferred Access tracking and support includes monitoring prerequisites and GPA, pulled from Banner
Enrolled Student Data	• Once enrolled, program staff will continue to add notes and supporting information in the database
Graduated Student Data	• Students are surveyed for Employment Outcomes data via SurveyMonkey. If student consents to complete survey, this data would be imported to the database for secure storage, with access limited to a smaller set of program staff.
Access to APEX database	• Program staff access to the Master of Management APEX database is managed by the Senior Application Support Specialist at Gustavson, as authorized by the program director, associate director, or designate. Users can log into APEX while on campus or via VPN when off campus.

1.4 Related Privacy Impact Assessments
None

1.5 Elements of Information or Data
Much of the data is pulled directly from Banner (not copied) to eliminate duplication of data and effort. Banner data is shown as read-only in the APEX database.

Note: Program staff who have access to APEX also have access to Banner.

This section has been divided into "Elements Pulled from Banner" and "Additional Elements Collected by the Program". Where there is a mix of data elements in a group (some pulled, some collected directly) there is a (1) and (2) indicator that the group is split into two parts.

Elements Pulled from Banner (Read Only)

Data	Description	Usage
Student Biographical Information	Includes: • Name • V# • Birthdate and age • Gender • Indigenous indicator • Language • Nationality	General identification of the student
Visa Status	Shows the code for the student's current Visa status (eg PR or SA)	This information is also used to direct international students to Gustavson's International Programs (IP) resources.
Student Contact Information	• Email address(es) • mailing address • phone number(s)	Contacting the student
Application Info	• Admit Code • Application date • Current College Code • Other Faculties	Used during the application process
Education History (1)	• Schools attended • Degree obtained	Where previous school information is available in Banner, it is pulled in.

	• Degree Program • Dates	Note: Staff can add custom records for past schools attended that have not been entered in Banner. These custom records reside only in the APEX database.
GARO Decisions	• Date and Decision code	Used to monitor how the student application is progressing through GARO
BDMS Documents	• Document type • Date • Comment • Link to Document in BDMS Xtender	This list of documents is made convenient for staff access within their APEX record
GARO Basis of admission	• SPACMNT Comments	Shows the evaluated GPA and degree used by GARO for admission
References (1)	• Referee Name • Date Received • Cancelled	Shows the submitted references
English Language Proficiency	TOEFL or IELTS test information from SOATEST • ENPR test components • ENPR Scores • Test dates	Part of the application evaluation, a program pre-requisite
Course and Grade Prerequisites (1)	• Course information (Term, Course, Units, Grade Point, Course Point) • Cumulative GPA • Sessional GPA	Used to check program prerequisites for: 5 required Business courses, GPA on those courses, as well as overall Sessional GPA Used for Preferred Access students as well to ensure they are on track to complete their prerequisites in time for their planned start date.
Provisions and Conditions	SPACMTN Comments for • Department Provisions (160) • Provisional Admit (PL1) • Conditional Admit (CA1)	These Banner entries show the current status of provisions and conditions for admission to the program.
UVic Scholarships	• Scholarship Name • date • award amount	
Grades Below B	• Term • Course • Grade	Used to support the student and for program metrics
Work Term Placement	• Term • Employer • Job Title • City • Country • Start and End Dates	Used for Pro-D support and counselling
Graduation data (1)	• Applied to Graduate • Graduation Status • Graduation Date	Used to support the student and to update status in the program

Additional Elements Collected by the Program

Data	Description	Usage
Program status information	• Status within program • Admission on Appeal • Cohort/ Start term • Leave status	Used to manage student data and reports
Preferred Access (PA) information	• PA application date • Recruited from high school or UVic • Intended start year	Provides additional information for students who have requested preferred access to MM. Recruitment information helpful for marketing.
Social Media contacts	• Skype or other SM info	Optionally provided by the student directly to the program
Additional Application data	• Application Region	Helpful for marketing planning
Education History (2)	• Schools attended • Degree obtained • Degree Program • Dates	If education history is missing that is pertinent to the application, staff can add schools.
Offer tracking	• Position offered • Deadlines to accept • Position accepted • Fees paid • Offer refused • No response received • Entry Point Change requested • Deferral requested • Deferral Fee paid • Waitlisted	Used to track students as they progress through the admissions process with the program
References (2)	• Date verified • Type of reference (Professional, Academic) • Notes	In addition to the Reference data pulled from Banner, staff add these notes to each Reference.
Evaluation	• Admissions Evaluation scores on GPA, References, and Interview • Evaluation Notes	
Course and Grade Prerequisites (2)	• Status tracking	For non-UVic applicants to the program proof of prerequisites is submitted by the student and marked as complete in APEX.
Notes	Notes recorded by staff and advisors. The Note feature includes: • Meeting date • Note text • Follow-up date and completion status • Category (for permissions) • Tags (for filter and search) • Who entered the note and when	Used for taking any general notes and during advising sessions. Notes are categorized to allow for different levels of access based on user roles. For example, a note related to immigration support is visible only to the role "Immigration Advisor", but a note about the student taking leave might be categorized to be available to program staff.

