

Why should I complete a PIA?

A PIA is a tool to help Schools/Districts ensure compliance with applicable privacy legislation. This document helps mitigate and evaluate many of the unintended risks and consequences that can develop as a result of not anticipating multiple perspectives and circumstances with a new system or project. As part of the process, schools/districts are taking the appropriate steps to ensure that parents, students and educators understand what measures are taken with regards to the safety and security of personal information and the importance of informed consent.

School/District staff need to contact the privacy office(r) or PIA Drafter, at their School/District, to determine internal policies for review and signing-off of a Privacy Impact Assessment. Staff may submit PIAs to their Superintendent of Schools for consideration. If you have any questions about this PIA template or FIPPA in general, you may contact the designated PIA Drafter as noted in this document, or call the provincial **Privacy and Access Helpline at Enquiry BC** as noted below. Completed PIA's must be retained in a secure location at the School/District for the purposes of a Privacy Commissioner's Audit.

Note: This process can help identify and reduce many of the unintended risks and consequences that may potentially jeopardize student and educator privacy and security issues.

What if my initiative does not include personal information?

Best practices indicate that School/Districts' should still complete Part 1 of the PIA and submit it along with the signature pages to their privacy office(r) even if it is thought that no personal information is involved. This process ensures that the initiative has been accurately assessed to meet the requirements of FIPPA.

Note: The definition of personal information is: *Recorded information about an identifiable individual other than contact information.*

The following examples are a non-exhaustive list of personal information:

- Name, address, email address or telephone number;
- Age, sex, religious beliefs, sexual orientation, marital or family status, blood type;
- Information about an individual's health care history, including a physical or mental disability;
- Information about an individual's education, financial, criminal or employment history;
- Social Insurance Number (SIN) and Personal Education Number (PEN); and
- Personal views, opinions, religious or political beliefs or associations.

Enquiry BC – Privacy and Access Helpline. Victoria: 250-356-1851 Vancouver: 604-660-2421 and elsewhere in BC, toll-free: 800-663-7867

Part 1 - General

Name of District:	Kamloops Christian School Association		
PIA Drafter:	Mr. Sandro Cuzzetto (CEO / Privacy Officer)		
Email:	sandroc@kamcs.org	Phone:	250-376-6900
Program Manager:	NA		
Email:	NA	Phone:	NA

1. Description of the Initiative

Educational Resource Acquisition Consortium (ERAC) is a cooperative member-based organization. Our School District has an active membership with ERAC who provides a range of services available to its members including evaluating, licensing and acquiring print, software, and digital learning resources. ERAC works in partnership with their members, BC public school districts as well as independent schools to support quality education for public and independent K-12 students.

This Privacy Impact Assessment (PIA) is to facilitate our School District in the provision of **Follett's Destiny Library Manager** through ERAC for the purposes of efficiently managing our library resources. *Follett's Destiny Library Manager* throughout this document will be identified as **Destiny Library**, a browser-based platform which includes features for circulation, cataloguing, searching and reporting on the usage of a school library's print and digital resources, including e-books, audiobooks and other media assets. It will be installed, used and maintained from <our central district location> and can be accessed 24 hours a day.

The vendor provides the option of self-hosting with data conversion services that permits our district to integrate *Destiny Library* with our Student Information System *MyEducationBC (MyEdBC)* used in our schools. Both systems are provided by a US company called Aspen. *Follett's System* and *MyEdBC* are both managed by Fujitsu Canada and provide Canadian hosting services with servers based in Montreal, Quebec.

Vendor

Follett Corporation

13 Westbrook Corporate Center | Westchester, IL 60154
Subsidiary: Follett Library Resources

Canadian Education Services:

3390 South Service Road, Suite 306, Burlington, ON L7N 3J5
canada@follett.com, 877.857.7870

British Columbia Contact:

Archie Jaswal, Follett International
ajaswal@fint.follett.com, 778-240-5912 or toll free 877-857-7870 extension: 47115

For Privacy and Security Inquiries:

Frank Coster, VP Canadian Operations
fcoster@follett.com, 1-905-464-2865
Vancouver, BC V6C 1Z7
Canada
604-484-8053
Email: information@ingenuityworks.com

2. Scope of this PIA

Our District has entered into a licensed subscription agreement with [Destiny Library](#). This PIA covers use of *Destiny Library* within school sites, by students, educators and other relevant school staff. Upon completion of this PIA, *Destiny Library* is ready for deployment to teachers and their students in our district.

