

Privacy Impact Assessment

PIA# 24-0007

INSTRUCTIONS/INFORMATION:

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.

Do I have to answer all the questions?

Sections marked as “required” must have an answer. Specify *N/A (not applicable)* if appropriate. Other sections not marked mandatory should STILL be answered if the information is known. You will be contacted to answer any questions that are deemed relevant to this assessment so it’s best to be complete.

What if my initiative does not include personal information?

You still need to complete some parts of the PIA to ensure compliance with regulation. Under question “4. Elements of Information or Data”, specify “*no personal information collected*”. Sections that are marked as “*required*” still need to be answered.

What if I have questions?

If you have any questions about FOIPPA generally, you may contact the “*Privacy and Access Officer*” (privacy@tru.ca). For questions specific to this PIA, contact the “*Information Security Director*” (jcuzzola@tru.ca).

Initiative Preamble (Required)

Initiative/ Project/ Program Name:	BorderPass Immigration Platform and Services		
Name of TRU Department/Branch:	TRU World		
PIA Drafter (you):	ZiPing Feng		
Your Email:	zfeng@tru.ca	Phone:	5225
Service/Vendor:	BorderPass		
Vendor Email:	max@borderpass.ca	Phone:	647-502-9008

Have you consulted IT Department for this Initiative/Project/Program?

Yes _____ No _____ N/A _____

(If no, it is recommended to consult IT Department first to resolve any potential IT-related issues.)

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Part 1 – General

1. Description of the Initiative (required)

Please provide a general description of the initiative and the context in which it functions. This could include the purpose of the initiative, its benefits, the larger process (if any) that it is part of, how it functions, the parties involved, etc. We will be assessing the impacts of this initiative so please include details which help us understand its size/scale and reach.

BorderPass is a visa administration and management platform for international students. The platform tracks student's progress and assists them with visa applications including study permits, extensions, work permits and PR, all being reviewed and submitted to the IRCC by BorderPass in-house Canadian lawyers. The platform also provides students with early planning tools of whether their study and work plans track against federal and provincial employment gaps. The benefits of working with BorderPass include compliance with IRCC and upcoming recognized institution framework, increased conversion and diversity, and a seamless digital experience to enhance international student support throughout their journey in Canada.

Services Include:

- Pre-screening Assessment to support the immigration advising and screening of Applicants to improve admissions process and increase yield from application to enrollment.

- s.13

Study Permit Application Services:

- Study permit application preparation, review, and filing services as well as PAL submission through BorderPass by Canadian immigration lawyers.
- Applicants will receive pre-arrival and post-arrival immigration packages as well as step by step guidance regarding their journey to Canada and the border process
- Including the ability to search and secure housing based on their preferences with plans to further enhance the housing platform to include exclusive property listings, landlord onboarding, roommate finder service, credit-building integrations, and more.

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- s.13 [REDACTED]
- Applicant will receive 1-year membership to the BorderPass Club which includes preferred pricing and application support for Co-Op Work Permit, Post Graduate Work Permit (PGWP), SIN application, Study Permit Extensions, in addition to ongoing legal immigration support

BorderPass Annual Subscription Services:

- Notifications of key dates, continuous monitoring & management of their visas and immigration documentation in BorderPass' Document Vault to ensure compliance.
- Relationship with Canadian immigration lawyers and access to professional legal immigration experts, including group workshops, 1:1 consultation, and email/chat support with prompt response times.
- Ongoing Express Entry score tracking and management providing Students with visibility, guidance and tips on their permanent residency pathways and relevant employment outcomes
- Newcomer essential services through BorderPass's trusted service providers and Membership benefits including SIN number registration, high-level tax advising to maximize credits and refunds to students, and preferred rates on follow-on visa services such as study permit extensions, co-op permits, work permits, spousal permits, and family support.

TRU Receives

- Pre-risk assessment to support the immigration advising and screening of prospective international applicants to increase yield to enrollment.
- Tracking and measurement of the performance of education agents by assessing the quality and long-term success of the Applicants that they send to the Institution.
- Aggregate data reports on key metrics such as study permit applications filed, study permit applications approved, pre-assessment risk levels, and diversity metrics (such as passport country, marital status, age & gender)
- BorderPass can provide document authentication capabilities to ensure that undocored documentation such as LOAs are submitted to the IRCC. This will enable TRU to emerge as a leader in document verification capability for Applicants in Canada.

2. Scope of this PIA (required)

This section should explain exactly what part or phase of the initiative the PIA covers and, where necessary for clarity, what it does not cover.

>> If unsure leave blank. Scope will be assessed by Privacy & Information Security Departments.

