

PRIVACY IMPACT ASSESSMENT

PART 1: GENERAL INFORMATION

Initiative Title:	SIMnet
Department:	School of Business
Initiative Lead (PIA Drafter) Name and email Address:	Julia Grav, Instructor & School of Business Faculty Curriculum Lead, gravj@camosun.ca
Dean or Director Name, Title, and Email:	Steven Rumpel, Acting Dean, rumpels@camosun.ca
Privacy Officer Assigned:	Ann Behennah
If initiative involves a third-party (e.g. vendor, consultant, partner), provide	
Third Party Name:	McGraw Hill
Product Name (if applicable):	SIMnet
Third Party Contact Name and Email:	John Kalafatis, Sales U Customer Manager – ALEKS and SIMnet, McGraw Hill Canada, john.kalafatis@mheducation.com
Third Party URL:	www.mheducation.ca

1. In three to five sentences, describe the initiative including:
 - a) what you are doing,
 - b) an overview of the process,
 - c) who is involved,
 - d) and when and/or how long your initiative runs.

SIMnet is an online training and assessment platform, used as an alternative to Pearson's MyLab. The software is an e-text that provides online simulations for students to practice skills directly related to the learning outcomes. The intention is for one section of BUS 140 to try SIMnet in the Fall 2025 semester. The software will be free for use in this pilot. The D2L integration is unique to the McGraw Hill SIMnet software.

2. In a few sentences, explain the scope of this PIA. For example, is this initiative limited to specific individuals or departments at Camosun College? Is this PIA covering the full initiative or just one phase of a larger project? Are there exceptions to how the initiative will be implemented?

The purpose of this PIA is to discuss the privacy implications for the SIMnet users (students/faculty) in terms of the collection and use of their personal data.

3. Is this an administrative/operational, teaching and learning, or a research initiative? Select all that apply.
- ☐ Administrative/Operational ☐ Research (Contact Research Ethics Board at rebchair@camosun.ca) if you have not already)
- ☒ Teaching and Learning
4. Has a PIA previously been completed for this initiative?
- ☐ Yes ☒ No ☐ Not sure
5. What activities will occur within the initiative? Use the bullet points below to make action statements. Replace the example action statement. Add or delete bullets as necessary.
- Online simulations for students to practice skills directly related to learning outcomes of BUS 140.
6. In a bulleted list, please list all the types of data or information you might collect, use, store, disclose, or access in your initiative - even if they are not Personal Information. Replace the bullet points below with the actual elements of information or data.
- McGraw Hill will collect first name, last name and email address from students during account creation.
 - For instructor accounts, instructors will provide the name of the school they teach at.
7. Did you list Personal Information in question 6? [Personal Information](#) is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.
- ☒ Yes ☐ No
8. If you answered "No" to question 7, in three to five sentences explain how will you ensure that you do not unintentionally collect Personal Information?

9. Does the initiative involve integration between Camosun College IT systems and Third-Party systems?

☒ Yes

☐ No

☐ N/A

If yes, list below: (put N/A on the first row if you answered No or N/A above. Add or delete rows)

Camosun IT system:

Third party system integrated: D2L

If there is Personal Information involved in this initiative, continue to complete the remaining sections of the PIA. If there is not any Personal Information involved in this initiative, please submit questions 1-9 to the Privacy Officer along with the completed signatures page.

PART 2: COLLECTION

FIPPA sets out rules for public bodies and their employees to collect of Personal Information. Unauthorized collection is prohibited. This section will help you identify the legal authority for **collecting** Personal Information and confirm that all Personal Information elements collected are necessary for the purpose of the initiative.

10. Whose Personal Information is collected in this initiative? Check all that apply.

- | | |
|---|---|
| ☒ Students | ☐ Former employees |
| ☐ Prospective students | ☐ Service provider employees |
| ☐ Former students | ☐ Donors or other constituents |
| ☐ Alumni | ☐ Volunteers |
| ☒ Employees - Instructors | ☐ Other community members |
| ☐ Other _____ | |

11. How frequently will the initiative collect Personal Information?

- ☒ Single instance of collection within one semester or quarter
- ☐ Ongoing collection up to a single year
- ☐ Ongoing collection over more than one year
- ☐ Other _____

12. How many individuals' Personal Information will be collected?

- ☒ 1 - 50 ☐ 51 - 500 ☐ Over 500

13. If the initiative involves a Third Party, are you able to test the product to see what personal information it collects?

