



Privacy Impact Assessment (PIA) for

Business Management Practicum Placement Partnership

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PART 1: GENERAL INFORMATION

PIA file number: 2024-015

Initiative title:	Business Management Practicum Placement Partnership
VCC Department / Program Area:	Business Management – MGMT 2019 / MGMT 2020
Link to VCC initiative website:	
Link to vendor website:	https://www.stepwest.com
Link to vendor privacy policy:	https://www.stepwest.com/privacy-policy/ https://hanovercrm.com/privacy-policy
Your name and title:	Joel Rivera, Practicum Instructor
Your work phone and email:	jrivera@vcc.ca

Initiative Lead name and title:	Willy Aroca Aguirre, Assistant Director Hospitality, Food Studies, Applied Business & Business Management Programs Milagros Palacios Infantas, Department Head, Business Management
Initiative Lead phone and email:	waroacaaguirre@vcc.ca ; mpalaciosinfantas@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 .	Yes
Related PIAs, if any:	

1. What is the initiative?

As a component of the Business Management Post Degree Program, students that are enrolled in both Term-3 and Term-4 of their studies use the services of a third-party recruitment agency to assist with job placement (term 3) and monitoring while on job placement (term 4). In the third term, students work with the agency's recruiters (Stepwest) to share their areas of interest as well as provide them with information and documentation such as resumes, valid work permits, etc. The stages of the recruitment process as well as the initiation of the recruitment process are triggered by the instructor to the recruitment partner. Information such as hours worked, progress updates are also shared by the student to the agencies where the information is compiled for the instructors to review on a regular basis. [s. 13\(1\)](#)

2. What is the scope of the PIA?

This PIA considers the practicum placement and monitoring process undertaken by VCC and Stepwest (now owned by parent company Alliance Abroad Inc.), including the use of Stepwest/Alliance Abroad's new platform, Hanover CRM. Stepwest has provided practicum placement services to VCC Business Management has since 2020, but the adoption of this new platform significantly changes Stepwest's previous personal information-collecting and sharing practices. Stepwest's implementation of Hanover is in progress and Stepwest/Alliance Abroad has confirmed Hanover will be used for all students in the practicum placement starting January 1, 2025.

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

- Practicum Participation information (collected from student by BM; disclosed to Stepwest)
 - First name, last name
 - student email address (possibly student number?)
- Registration on Hanover platform (collected from student in Hanover)
 - Name
 - Email address
 - Phone number
 - Date of birth
 - Student number
 - Nationality
 - Address, emergency contact (optional information)
- Registration on Hanover platform (VCC staff)
 - Name; email address
- Consultation interview and Report (collected from student by Stepwest, via Hanover)
 - Name, email, VCC program, job preferences
 - English proficiency level, employment history, educational history
 - Comments from staff who conducted the consultation (recorded opinions about an individual)
 - Eligibility to hold practicum in Canada (verification but not collection of work permit)
 - Resumes and Cover Letter
- Terms and Conditions with Stepwest (collected from student by Stepwest twice, via Hanover)
 - Student name
 - Email address
 - Student number
 - Phone number
 - Placement date and duration
 - Additional terms of student's placement: e.g. their desired start date, interests, possible other information about location, work history, educational history (appended to second Terms & Conditions agreement)

- Interview Process (collected from student and about student from interview process by Stepwest and via Hanover platform)
 - Whether interview was successful; interview feedback
- Progress Reports (collected from student via Hanover platform)
 - Recorded responses including personal opinions about employment, learning, challenges, etc.
 - Hours worked
- Reports from Practicum Supervisors (Check-In Forms) (collected from employers via Hanover platform)
 - Name, phone number, position, recorded opinions and feedback about the student on practicum
- Practicum Placement Agreement (with practicum employer; available in Hanover)
 - Duration and terms of employment
 - Student name, contact information
- Hanover CRM site/service
 - May include IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of website or service use.

3.1 Did you list personal information in question 3?

Yes – nearly all information collected in this initiative is personal information.

