



Privacy Impact Assessment (PIA) for

Partnership with Adler University – Referral to

Adler Community Health Assessment Program

Before you start	1
PART 1: GENERAL INFORMATION	2
PART 2: COLLECTION, USE, AND DISCLOSURE	5
PART 3: STORING PERSONAL INFORMATION	7
PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA	8
PART 5: SECURITY OF PERSONAL INFORMATION	10
PART 6: ACCURACY, CORRECTION AND RETENTION	11
PART 7: PERSONAL INFORMATION BANKS	12
PART 8: ADDITIONAL RISKS	13
PART 9: SIGNATURES	14

Before you start

- This Privacy Impact Assessment (PIA) form is used by VCC to assess whether a new initiative, or proposed significant change to an existing initiative, meets the privacy protection requirements of the B.C. *Freedom of Information and Protection of Privacy Act*. FIPPA’s protection of privacy requirements. A PIA is a legislative requirement ([FIPPA s. 69\(5.3\)](#)) and mandatory before implementing an initiative.
- You/Your refers to the individual responsible for drafting this PIA, who should be an individual from the relevant department or program area with sufficient knowledge to do so. The PIA must be signed by the role within the program area with the appropriate position to hold accountability for this initiative.
- Please include references to other documents when applicable, but do not insert or embed any documents to/in this assessment form.

- Please review the initial assessment questions and contact the Privacy Office at privacyandfoi@vcc.ca before you begin the form, if you have not already. See more guidance about the PIA process, including the supplementary Guidance Document, on the Privacy web site.

PART 1: GENERAL INFORMATION

PIA file number: 2024-013

Initiative title:	Partnership with Adler University
VCC Department / Program Area:	Disability Services
Link to VCC initiative website:	
Link to vendor website:	https://www.adler.edu/
Link to vendor privacy policy:	
Your name and title:	Nigel Scott, Associate Director, Student Accessibility
Your work phone and email:	604-871-7518 nscott@vcc.ca
Initiative Lead name and title:	Nigel Scott, Associate Director, Student Accessibility
Initiative Lead phone and email:	604-871-7518 nscott@vcc.ca

General information about the PIA:

Is this initiative a data-linking program under FIPPA? See the definition in Schedule 1 of FIPPA . If this PIA addresses a data-linking program, the Privacy Officer must submit this PIA to the Office of the Information and Privacy Commissioner .	No
Is this initiative a common or integrated program or activity? See the definition of Schedule 1 of FIPPA . Under section FIPPA 69 (5.4) , the Privacy Officer must submit this PIA to the Office of the Information and Privacy Commissioner.	No
Does this initiative involve a regular or systematic exchange of personal information between organizations? If yes, this initiative may require an Information Sharing Agreement .	No
Related PIAs, if any: 2024-007 Clockwork	



1. What is the initiative?

This initiative connects VCC students in need of a psychoeducational assessment with Adler University students, under the supervision of Adler Community Health, for the purpose of having the assessment conducted. In the initiative, students will go through a regular intake process with Disability Services, and then, if identified as eligible for participation in this initiative through regular Disability Services processes, students will sign a consent form to disclose their personal information to Adler University for the purpose of allowing Adler University and Adler Community Health to contact them to initiate the intake into Adler's program, and for Adler University to invoice VCC.

The VCC Foundation covers the cost of the assessment through a student bursary, and invoices are paid by VCC to Adler University with those funds.

Assessments are conducted at VCC by an Adler University student supervised by Adler Community Health; students enter into an intake process with Adler University, and then assessments are owned by the student. The student is not required to share any information contained in the assessment with VCC, and Adler University does not share any information from their program/assessment with VCC. This program is designed to operationally mirror the Learning Disability Assessment Bursary program provided by Student Aid BC and is available to students who do not qualify for the Student Aid BC program.

This initiative is initially for one school year (September 2024 to June 2024) and will support between three and ten students.

2. What is the scope of the PIA?

This is the initial pilot of this program and will be evaluated to see if it should continue. The scope of this is only the new partnership with Adler University and the disclosure of students' information for the purpose of this initiative; the PIA does not consider established Disability Services intake processes, the existing ClockWork database, or the administration of Adler University's program, which students will choose to enter independently and external to VCC. All information collected by Adler from the student, and the student's assessment, is handled by Adler Community Health and will not be disclosed to VCC.

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



Disability Services intake process and determination of eligibility:

- Students would disclose their need for an assessment to their Disability Counsellor. Case notes are stored on ClockWork per regular Disability Services procedures.
- Pre-assessment screens would be conducted by the Disability Counsellor and stored on ClockWork. These screens are part of Disability Services procedures and are not disclosed to Adler.
- Disability Services select eligible students to participate in this program based on the evaluation of their pre-assessment screens.

Disclosure to Adler and VCC departments:

- If determined to be eligible for this program, each eligible student will sign the Consent Form to consent to disclose:
 - their name and student number, to the VCC Foundation for the purpose of assigning a bursary to cover the cost of the assessment.
 - their name and student number, to the Financial Aid and the Finance Department, to process their bursary and pay invoices.
 - their name, student number and contact information shared with Adler University and Adler Community Health, which they will use to contact the students and facilitate the assessment.