- ☒ Yes ☐ No ☐ N/A (No Third-Party product involved)

14. For what purpose will the Personal Information be used? (check all that apply)

- ☒ It is necessary and directly related to college operations – Students enrolled in Business 140.
- ☐ It is necessary and related to requirements stated in college bylaws, policy, and procedure.
- ☐ It is collected because collection is required or authorized under local, provincial, or federal law. Be prepared to directly cite the section of a particular law that applies if asked.
- ☐ It is collected for determining suitability for an honour or award including a scholarship, prize, or bursary.
- ☐ It is being collected for a quality assurance or improvement initiative that has been approved by the college Executive.

15. How will you reduce the risk of collecting unnecessary Personal Information? (Check all that apply.)

- ☒ The initiative will only collect specific information deemed necessary for and directly related to the initiative
- ☐ The initiative will use forms with primarily closed-ended questions and minimal open-ended questions
- ☐ The initiative will use forms with drop-down menus
- ☐ The initiative will have documented data gathering and aggregation processes for open ended submissions or fields
- ☐ The Department needs Privacy Officer review and support because none of the above apply

16. FIPPA Collection Notice: When collecting Personal Information, FIPPA requires that you provide a collection notice (except in limited circumstances). Please fill in the template collection notice below and remove bold and square brackets.

*Camosun College ("Camosun") collects your Personal Information in accordance with section 26 of the Freedom of Information and Protection of Privacy Act ("FIPPA"), R.S.B.C. 1996, c.165 for the purposes of **[explain purposes]**. If you have any questions about the processing of your Personal Information, please contact privacy@camosun.ca.*

Please ask the Privacy Office for assistance drafting your collection notice if your initiative requires indirect collection of Personal Information (i.e. if a service provider collects Personal Information from students or employees on behalf of Camosun College). The Privacy Office may recommend changes to the FIPPA Collection Notice that you draft above.

PART 3: USE

FIPPA sets out requirements and restrictions related to use of Personal Information. This section will help you identify the legal authority for **using** Personal Information and ensure that the use of Personal Information is limited to the original purpose for collection.

- 17.** What is the intended use of the Personal Information collected? (check all that apply)
- ☒ The Personal Information will be used for the purposes checked off in Question 14
 - ☐ The Personal Information will be used for secondary purposes, and I have a consent notice attached as an appendix to this PIA that meets the requirements found in FIPPA regulations. I will work with the Privacy Office to determine if secondary use is appropriate and compliant with FIPPA.
 - ☐ The Personal Information will be used for a purpose for which the information may be disclosed to the public body under [section 33](#). The Privacy Office will attach the relevant section number to this selection if it applies.
- 18.** How will you ensure that parties using the Personal Information will use it only for the purposes stated in 17 above? Check all that apply.
- ☐ Documented department information management practices and training
 - ☐ Documented use restrictions communicated from your department to another Camosun College department
 - ☐ Written contract between Camosun College and a Third Party including explicit conditions – Data Privacy - [Privacy Center](#)
 - ☒ McGraw Hill has advised that by default, institutions agree to the SCCs and International Terms of Service. We have the option of putting a contract in place – but there is no contract at this time.
- 19.** Does your initiative use Personal Information to make decisions that directly affect an individual?
- ☒ Yes – course participation data which includes Gradebook, Assignment Submissions, progress. ☐ No
- 20.** What is the intended impact of the decisions that are being made that directly affect an individual? (check all that apply).
- ☒ Directly affects academic status or grades – however D2L retains course information for 12+ months. The official home for student grades is in the RO office, subject to their retention policy.

21. Who will be using the Personal Information collected by this initiative? (Check all that apply and provide details.)

Your department:	N/A
Other Departments at Camosun College	External Partners and Service Providers
N/A	McGraw Hill

PART 4: STORAGE

22. Is all Personal Information involved in your initiative stored within standard Camosun College storage locations, technologies, or services?

☒ Yes ☒ No

Camosun College storage: Please list the approved standard Camosun College storage locations, technologies and/or services.

- ☐ Microsoft 365 (SharePoint, OneDrive, Teams)
- ☐ Colleague
- ☒ D2L
- ☐ Team Dynamix
- ☐ Other: _____

Local Servers (and/or Systems):

- ☒ Vendor's Local Storage Option – please specify:
- ☐ Camosun College's Networked Drives
- ☐ Physical Media

Cloud Hosting:

- ☒ Vendor's Cloud Storage Option – please specify: Vendor stores data across continental US on Amazon AWS.

