



# Privacy Impact Assessment (PIA) for VCC Online Training – Frame & Associates LMS

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## 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](mailto: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 myVCC [Privacy website](#).

## PART 1: GENERAL INFORMATION

PIA file number: #2025-002

<b>Initiative title:</b>	VCC Online Training – Frame & Associates LMS
<b>VCC Department / Program Area:</b>	People Services
<b>Link to VCC initiative website:</b>	<a href="http://training.frameassociates.com">training.frameassociates.com</a>
<b>Link to vendor website:</b>	<a href="https://www.frameassociates.com/">https://www.frameassociates.com/</a>
<b>Link to vendor privacy policy:</b>	<a href="https://www.frameassociates.com/privacy/">https://www.frameassociates.com/privacy/</a> <a href="https://training.frameassociates.com/privacy">https://training.frameassociates.com/privacy</a>
<b>Your name and title:</b>	Monica Hegberg
<b>Your work phone and email:</b>	Ext 7158 - mhegberg@vcc.ca
<b>Initiative Lead name and title:</b>	Elaine Pedersen, Director of Recruitment and People Development
<b>Initiative Lead phone and email:</b>	Ext 7019 - epedersen@vcc.ca

General information about the PIA:

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

## 1. What is the initiative?

Frame & Associates Consulting, VCC's vendor, is a Canadian company that specializes in diversity, employment equity, and respectful workplace training and consulting services and provides secure online hosting and management services for other organizations' training courses through their LMS. Frame & Associates states that their LMS is PIPEDA and PIPA-compliant.

VCC People Services provides mandatory online workplace training courses (including, at this time, Respect in the Workplace training; Privacy and FOI; Conduct & Conflict of Interest) to employees through Frame & Associates' online LMS platform. Some course content is created by Frame & Associates, including the current Respectful Workplace Training module, and VCC provides the content for other courses (VCC-owned courses). Frame & Associates hosts and administers employees' access to the platform and all VCC's available courses. The LMS may also host other workplace training courses in the future that are not mandatory, and VCC employees are able to access the LMS and take the courses even when not required as new employees or for the periodic renewal of training.

To access these courses, employees log onto the LMS with a VCC-unique username and passkey; provide personal information to identify them as VCC employees within the LMS; and select and complete the required courses. Frame & Associates' LMS logs the employee's score and completion status in their database but only provides a field associated with the individual employee to indicate an employee's completion (checkmark) to VCC's administrative access to the LMS. The completion status may reflect completing the course content or completing a quiz at the end, depending on the requirements of the course. Employees may view their test score, if the course includes a quiz, but only completion status will be shared with VCC.

The LMS also collects feedback through a user survey after the user completes the course, in the case of courses created by Frame & Associates. Frame & Associates and VCC may both view feedback in a way that is not associated with the respondent. Surveys may include open-text fields for employees' comments. Feedback is used for course and system improvements only and are not associated with a course completion, so there is no way to identify the respondent, unless any details are provided in written comments.

To track employees' completion of mandatory courses, People Services downloads reports from the LMS that contain the employees' identifying information, as provided at the start of the course, and completion status and uses this to match with and populate a Master Excel spreadsheet, held by People Services, that is used to track completion and add and determine dates for reminders for completion or renewing training as required.

## 2. What is the scope of the PIA?

This PIA covers VCC's use of Frame & Associates' online LMS platform for administering online workplace training courses, including employees' access and use of the platform and VCC People Services' access and use of employees' information shared with the LMS, including completion of courses and a user feedback survey.

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

- Frame and Associates collects employee information directly from users including:
  - First and last name
  - Employee ID Number
  - VCC email address
  - Department
- Frame and Associates records the users' course completion record in their database
  - Score (if applicable); pass (completion); data and time of submission of results
- Frame and Associates administers a survey at the end of course asking users about their course experience. This information is collected directly from the individual is recorded in their database but not associated with the individual.
  - Close-ended responses and open-text responses (comments)
- VCC accesses employee information, course completion dates, and course feedback from LMS and/or by downloading a report from LMS (containing employees' personal information, courses, and completion status).
- Website (online LMS) collects cookies

Users are also required to consent to Frame & Associates' [Terms of Use](#) and [Privacy Policy](#) on the registration page where they provide their personal information.

#### 3.1 Did you list personal information in question 3?

Yes.

- If yes, are all of the personal information elements **necessary** for your initiative?
  - Yes.

### 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
VCC employees log on to the online training courses on VCC's instance of the Frame & Associates LMS and enter their first/last name, employee ID number, VCC email address and department.	Collection	26(c)	
Employees select and complete courses and quizzes (if required), and their result is recorded in Frame & Associates LMS.	Collection Use	26(c) 32(a)	
At the end of the courses created by Frame & Associates, employees complete the optional feedback survey. The information/opinions are recorded in the LMS.	Collection	26(e)	
People Services accesses employees' course completion status (pass/not completed) in the LMS and downloads a report from the LMS (containing list of employees, all the PI they provided, and their courses and completion status).	Use	32(a)	
People Services transfers report data into PS Master spreadsheet containing employees' completion status/dates for renewals or reminders. PS disposes of reports once they no longer serve an operational purpose.	Use	32(a)	
People Services and F&A access the results from the F&A feedback surveys, when available, and use relevant feedback to improve courses and services.	Use	32(a)	Results are not associated with an individual but

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
			open-text comments could contain PI.

