



Privacy Impact Assessment

Mail Outs

Student Recruitment

Heather Bastin, Executive Director,
External Relations

April 16, 2026



Why do I need to do a PIA?

Section 69 (5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy officer for their public body to determine internal policies for review and to sign off on the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

Contact the CMTN privacy officer for question-specific guidance on completing a PIA by sending an email to foi@coastmountaincollege.ca.

What if my initiative does not include personal information?

Public bodies (which include CMTN) still need to complete Part 1 of the PIA and submit it, along with the signature pages, to their privacy officer even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General Information

Name of Department/ Branch	Student Recruitment		
PIA Drafter:	Heather Bastin, Executive Director, External Relations Aman Kang, Director of President's Office		
Email:	HBastin@coastmountaincollege.ca	Phone:	250.635.6511 ext. 5494

1. Description of the Initiative

The Student Recruitment department plans to implement a targeted outreach initiative involving the distribution of handwritten postal correspondence to prospective students at various stages of the admissions process. The initiative will focus on individuals who, between October 2025 and the present, fall within one of the following categories:

- Incomplete application
- Conditional acceptance
- Complete application and ready to register

The purpose of this initiative is to encourage individuals to complete outstanding requirements and advance to full registration.

This outreach method is intended to complement existing communication channels, including email and telephone contact. The use of handwritten postal mail is a deliberate approach to provide a more personal and engaging form of communication, recognizing that traditional methods may not be as effective for all individuals. This initiative reflects a “suite of three” communication approach, combining email, telephone, and postal outreach.

Each recipient will receive a handwritten card addressed to them by name. The content of the message will be tailored to their current application status and will include:

- A personalized message acknowledging their application status
- Encouragement to complete next steps
- Contact information for Enrollment Services
- A QR code directing the recipient to the online advising appointment booking page
- A small promotional item (a sticker)

Booking an advising appointment is voluntary. The QR code directs individuals to an online booking form where personal information may be collected, including:

- First name and last name
- Email address
- Mailing address
- Telephone number
- Student number or date of birth (if a student number is not available)
- Appointment details (reason for appointment, preferred meeting format)
- Optional information such as special requests or support person details

Individuals may also choose to contact the College directly using the business contact information provided in the correspondence.

Mailing addresses used for this initiative are collected through the EducationPlannerBC (EPBC) application system and stored in Colleague. An Institutional Research employee will generate a report containing the minimum necessary personal information (name, mailing address, application status, and program) and provide it to a designated Customer Service Representative within the Student Recruitment department for the purpose of preparing the mail-out.

A note will be added to each individual’s record in Colleague indicating that a postal communication was sent, including the date of the mail-out. This is for record-keeping purposes only and does not impact the individual’s application or student record.

This initiative also requires an update to the existing privacy statement associated with the advising appointment booking process to ensure compliance with applicable privacy legislation.

Status	Message for Card	Inserts:	Make note on Colleague that card was sent on [date]	Important considerations
Incomplete Application	{Date} Dear _____: Thank you for your application for the _____ program at Coast Mountain College. We noticed your application is not yet complete, and we understand the process can sometimes feel overwhelming. If you would like assistance in completing your application, please reach out to our Enrolment Services team – we're here to support you every step of the way. We look forward to welcoming you to CMTN in September. Sincerely, {write name clearly}	Business Card for Enrolment Services Holographic sticker	Yes	The applicant may have applied to more than one program. If that is the case, and both applications are IA, reflect that in the message. If one application is further along than the other, assume that is the program that they are working towards and respond accordingly.
Conditional Acceptance	{Date} Dear _____: Congratulations on your conditional acceptance to the _____ program at Coast Mountain College! You're almost there. Please contact our Enrolment Services team for support to move to full acceptance. Course registration opens on	Advisor booking card Holographic sticker	Yes	Some applicants with conditional acceptance will be automatically moved to RG by RO just before April 30. Once we have the mailing list, it will be cross-checked with

	April 30, so we encourage you to connect with them soon. We look forward to welcoming you to CMTN in September. Sincerely, {write name clearly}			RO to confirm which students fall into this group. Those students should receive the full acceptance message, not the conditional acceptance message.
Complete Application – Ready to Register	{Date} Dear _____: Congratulations on your acceptance to the _____ program at Coast Mountain College! Course registration opens on April 30. Please contact an advisor if you would like assistance with course selection and registration. Sincerely, {write name clearly}	Advisor booking card Holographic sticker	Yes	

2. Scope of this PIA

This Privacy Impact Assessment (PIA) applies to the collection, use, and disclosure of personal information associated with the distribution of handwritten postal correspondence to prospective students as part of the outreach initiative.