Consent Tracking	Track whether student has given consent to: • use of their photo • share their email address with their cohort	Allows reports to be run before activities relating to photos or emails are carried out, to help ensure the student's consent is adhered to
Student Support Information	• T-shirt size • Dietary restrictions	• Ordering shirts • Referenced for catered events
Departmental Scholarships	• Scholarship Name • date • award amount	
Study / Work Permit Support	• related dates • pronouns (based on gender indicated in Banner)	Allows program to provide Co-op with the information they need to generate the letter students need to apply for their work permit
Professional Development Support	• Areas of Interest • Strengths • Projects and Teams • Consent for post-program career emails	Used for Pro-D support and counselling
Mentor Program	• Is involved in the mentorship program • Date of application • Mentor Name • Check-in meetings and notes	Used by the mentor program manager to track the student's progress through the mentorship program
Graduation data (2)	• Letter of Recommendation • Dean's List	Tracking students through Graduation process
Alumni Employment Outcomes	• Employment Status • Offer and Acceptance dates • Employer details, including City and Country • Employer Website • Job Title • Job Description • Current Base Salary (range) • Signing Bonus • Other Compensation • Pre-program Base Salary • Alumni Comments • Internal Notes • Consent to Participate in this Survey • Consent to share response for future Research • Consent mechanism (where is that consent stored)	Optional survey of students after they've left the program, the cumulative information is used for marketing and program metrics

2.0 Protection of Personal Information

2.1 Storage or Access outside of Canada

No data will be stored outside of Canada. If program staff are travelling outside of Canada and need to access the system, they will only be able to access the system using VPN.

As the system is entirely built and maintained by UVic's University Systems staff, there will be no remote access for service or maintenance from outside of Canada.

2.2 Data-linking Initiative

In FOIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.	
Personal information from one database is linked or combined with personal information from another database;	Yes The APEX database will link to Banner data.
The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	No
The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	No

2.3 Common or Integrated Program or Activity

In FOIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.	
This initiative involves a program or activity that provides a service (or services);	Yes
Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	No
The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No

2.4 Personal Information Flow Diagram and/or Personal Information Flow Table

See also "Appendix B: Personal Information Flow Diagram" on page 18 for a visual representation.

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
	Preferred Access (only available to UVic undergrads)	--	--
1	UVic undergrad student applies to be preselected for Master of Management.	Collection Storage	26(c) 30.1

	• Complete online application form. Must log into UVic to complete form. • Submitted data flows directly to Master of Management APEX database • Preselection application links to student Banner record		
2	Master of Management staff review and evaluate application; decide whether to offer a seat in the program	Use	32(a)
3	Staff monitor student academic progression to ensure program prerequisites are satisfied	Use	32(a)
	All Program Applicants	--	--
4	Student applies to Master of Management via GARO regular application process. • Application flows through from Banner to APEX	Collection Storage	26(c) 30.1
5	Master of Management staff review and evaluate application; decide whether to offer a seat in the program	Use	32(a)
6	Master of Management advisors meet with students at various times during the application process • Reviewing prerequisites and conditional offer status • Updating conditions and evaluation tracking • Adding and reviewing meeting notes	Collection Use	26(c) 32(a)
	All Students Registered in MM Program		
7	Once the student is in the program (or on their way) we email them for student support questions, for example: consent for photo, t-shirt size, and optional information regarding any dietary concerns.	Collection Storage Use	26(d)(ii) 30.1 32(a)
8	Master of Management advisors meet with students at various times from during their time in the program: • Advising support • Providing Professional Development and Mentor support • Adding and reviewing meeting notes	Collection Use	26(c) 32(a)
	Alumni of the MM Program		
9	Students may consent to complete an Employment Outcomes survey. The survey is currently hosted in SurveyMonkey and we plan to upload this data to APEX and delete it from SurveyMonkey. The aggregate of this data is used as a measure of success / program metrics and for marketing.	Collection Storage Use	26(d)(ii) 30.1 32(a)