<District Note: Please see sample consent forms located in Appendices A and B in this document to be tailored to your District's needs. For further help with collection notices please see [Tip Sheet for Consent & Disclosure](#) located on the ERAC website.>

Related Privacy Impact Assessments It is our understanding that there is no current *Follett Destiny Library Manager* PIA submitted to the Office of the Information & Privacy Commission of British Columbia (OPIC) or BC Ministry of Education.

3. Elements of Information or Data

Each *Destiny Library* user (i.e. student and or staff member) is considered a "patron" and must have a patron record that associates them with the materials they check out, fines they incur and any patron transactions.

Patron records are created and managed by an Administrator(s) within our district.

Destiny Library Administrators will comply with district policies regarding adding or editing patron records. (A district's student information system might overwrite or delete changes.)

Destiny Library administrators can add patron records at the site level if they have appropriate access level permissions. Before adding a patron record, administrators should always search the district's patron database to make sure a patron record does not already exist.

Information associated with a patron <will or may> include:

- First, last and middle name
- Nickname
- Birthdate
- Graduation year
- User name and password
- Email address
- Home room classroom

Part 2 – Protection of Personal Information

4. Storage or Access outside Canada

No Student data is stored outside of Canada. *Destiny Library* is self-hosted by our school district on local servers OR is hosted on Fujitsu servers located in Montreal, Quebec <district to adjust wording based on hosting option used>. The *Destiny Library* is accessed via a web browser using server-side <e.g. 128-bit SSL encryption>. All our public schools are connected to data centres through <the Provincial Learning Network (SPANBC) or the Next Generation Network (NGN)>, managed by the province. Connections between data centres and service centres use dedicated circuits that are routed entirely through Canada. School employees working from home, parents and students access *Destiny Library* over the internet. All network traffic uses 128-bit SSL encryption.

Commented [BK1]: Districts are to edit by adding the appropriate specifications that are used in their schools.

5. Data-Linking Initiative*

In FIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.

1. Personal information from one database is linked or combined with personal information from another database;

no

2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;

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.

no

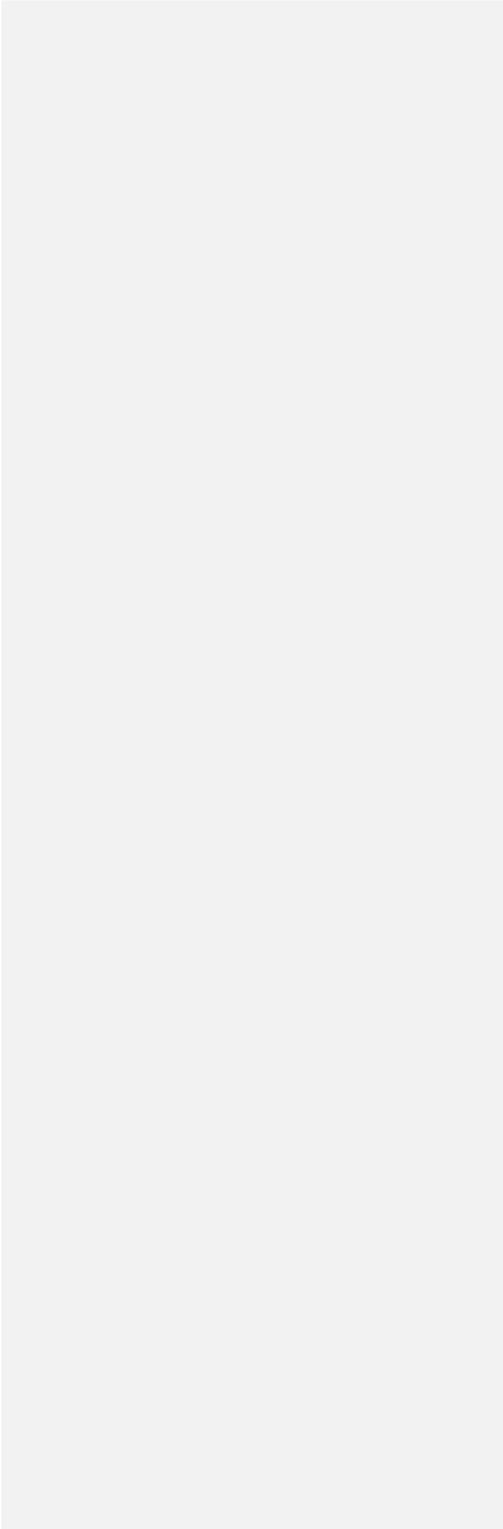
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.

