



Privacy Impact Assessment (PIA) for Student Inbound and Outbound Mobility at VCC

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PART 1: GENERAL INFORMATION

PIA file number: #2024-008

Initiative title:	Inbound and Outbound Mobility
VCC Department / Program Area:	International Education
Link to VCC initiative website:	https://www.vcc.ca/international/
Link to vendor website:	N/A
Link to vendor privacy policy:	N/A
Your name and title:	Alexander Kim, International Student Engagement and Mobility Coordinator
Your work phone and email:	+1 604.443.8391; alekim@vcc.ca
Initiative Lead name and title:	Jennifer Gossen, International Education Director
Initiative Lead phone and email:	+1 604.443.8766; jgossen@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: BCNET – Ellucian Banner Cloud	

1. What is the initiative?

VCC International Education department is developing processes and building partnerships for student/faculty/staff inbound and outbound mobility opportunities. This initiative encompasses International Education’s Student Inbound and Outbound Mobility processes, specifically regarding the collection, review, and approval or rejection of applications for inbound students (applying to VCC opportunities) or outbound students (VCC students applying to external opportunities). Students apply through the completion of a VCC Mobility Application Form and associated supporting documentation. Inbound applications may be received from both domestic or international students and outbound applications may also be for domestic or international opportunities at partner institutions around the world.

VCC International Education, through its Internationalization or Mobility Services area, plans to continue promoting and expanding on opportunities offered by VCC and partners. Currently, VCC’s International Student Engagement and Mobility Coordinator (ISEMC) is the main contact person working on this project with support from the UMAP director and VCC’s IE director.

This activity is continuous on a rolling year basis with dates/schedules established depending on opportunities made available as the receiving and/or sending institution.

Mobility opportunities are advertised to students through VCC’s Internationalization and Mobility Services newsletters and other communications. These communications will encourage students to apply directly to VCC through the application processes discussed in this PIA, with the understanding that applying to partner institution programs may require submitting applications through other

platforms and are external to VCC and personal information will not be managed by VCC on those platforms.

Both inbound and outbound students apply to VCC through this application process by completing and submitting the application package. Applications are currently submitted via email but an online submission platform may be available in the future.

Once an outbound application submitted is reviewed by ISEMC and is approved and selected, VCC discloses their application information to the host institution, if applicable. Registration is completed by the host institution and in accordance with the policies and laws of their institution and jurisdiction.

For inbound opportunities, students register with VCC through the relevant and established registration process following the approval of their application. IE may facilitate this registration process by providing a Letter of Acceptance or other supporting documentation when applicable.

2. What is the scope of the PIA?

The scope of the PIA concerns the Student Inbound and Outbound Mobility Processes and Information Collection, from the receipt of a student’s VCC Mobility application to the end of decision-making about the application (prior to registration, either at VCC or at the host institution). This PIA considers only direct applications. International Education may enter into bilateral exchanges or other types of mobility opportunities with other agreements and information sharing practices, and those must be assessed separately. Those opportunities may also require group leaders to complete additional risk assessment forms.

There are also existing processes and forms in place for Faculty/Staff mobility opportunities and the International Education Department’s role in sharing opportunities and facilitating the process.

Banner, M365/SharePoint/Outlook, Guard.me Global (travel insurance), and registration processes at VCC and host institutions are outside the scope of this PIA.

VCC is currently the International Secretariat for UMAP, ending in 2025. UMAP’s platform, USCO, is outside the scope of this PIA and all students are encouraged to apply directly to VCC.

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

Source	Data/Information Elements	Collection
Application Form	Student ID; Student name; Date of birth; Gender Educational history (transcripts, GPA, course selection) Country of Citizenship and citizenship status Address; phone number; email Emergency contact; contact information; relationship to student Optional request for disability/accommodation services	Collected directly from student.