2.5 Privacy Risk Mitigation Table

Please see "Appendix C: Risk Likelihood and Impact Scales" on page 19 for scales used in this section

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	Staff that don't usually have access to this level of student information are given access to APEX	Access to APEX will be granted only by authority of the Master of Management Associate Director (or designate) Director will be advised that only staff who have access to Banner should be given access to APEX Program staff. (At this time, all program staff have access to Banner.)	2	2

		The ability to enable access to APEX is given only to the Senior Application Support Specialist for Gustavson, backed up by Systems staff. Access is granted based on user roles, which are assigned privileges to pages of data and reports the user can read and/or write to. Please see "Appendix D: Role Privilege Matrix" on page 20 for details. For example, only specific roles can see Employment Outcomes data.		
2.	Staff leave and still have access to APEX	Master of Management Associate Director utilizes an off-boarding checklist that includes removal of staff access. In addition to specific requests from the program to remove staff, the Senior Application Support Specialist and DSS support staff receive notification of staff leaving from the Gustavson Dean's office.	2	2
3.	APEX application is hacked / accessed by outside bad actor	Sec. 15 - Disclosure harmful to law enforcement	1	3-4
4.	Staff have inappropriate roles in APEX enabling them to see data they don't need for their jobs	Access is managed as noted in Risk #1 above	2	2
5.	Staff collect data that is not necessary to the administration of the program (ie over-collection of data)	This APEX database has been custom-designed over months of meetings between the project team and Gustavson subject-matter experts (SMEs). Each field of data being collected has been reviewed to ensure it has a purpose consistent with administration of the program.	2	2

2.6 Privacy & Security Risks

Please see "Appendix C: Risk Likelihood and Impact Scales" on page 19 for scales used in this section

ID	Risk Description	Probability (1-5)	Impact (1-5)	Risk Mitigation Measures (reduce probability and/or impact)
1	Lack of legal authority to collection, use or disclose PII	1	5	Only UVic staff collect, use, or disclose the PII in this system. The data collected is within our legal authority.
2	Unauthorized collection of PII by authorized individuals/processes/systems	1	5	The data is ultimately being collected directly from the student
3	Excessive collection of PII by authorized individuals/processes/systems	2	2	Gustavson staff have student privacy top of mind, and are considerate in what free-form data (ie in the form of notes) are collected.

				See also item 5 in the previous risk section "2.5 Privacy Risk Mitigation Table".
4	Inappropriate or unauthorized use of PII by authorized individuals/processes/systems	2	5	Gustavson staff take annual privacy training.
5	Unauthorized disclosure by individuals/processes/systems	2	5	Gustavson staff take annual privacy training.
6	Creation of new PII by data matching	-	-	There is no data matching anticipated
7	Unauthorized tracking of individuals through transaction monitoring	-	-	There is no transaction monitoring anticipated
8	Data stored outside of Canada and in the public cloud	n/a	n/a	This system resides completely on Sec. 15
9	Data retention beyond prescribed timeline	5	2	**Accept** There is no data archiving or disposition feature in the current APEX database applications, nor is there a plan to build these features into this new APEX database. Student records in APEX will be made inactive and the status will be updated to indicate that they have graduated from the program, but the data will continue to reside in the database. **Mitigate** Near-future plans include being able to limit access to student records based on the record status, which can reduce the number of staff members who have access to older records.
10	Risk of increased surveillance	-	-	The advent of this system does not raise the risk of increased surveillance.
11	Unauthorized use as a records repository	5	2	See item #9 above. This database will be the official repository for the data collected specifically by the program: ie data that is not already collected in Banner.
12	Public perception	-	-	No change in public percept is anticipated
13	Use of existing PII data in a new system or business process	5	1	By design this new APEX database will *display* existing PII data from Banner, but will not duplicate that data.