- If yes, are all of the personal information elements **necessary** for your initiative?
 - No (see Part 8 and Privacy Comments)

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

n/a

PART 2: COLLECTION, USE, AND DISCLOSURE

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
Student completes form from VCC BM with their name, email address, and whether they are self-placing in a practicum or want to enter the review process with Stepwest.	Collection	26(c)	Form needs to include collection notice and must be administered through a secure platform.
Stepwest emails registration link to students to register with the Hanover platform.	Use	32(a)	
Student registers with the Hanover platform. VCC Business Management staff also registers.	Collection	26(c)	
Student receives an email from Stepwest via a third-party scheduling system with a link to book a consultation session.	Use	32(a)	Booking happens via third party service, Calendly. Privacy has not received information about its compliance with FIPPA; service provider should use an alternative if not.
Students sign Terms and Conditions with Stepwest via the Hanover platform. Terms collect student contact information and practicum duration, and also require students to agree to behavioural requirements directly with vendor.	Collection		Student has already provided contact information and duration through registration on platform. s. 13(1) [REDACTED] [REDACTED] Terms are signed through Hanover platform.
Student has a consultation session with Stepwest recruiter to discuss availability, job	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
preferences, etc. Consultation report is available in Hanover.			
Stepwest verifies student’s eligibility to hold a practicum (verifies work permit) during consultation interview. Eligibility is recorded.	Collection	26(c)	s. 13(1) [REDACTED] [REDACTED] [REDACTED] [REDACTED]
Student signs the Terms and Conditions again, this time with details regarding job placement (such as interests or date of availability) appended to the Terms, via Hanover platform.	Collection		Terms and Conditions do not need to collect PI again; Terms are signed through Hanover platform.
Student has second consultation meeting to work on resume with Stepwest recruiter and to discuss possible placements.	Collection Use	26(c) 32(a)	
Following the consultation session, the recruiter works on securing potential interviews and placements for the students (disclosing resume to possible placements). When an organization is a potential match, the student is emailed with details for the interview.	Use Disclosure	32(a) 33(2)(d)	
If the student is successful in obtaining the placement, they will be provided with a practicum placement agreement that will be	Use	32(a)	

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
signed by the student, school and employer, held in Hanover.			
If the student is unsuccessful, they will repeat the interview process until they have been placed. Results of interviews and feedback are added to Hanover by Stepwest recruiter.	Collection Use	26(c) 32(a)	
During the practicum, students will complete progress reports about their employment via Hanover platform (will be disclosed/can be accessed by VCC staff).	Collection	26(c)	
Practicum employer completes progress reports about the student during the practicum via Hanover platform; these can be accessed by practicum student and VCC staff.	Collection	26(c)	No collection notice provided on these forms.
VCC staff uses reports from practicum placement to evaluate student's completion of this program requirement.	Use	32(a)	

6. Collection Notice and Consent

6.1 Collection Notice

Business Management form:



Your personal information is collected under the authority of section 26(c) of the BC *Freedom of Information and Protection of Privacy Act* (FIPPA). This information will be used to identify you as a participant in the Practicum Placement and to initiate the practicum placement services. This information will be provided to VCC's practicum recruitment agency, Stepwest, in order to contact you and permit you to register with Stepwest's system, Hanover, for administering and providing practicum placement services. Questions about the collection and use of this information may be directed to Joel Rivera, Practicum Instructor (lead), Business Management via email at jrivera@vcc.ca.

Location: The collection notice will be provided on the Practicum Placement form that students are required to complete when starting the practicum program.

Stepwest collection notice:

Stepwest is under contract with Vancouver Community College to provide practicum placement and monitoring services. Your personal information is collected for VCC under the authority of section 26(c) of the BC *Freedom of Information and Protection of Privacy Act* (FIPPA). This information collected from you during registration with Stepwest's platform, Hanover, and throughout the practicum placement process. This information is directly related to and needed by Stepwest to administer and provide practicum placement and monitoring services. This information will be used to contact you via email; to verify your eligibility to hold a practicum; to assist in creating your resume; to find you a practicum placement through disclosing your resume to potential employers; and to monitor and record your progress throughout your practicum. If you have any questions about the collection and use of this information please contact Joel Rivera, Practicum Instructor (lead), Business Management via email at jrivera@vcc.ca.

Location: Notice will be provided to students prior to registration with Stepwest, either at the point of registration itself, or included in the initial email contact that provides them with the registration link.