6. Common or Integrated Program or Activity* - Not applicable for this product.

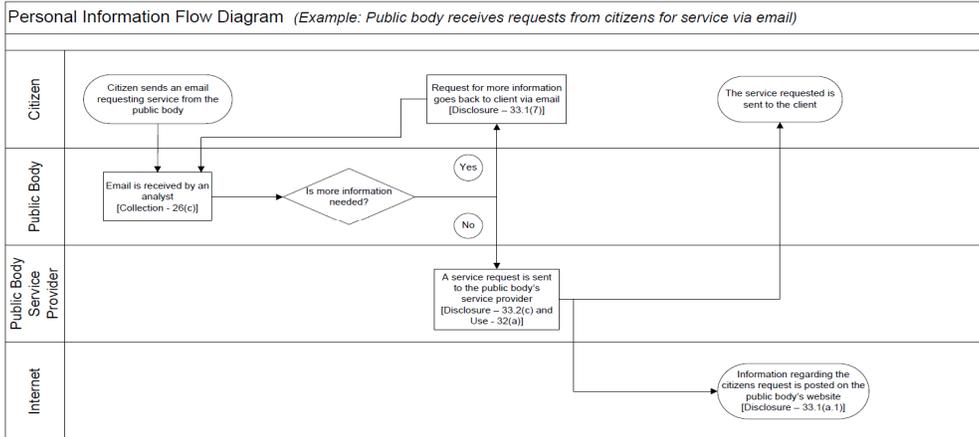
<p>In FIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements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

** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC). Contact your school district’s privacy office(r) to determine how to proceed with this notification and consultation.*

For future reference, public bodies are required to notify the OIPC of a “data-linking initiative” or a “common or integrated program or activity” in the early stages of developing the initiative, program or activity. Contact your school district’s privacy office(r) to determine how to proceed with this notification.



7. Personal Information Flow Diagram and/or Personal Information Flow Table:



Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Student Consent and Parental Authorization is sought to start using the program and may collect personal information.	Collection	26(d)
2.	Student uses Program for course work or on own time.	Use	32(a), 32(b)
3.	Service request transferred to service provider contracted by school district.	Disclosure & Use	33.2(c) and 32(a)

8. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Vendor's employees could access personal information and use or disclose it for personal purposes.	Oath of Employment; contractual terms, etc.	Low	High
2.	Request may not actually be from client (i.e. their email address may be compromised).	Implementation of identification verification procedures.	Low	High
3.	Users' personal information is compromised when transferred to the service provider.	Transmission is encrypted and over a secure line.	Low	High

9. Collection Notice

Personal Information

Follett may collect "**Personal Information**" (which is information that can be used to contact or specifically identify an individual, such as your full name, mailing address, mobile number, and email address), account information (such as a password or other information that helps confirm identity) and demographic or other information (such as gender, age or birthdate, postal code and information about interests and preferences).

Any information that is combined with Personal Information will be treated as Personal Information.

Follett does not knowingly collect personal information from individuals younger than the age of 13.

Forums

Follett provides forums where users can post reviews and other information relating to products. For anyone posting in these forums, certain information, such as their name, may be publicly displayed on the Services along with their User Content (i.e. their post).

Usage Information

Follett and its third-party services providers (such as analytics providers) may automatically collect certain data whenever a student or school staff accesses *Destiny Library*.