Student name, number, and contact information are collected outside of this initiative, through VCC Banner system upon registration with VCC and through intake processes with Disability Services.

3.1 Did you list personal information in question 3?

Yes:

- Student name
- Student number
- Student contact information (students may indicate on consent form whether they want to disclose either or both phone and email address)

- Medical/disability status information about student’s eligibility for program (only understood through reference – no details are disclosed by Disability Services other than that the student is eligible for participation in program)
- If yes, are all of the personal information elements **necessary** for your initiative?
 - Yes – information is required for contact by Adler to facilitate the assessment and then invoicing.

4. If you answered “no” to question 3.1: How will VCC reduce the risk of unintentionally collecting personal information?

Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in a privacy breach or other privacy incident. After you answer this question, submit this PIA to the Privacy Office. You do not need to complete the rest of the PIA template.

N/A

PART 2: COLLECTION, USE, AND DISCLOSURE

This section will help you identify the legal authority for collecting, using, and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

5. Collection, use, and disclosure flow

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FIPPA authority or other legal authority	Specify any potential risks
Step 1: Student intake with Disability Services per regular DS processes.	Collection	26(c)	

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	FIPPA authority or other legal authority	Specify any potential risks
Step 2: Disability Services determines that student is eligible for program with Adler University.	Use	32(a)	
Step 3: After the eligible student signs the consent form, Student name, number, and contact information are disclosed to Adler University and Adler Community Health.	Disclosure	33(2)(c)	
Step 4: Student name and student number are shared with the VCC Foundation, Financial Aid, and Finance Department to process bursary, after eligible student signs the consent form.	Disclosure	33(2)(c) 33(2)(d)	
Step 5: Adler University uses student information to contact student to start intake process for the Adler program according to their procedures, and to invoice VCC for payment.	Use	PIPA 6(2)	

6. Collection Notice and Consent

6. 1 Collection Notice

If you are collecting personal information directly from an individual the information is about, FIPPA s. 27(2) requires that you provide a collection notice (except in limited circumstances). If your vendor is collecting personal information on behalf of VCC, the vendor must also provide a collection notice. FIPPA requires that you notify the individual of:

- *the legal authority,*
- *purpose(s) and use of their personal information (including any third party disclosures), and*
- *contact information or someone who can answer questions about the collection and use.*

Collection notice is provided to students on the regular Disability Services intake form and through Disability Services intake procedures that are outside the scope of this PIA.



6. 2 Consent

If you are obtaining consent for the use or disclosure of personal information (indicated by the FIPPA authorities you used in Question 5), add any consent language here.

See attached form

PART 3: STORING PERSONAL INFORMATION

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7. Is any personal information stored outside of Canada?

No

- If no, skip to [Part 5](#).

8. If you answered yes to Question 7: Where are you storing the personal information involved in your initiative?

9. Does your initiative involve sensitive personal information that will be stored outside of Canada?

N/A.

- If yes, go to [question 10](#)
- If no, skip ahead to [Part 5](#)

10. If you answered “yes” to Question 9: Is the sensitive personal information being stored outside of Canada only because it is being made available to the public under an enactment that authorizes or requires the information to be made public (FIPPA section 33(2)(f))?

- If yes, what enactment?
 - then skip ahead to [Part 5](#).
- If no, go to [Part 4](#).

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

Complete this section only if you answered yes to Question 9: you are disclosing sensitive personal information to be stored outside of Canada. This section will require consultation with a representative from IT Services.

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

- If yes, fill in the table below (add more rows if necessary) and then go to [question 13](#)
- If no, go to [question 12](#)

Name of service provider	Name of cloud infrastructure and/or platform provider(s) (if applicable)	Where is the sensitive personal information stored (including backups)?

12. If you answered “no” to Question 11: Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

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

- If yes, describe the contractual measures related to your initiative.
 - [Answer]
- Is VCC’s Privacy Protection Schedule or Privacy Protection Schedule for Cloud Services appended to the initiative’s contract?

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

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

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

Privacy risk	Impact to individuals (low, medium, high)	Likelihood of unauthorized collection, use, disclosure or storage of the sensitive personal information (low, medium, high)	Level of privacy risk (low, medium, high, considering the impact and likelihood)	Risk response (this may include contractual mitigations, technical controls, and/or procedural and policy barriers)	Is there any outstanding risk? If yes, please describe.

Outcome of Part 4

The outcome of Part 4 will be a risk-based decision made by the role designated accountable for the initiative on whether to proceed with the initiative, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 16.

Is the outcome to proceed with the initiative? [Answer: Yes or No]

PART 5: SECURITY OF PERSONAL INFORMATION

In Part 5, you will share information about the privacy aspect of securing personal information. People, organizations or governments outside of your initiative should not be able to access the personal information you collect, use, store or disclose. You and/or your vendor need to make sure that the personal information is safely secured in both physical and technical environments.

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

Yes: ClockWork database is used to store Disability Services case notes, intake information, and students' consent forms.