PART 3: STORING PERSONAL INFORMATION

7. Is any personal information stored outside of Canada?

Yes – Hanover stores information outside of Canada.

Calendly, the third-party service used for scheduling consultations, has its servers in the United States. The Privacy Office has not received any information about whether Calendly collects students' information during Stepwest's use of the service.

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

Hanover, Stepwest/Alliance Abroad's new platform, is hosted on AWS EU-West zone 1 (Ireland).

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

No

Privacy Note: s. 13(1) [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted] Work permits or any other sensitive information should not be uploaded to Hanover or shared via email and if this changes, this PIA, including Part 4, must be revised.

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))?

[Answer: Yes or No]

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

PART 4: ASSESSMENT FOR DISCLOSURES OUTSIDE OF CANADA

- 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.

[Answer]

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

- [Answer: Yes or No] 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? [Answer: Yes or No]

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

[Answer]

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

[Answer]

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

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

Yes: Hanover, Stepwest/Alliance Abroad's new platform.

- If yes: Are these digital tools, databases, or information systems new to VCC?
 - Yes – the platform is a recent change to Stepwest's practices.

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?

Yes: VCC IT Services will complete a security assessment for this platform.

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

IT has conducted and approved a preliminary assessment of Hanover CRM and will complete a full assessment of Hanover CRM's security.

S. 15(1)(I)

19. Controlling and tracking access

Strategy	
We only allow employees in certain roles access to information:	Yes: Hanover has administrator roles for the service provider and VCC staff roles, which only have access to “school view” (student name, email, placement & placement contact, placement agreement, and reports from the placement), and not the students’ entire profiles.
Employees that need standing or recurring access to personal information must be approved by their managerial lead:	Yes: VCC staff will have to be granted permission to register and be assigned to view students’ profiles in “school view.”
We use audit logs to see who accesses a file and when:	s. 15(1)(l) <div style="background-color: #cccccc; height: 15px; width: 100%;"></div> <div style="background-color: #cccccc; height: 15px; width: 100%;"></div> <div style="background-color: #cccccc; height: 15px; width: 100%;"></div> <div style="background-color: #cccccc; height: 15px; width: 100%;"></div>
Describe any additional controls:	Hanover uses role-based access for students, VCC staff, and Stepwest administrators. VCC staff may only view students’ information in the “school view” as described above. Students may view all information related to them only and edit until information is locked after verification/submission, depending on stages of the practicum placement process.

PART 6: ACCURACY, CORRECTION AND RETENTION

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

Most information collected directly from students via self-service options in Hanover, or directly from Stepwest recruiters about students and added to their profiles. Information can be edited within Hanover until locked by Stepwest administrators at certain points of the practicum placement process (after it is verified and as needed to be able to disclose to employers). All the information collected about each student, including consultation and progress reports, is available to each student.

21. Requests for correction

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

Yes: Students can correct any self-service information until it is locked by Stepwest administrators at certain points of the practicum placement process. For any information that is recorded opinions, or after self-service has been locked, students may email their Stepwest recruiter to have either the portion unlocked for editing or to submit an annotation or correction that will either be made or included within the student's profile.

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 – see previous question. Employers can also contact Stepwest recruiters to annotate or correct any information they provided during the practicum process.

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?

Per terms of Privacy Protection Schedule, Stepwest will notify practicum employers if necessary.

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

Yes

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: Records in Hanover are retained for 2 years and then archived (semi-active) for an additional 4 years before destruction (total 6 years retention). VCC may request to have any records unarchived if needed after the 2-year period.

PART 7: PERSONAL INFORMATION BANKS

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

Yes: "Student Practicum Files." Student profiles are searchable within Hanover system.