The scope is limited to the use of personal information required to prepare and send the mail-out, including:

- Name
- Mailing address
- Application status

- Program applied for

This PIA specifically addresses the process of generating mailing lists, preparing correspondence, and distributing mail to individuals, as well as related record-keeping activities within Colleague.

To mitigate the risk of misdirected mail and unauthorized access to personal information, the following measures will be implemented:



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These measures are intended to reduce the likelihood of mail being opened by unintended recipients and to support the secure return of misdirected correspondence.

Despite these controls, there remains a residual risk that mail may be opened by an unintended recipient if delivered incorrectly. This risk is inherent to postal communication and will be managed through the implementation of the above safeguards and adherence to the principle of using the minimum amount of personal information necessary.

This PIA does not extend to subsequent actions taken by recipients, such as voluntary contact with the College or booking advising appointments, which are addressed under separate processes and PIAs.

3. Data or Information Elements Involved in Your Initiative:

The personal information used for this initiative includes the following elements:

Category	Information Involved	Purpose
Contact Information	Name and mailing address	To prepare, address, and deliver handwritten postal correspondence to prospective students
Application Information	Program applied for and application status (for example, incomplete application, conditional acceptance, ready to register)	To tailor the message content in the handwritten card and ensure accurate and relevant communication
Administrative Record	Record of outreach (for example, note in Colleague indicating that a card was sent, including date)	To support internal tracking, coordination of communications, and to avoid duplicate or conflicting outreach

3.1 Did you list personal information in question 3?

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.

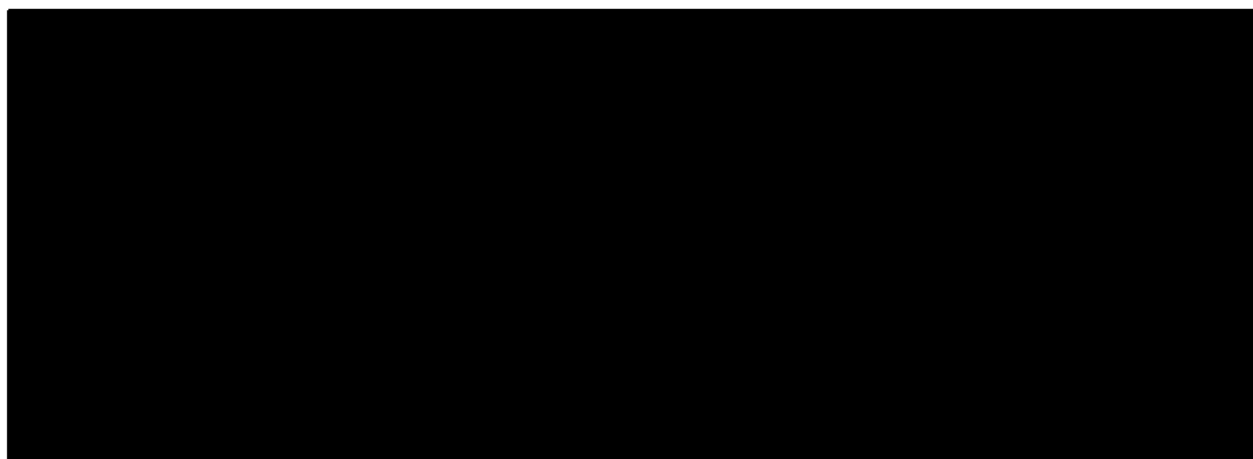
Yes. Personal information elements are identified in question 3 and include name, mailing address, program applied for, and application status.

2. Reducing the Risk of Unintentionally Collecting Personal Information

Sometimes initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident or privacy breach. How will you reduce this risk?

This initiative does not involve the active collection of new personal information from individuals. Personal information used for the mail-out is limited to existing information already collected through established application processes and maintained within College systems.

To reduce the risk of unintentionally collecting additional personal information:



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These measures ensure that the initiative is limited to the use of existing personal information and does not introduce new or unintended collection activities.

Part 2 – Collection, Use, and Disclosure

This section will help you to identify the legal authority for collecting, using, and disclosing personal information and to confirm that all personal information elements are necessary for the purpose of the initiative.

3. Collection, Use, and Disclosure

In the first column of this table, describe the way personal information moves through your initiative, step by step, as if you were explaining it to someone who knows nothing about your initiative.