23. Is any Personal Information involved in your initiative stored outside of Canada?

☒ Yes ☐ No

24. Where is the Personal Information stored? Please identify applicable geographic locations for primary storage and backups. If Personal Information is stored in more than one primary location, the Privacy Office can expand the response field in this question.

Primary Storage – across continental US on Amazon AWS

25. Does your initiative involve Sensitive Personal Information? (Any Personal Information can be Sensitive Personal Information in different contexts. Please contact the Privacy Office to discuss.)

☐ Yes ☒ No

26. Is any of the Sensitive Personal Information stored outside of Canada?

☐	Yes	☐	No	☒	N/A
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- 27.** Where is the Sensitive Personal Information stored? Please identify applicable geographic locations for primary storage and backups. **Type N/A in the cells on the first row if Sensitive Personal Information is not stored outside of Canada as indicated in Question 26.**

Name of Third Party	Name of cloud infrastructure and/or platform provider(s) [Vendor's Cloud Storage Option]	Where is the Sensitive Personal Information stored (including backups)?
SIMnet	Amazon AWS	N/A

PART 5: DISCLOSURE

FIPPA sets out requirements and restrictions related to disclosure of Personal Information. This section will help identify the legal authority for **disclosing** Personal Information, and consider risks related to that disclosure. **Fill out this section if Question 26 was answered “Yes”**

Complete this section if you are disclosing Sensitive Personal Information to be stored outside of Canada. You may need help from the Privacy Office.

- 28.** Is any Personal Information being disclosed outside of Canada under FIPPA section 33(2)(f)? This section allows for information to be made available to the public under an enactment that authorizes or requires the information to be made public.
- ☒ Yes ☐ No
- 29.** Is any of the Personal Information being disclosed outside of Canada under FIPPA section 33(2)(p)? This section allows disclosure for the purposes of (i) a payment to be made to or by Camosun College, (ii) authorizing, administering, processing, verifying, or cancelling a payment, or (iii) resolving an issue regarding a payment.
- ☐ Yes ☒ No
- ☐ The payment processor is out of scope of this PIA
- 30.** Describe the privacy risks for disclosure of Personal Information outside of Canada.

Use the table to indicate the privacy risks. For each privacy risk you identify, describe the potential impact to individuals or Camosun College, and 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, physical, technical, administrative measures) you outline elsewhere in this PIA. Privacy risks below are examples only; add new rows if necessary.

Privacy risk	Impact to individuals or Camosun College	Risk response
Unauthorized collection of PI by Camosun employees	N/A – the student enters the data and manages their account.	
Unauthorized use of PI by Camosun employees	N/A – the student enters the data and manages their account.	
Unauthorized disclosure of PI by Camosun employees	N/A – the student enters the data and manages their account.	

Unauthorized collection of PI by Third Party/ies	Low	Contractual terms, privacy policies, high security standards and practices.
Unauthorized use of PI by Third Party/ies	Low	Contractual terms, privacy policies, high security standards and practices.
Unauthorized disclosure of PI by Third Party/ies	Low	Contractual terms, privacy policies, high security standards and practices.

***Note: the Privacy Office has a Privacy Breach system in place to provide assistance.**

PART 6: PROTECTION

Please share how the initiative will secure Personal Information to protect personal privacy. People, organizations, or governments outside of your initiative should not be able to access the Personal Information you collect, use, store or disclose. You need to make sure that the Personal Information is safely secured in both physical and technical environments.

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

☒ Yes ☐ No

32. What **physical security** safeguards are in place to protect Personal Information in this initiative? **N/A**

Identify the elements of physical security that protect where the records for your initiative are stored (Check all that apply. Specify, "Other" if applicable) – N/A

Safeguard	At Camosun	At Third Party
Restricted access to property (i.e. key card access)	☐	☐
Security monitored building	☐	☐
Key locks and door astragals	☐	☐
Locked filing cabinets	☐	☐
Chain of custody process	☐	☐
"Clean desk" practices	☐	☐
Security officers	☐	☐
Security cameras	☐	☐
Other:	☐	☐

33. What **technical security** safeguards are in place to protect Personal Information in this initiative?

Describe the elements of technical security that protect where the records for your initiative are stored (e.g. secure passwords, encryption, firewalls, etc.) (More options on the following page) N/A

Safeguard	At Camosun	At Third Party
Authentication control: Strong Password Management	☐	☐
Authentication control: Multi Factor Authentication ("MFA")	☐	☐