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BorderPass to attach the most up to date data Policy Packet. The packet contains the following 15 policies that they have in place as part of their SOC 2 Type 2 compliance framework. All policies have been reviewed and signed by all employees and are audited on a regular basis:

- Access Control Policy
- Asset Management Policy
- Business Continuity and Disaster Recovery Plan
- Code of Conduct
- Cryptography Policy
- Data Management Policy
- Human Resource Security Policy
- Incident Response Plan
- Information Security Policy (AUP)
- Information Security Roles and Responsibilities
- Operations Security Policy
- Physical Security Policy
- Risk Management Policy
- Secure Development Policy
- Third-Party Management Policy

2-1. Is this initiative recurring in a regular interval, e.g., yearly, or biennially? (required)

- Annual contract with the ability to renew for up to 3 years

3. Related Privacy Impact Assessments

Please identify any approved PIAs which cover any parts of the initiative or any previously approved PIAs for this initiative.

- BorderPass takes privacy and data security very seriously and has completed and been approved for data security/PIAs for each of the implementations that have been initiated. This involves over 12 institutions including but not limited to: Centennial College, Durham College, Ontario Tech University, Humber College, Fanshawe College, SAIT, Medicine Hat College, Queens University, George Brown College, Bow Valley College, TMU

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4. Elements of Information or Data (required)

BorderPass will collect the following personal information directly from students via the portal:

- **Full name**
- **Email / phone**
- **Date of birth**
- **Student ID**
- **Marital Status**
 - If a student is married or in a common-law relationship, they will need to upload a marriage certificate and license, or your common-law declaration form along with a copy of your spouse's passport.
- **Passport country**
- **Academic information)**
 - Letters of acceptance, recent diplomas, and transcripts.
 - Students will upload any diplomas and transcripts they have received from their studies in their home country, or previous study programs in Canada or elsewhere abroad.
- **Passport details**
 - You will need to upload a copy of your passport biodata page here. This is the page which contains your photo and identification information. Please remember that your visa cannot go beyond your passport expiry date. We strongly recommend that your passport is valid at least 12 months beyond your anticipated visa expiry date.
We also recommend you include a copy of any past visas stamped in your passport as this helps to display your positive travel history to the IRCC.
 - You also have the option to upload a copy of the front and back of your national ID if you have one. Please note if you do not have a national ID, you do not need to upload anything here.
- **Social Insurance number**
- **Language test results**
 - If you have taken language tests to showcase your proficiency of English or French, this is where you can upload your test results. Please note that the IRCC currently only accepts the following tests:
 - For English: IELTS, CELPIP and TOEFL iBT.
 - For French: TEF, TCF and TEFAQ.
 - For Student Direct Stream you must have achieved the following minimum scores.
 - IELTS test results.
 - TEF test results.
 - CELPIP General Test Results.
 - CAEL and Pearson PTE Academic Test Results.
 - TOEFL Test Results.
- **Financial information (bank statements)**
 - In the Finances section, you will be required to upload bank statements showing at a minimum, your first year tuition amount + \$20,635 CAD + your travel costs.
 - Acceptable documentation:

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- Personal bank statements from the past six months
- Personal savings accounts
- Certificate of deposit
- Supplementary Financial Documents (may be uploaded but are not required):
 - Investment portfolios
 - Tax documents
 - Business ownership documents
 - Assets
- **Family information/details**
 - If the student has family members who have Canadian status, this option will appear in the Document Vault to allow them to upload family's valid Canadian visa or permit.
- **Medical information**
 - The IRCC may request the student take a medical exam, so providing an upfront medical exam may reduce IRCC processing times. To qualify for SDS, the student must get an upfront medical exam. **The medical exam must be performed by an approved immigration panel physician (approved by IRCC).**
 - Students need a medical exam if at least one of these applies to them:
 - They have travelled or lived in certain countries or territories for 6 months or more in the year before they come to Canada
 - List of these countries is found [here](#). (Gov of Canada webpage).
 - Or, they will be working in a job in which public health must be protected.
 - Examples of these jobs:
 - workers in health-care settings
 - clinical laboratory workers
 - patient attendants in nursing and geriatric homes
 - medical students admitted to Canada to attend university
 - medical electives and physicians on short-term locums
 - workers in primary or secondary school settings, or workers in child-care settings.
 - **Information collected during the medical exam:**
 - go through a medical history questionnaire;
 - weight;
 - height;
 - check hearing and vision;
 - take blood pressure;
 - feel pulse;
 - listen to heart and lungs;
 - feel abdomen;
 - check how limbs move;
 - look at skin.
- Students may be referred to a specialist for more testing, depending on the results of your medical exam.