3.0 Security of Personal Information

3.1 Please describe the physical security measures related to the initiative (if applicable).
- All data is stored in Sec. 15

3.2 Please describe the technical security measures related to the initiative (if applicable).
- Access to the Staff-facing APEX application containing / displaying student data is restricted by UVic local network or VPN.
- Sec. 15 will be implemented on all APEX applications.
- Only CAS-authenticated, provisioned accounts with the appropriate roles can access the data in the Staff-facing application.
- No data can be accessed from the Student-facing APEX form.
- Only current undergrad students will be able to apply for Preferred Access in the Student-facing APEX form, and they must sign in to UVic (CAS-authenticated).

3.3 Does your department rely on security policies other than the Information Security Policy?
- No

3.4 Please describe any access control and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.
- User accounts are managed by Gustavson Senior Application Support Specialist, who acts as the APEX administrator for the system. Users are approved for provisioning or de-provisioning by Master of Management Program Directors or the Gustavson Administrative Authority or designate.
- Users are assigned specific roles to ensure the appropriate level of read / write access is given. Roles are provisioned with fine-grained privileges to each appropriate page and report in APEX, to help ensure that staff see only the data needed for them to perform their functional duties. For example, not all program staff will have access to employment outcomes data. See "Appendix D: Role Privilege Matrix" on page 20 for details.

3.5 Please describe how you track who has access to the personal information.
- A list of current users and their roles is available to the APEX administrator.
- Changes to access is not tracked in any central repository or through any auditing; however, emails would exist requesting adding / removing users.
- Users are de-provisioned from APEX as part of Gustavson's standard de-provisioning process when someone leaves UVic or changes jobs within UVic.

4.0 Accuracy/Correction/Retention of Personal Information

4.1 How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the university notify them of the update, correction or annotation?
- Information that is stored in Banner is updated by Office of the Registrar staff. Updated data will be reflected in the APEX database either immediately or overnight, depending on the technical source of the data.
- Data collected uniquely in the Master of Management APEX database is updated by Master of Management staff. If the data updated affects reports provided to senior management at Gustavson (ie Deans) these reports will be recreated with the current data as needed.

4.2 Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.
- **Yes. The personal information collected in this APEX database (combined with Banner application data) is used to help make offer decisions for the Master of Management program.**

4.3 If you answered "yes" to question 4.2, please explain the efforts that will be made to ensure that the personal information is accurate and complete.
- **We rely on personal information in Banner being kept current through existing Office of the Registrar processes.**
- **Master of Management staff communicate regularly and directly with applicants and students to ensure that the state of the data collected specifically in APEX is current.**

4.4 If you answered "yes" to question 4.2, do you have approved records retention and disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?
- **Records in the APEX database are retained for at least one year after it is used in making a decision, and Banner data is currently retained at least for the lifetime of the student.**
- **Disposition of records in APEX is not currently scheduled or enabled.**

5.0 Further Information

5.1 Does this initiative involve systematic disclosures of personal information? If yes, please explain.
- **No.**

Information Sharing Agreement – Required Information	
Description	
Primary department involved	
All other departments involved	
Business contact title	
Business contact telephone number	
Indication of whether or not personal information is involved	
Start date	
End date (if applicable)	

5.2 Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.
- **No.**

5.3 Will a personal information bank (PIB) result from this initiative?
- **No.**

6.0 Comments and Signatures

Chief Information Officer: Wency Lum

Comments:	
Date:	
Sign-Off:	

Administrative Authority: Kevan Gorham for Saul Klein

Comments:	Looks good, thank you.
Date:	May 28, 2019
Sign-Off:	Kevan Gorham

Portfolio Manager: Nav Bassi

Project Comments:	Pleased to see such a thorough PIA and evidence of privacy-protecting controls.
Date:	March 14, 2019
Sign-Off:	Electronic

Consultation Checklist

IT Projects
The following leaders in each functional area can refer you to an appropriate subject matter expert to help develop the technical elements of your project plan and ensure it is complete.