PART 8: ADDITIONAL RISKS

25. Risk response

Possible risk	Response / mitigation strategies
<p>Risk 1: Over-collection and unauthorized collection of personal information.</p>	<ul style="list-style-type: none"> ○ Stepwest/Alliance Abroad must not collect any information that is not necessary or directly related to the practicum placement and monitoring process (e.g. nationality) ○ s. 13(1) [REDACTED] ○ Stepwest should limit re-collecting personal information on its Terms & Conditions forms, since this information is collected at registration and the Terms will be agreed to within the new system and do not require personal information to be submitted. ○ VCC Business Management and Stepwest/Alliance Abroad both must provide proper collection notices to students at the point where information is collected. (Terms and Conditions/Privacy Policy is not a FIPPA-compliant collection notice) ○ Stepwest should provide a collection notice to employers when collecting progress reports (personal information may include recorded opinions/evaluations)
<p>Risk 3: Service provider uses a third-party platform (Calendly) for scheduling their consultation interviews.</p>	<p>No mitigation strategy offered: this is part of Stepwest’s service and VCC has not received any information about how this service collects or uses students’ personal information.</p>
<p>Risk 4: Service provider’s failure to comply with Privacy Protection Schedule.</p>	<ul style="list-style-type: none"> ○ s. 13(1), s. 15(1)(l) [REDACTED]

Possible risk	Response / mitigation strategies
	<ul style="list-style-type: none"> ○ s. 13(1), s. 15(1)(l) [REDACTED] [REDACTED] [REDACTED] [REDACTED]

PART 9: SIGNATURES

Privacy Office Comments

s. 13(1), s. 15(1)(l) [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] Since the initial review, Stepwest and their parent company, Alliance Abroad Inc., have indicated that Stepwest will be implementing the Hanover CRM platform to manage student information, documentation, and information-sharing between the practicum employer, VCC, and Stepwest. The introduction of Hanover centralizes the flow of personal information within this initiative and addresses many of the previous concerns. The Privacy Office can recommend proceeding with the initiative with the following mitigation strategies, also identified in Part 8.

1. Collection/Privacy Notification

VCC Business Management and Stepwest/Alliance Abroad both need to provide students with proper notification about the collection and use of their personal information. s. 13(1) [REDACTED]
[REDACTED]
[REDACTED]. Question 6 includes drafts of these collection notices.

VCC has also not received information about Stepwest’s use of Calendly, the third-party scheduling service, and whether this collects student information. The service provider should ensure that this service is compliant with FIPPA or use an alternative.

2. Sensitive Information and Disclosure Outside of Canada

This PIA has been completed with the understanding that no sensitive personal information (including unique government identifiers, like work permits or SINs; medical information; financial information) is being collected in this initiative.

s. 13(1)

If this initiative changes and any sensitive personal information is disclosed outside of Canada (i.e. is uploaded to the Hanover platform), Part 4 of this PIA will need to be completed.

3. Limit the collection of personal information

Some personal information may not be necessary to collect for the practicum placement services, but are default options in the Hanover platform, such as nationality or date of birth. The service provider must ensure that only information that is necessary and directly related to the practicum placement process is being collected from students. Alliance Abroad uses Hanover for multiple different initiatives but the service provider's work with VCC must comply with FIPPA.

This also includes the service provider's Terms and Conditions. These are now able to be completed within the Hanover CRM platform and do not need to repeatedly collect students' personal information, which they will have already provided to Hanover.

4. Continued Use of Platform

The Privacy Office can recommend proceeding with this initiative on the condition that the service provider adopts this new information flow and exclusive use of the Hanover platform. s. 13(1)

The service provider has confirmed that as of January 1, 2025, it will administer the practicum placement process for all students through Hanover, and this PIA is approved on that condition. Both Business Management and the service provider must use the Hanover platform as assessed

here and implement the identified mitigation strategies in order to be compliant with FIPPA, and cease their previous personal information collection, sharing, and storage practices.

Any changes to the initiative as documented here will require the initiative to be reassessed and this PIA to be revised.

Privacy Office Signatures

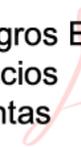
This PIA is based on a review of the material provided to the Privacy Office as of the date below.

Role	Name	Electronic signature	Date signed
Privacy Officer	Surinder Aulakh	 Digitally signed by Surinder Aulakh Date: 2024.11.20 06:27:17 -08'00'	11/20/24

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	Milagros Palacios Infantas	 Digitally signed by Milagros E Palacios Infantas Date: 2024.11.29 13:58:12 -08'00'	11/29/2024
Contact Responsible for Systems Maintenance and/or Security	Norman Chang	 Digitally signed by Norman Chang Date: 2024.11.21 10:52:59 -08'00'	11/21/24