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- Students will be required to take a medical exam before entering Canada. Their visa processes cannot begin until they have gotten their medical exam.
- **If students take their medical exam before visa submission:** They must include proof of the exam in your application.
- **If students take their medical exam after visa submission:** Their results will be automatically submitted to the Canadian government and there is no further action. They may keep a copy of any documents the panel physician gives you for your record.
- **Employment information**
 - Once a student begins working Border Pass can track their employment in terms of where they work (work history).
 - Pay stubs as required to show for PR applications.
- **Housing details**
 - Address of where student lives - will be required to be tracked given new IRCC regulations
- **Tuition information**
 - Payment receipt(s) for any tuition students have paid for their upcoming Canadian study program.
- **Photo**
 - You will need to include a digital photo of your face to include with your application. This photo will be similar to a passport photo.
- **Letter of acceptance** for the Canadian school student will be attending. Full document will be required, not only the first page.
 - The letter of acceptance should display:
 - School's letter head;
 - School's full mailing address and contact information;
 - Tuition fees;
 - Any conditions of acceptance, if applicable;
 - Start and finish date of your program;
 - Name of your study program.
- **Co-op Letter**
 - If the Canadian study program includes a co-op component, student will have been issued a co-op letter. This is required to apply for a co-op work permit.
 - copy of the passport or national ID of all student's immediate family members who live outside Canada (for example this can be parents, stepparents, siblings, step siblings, children, stepchildren)
 - A recommended document they can upload here too is their resume. A resume is a document that displays student education and work history along with skills and personal interests.
 - In the Additional Documents section, students can upload any other documents that they think show a strong tie to their home country or show a reason why they will return to their home country after their authorized stay in Canada.
- **Client information**
 - You will need to upload a copy of the passport or national ID of all your immediate family members who live outside Canada (for example this can be your parents, stepparents, siblings, step siblings, children, stepchildren)
 - A recommended document you can upload here too is your resume. A resume is a document that displays your education and work history along with your skills and personal interests.

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- In the Additional Documents section, you can upload any other documents that you think show a strong tie to your home country or show a reason why you will return to your home country after your authorized stay in Canada.
- **Police Clearance**
 - IRCC may request a Police Clearance Certificate from students at some point. In order to save processing times, students may get the Certificate done before submitting their application to the IRCC. Alternatively, they may do it at a later date in the event they request one.
 - Students will need to provide a Police Clearance from every country they have lived in for more than 6 months since they were 18. Students do not need to provide a Police Clearance if no single stay exceeded 6 months.
- **Letter of enrolment**
 - This is a document you would need to request from your school. A letter of enrolment is an institution letter which will show your current status as an enrolled student.
- **Completion of Studies**
 - Once the student has completed their study program, their institution will issue them with a Completion Letter or Graduation Letter. This letter will confirm they have completed your study program.

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada (required)

Can your information be accessed from outside Canada (i.e. on the TRU website), or is your information being stored outside Canada (i.e. in the “cloud”, or on a non-Canadian social media site)?

5-1. Is a service provider(s) involved? If so, where is the provider located (e.g. Canada, U.S., or other country)? (required)

AWS stored- Located in Canada (more details in policy package)

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6. Common or Integrated Program or Activity (required)

If you answer yes, please contact the *Privacy and Access Officer*

If you answer “yes” to <u>all</u> 3 of these questions, your initiative qualifies as “a common or integrated program or activity,” and you must comply with requirements under FOIPPA.	
1. This initiative involves a program or activity that provides a service (or services);	yes/no
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	yes/no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes/no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	N

7. Data-linking Initiative* (required)

If you answer yes, please contact the *Privacy and Access Officer*

If you answer “yes” to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under FOIPPA.	
1. Personal information from one database is linked or combined with personal information from another database;	yes/no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	yes/no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	yes/no

8. Provide a diagram, flowchart, and/or table that shows how your initiative will collect, use, and/or disclose personal information (see examples below) (required).

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Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	User visits portal via referral link	N/A	N/A
2.	Creates profile using name, email, password and ID	Collection	s.26(c)TRU not collecting at this stage.
3.	User is presented with pre-screening assessment to upload required documents for the immigration process (Includes passport, financial docs, language test) and input fields such as preferred first name, legal first name, last name, email address, student ID (if applicable), school, program, age, family information, visa history, criminal/medical information, financial information, location and other fields detailed in the BorderPass Privacy policy	Collection and Use	s. 26(c) & 32(a)TRU not collecting at this stage.
4.	Logged in user completes the form. Fills in missing fields.	Collection & Use	s.26(c)(d) & 32(a)TRU not collecting at this stage.
5.	BorderPass shares results from pre-screening with TRU	Use & Disclosure, Collection by TRU.	s. 32(a) & 33(2)(h)s.26(c) , s.27(1)(a)(i).
6.	Users return to BorderPass to complete study permit application and track immigration status	Collection and Use	s. 26(c) & 32(a)
7	Users submit applications to BorderPass Lawyers for Review	Disclosure	s. 33(2)(d)
8	BorderPass Lawyers submit applications to IRCC	Disclosure	s. 33(2)(d)
7.	Data destruction policy outlined in data policy package	Protection	s. 30

9. Risk Mitigation Table (required)

Please identify any privacy risks associated with the initiative and the mitigation strategies that will be implemented. Please identify the likelihood (rare, unlikely, possible, likely, almost certain) of this risk happening and the degree of impact it would have on individuals if it occurred (insignificant, minor, moderate, major, catastrophic). You may contact the *Information Security Director* for assistance.

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Risk Mitigation Table				
Risk	Mitigation Strategy	Likelihood	Impact	Exposure
1. s.13				
2.				
3.				