Service Area	Impact? (Y/N)	Leader	Expert Consulted	Date of Consultation
Office of the CIO		Wency Lum		
Systems General Office		Chandra Beaveridge		
Client Technologies	Y	Lance Grant	Lance Grant	January 8, 2019
Desktop Support Services		David Street		
Computer Help Desk		Marcus Greenshields		
Academic & Admin Services	Y	Nav Bassi	Nav Bassi	March 14, 2019
Client Account Managers		Scott Thompson		
Production and Technical Support	Y	Rizwan Bashir	Rizwan Bashir	*Pending*
Development Services	Y	Ivan Petrovic	Ivan Petrovic	May 9, 2019
UVic Online	Y	Scott Thompson	Scott Thompson	March 13, 2019
Data Centre Services		Kim Lewall		
Network Services		Jane Godfrey		
Infrastructure Services		Ron Kozsan		
Information Security Office	Y	Eric van Wiltenburg	Eric van Wiltenburg	April 26, 2019
Project Management Office		Chandra Beaveridge		

Other Projects and Consultation

Department/Unit	Expert Consulted	Comments	Date of Consultation
Privacy Office	Bill Trott	Worked together to complete PIA elements	April 11, 2019
Records Management	Dave Young	Discussed record retention and disposition in APEX	January 25, 2019

Revision History

Version	Date	Author	Comments
1.0	December 10, 2018	Tammy Ruffolo	Draft for assistance and review
1.1	March 12, 2019	Tammy Ruffolo	Updates from Lance and circulate new draft for consultation and feedback
1.5	April 12, 2019	Tammy Ruffolo	Updates from meeting with Bill Trott: new appendices, completed risk tables, minor clarifications
2.0	April 16, 2019	Tammy Ruffolo	Completed PIA for consultation. Submitted to PRC May 9, 2019
2.1	May 31, 2019	Tammy Ruffolo	Signed off by Sponsor, submit to PMO

Appendix A: Privacy Threshold Analysis (from Project Plan)

8.1 Questionnaire

1	Has a Privacy Impact Assessment ever been performed for this project or program?	N
2	What is the information classification level of information collected, maintained, or shared in any identifiable form as part of this project or service? Select all classification levels that apply. See University Policy IM7800 for detailed definitions. ☐ Highly Confidential ☒ Confidential ☒ Internal ☐ Public ☐ Don't know ☐ Information is not collected, maintained, or shared in any identifiable form as part of this project or service	
3	What are the type(s) of personal, critical, or sensitive information collected, maintained, or shared by this project? Please be specific about the data elements. *Examples include, but are not limited to information about students, employees, donors, alumni, credit cards, health Information, etc. See Appendix A of University Policy IM7800 for more examples.*	

Highly Confidential	• None expected
Confidential	• Advising notes, student course enrollment
Internal	• Grades, student numbers, student contact information
Don't Know	•

4	Does this project or program involve the implementation of a new electronic system or use of a new application/ software to support the creation, collection, storing, backing-up or disposition of personal, sensitive, or critical information?	Existing APEX Infrastructure/ New Application
5	Does the project apply new or additional information technologies that have substantial potential for privacy intrusion?	N
6	Will the project involve the collection or creation of new information about individuals? Student data will be collected / recorded that is specific to the Master of Management program that is not recorded anywhere else.	Y
7	Will personal information about individuals or sensitive/critical information be disclosed to organizations, programs, processes or people who have not previously had routine access to the information?	N
8	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used? The use of the information collected is consistent with application processes and student tracking already used at UVic.	N
9	Will the project collect, use, or disclose PII or sensitive/critical information for research purposes?	N

| 10	Will the project require that individuals are contacted in ways that they may perceive to be intrusive?	N
11	Is any of the information owned by another organization?	N
12	Does the project involve new or significantly changed consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources? Note: The APEX application will pull data from Banner, though we don't expect it'll be pulling anything significantly different from the existing APEX applications built for Gustavson.	N
13	Does this project collect, access or use Social Insurance Numbers (SIN)?	N
14	How many user records containing PII or sensitive/critical information will be stored, accessed or used? [1-1000] [1001-5000] [5 001-50 000] [50 001-100 000] [100 000+]	Sec. 15
15	Where will the information be stored? Sec. 15	
16	Will a third party (e.g. vendor or service provider) have access to the information?	N
17	Is any of the information being accessed from outside of Canada? It is possible that staff travelling will VPN into the APEX application while working abroad. VPN will be required to access application from off Campus.	Y
18	Does the IT system connect, receive, or share information in identifiable form, or PII or sensitive/critical information with any other IT systems? 1. Personal information is used in a system that has connections to at least one other system: **Banner Student data** 2. Personal information is transferred to a portable device (i.e. USB key, diskette, laptop computer), transferred to a different medium or is printed: **Reports can be downloaded and/or printed** 3. Personal information is transmitted using wireless technologies: **APEX can be access over WiFi, but only by using VPN**.	Y
19	If there is external sharing, is it pursuant to new or existing information sharing agreements? [[List these agreements]]	No external sharing