This is called Usage Information and can include:

- type of device used to access the site,
- areas of the site accessed or used,
- the time of day
- IP address or another unique identifier
- Geographic information about the location of the device

Usage Information is generally non-identifying, but if it is associate with a specific and identifiable person, Follett treats it as Personal Information.

Follett collects usage information through cookies, web beacons and embedded scripts.

How information is used

Follett may use information it collects (including both personal information and usage information) in the following ways:

- To provide access to features within its products
- to provide customer service including responding to your questions, complaints or comments
- To tailor content and recommendations
- To confirm or fulfill orders
- To provide information, products or services

- To provide location features and services
- To process registrations, including validating information that is submitted
- To improve services and products
- To analyze usage of services and purchases of products;
- To contact users regarding usage services and changes to policies;
- To enforce applicable agreements and policies

How information is shared

Follett may share information in the following cases:

- To third-party service providers only as necessary to perform services on Follett's behalf
- With your consent
- As required by law
- To prevent harm or loss
- In connection with a sale of Follett's business
- If it is non-personal, aggregated information
- If users enter contests or promotions and submit personal information

External sites

Destiny Library may link to other applications and websites not administered by Follett. The privacy policies and practices of these applications and sites is not the responsibility of Follett and is not covered within the scope of this PIA.

Part 3 – Security of Personal Information

<If this PIA involves an information system, or if it is otherwise deemed necessary to do so, please consult with your school district's privacy office(r) and/or security personnel when filling out this section. They will also be able to tell you whether you will need to complete a separate security assessment for this initiative.>

10. Please describe the physical security measures related to the initiative (if applicable).

N/A

11. Please describe the technical security measures related to the initiative (if applicable).

Destiny Library uses the following data security measures:

Single database; data does not need to be replicated to other data stores

Each district has a separate physical database file

Security rules are applied universally to each database instance

For districts that host the services with Follett, all data is securely transmitted over the HTTPS protocol.

For districts who host Destiny on-site, HTTPS is supported and works with the SSL certificate that matches the on-site domain. Secure transmission includes page content, images, fonts, and user data.

The databases are not accessible from outside the data center firewall in case the Destiny product is housed at the Follett-managed data center

The database is not directly accessible via the internet

All access to the database is managed through the application; data is only visible to users with specific rights and permissions

Destiny is routinely tested against attacks

Authentication methods are exercised through automated unit tests to validate that data access is restricted to users with the appropriate permissions.

12. Does your district department rely on any security policies?

Only our Technology Department has access to create, delete or edit teacher accounts. Accounts are updated by September 30th of the school year by each school once their staff is finalized.

13. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

- Teacher users can add only students and see only classes that they have permissions to.
- Students only have access to their own account and records when logged in to the application.

14. Please describe how you track who has access to the personal information. The program is an online application therefore information is only assessable when logged into the program. Users have access to

information based on their roles as described in section 13 above.

Part 4 – Accuracy/Correction/Retention of Personal Information

15. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated? If personal information will be disclosed to others, how will the school/district notify them of the update, correction or annotation? NA

16. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain. NA

17. If you answered "yes" to question 16, please explain the efforts that will be made to ensure that the personal information is accurate and complete.
Not applicable

Note: For additional information on the *Privacy Management and Accountability Policy* and the Pro-active Disclosure & Information Management Act, see: <https://pia.bcerac.ca/accountability/>

18. If you answered "yes" to question 16, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual? Not applicable.

Part 5 – Further Information

19. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

Not applicable

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact your privacy office(r).

20. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact your privacy office(r).

21. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FIPPA. Under this same section, this information is required to be published in a public directory.

No

< If you have any questions regarding the above section, please contact your school district's privacy office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.>

Please ensure **Parts 6 and 7** are attached to your submitted PIA.

Part 6 – Privacy Office(r) Comments

This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. The PIA is a “living document” that is periodically reviewed. Should there be substantial changes that may affect the privacy of our users, an update will be initiated. As part of our business practices, this PIA will be reviewed annually. If, in the future, any substantive changes made to the scope of this PIA, the school district will complete a PIA Update and submit it to this Privacy Office(r).