	<p>Criminal history (whether ever convicted of a criminal offense)</p> <p>Legal ability to travel to an international destination</p> <p>Anticipated Graduation date</p> <p>English Language Proficiency</p> <p>Motivation letter and resume (opinion, employment history, etc.)</p> <p>Current Program of study; Registration Status</p>	
Additional application package documentation	<p>Transcripts/GPA</p> <p>Motivation letter</p> <p>Resume</p> <p>Required demonstration of English proficiency (depending on program requirements)</p> <p>Passport, as applicable</p> <p>Passport-sized photograph</p>	Collected directly from student.
Consent to Disclose Information (Outbound)	<p>Name; Student ID</p> <p>Consent to disclose PI to host institution</p> <p>Signatures</p>	Collected directly from student.
Travel Insurance Proof (Outbound)	<p>Students register with Guard.me Global and provide IE with PDF of insurance policy card: Name; birth date; student number; policy number; coverage dates; institution (VCC)</p>	Collected directly from student.
Mobility Student Information Change Form	<p>For updates to contact info or change of name: Student ID; address; phone; email; birthdate; copy of government-issued ID (if applicable)</p> <p>For updates to citizenship information: citizenship status; citizenship/visa ID number; nation of birth; nation of citizenship; native language; issue date; expiration date</p>	Collected directly from student.
Participation in Off Campus Activity (Student Waiver Liability) (Outbound)	<p>Student name; current course and number; off-campus location</p> <p>yes/no responses for: having health insurance and having health problems that may prevent participation</p> <p>emergency contact name; relationship, phone</p> <p>signature; guardian name and signature (if applicable)</p>	Collected directly from student.
International Travel Risk Form (Outbound)	<p>Student name; gender; date of birth; student/Banner ID number</p> <p>email; phone; home address</p> <p>VCC program; dean/director name; activity supervisor/advisor;</p> <p>Activity city/country; host organization; out of country address; out of country email; out of country phone</p> <p>Emergency contact name, contact information, relationship</p> <p>Travel details; nature of activity; dates of travel; transportation method and flight numbers</p> <p>Signatures (student, VCC approval)</p>	Collected directly from student.

Photo/Video Release (Standard VCC form)	Name; email; date; signature; consent	Collected directly from student.
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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: all information is needed to assess a student’s eligibility for the mobility opportunities for which they are applying.

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

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

Outbound Applications (VCC Students Applying to Other Institutions)

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
IE receives outbound application package from student via email to IE Mobility email address.	Collection	26(c)	
Student’s ID, registration, and contact information is verified via Banner to confirm eligibility in outbound opportunities (available only to registered students).	Use	32(a)	



IEMC determines student's eligibility and suitability for the activity or program: IEMC reviews application information to verify and approve student and conducts interviews with students to assist in determining eligibility.	Use Collection	32(a) 26(c)	
IEMC accepts or rejects the Application.	Use	32(a)	
If the student's application is rejected, IE informs the student and the process ends.	Use	32(a)	
If accepted, the student completes the Participation in Off Campus Activity (Student Waiver of Liability) form and VCC International Travel Risk and Security form (if international);	Collection Use	26(c) 32(a)	
Department of SSRP assesses forms related to international travel and approves or denies form.	Use	32(a)	
If International Travel Risk form approved, student registers for required travel insurance with Guard.me and provides PDF copy of insurance card to IEMC.	Collection	26(c)	
Student signs Consent Form to consent to the release of their application information to the host/outbound institution.	Collection	26(c)	
IEMC discloses the student's application package to the host institution, and student will register with that institution.	Disclosure	33(2)(c)	
IE may update or change student's application information if request received.	Collection Use	26(c, d) 32(a)	
Optional Feedback on Program Experience Submission (students may be contacted at a later date to provide feedback used for evaluation/planning of the program and/or internal marketing to VCC community.)	Use Collection Disclosure	32(a) 26(c, e) 33(2)(d)	

Inbound Applications (Students from Other Institutions Applying to VCC)



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
IE receives inbound application package from student via email to IE mobility email address.	Collection	26(c)	
ISEMC determines student’s eligibility and suitability for the activity or program: ISEMC reviews application information to verify and approve student and conducts interviews with students to assist in determining eligibility.	Use Collection	32(a) 26(c)	
IE accepts or rejects the Application.	Use	32(a)	
If the student’s application is rejected, IE informs the student and the process ends.	Use	32(a)	
If accepted, IE facilitates and connects the student to the relevant department and registration is completed through existing VCC registration processes. IE may support registration by issuing a Letter of Acceptance (LOA) or providing other supporting documentation, depending on the department or learning opportunity; otherwise, IE’s involvement with the registration process ends.	Use Disclosure	32(a) 33(2)(d)	
IE may update or change student’s application information if request received.	Collection Use	26(c, d) 32(a)	
Optional Feedback on Program Experience Submission (students may be contacted at a later date to provide feedback used for evaluation/planning of the program and/or internal marketing to VCC community.)	Use Collection Disclosure	32(a) 26(c, e) 33(2)(d)	

6. Collection Notice and Consent

6.1 Collection Notice

Collection notice:

PROTECTION OF PRIVACY

Vancouver Community College (VCC) collects your personal information under the authority of the section 26(c) of the BC Freedom of Information and Protection of Privacy Act (R.S.B.C. 1996, c. 165) (FIPPA). This information will be used to review your application and select and determine your eligibility for mobility opportunities through VCC International Education. Your personal information will be collected, used, disclosed, and retained in compliance with FIPPA. If you have any questions about the collection, use and disclosure of your personal information by VCC, please contact the **International Student Engagement and Mobility Coordinator at [nnn@vcc.ca]**.