8.2 PIA Requirement

☐   No, a PIA is not required for this project

☐   No, a PIA is not required for this project, but the PTA must be updated and reviewed prior to go-live

☒   Yes, this project requires a new PIA or update to an existing PIA

The creation of a new system to collect new information about students warrants the creation of a PIA.

Appendix B: Personal Information Flow Diagram

Sec. 15 - Disclosure harmful to law enforcement
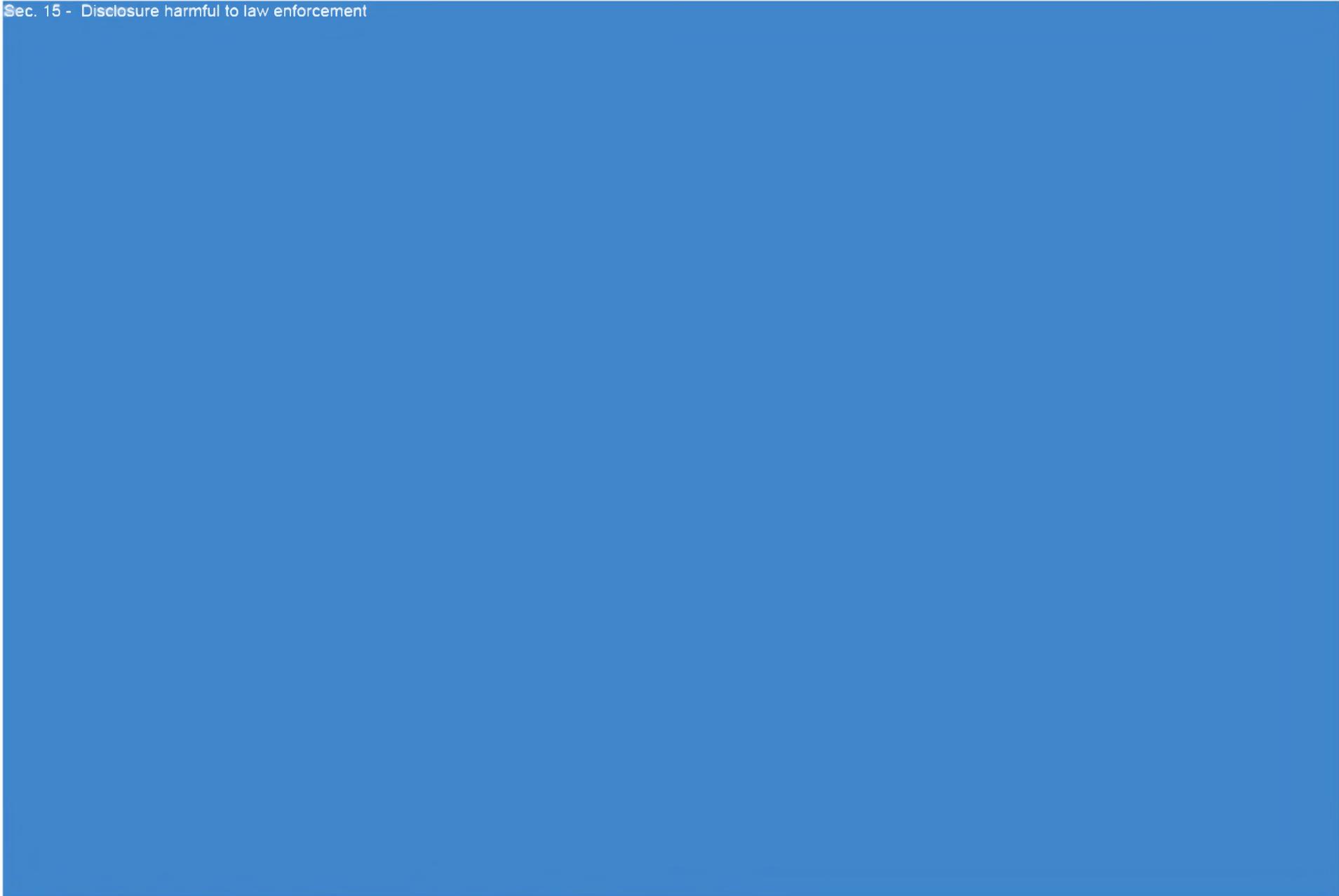
Appendix C: Risk Likelihood and Impact Scales