Unless the Agreement otherwise specifies, or the District otherwise directs in writing, the vendor must not disclose any personal information outside of Canada.

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

Part 7 - Program Area Signatures

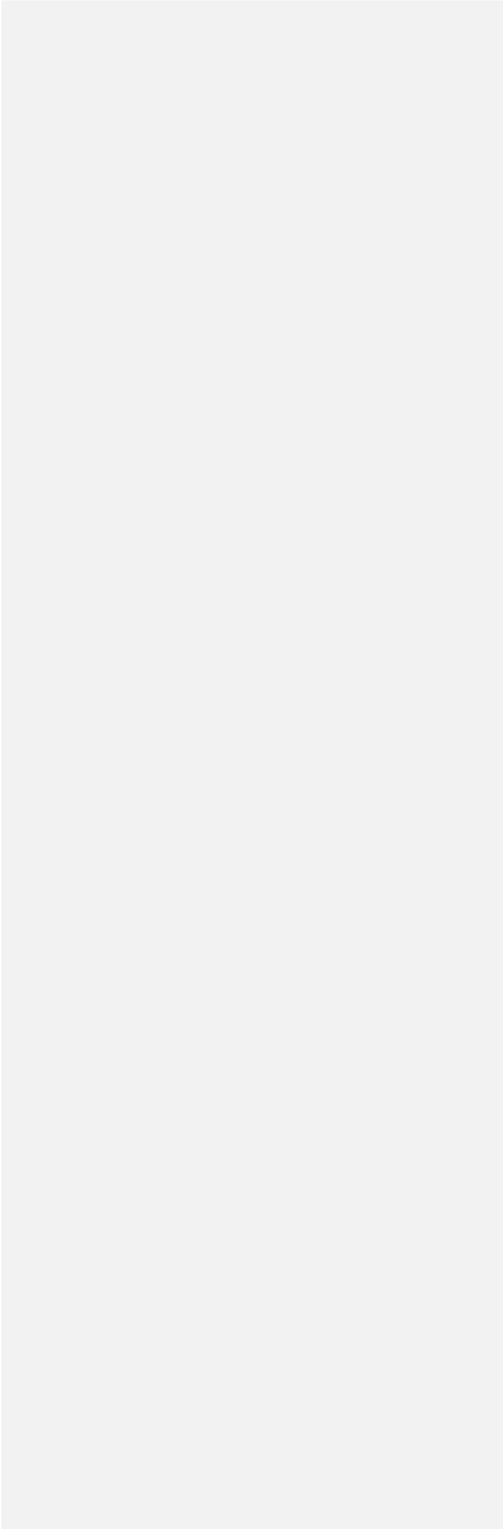
Mr. Sandro Cuzzetto
Program/Department Manager
Privacy Officer/Privacy Office
Representative



Signature

Dec. 22, 2020
Date

If you have any questions, please contact your school district's privacy office(s) or call the OCIO's Privacy and Access Helpline at 250 356 1851.





Privacy Impact Assessment Appendix A

Collection Authorities:

Section 26 of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) details the authorities under which a public body may collect personal information. If a program involves the handling of personal information, the program must have an authority to have collected that information. Please cite in your Privacy Impact Assessment the primary authorization(s) related to your initiative from the collection authority section below.

Section	Authority - A public body may collection personal information only if:
26(a)	The collection of the information is expressly authorized under an Act (Act name, and relevant section numbers must be provided)
26(b)	The information is collected for the purposes of law enforcement*
26(c)	The information relates directly to and is necessary for a program or activity of the public body
26(d)	With respect to personal information collected for a <u>prescribed* purpose</u> (i) the individual the information is about has consented in the prescribed* manner to that collection and (ii) a reasonable person would consider that collection appropriate in the circumstances
26(e)	The information is necessary for the purposes of planning or evaluating a program or activity of a public body
26(f)	The information is necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonable to occur
26(g)	The information is collected by observation at a presentation, ceremony, performance, sports meet or similar event (i) at which the individual voluntarily appears, and (ii) that is open to the public
26(h)	The information is personal identity information that is collected by (i) a provincial identity information services provider and the collection of the information is necessary to enable the provincial identity information services providers to provide services under section 69.2 or (ii) a public body from a provincial identity information services provider and the collection of the information is necessary to enable (a) the public body to identify an individual for the purpose of providing a service to the individual or, (b) the provincial identity information services provider to provide services under section 69.2

*Relevant definitions:

Prescribed: means prescribed by FOIPPA regulation.