Role-based access	☐	☐
Encrypted in transit	☐	☐
Encrypted at rest	☐	☐
Isolation Control: Application	☐	☐
Isolation Control: Network	☐	☐
Isolation Control: Database	☐	☐
Vulnerability Scanning	☐	☐
Vulnerability Penetration Testing	☐	☐
Secure Configuration Management	☐	☐
Patch Management	☐	☐
Technical control: Perimeter firewalls	☐	☐
Technical control: Web application firewalls	☐	☐
Technical control: Denial of Service Mitigation	☐	☐
Technical control: Intrusion Detection and Prevention Systems	☐	☐

34. What administrative safeguards are in place to protect Personal Information?

Describe the elements of administrative security that protect where the records for your initiative are stored (e.g. aliasing, aggregation, policies/procedures, standards of practice, etc.)

Safeguard	At Camosun	At Third Party
Agreement/Contract	☐	☒
Privacy/Data Protection Policy	☐	☒
Documented business practices and processes for proper collection and management of Personal Information	☐	☐
Privacy training specific to the initiative	☐	☐
Cybersecurity Training	☐	☐
Staff Security Awareness Training	☐	☐
Dedicated Information Security Staffing	☐	☐
Information Security Policy	☐	☐
Vendor Third Party Compliance and Certifications (i.e. ISO, SOC Type 2, CSA, PCI DSS, SOX)	☐	☒
Security Incident Response Plan	☒	☐
Camosun College – Standards of Conduct Policy O-5.11 [employees]	☒	
Camosun College – Protection of Privacy Policy O-6.1	☒	
Camosun College – Systems and Networks Administration O-1.2	☒	
Camosun College – Acceptable Technology Use Policy O-1.1 [network use]	☒	
Camosun College – Academic Integrity Policy E-1.13 [students]	☒	
Camosun College – Student Misconduct Policy E-2.5 [students]	☒	
Other:	☐	☐

35. If the initiative involves a Third Party, please indicate what type of Agreement governs the relationship between Camosun College and the Third Party. Please select one.

- ☐ Camosun College GSA (negotiated Agreement between Camosun College and the Third Party)
- ☐ Vendor's Agreement (negotiated Agreement between Camosun and the Third Party)
- ☒ Online "Terms of Service" or "Terms of Use" (often non-negotiable)
- ☐ Memorandum of Understanding/Memorandum of Agreement ("MOU"/"MOA")
- ☐ Other (specify):
- ☐ No Agreement

36. If the initiative involves a Third Party, does an End User License Agreement ("EULA") apply to the individuals whose Personal Information is involved?

- ☒ Yes ☐ No

37. The Privacy Officer will need to review all draft/proposed Contracts/Agreements (and related materials, i.e. contract appendices/schedules; Third Party privacy policies or online terms and conditions, if any) involved in the initiative. Have you ensured these have been provided? Check only one.

- ☒ Yes ☐ No ☐ N/A (No Third Party involved)

38. Where are the privacy related terms referenced in the contract or agreement if applicable? (Check all that apply)

- ☐ In the body of the contract or agreement
- ☐ Third Party will sign Camosun College's Privacy Protection Schedule
- ☐ Third Party will sign Camosun College's Data Security Schedule
- ☒ In the Third Party's privacy or data protection policy or appended schedules
- ☐ In a separate Information Sharing Agreement
- ☐ There are no privacy related terms in the contract or agreement (or related documentation)
- ☐ There is no contract or agreement for this initiative

39. Controlling and tracking access

Review each strategy below that describes how to limit or restrict who can access Personal Information and how to keep track of who has accessed Personal Information in the past. Check all that apply. Specify "Other" if applicable. N/A

- ☐ Managed role-based access to Personal Information for Camosun College employees
- ☐ Managed role-based access to Personal Information for Third Party
- ☐ Third Party access is time limited for installing, implementing, maintaining, repairing, troubleshooting, or upgrading an electronic system
- ☐ Third Party access escorted by authorized Camosun College employee
- ☐ Audit logs at Camosun College
- ☐ Audit logs from Third Party
- ☐ Other: *(fill in details)*

40. Artificial Intelligence ("AI"): Are you aware whether this initiative actively incorporates or uses any AI features? If yes, please contact the Camosun College Privacy Office at privacy@camosun.ca.

☐ Yes
 ☒ Not at this time
 ☐ Unknown

PART 7: ACCURACY AND CORRECTION

FIPPA section 28 states that a public body must make every reasonable effort to ensure that an individual's Personal Information is accurate and complete. FIPPA also gives an individual the right to request correction of errors or omissions to their Personal Information.