- If yes: Are these digital tools, databases, or information systems new to VCC?
 - No – ClockWork has been assessed.

17.1 If you answered “yes” to Question 17: Do you or will you have a security assessment to ensure the initiative meets the security requirements of FIPPA s. 30?

Not applicable – ClockWork already has a completed PIA and assessment.

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

Security of Disability Services intake processes and ClockWork database are already assessed. The determination of eligibility for students in this program, and any associated case notes and consent forms for this initiative will be stored in ClockWork like all Disability Services records and only accessible

by the approved Disability Counsellor roles in ClockWork, with password protection, role-based access, and other technical security requirements.

DS will maintain the security of the students' personal information in disclosure by:

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

19. Controlling and tracking access

Strategy		
We only allow employees in certain roles access to information:		Yes
Employees that need standing or recurring access to personal information must be approved by their managerial lead:		Yes
We use audit logs to see who accesses a file and when:		Yes (in ClockWork)
Describe any additional controls:		

PART 6: ACCURACY, CORRECTION AND RETENTION

In Part 6, you will demonstrate that you will make a reasonable effort to ensure the personal information that you have on file is accurate and complete.

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

This is part of established DS intake processes. Students complete an online intake form and meet with a DS Counsellor and all information is collected directly from students or through assessments made by a DS Counsellor.

Students will only sign the consent form to disclose personal information if they are selected to be eligible in the program and they wish to participate, and the consent form is only valid until the end of

the assessment, which concludes upon VCC's payment of the invoice received from Adler University. This ensures that the information they disclose is current, accurate, and complete.

21. Requests for correction

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

Yes: Students can contact their Disability Counsellor and students are able to update their contact information through the VCC Banner system.

21.2 Sometimes it's not possible to correct the personal information. FIPPA s. 29 requires that you make a note on the record about the request for correction if you are not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes: DS can make a note on file in ClockWork.

21.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FIPPA s. 29 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?

Yes.

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

Yes – DS Counsellors make a decision about whether the student is eligible to participate in the program with Adler University based on their intake and pre-assessment.

23. If you answered “yes” to Question 22: Do you have a records retention schedule in place related to personal information used to make a decision?

Yes, VCC Records Retention Schedule (part of student's case files in DS).

PART 7: PERSONAL INFORMATION BANKS

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



No – intake processes are under the PIB of DS Case Files, but no new PIB is created through this initiative.

PART 8: ADDITIONAL RISKS

Part 8 asks that you reflect on the risks to personal information in your initiative and list any risks that have not already been addressed by the questions in the template.

25. Risk response

Possible risk	Response / mitigation strategies
Risk 1: Adler Community Health attempts to disclose or share any information about the student's assessment by Adler.	VCC Disability Services will only receive any information about the assessment directly from the student per regular DS processes.
Risk 2: Adler Community Health requests additional information about a participating student or records from DS about a student.	Student may sign an authorization form to release information or records to a third-party, but VCC DS cannot release anything without the student's consent and details of specifically the records and use of that information.
Risk 3: Student decides they no longer want to participate in program before intake with Adler.	VCC DS can request Adler to destroy any of student's information shared already.

PART 9: SIGNATURES

You have completed a PIA. Submit the PIA to the Privacy Office for review and comment, and then have the PIA signed by those responsible for the initiative.

Privacy Office Comments

Privacy Office Signatures

This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer	Surinder Aulakh		2024-10-1

Program Area Signatures

The PIA must be signed by a role that is able to hold accountability for a PIA, proportionate to the sensitivity of personal information and/or the risks of the initiative. This signature confirms that this PIA accurately documents data elements and information flow at the time of signing. If there are any changes to the overall initiative, including the way personal information is collected, used, stored, or disclosed, the program area will contact Privacy and, if necessary, complete a PIA update.

Program Area Comments:

Role	Name/Position	Electronic signature	Date signed
Role designated accountable for the initiative	Nigel Scott, Assoc 	 Digitally signed by Nigel Scott Date: 2024.10.01 14:15:58 -07'00'	Oct 1, 2024

Consent to Disclose Personal Information

Your privacy is important to us. Disability Services collects, uses, and discloses your personal information in accordance with the *BC Freedom of Information and Protection of Privacy Act* as well as applicable VCC policies.

Disclosure

Your personal information that will be disclosed includes:

- First and last name
- Phone number and/or email address
- Student number

Your personal information will be disclosed to Adler Community Health Services and Adler University for the purposes of facilitating a referral to Adler Community Health Services and the coordination of payment for a psychoeducational assessment. Adler Community Health Services will use your information to contact you and will use your name and student number to invoice VCC for the coordination of payment.

Your name and student number will be disclosed to the VCC Foundation, VCC Financial Aid and the VCC Finance Department in order to facilitate payment for services provided.

Consent

I authorize Disability Services to disclose my personal information to Adler Community Health Services, Adler University and the necessary VCC departments solely for the purposes described above.

This consent is valid from the date signed until the completion of the psychoeducational assessment process.

Student Name	Student Signature	Student Number	Date mm/dd/yyyy
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