Law enforcement: means (a) policing, including criminal intelligence operations, (b) investigations that lead or could lead to a penalty or sanction being imposed, or (c) proceedings that lead or could lead to a penalty or sanction being imposed.



Privacy Impact Assessment Appendix B

Use Authorities:

Section 32 of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) details the authorities under which a public body may use personal information. If a program uses personal information in any way, the program must have an authority to use that information. Please cite in your Privacy Impact Assessment the primary authorization(s) related to your initiative from the use authority section below.

Section	Authority - A public body may use personal information only:
32(a)	For the purpose for which that information was obtained or compiled, or for a use consistent* with that purpose
32(b)	If the individual the information is about has identified the information and has consented, in the prescribed* manner, to the use
32(c)	For a purpose for which that information may be disclosed to that public body under sections 33 to 36

*Relevant definitions:

Consistent purpose: A use of personal information is consistent with the purpose for which the information was obtained or compiled if the use (a) has a reasonable and direct connection to that purpose, and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Prescribed: means prescribed by FOIPPA regulation.



Privacy Impact Assessment Appendix C

Disclosure Authorities:

Sections 33 to 36 of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) detail the authorities under which a public body may disclose personal information. If personal information moves in any way from one person to another the program must have an authority to disclose that information. Disclosures can include, but are not limited to: sharing, releasing, transferring, provision of access, publication, or divulging personal information. Please cite in your Privacy Impact Assessment the primary authorization(s) related to your initiative from the disclosure authority section below.

The list of disclosure provisions under FOIPPA is lengthy. For ease of use we have organized all of the disclosure provisions into common categories based on the purpose of the disclosure. For an ordered listing of disclosure authorities, please see sections 33-36 in FOIPPA [here](#).

Some authorities will appear more than once. Every instance where disclosure can only occur within Canada has been explicitly identified as "A public body may disclose personal information inside Canada only..."

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	Disclosures with an individual's consent or other authorizations
33.1(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed* manner, to its disclosure inside or outside Canada, as applicable
33.2(g)	<i>A public body may disclose personal information inside Canada only to a member of the Legislative Assembly</i> who has been requested by the individual the information is about to assist in resolving a problem



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33.2(h)	<i>A public body may disclose personal information inside Canada only to a <u>representative of the bargaining agent</u>, who has been authorized in writing by the employee whom the information is about, to make an inquiry</i>
33.1(7)	A public body may disclose personal information <u>to the individual</u> the information is about if (a) the individual has initiated contact with the public body about a matter and the public body is responding to that contact, (b) the public body discloses information only in respect of the matter, and (c) the public body use (i) the same communication method used by the individual to initiate contact, or (ii) another communication method authorized by the individual
	Disclosures for a consistent purpose
33.2(a)	<i>A public body may disclose personal information inside Canada only for the purpose for which it was obtained or compiled or for a use consistent with that purpose</i>
	Disclosures resulting from public events and/or dialogues
33.1(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event (i) at which the individual voluntarily appeared, and (ii) that was open to the public
33.1(1)(r)	If the information (i) was disclosed <u>on a social media site</u> by the individual the information is about, (ii) is obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs, or activities of the public body or respecting legislation relating to the public body, and (iii) is disclosed for a use that is consistent with the purpose described in subparagraph (ii)
	Disclosures to government officials
33.1(1)(e)	To an individual who is a <u>minister, an officer of the public body or an employee</u> of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee, and (ii) in relation to disclosure outside Canada, the outside disclosure is necessary