In this section, please demonstrate how you will make a reasonable effort to ensure the Personal Information you have on file is accurate and complete.

41. How will Camosun College ensure that the Personal Information is accurate and complete? (Check all that apply)

- ☒ Individuals input their own Personal Information
- ☐ Individuals update their own Personal Information
- ☐ Employee verifies that information is accurate and complete before processing
- ☐ Documented processes to ensure accurate and complete data entry and maintenance
- ☐ The Third Party manages the accuracy and completeness of Personal Information under the direction of Camosun College
- ☐ Software or service uses automated processes to enter and manage Personal Information
- ☐ Other: *(fill in details)*
- ☐ Other: *(fill in details)*

42. Is there a documented process in place to correct Personal Information?

☐ Yes
 ☒ No

43. Sometimes it is not possible to correct the Personal Information. FIPPA requires a process to make a note on the record about the request for correction if it isn't possible to correct the record itself. Is there a documented process in place to annotate the record?

☐ Yes
 ☐ No
 ☒ N/A (Corrections possible)

44. If there is a request for correction from an individual and Camosun College or the Third Party disclosed that individual's Personal Information in the last year, FIPPA requires that Camosun College or the Third Party provide the applicable other public body or Third Party about the request for correction. Will Camosun College or the Third Party ensure that these notifications are done when necessary?

- ☒ Camosun College will forward correction notifications
- ☐ Third Party will forward correction notifications
- ☐ Camosun College and Third Party will split responsibility based on who was authorized to disclose Personal Information to third parties before a correction request was made.

PART 8: RETENTION AND DISPOSITION

FIPPA requires that public bodies keep Personal Information for a minimum of one year after it is used to make a decision. Personal Information needs to be disposed of to limit privacy risk after legal retention timelines.

- 45.** How long will Camosun College need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

Record Type: D2L	Retention Period (in years/months): 3 years
Record Type:	Retention Period (in years/months):
Record Type:	Retention Period (in years/months):
Record Type:	Retention Period (in years/months):

- 46.** How long will the Third Party need to retain the records containing Personal Information? If there are different retention timelines for different types of records, please state each retention timeline based on record type.

Record Type: D2L	Retention Period (in years/months): 3 years
Record Type:	Retention Period (in years/months):
Record Type:	Retention Period (in years/months):
Record Type:	Retention Period (in years/months):

- 47.** How will you ensure that the records containing Personal Information are disposed of in accordance with the retention schedule noted in questions above? (Check all that apply)

- ☐ Schedule records review and disposition dates in Outlook calendars
- ☐ Build conditions for disposal into department Standard Operating Procedures
- ☐ Send direct written communication to staff or service providers.
- ☒ Other (explain): N/A

- 48.** What methods will be used to dispose of Personal Information following retention period? (Check all that apply.)

- ☐ Camosun College business unit shredding on campus
- ☐ Camosun College contracted shredding service provider
- ☐ Camosun College deletion of electronic record(s)
- ☐ Service Provider shredding/deletion of record(s) under Camosun College contract
- ☐ Service Provider shredding/deletion of record(s) under Camosun College written instruction
- ☒ Other (explain): N/A
- ☐ Other (explain):

PART 9: INFORMATION FLOW – N/A

49. Complete the Information Flow Table N/A

Use column 1 to describe the way Personal Information moves through your initiative step by step. Describe the steps as if you were explaining it to someone who does not know about your initiative.

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of Personal Information.

The Privacy Officer will complete column 3 to identify the legal authority you have for the collection, use or disclosure.

Information Management Steps	Collection, use or disclosure	FIPPA and other legal authorities
Step 1:		
Step 2:		
Step 3:		
Step 4:		

Optional: Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.

PART 10: TRAINING – N/A

- 50.** Identify which of the following activities all employees and Third Party (as applicable), will be trained on when collecting and managing the Personal Information for the College initiative. N/A
- ☐ Collection: Limit the collection to only what is explicitly necessary
 - ☐ Use: Use the Personal Information only for the purpose for which it was originally collected
 - ☐ Access: Only authorized employees (and, where applicable, service providers) may access the Personal Information
 - ☐ Disclosure: Not to disclose the Personal Information inside or outside Camosun College unless authorized under FIPPA
 - ☐ Storage: To store the Personal Information only in Camosun College-provided or approved storage locations and not to store unnecessarily in multiple locations
 - ☐ Retention: to keep the Personal Information for a minimum of one year – with longer retention periods only when necessary
 - ☐ Disposal: To dispose, when applicable, in a secure method that renders the Personal Information permanently irretrievable