In the shaded columns, your privacy officer will identify whether each step represents collection, use, or disclosure and will ensure you have legal authority for what you want to do.

Add or delete rows as needed.

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.

Movement of Personal Information Through Your Initiative		Information Collection, Use, and Disclosure	FOIPPA Authority	Other Legal Authority
Step 1	Personal information (name, mailing address, program applied for, and application status) is collected by the College through the application process via [REDACTED]	Collection	Section 26(c)	Not applicable
Step 2	Personal information is transferred from [REDACTED] and stored within the College's student information system [REDACTED]	Collection and Use	Section 26(c) and Section 32(a)	Not applicable
Step 3	An Institutional Research employee generates a report from [REDACTED] containing the minimum necessary personal information (name, mailing address, application status, and program applied for) for individuals meeting the initiative criteria.	Use	Section 32(a)	Not applicable
Step 4	The report is securely provided to a designated Customer Service Representative within the Student Recruitment department.	Use and disclosure	Section 32(a) and Section 33 (2)(d)	Not applicable
Step 5	The Customer Service Representative uses the information to prepare handwritten cards and address envelopes for mailing.	Use	Section 32(a)	Not applicable
Step 6	The sealed handwritten cards are mailed to prospective students through a postal service.	Disclosure	Section 33 (2)	Not applicable
Step 7	If mail is undeliverable, it may be returned to the College using the return-to-sender label.	Use	Section 32(a)	Not applicable
Step 8	Recipients may voluntarily contact the College or book an advising appointment using the QR code provided; any personal information collected through this process is managed under existing College processes and is outside the scope of this initiative.	Collection	Section 26(c)	Not applicable

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4. Collection Notice

If you are collecting personal information directly from the individual the information is about, FOIPPA requires that you provide that person with a collection notice (except in limited circumstances).

This initiative does not involve the direct collection of personal information through the mail-out. Personal information used for this initiative is collected through existing application processes.

However, individuals may choose to provide personal information by accessing the advising appointment booking page via the QR code included in the correspondence. The collection notice associated with the booking process will be updated as follows:

Personal information collected through the advising appointment booking process is authorized under section 26(c) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA-BC). The information you provide will be used for the purpose of scheduling an appointment and for statistical purposes to improve the delivery of services to students.

Your personal information will be accessed only by authorized staff within Coast Mountain College (CMTN) and will not be disclosed except as necessary to fulfill the purposes identified above or as required by law.

If you have questions about the collection, use or disclosure of this information, please contact the Registrar by emailing esuderman@coastmountaincollege.ca.

For questions or concerns related to privacy, please contact the Privacy Officer by emailing foi@coastmountaincollege.ca."

Part 3 – Storing Personal Information

5. Storing Personal Information Outside Canada

If you are storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

7.1 Is any personal information stored outside of Canada?

No, personal information is not being stored outside of Canada.

7.2 Where will you store the personal information involved in your initiative?

Not applicable.

7.3 Does your initiative involve sensitive personal information?

Not applicable.

7.4 Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

Not applicable.

Part 4 – Assessment of Disclosures Outside of Canada

Complete this section if you are disclosing sensitive personal information to be stored outside of Canada. You will likely need help from your privacy officer to complete this section. More help is available in the [Guidance on Disclosures Outside of Canada](#).

8 Type of Storage Outside of Canada

Sensitive personal information is not being disclosed outside of Canada.

8.1 Is the sensitive personal information stored by a service provider?

Not applicable.

8.2 Provide details on the disclosure, including to whom it is disclosed and where and how the sensitive personal information is stored.

Not applicable.

8.3 Describe the contractual terms in place (if applicable).

Not applicable.

8.4 Are you relying on an existing contract, such as an enterprise offering from the Office of the Chief Information Officer (OCIO)?

Not applicable.

8.5 Which enterprise service are you accessing?

Not applicable.

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

Not applicable.

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

Not applicable.

8.8 Describe the privacy risks for disclosure outside of Canada.

Not applicable.

Outcome of Part 4

The outcome of Part 4 will be a **risk-based decision made by the head of the public body on whether or not to proceed with the initiative**, with consideration of the risks and risk responses, including consideration of the outstanding risks in question 8.8. **The public body may document the decision in an appropriate format as determined by the head of the public body or by using this PIA template.**

Part 5 – Security of Personal Information

This part captures information about the privacy aspects 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 need to ensure that the personal information is safely secured in both physical (e.g., your office building or work environment) and technical (e.g., online cloud service) environments.