LIKELIHOOD	Risks that are Ongoing	Risks that are one off		IMPACT	Project Impact	Business Interruption	Reputation / Image
Very High 5	We expect that the risk will occur many times a month. The risk is already happening	We fully expect the risk to occur. The risk is already occurring (i.e. it's an issue)		Very High 5	A risk that can prove detrimental for the whole project.	Inability to provide Key administrative functions at critical times (i.e. missing payroll runs, student admin system down at enrolment time)	Sustained front page adverse national media coverage. International media coverage
High 4	We expect that the risk will occur at least once a year	We expect that the risk will most probably occur		High 4	Risks which can significantly jeopardize some aspects of the project, but which will not completely ruin the project.	Inability to provide key administrative functions over a sustained but non-critical period	Intermittent adverse National media coverage
Medium 3	We expect that the risk will occur once in 3 years	We expect that the risk may occur at some time and we think it more likely than not		Medium 3	Risks which will cause some problems, but nothing too significant.	Inability to provide key administrative functions Intermittently	Sustained front page adverse local media coverage. Public demonstration of students and/or community concern
Low 2	We expect that the risk will occur once in 10 years	We expect that the risk may occur at some time, and we think it less likely than not		Low 2	Any risks which will have just a mild impact on the project, still these should be addressed in time.	Performances of key administrative functions are reduced for sustained periods	Intermittent adverse local and University of Victoria media coverage
Very Low 1	We expect that the risk will occur once in 50 years	We expect that the risk may occur only in exceptional circumstances but that it is highly doubtful that it will		Very Low 1	Risks which do not pose any significant threat and which can be left unmediated without any fear.	Performances of key administrative functions are reduced intermittently	Intermittent adverse coverage contained to University of Victoria media

Appendix D: Role Privilege Matrix

This table is an example of the roles and page privileges planned for the Master of Management APEX database staff-facing application. Once development begins and requirements are further discussed, the specific roles and privileges may be modified from what is presented here.

Role / Page	Biographical Info	Contact Info	Application Info	Evaluation	Progression	Notes*	Student Support	ProD Support	Mentorship	Employment Outcomes
MM Director	R/W	R/W	R/W	R/W	R/W	R/W	R/W	R/W	RO	R/W
MM Admissions	R/W	R/W	R/W	R/W	R/W	R/W	R/W	RO	RO	N
Program Advisor	R/W	R/W	R/W	N	N	R/W	R/W	RO	RO	R/W
ProD Advisor	RO	RO	N	N	N	R/W	RO	R/W	RO	N
Co-Op Advisor	RO	RO	N	N	N	R/W	RO	RO	RO	N
Mentor	RO	RO	N	N	N	R/W	N	N	R/W	N
Administrator	R/W	R/W	R/W	R/W	R/W	R/W	R/W	R/W	R/W	R/W

Legend:

- R/W = read and write (edit) privileges
- RO = read-only privileges
- N = no privileges

*Notes Privileges

Notes are further broken down into categories, set by the staff member who creates the note. Note categories for Master of Management are yet to be defined, though the mechanism to apply roles and privileges to notes is already being used in the Gustavson APEX databases for BCom, MBA, MGB, and IP. This example is from a different APEX Project for International Programs at Gustavson

Roles || Categories >	Note Categories							
	Immigration	IP General	Program Advisor	COM 405	Mentor Only	Mentor Shared	Scheduling	Program General
IP Immigration Officer	R/W	R/W	N	N	N	N	R	N
IP Advisor	N	R/W	N	N	N	N	R	N
Program Advisor	N	R	R/W	R	N	R	R/W	R/W
COM 405	N	N	N	R/W	N	R	R/W	R/W
Mentor	N	N	N	N	R/W	R/W	R	R
MBA Career Advisor	N	N	R/W	N	N	R	R/W	R/W