PART 11: PERSONAL INFORMATION BANKS – N/A

- 51.** Will your initiative result in a Personal Information Bank ("PIB")? A PIB is a collection of Personal Information searchable by name or unique identifier. If yes, please complete the table below. If more than one PIB will result, copy and paste an additional copy of the table below and fill out a separate table for each PIB.
- ☐ Yes ☒ No

Title	
Location	
Personal Information Types	
Categories of Individuals Included	
Collection Authority	
Purpose of Personal Information	
Categories of Persons Managing Information	

PART 12: OIPC REVIEW REQUIREMENTS (Privacy Officer to Complete)

- 52.** Is this initiative a data-linking program under FIPPA? If this PIA addresses a data-linking program, this PIA must be submitted to the Office of the Information and Privacy Commissioner.
- ☐ Yes ☒ No
- 53.** Is this initiative a common or integrated program or activity? If this PIA addresses a common or integrated program, this PIA must be submitted to the Office of the Information and Privacy Commissioner.
- ☐ Yes ☒ No

PART 13: PRIVACY OFFICE(R) COMMENTS

This PIA is based on a review of the material provided to the Privacy Office(r) as of August 18, 2025. If, in the future, any substantive changes are made to the scope of this PIA, the College will have to complete a PIA Update and submit it to Privacy Office(r).

Based upon the foregoing, no concerns at this time.

Privacy Office Signature

This PIA is based on a review of the material provided to the Privacy Office as at the date in Part 13 Privacy Officer Comments above.

Name and Title	Signature	Date signed
Ann Behennah, EA to Deborah Huelscher, VP Admin & CFO	Section 22	August 18, 2025

PART 14: APPROVAL SIGNATURES

Institution Signatures

This PIA is compliant with FIPPA when it accurately documents information management practices and information flow at the time of signing. If there are any changes to the overall initiative, including to the way Personal Information is collected, used, stored, or disclosed, the Department will inform the Privacy Office, and if necessary complete a PIA update.

By signing where required below, the signatories acknowledge and confirm their declarations as noted.

Declaration of Initiative Lead: I confirm that I understand the privacy impacts of this College initiative and I am committed to my FIPPA obligations related to the collection and management of Personal Information involved in the initiative. If there are any changes to the initiative, including to the way Personal Information is collected, used, stored, or disclosed, I understand that the department will need to inform the Privacy Office and if necessary, complete a PIA update. I will establish and document information management guidelines for the Personal Information and ensure these are followed. I will ensure employees are trained on and able to comply with their obligations under FIPPA; related College policies and procedures; and Camosun College Privacy Office recommendations relative to this initiative.

Signature of Initiative Lead or PIA Drafter

Name and Title	Signature	Date signed
Julia Grav, Instructor	Section 22	August 18, 2025

Declaration of Dean / Director / Budget Holder/ WPL/ One-Over-One Signatory: I confirm that I have reviewed this PIA and I acknowledge the residual privacy risks identified. I support the department by providing required time and operational resources to comply with FIPPA, related College policies and procedures, and Camosun College Privacy Office recommendations relative to this initiative.

Signature of Dean / Director

Name and Title	Signature	Date signed

Declaration of Information Security: (Required only when college initiative involves Information Security considerations).

I confirm that I am satisfied that the Information Security safeguards employed in this college initiative meet reasonable requirements relative to the amount or sensitivity of the Personal Information or Camosun College business information described in this PIA.

Signature of Information Security

Name and Title	Signature	Date signed

Declaration of Information Technology: (Required when College initiative involves use of Camosun College IT systems or integration of Third Party technology with Camosun College IT systems.)

I confirm that I understand and approve of the proposed use case of Camosun College IT systems described in this PIA, where applicable. I understand and approve of the Third Party's integration with Camosun College's IT systems for the College initiative described in this PIA, where applicable.

Signature of Information Technology

Name and Title	Signature	Date signed

Declaration of Head of Public Body or Designate: (Required where proportionate to the sensitivity of the personal information and/or the risks of the initiative).

I have reviewed this PIA carefully and accept and will be accountable for the residual privacy risks identified for this College initiative. I am satisfied with the completion of this PIA under FIPPA.

Signature of Head of Public Body or Designate Under FIPPA

Name and Title	Signature	Date signed