



Privacy Impact Assessment (PIA) for VCC Well-being Survey

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PART 1: GENERAL INFORMATION

PIA file number: #2025-001

Initiative title:	VCC Well-being Survey
VCC Department / Program Area:	Mental Health and Well-being Steering Committee
Link to VCC initiative website:	n/a
Link to vendor website:	n/a
Link to vendor privacy policy:	n/a
Your name and title:	Mary Corbett, Privacy Coordinator
Your work phone and email:	Marcorbett@vcc.ca
Initiative Lead name and title:	Clayton Munro, AVP, Student & Enrolment Services
Initiative Lead phone and email:	cmunro@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:	

1. What is the initiative?

The VCC Well-being Survey is an annual survey administered by the Mental Health and Well-being Steering Committee and developed in collaboration with Institutional Research; Indigenous Education and Community Engagement; EDI Committee; Environmental Sustainability Advisory Group; Accessibility Services; and International Education. The survey is administered both to VCC employees and students.

VCC launched its Mental Health and Well-being Framework in 2022, which included six key commitments for fostering mental health and well-being throughout the VCC community. A central element of the framework is the recognition that promoting well-being is an ongoing journey that requires consistent engagement and feedback from VCC's students and employees. The Mental Health and Well-being Steering Committee uses the disaggregated data and feedback from the survey to better understand the distinct experiences of the many diverse members and groups within the College community and to help inform VCC's mental health and well-being initiatives.

The survey invitation is emailed to student and employees' VCC emails annually in January, since 2023. The surveys differ slightly between student and employee versions.

The survey is anonymous (respondents are not linked to an individual). The survey is administered by Institutional Research (IR) through an email invitation or a direct link provided to Disability Services so that they may assist students who made need support to complete the survey. IR receives, manages, analyzes, and reports on the survey responses.

In previous years, the survey collected a respondent's name, email, and IP address; in 2025, the survey is no longer linked to an individual. There remains a risk of the survey collecting personal information through responses to demographic questions and in written comments. IR removes information about an identifiable individual from the survey data before providing it to the Steering Committee for review and use in assessments/reporting.

2. What is the scope of the PIA?

The scope of the PIA is the administration of the Well-being Survey and its collection and use of personal information. This PIA will identify personal information privacy risks and mitigation strategies.

SurveyMonkey and any initiatives informed by the data collected through this survey are outside the scope of this PIA.

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

Respondents are contacted using name and VCC email address.

Most data are collected directly from the survey respondent through close-ended questions (primarily rating scales in response to prompts about the respondent's experience) and minimal open-ended questions for feedback or expansion on close-ended responses.

Survey questions relate to:

- Campus Experience Statements
- Stress & Support
- Demographics questions regarding:
 - age range;
 - years lived in Canada;
 - international student status (student survey only);
 - race/ethnicity;
 - primary campus and hours worked per week (employment history);
 - gender identity;
 - sexual orientation;
 - disability status and accommodation; chronic medical condition
- Additional comments and feedback (written comments)

Written comments may include the individual's recorded personal view or opinions, or recorded opinions about another individual.

The survey also collects the start and end time of the survey and assigned a respondent ID number to each survey (not linked to an identifiable individual).

The survey is anonymous and does not collect any direct identifier (name, student/employee number, etc.), email, or IP address of a respondent, as of 2025.

3.1 Did you list personal information in question 3?

Yes. Responses are not linked to an identifiable individual but there is a risk that the respondent may be identifiable through the responses. Written comments for feedback or expansion may collect the recorded opinions about another identified individual or provide information that identifies the respondent, or respondents could be identified through their responses to

demographic questions. Aggregate data can still present reidentification risks in consideration of demographic responses and other recorded information depending on reporting.

- 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?

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
Student and employee contact information (name, email) from College records is provided to SurveyMonkey tool.	Use	32(a)	
Survey invitation is sent to potential student and employee respondents via VCC email addresses from s. 15(1)(l) account, or access is provided to respondent via direct link if assistance required from Disability Services.	Use	32(a)	
Respondents provide responses to survey.	Collection	26(e)	
IR staff compiles and analyzes and data from survey responses and reports. IR manually reviews the	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
written responses and removes identifying information before providing it to the Steering Committee.			
VCC/MHW Steering Committee reviews and uses the reports and data to inform College well-being initiatives.	Use	32(a)	Potential for reidentification of individuals from survey data or written comments (even with PI removed).

6. Collection Notice and Consent

6. 1 Collection Notice/Consent

Survey preamble:

In 2022, VCC launched our Mental Health and Well-being (MHW) Framework, which included six key commitments to fostering mental health and well-being throughout our community. A central element of this framework is the recognition that promoting well-being is an ongoing journey that requires consistent engagement and feedback from our students and employees.