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

Yes, the initiative involves the use of existing College information systems to access and process personal information, including [REDACTED]. A separate digital advising appointment 15 (1)(l) booking system is also made available to recipients on a voluntary basis.

9.1 Do you or will you have a [security assessment](#) to help you ensure the initiative meets the reasonable security requirements of [FOIPPA section 30](#)?

No, a formal security assessment is not required for this initiative. The initiative relies on existing College systems and established administrative processes, and does not introduce new technology, systems, or significant changes to how personal information is managed.

Appropriate administrative and physical safeguards will be implemented to protect personal information, including limiting access to authorized staff and using the minimum amount of personal information necessary, in alignment with section 30 of FOIPPA.

9.2 Does your initiative involve generative artificial intelligence or machine learning?

No, this initiative does not involve generative artificial intelligence or machine learning.

9.3 Are all digital records stored on government servers and are all physical records stored in government offices with government security?

Yes, digital records are stored on government servers (College Servers) and all physical records are stored in College owned offices with role-based access.

The spreadsheet containing personal information will be maintained in a digital format and will be password protected, with access limited to authorized staff only.

Physical records are limited to handwritten cards during preparation and are handled within College offices using appropriate administrative and physical safeguards. Cards that are returned to the College will be securely shredded, and a note will be added to the individual's record to document the returned mail. No unnecessary physical records will be retained beyond what is required to complete the mail-out.

9.4 Controlling and tracking access

In the table that follows, check each strategy that describes how you limit or restrict who can access personal information and how you keep track of who has accessed personal information in the past. Insert your own strategies if needed.

Strategy	Y or N
Access to personal information is restricted to employees whose roles require it (for example, Institutional Research and Student Recruitment staff).	Yes
Employees who require standing or recurring access to personal information must receive approval from the appropriate Manager or Executive Director.	Yes
Personal information is accessed only for the purpose of preparing and distributing the mail-out.	Yes
The spreadsheet containing personal information is password protected and stored in a secure digital environment.	Yes
Access to the spreadsheet is limited to designated staff involved in the initiative.	Yes
Personal information is not stored on personal devices or shared through unauthorized channels.	Yes
A record is maintained in Colleague to document that outreach has occurred.	Yes
Returned mail is securely destroyed (shredded), and access to returned materials is limited to authorized staff.	Yes

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.

10. Accuracy of Personal Information

[FOIPPA section 28](#) states that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete.

10.1 How will you ensure that the personal information is accurate and complete?

Personal information used for this initiative is obtained directly from applicants through established application processes, including [REDACTED] submitted to the Registrar's Office (RO). As such, the information is considered to be provided by the individual and is relied upon as accurate at the time of submission.

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To support accuracy and completeness:

- Personal information is maintained within [REDACTED] which serves as the authoritative system of record
- Mailing lists are generated using current data available at the time of report extraction
- Individuals have the ability to request corrections to their personal information through the Registrar's Office
- Any correction requests received are processed through established College procedures to ensure records are updated accordingly

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11. Requests for Correction

[FOIPPA](#) gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

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

Yes. The Registrar's Office (RO) is responsible for processing requests to correct personal information.

If a request to update or correct personal information is received through this initiative or by staff involved in the mail-out, it will be directed to the Registrar's Office for appropriate handling in accordance with established College procedures. Staff will act in accordance with a duty of care to ensure that individuals are guided to the correct process and that no unauthorized changes are made outside of official systems.

11.2 Sometimes it is not possible to correct the personal information. [FOIPPA](#) requires that you make a note on the record about the request for correction if you are unable to correct the record itself.

Will you document the request to correct or annotate the record?

Yes. Requests to correct personal information will be documented and processed by the Registrar's Office (RO) in accordance with established College procedures.

11.3 If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, [FOIPPA](#) requires that you notify the other public body or third-party recipient of the request for correction.

Will you notify the other public body or third-party recipient?

Yes, where applicable. This initiative does not involve routine disclosure of personal information to other public bodies or third-party recipients beyond standard postal delivery.

If a correction request is received and it is determined that personal information has been disclosed to another public body or third-party recipient within the past year, the Registrar's Office (RO) may notify the relevant party of the correction request in accordance with FOIPPA requirements.

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

No. This initiative does not use personal information to make decisions that directly affect an individual. Personal information is used solely to identify an individual's application status and to support targeted outreach.