Location: The collection notice will be included on the VCC Student Mobility Application form and any form where personal information is collected, but the purpose of collection and use will be revised accordingly.

*Email was previously **s. 15(1)(l)** - IE is seeking another address for Student Mobility applications at this time.

6.2 Consent

Student Consent Form for the release of the Mobility Application form information to host institution:

I hereby authorize Vancouver Community College to disclose, under the Freedom of Information and Protection of Privacy Act (FIPPA), my personal information contained in my VCC Student Mobility Application Form to **[host institution]** for registration in the mobility exchange opportunity. I understand that **[host institution]** will collect, use, disclose, and store my personal information according to the privacy policies and laws applicable to that institution.

This consent is effective on the date of signature and remains in effect until the student requests, in writing, to Vancouver Community College to withdraw this authorization.

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?

Personal information is stored within VCC's M365 environment, on SharePoint and Outlook, in Canada. M365 is outside the scope of this PIA and VCC's approved tool for secure College document management.

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, the initiative involves digital tools/databases/information systems (Banner, SharePoint, Outlook, M365 environment) that are currently in use at VCC.

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 (for the digital tools/information systems involved).

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

For the Initiative: The IE follows VCC IT’s current security policy and procedures applied to Banner and SharePoint. Only technical security measures are considered since no physical records are being handled.

Technical security measures within IE Office include: s. 15(1)(l)

19. Controlling and tracking access

Strategy	
We only allow employees in certain roles access to information:	ISEMC, UMAP Director, IE Director
Employees that need standing or recurring access to personal information must be approved by their managerial lead:	Approval from ISEMC and/or IE Director
We use audit logs to see who accesses a file and when:	Yes
Describe any additional controls:	s. 15(1)(l) The IE Mobility inbox, where applications are directed, can also only be accessed by the relevant roles (ISEMC and UMAP director).

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?

Application and other forms are completed by the student and collected directly from the student so that they may verify their information before submitting and ensure that the information is as accurate and complete as possible. For outbound applications, IE will verify the student's information against the information in VCC's student information system (Banner) to ensure it is accurate.

21. Requests for correction

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

Yes: the student/applicant can request the update/correction by submitting a Mobility Student Change Form for contact information, legal name, or an update to their citizenship information to International Education. Any other requests for corrections can be made directly through an email to IE.

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: A note will be added to the student's application file or students will use and IE will retain the Mobility Student Change Form.

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.

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: SS-109 SS-109 - International Study Abroad/Field School Program Applications

Responsible Office: International Education; Destroy 7 years after date of last service.

PART 7: PERSONAL INFORMATION BANKS

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

Yes: International Study Abroad/Field School Program Application files.

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
Students may submit their applications through an insecure email.	<p>IE will encourage students to use their VCC or home institutional (inbound) email to enable better security in transmission (especially in consideration of the sensitivity of some of the application’s supporting documentation).</p> <p>IE should not retain applications and supporting documentation in Outlook after receiving an application.</p>
Students may submit application through UMAP’s USCO platform.	<p>All students are encouraged to email their applications directly to the IE Mobility inbox until the online application platform is available.</p> <p>Students will be informed that using other institutions’ platforms may require their agreement to Terms of Use external to VCC and applying through VCC email/application is preferable.</p>
Disclosure of outbound students’ personal information to host institutions with different privacy legislation and policies, and less requirements for security around PI.	<p>Students sign Consent to Disclose Personal Information forms which include a statement that PI will be handled according to the jurisdiction of the host institution.</p> <p>Communication with students that registration with host institution is a separate process and their relationship will be with host institution.</p>
Over-collection of PI during the application process.	Students will receive instructions to only provide travel/medical/other sensitive PI when necessary and it directly relates to their mobility opportunity.

PART 9: SIGNATURES

Privacy Office Comments

At this time, VCC and host/home institutions do not share any assessments, credentials, etc. about students involved in these mobility opportunities. This PIA only considers direct applications from students directly registering with VCC or the host institution. s. 13(1)

[Redacted]

International Education may introduce an online platform for applications in the future. s. 13(1)

[Redacted]

This PIA should be revised if the platform is introduced or any other processes change.

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		19-02-2025

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	Jennifer Gossen Director, International Education		February 25, 2025