This survey is an essential part of that commitment. It allows us to better understand the experiences, challenges and needs of our college community as it relates to well-being. You are invited by the Mental Health and Well-being Steering Committee to participate in the Well-being Survey. By taking this survey, you will help inform mental health and well-being initiatives at the College by providing data that will be used for planning and the evaluation of these initiatives. The survey will be used to provide critical insights to inform current and future initiatives, ensuring that our efforts are impactful and responsive to the needs of students and employees.

This survey is championed by the Mental Health and Well-being Steering Committee in collaboration with:

- Institutional Research
- Institutional Lead, Indigenous Education and Community Engagement
- Co-Chairs, Equity, Diversity and Inclusion (EDI) Advisory Committee
- Chair, Environmental Sustainability Advisory Group
- Accessibility Services

- International Education

Completing this survey is optional and all questions are voluntary. If you decide to complete this survey, you may choose which questions to answer and you may stop the survey at any time before completing. Responding to all questions will take about 5-10 minutes.

This survey is anonymous. Only authorized personnel from Institutional Research will have access to raw data. However, responses cannot be linked to individuals. Please review your responses before submitting as they cannot be edited after. Your or others' anonymity cannot be guaranteed if you identify yourself or others through written comments.

Your written comments may be used for reporting purposes. Information that may identify you or other individuals will be removed to the extent possible. Any information you provide by answering the survey questions will only be shared and reported on in aggregate. Data pertaining to areas where the response numbers are small, and therefore might identify individuals, will not be disclosed publicly. An aggregated and de-identified version of the survey data may be shared with VCC College members or other external partners (e.g. other post-secondary institutions) who are conducting similar research.

Any personal information is being collected under the authority of section 26(e) of the Freedom of Information and Protection of Privacy Act (FIPPA). We are pleased to note that this survey collects disaggregated data, which helps us better understand the distinct experiences of the many diverse members and groups within our college community.

If you have questions or concerns about this survey, please contact **Clayton Munro** (AVP, Student and Enrolment Services) or **Elaine Pedersen** (Director, Recruitment & People Development).

The collection notice/consent will be posted before the survey in the informed consent preamble.

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: VCC's SurveyMonkey enterprise license is a Canadian license, which ensures that all survey data is stored in Canada.

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

N/A

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



N/A

- 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))?**

N/A

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

Use the table to indicate the privacy risks, potential impacts, likelihood of occurrence, and level of privacy risk. For each privacy risk you identify describe a privacy risk response that is proportionate to the level of risk posed.

This may include reference to the measures to protect the sensitive personal information (contractual, technical, security, administrative and/or policy measures) you outlined. Add new rows if necessary. See Section 3 of the Guidance Document for examples of privacy risks and risk responses and more guidance for how to complete this table, or see the [Guidance on Disclosures 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.

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

- Survey data is held in SurveyMonkey and only accessible by 1 employee through a password-protected account. Employee (IR) de-identifies data before sharing/reporting to avoid disclosure of personal information.

- s. 15(1)(l) [redacted]
- [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 (and access is limited to 1 staff member)
Describe any additional controls:	Only 1 IR staff member has access to raw data for this survey and account is password-protected. s. 15(1)(l) [redacted]	

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?

All survey responses are collected directly from the individual respondent.

21. Requests for correction

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

Survey respondents are responsible for reviewing their responses before submitting and cannot edit their responses once submitted. Since responses are not linked to an identifiable individual, responses cannot be corrected once submitted.

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 - See above answer.

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. Personal information collected in this survey will not be disclosed to any other third party and will be removed from raw data before reporting by IR.

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

No.

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?

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

Possible risk	Response / mitigation strategies
Risk 1: Respondents may provide personal	<ul style="list-style-type: none">• Consent preamble revised to notify respondents that written responses will be anonymized to the extent possible.

Possible risk	Response / mitigation strategies
information in open-text fields that may allow them or others to be identified.	<ul style="list-style-type: none"> • IR removes identifying information from written comments before providing them in data/reports (minimal risk of identification remaining).
Risk 2: Unauthorized access to survey responses before they are de-identified (internal or external breach)	<ul style="list-style-type: none"> • IR follows internal procedures and does not provide data to Steering Committee until personal information has been removed. • IR follows VCC Privacy Breach Procedures if any unauthorized access to PI occurs, and any breaches must be immediately reported and contained. • Responses are anonymous to decrease the likelihood/amount of responses containing personal information. • SurveyMonkey technical and security policies include notifying customer of unauthorized access. • Retention policy: Raw data, including any personal information, is retained for 5 years according to IR/VCC policy.

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	 Digitally signed by Surinder Aulakh Date: 2025.01.24 10:59:39 -08'00'	2025-01-24

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	Clayton Munro / AVP Student & Enrolment Services	 Digitally signed by Clayton Munro Date: 2025.01.24 14:16:53 -08'00'	2025-01-24