While the correspondence encourages individuals to take action (for example, completing their application or registering for courses), it does not influence or determine any administrative or academic decisions, such as admission, registration, or program eligibility.

All decisions that directly affect individuals are made through established College processes and are not impacted by this initiative.

11.5 FOIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision. In addition, the [Information Management Act](#) requires that you dispose of government information only in accordance with an approved information schedule or with the approval of the chief records officer.

Do you have an approved information schedule in place related to personal information used to make decisions?

Yes, where applicable. Personal information used in this initiative is managed in accordance with existing records management practices.

For information that becomes part of an individual's student record (for example, where an individual takes further action, such as registering or engaging with Enrolment Services), retention and disposition are governed by the Registrar's Office (RO) and applicable records schedules for student information.

For the recruitment component of this initiative, personal information is maintained in a temporary digital spreadsheet used solely to facilitate the mail-out. This information will be retained only as long as necessary to complete the initiative and will be securely disposed of in accordance with College procedures.

Part 7 – Agreements and Personal Information Banks

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

12. Does your initiative involve an [information sharing agreement](#)?

No, this initiative does not involve an information sharing agreement.

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

No, this initiative does not result in a personal information bank.

13.1 Describe the type of information in the bank.

Not applicable.

13.2 Name the main ministry or agency involved.

Not applicable.

13.3 Name any other ministries, agencies, public bodies, or organizations involved.

Not applicable.

13.4 List the business contact title and phone number for the person responsible for managing the personal information bank.

Not applicable.

Part 8 – Additional Risks

14. In the table below describe any additional risks that arise from collecting, using, disclosing, or storing personal information in your initiative that have not been addressed by the questions on the template.

Add new rows if necessary.

Possible Risk	Response
Mail is delivered to an incorrect address and opened by an unintended recipient	Envelopes will include a return-to-sender label and be clearly marked "Confidential: To Be Opened by Addressee Only." Only the minimum necessary personal information will be included. Residual risk is acknowledged as inherent to postal communication.
Outdated or incorrect mailing address results in misdirected mail	Mailing lists will be generated using the most current data available in [REDACTED]. Where possible, data will be reviewed prior to mail-out to identify obvious errors.
Unauthorized access to the spreadsheet containing personal information	[REDACTED] [REDACTED] access will be limited to authorized staff only.
Retention of personal information beyond what is necessary	The spreadsheet will be retained only as long as necessary to complete the initiative and will be securely disposed of. Returned mail will be shredded.

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Possible Risk	Response
Misinterpretation of outreach as official decision-making communication	Messaging will be clearly framed as informational and supportive outreach and will not imply any change in application status or decision-making authority.

Part 9 – Privacy Officer Comments

This Privacy Impact Assessment has been reviewed based on the information provided as of April 16, 2026.

This initiative does not involve the direct collection of personal information. Rather, it relies on the use of existing personal information previously collected through established application processes. As such, the initiative is limited in scope to the use and limited disclosure of personal information for outreach purposes.

Based on the information provided, the initiative demonstrates alignment with the *Freedom of Information and Protection of Privacy Act* (FOIPPA), including adherence to the principles of using the minimum amount of personal information necessary and implementing appropriate administrative and physical safeguards.

However, there are inherent risks associated with the use of postal communication, including the potential for misdirected mail and unauthorized access by unintended recipients. While mitigation measures have been identified, including return-to-sender labels and confidentiality markings, these risks cannot be fully eliminated and must be accepted and monitored.

It is recommended that:

- The advising appointment booking collection notice be updated to ensure full compliance with FOIPPA requirements
- Access to personal information be strictly limited to authorized staff and monitored throughout the initiative
- The temporary spreadsheet containing personal information be securely stored, password protected, and disposed of promptly upon completion of the initiative
- Staff involved in the initiative be reminded of their obligations regarding the handling of personal information

No significant privacy risks have been identified that would prevent the initiative from proceeding, provided that the above safeguards and recommendations are implemented and maintained. Ongoing oversight is recommended to ensure continued compliance.

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Part 10 – Signatures

Aman Kang		21/04/2026	22 (1)
Privacy Officer		Date	
Heather Bastin		23/04/2026	
Program/Department Manager		Date	
Dr. Titi Kunkel		21/04/2026	
Vice-President, Academic, Student and International		Date	
Michael Doyle		21/04/2026	
Vice-President, Corporate Services & CFO		Date	
Dr. Laurie Waye		22/04/2026	
President & CEO		Date	

A final copy of this PIA (with all signatures) must be kept on record.