**6. Collection Notice and Consent**

**6. 1 Collection Notice**

Collection Notice:

Frame & Associates is under contract with VCC to host and administer VCC’s online training courses. Your personal information is collected for VCC under the authority of s. 26(c) and s. 26(e) of the BC *Freedom of Information and Protection of Privacy Act* (FIPPA). Frame & Associates and VCC will use this information to administer the online courses through Frame & Associates’ LMS; record your completion of the courses; contact you to complete or renew your training; and collect and review your feedback through an optional survey when available. Questions about the collection of this information may be directed to People Services at hrcentral@vcc.ca.

The collection notice will be posted on People Services’ internal myVCC website on the page where employees access the links to the LMS, and in any training renewal or reminder emails sent to employees from People Services.

**6. 2 Consent**

N/A

**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: All data is stored in Canadian data centers and the web application is hosted on Canadian data centres.

- 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?**

[Answer]

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

[Answer: Yes or No]

- 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))?**

[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**

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?**

[Answer: Yes or No]

- 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

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.

- If yes: Are these digital tools, databases, or information systems new to VCC?
  - No.

**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?**

No.

- If no, continue to [question 18](#).

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

Frame & Associates LMS:



- s. 15(1)(l) [Redacted]
- Client data is organization-specific; other LMS clients and users do not have access to completion data or PI of other clients, and this is enforced by the application code.
- Limited PI is collected and is only used as needed to report completion results to clients.
- Frame & Associates has access to PI of clients through completion reports, but access is limited to 3 Frame & Associates administrators.
- s. 15(1)(l) [Redacted]
- [Redacted]
- Breach reporting process: If a breach were detected, Frame & Associates would secure administrative accounts and records and notify VCC on the scope of the breach, the timeline, and the information impacted.

People Services: Access to Frame & Associates’ administrative side of the LMS is limited to specific People Services roles with the account name and password. The downloaded reports and Master tracking spreadsheet are stored in People Services’ SharePoint, limited to People Services staff who require access to this information for the completion of their job duties.

## 19. Controlling and tracking access

<b>Strategy</b>		
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:		No
<b>Describe any additional controls:</b>	<p>The LMS records when courses have been added or updated with timestamps of when data is updated, but there are no audit logs for generating reports or to identify a specific user.</p> <p>VCC only has administrative access to VCC’s data, limited to certain roles, and cannot edit the completion results, only download reports. VCC’s SharePoint will record when a file (like the Master Spreadsheet) has been updated and by whom.</p>	

## 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?

Employees provide their personal information directly to the Frame & Associates LMS at the time of log-in and directly provide their optional feedback. Employees can review their information and responses for accuracy and completion prior to submitting.

People Services matches the information provided by the employee and downloaded in the report to the Master spreadsheet to update the completion status and date collected by the report. People Services primarily uses the employee's VCC as the identifier as employees may use a preferred name or input their employee ID number in different formats.

### 21. Requests for correction

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

Yes: Unlikely that personal information will need to be corrected as it is provided by the employee, and People Services relies primarily on the employee's VCC email to be the identifier (employees sometimes incorrectly input their employee ID), but employees can contact People Services to update any PI or confirm their completion status. Users cannot correct their own PI within Frame & Associates' LMS.

#### 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?

N/A

#### 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?

N/A

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

No (Completion of training has no effect on an individual's employment; individuals will just be reminded to complete training as necessary).

**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?**

N/A

**PART 7: PERSONAL INFORMATION BANKS**

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

*A [personal information bank](#) is a collection of personal information that is organized and retrievable by the name of the individual or an identifying number, symbol or other identifier.*

No.

**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**

<b>Possible risk</b>	<b>Response / mitigation strategies</b>
People Services retains reports downloaded from the LMS indefinitely (containing personal information), after they have been used to populate the Master tracking spreadsheet, creating additional records with PI that may be outdated or inaccurate past their period of use.	These are transitory records (do not serve a purpose once used to populate the spreadsheet). People Services will regularly dispose of these when they are not needed, and the reports can be re-downloaded from the LMS if needed.
Unauthorized individuals could access Frame & Associates’ LMS, and VCC’s employees’ personal information stored there.	Frame & Associates LMS includes technical security measures to protect from unauthorized access; limits access to clients’ PI to 3 administrator roles; and has a breach notification process.  People Services secures employees’ PI and follows VCC’s FIPPA policy and procedures for reporting breaches.

## 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	Caralee Maloney	Caralee Maloney Digitally signed by Caralee Maloney Date: 2025.02.24 09:49:35 -08'00'	February 24, 2025

### 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	Elaine Pedersen	Elaine Pedersen Digitally signed by Elaine Pedersen Date: 2025.02.24 16:37:56 -08'00'	February 24, 2025