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	because the individual is temporarily travelling outside Canada.
33.1(1)(e.1)	<u>To an individual who is a service provider</u> of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body, and (ii) in relation to disclosure outside Canada (A) the individual normally received such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada.
33.1(1)(f)	<u>To an officer or employee of the public body or to a minister</u> , if the information is immediately necessary for the protection of the health or safety of the officer, employee or minister
33.1(1)(g)	<u>To the Attorney General or legal counsel</u> for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body
33.1(1)(h)	<u>To the minister responsible for the Coroners Act</u> or a person referred to in section 31(1) of that Act, for the purposes of that Act
33.2(c)	<i>A public body may disclose personal information inside Canada only to an officer or employee of the public body or to a minister</i> , if the information is necessary for the performance of the duties of the officer, employee, or minister
33.2(d)	<i>A public body may disclose personal information inside Canada only to an officer or employee of (i) a public body, or (ii) an agency, or to a minister</i> , if the information is necessary for the delivery of a common or integrated program* or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed
33.2(e)	<i>A public body may disclose personal information inside Canada only to an officer or employee of a public body or to a minister</i> , if the information is necessary for the protection of the health or safety of the officer, employee or minister
33.2(f)	<i>A public body may disclose personal information inside Canada only to the auditor general</i> or any other prescribed* person or body for audit purposes
33.2(g)	<i>A public body may disclose personal information inside Canada only to a member of the Legislative Assembly</i> who has been requested by the individual the information is about to assist in resolving a problem



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33.2(h)	<i>A public body may disclose personal information inside Canada only to a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry</i>
33.2(i)	<i>A public body may disclose personal information inside Canada only to a public body or a law enforcement agency in Canada to assist in a specific investigation (i) undertaken with a view to a law enforcement proceeding, or (ii) from which a law enforcement proceeding is likely to result</i>
33.2(j)	<i>A public body may disclose personal information inside Canada only to the archives of the government of B.C. or the archives of a public body, for archival purposes</i>
33.2(l)	<i>A public body may disclose personal information inside Canada only to an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body</i>
	Disclosures for financial purposes
33.1(1)(a.1)	If the information or disclosure is of a type described in section 22(4)(e), (f), (h), (i), or (j)
	22(4)(f): the disclosure reveals the financial details of a contract to supply goods or services to a public body
	22(4)(h): the information is about expenses incurred by the third party while travelling at the expense of a public body
	22(4)(j): the disclosure, in respect of a discretionary benefit of a financial nature granted to a third party by a public body, not including personal information referred to in subsection (3)(c), reveals any of the following with respect to the benefit: (i) the name of the third party to whom the benefit applies; (ii) what the benefit grants to the third party; (iii) the date the benefit was granted; (iv) the period of time the benefit is valid; (v) the date the benefit ceases.
33.1(1)(i)	If (i) the disclosure is for the purposes of collecting amounts owing to the government of B.C. or a public body by (A) an individual (B) a corporation of which the individual the information is about is or was a director or officer, and (ii) in relation to disclosure outside Canada, there are reasonable grounds for



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	purposes
	Special disclosure authorities
33.1(4)	ICBC may disclose personal information if (a) the information was obtained or compiled by ICBC for the purposes of insurance provided by the public body, and (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim
33.1(5)	A provincial identity information services provider (PIISP) may disclose personal identity information (a) to enable the PIISP to provide services under section 69.2, or (b) to a public body if the disclosure is necessary to enable the public body to identify an individual for the purpose of providing service to the individual.
33.1(6)	A public body may disclose personal identity information to a PIISP if the disclosure is necessary to enable (a) the public body to identify an individual for the purpose of providing a service to the individual, or (b) the PIISP to provide services under section 69.2

*Relevant definitions:

Prescribed: means prescribed by FOIPPA regulation.

Consistent purpose: A use of personal information is consistent with the purpose for which the information was obtained or compiled is the use (a) has a reasonable and direct connection to that purpose, and (b) is necessary for performing the statutory duties of, or for operating a program or activity of, the public body that uses or discloses the information.

Common or Integrated Program or Activity: Means a program or activity that (a) provides one or more services through (i) a public body and one or more other public bodies or agencies working collaboratively, or (ii) one public body working on behalf of another public body or agency, and (b) is confirmed by regulation as being a common or integrated program or activity.

Law enforcement: means (a) policing, including criminal intelligence operations, (b) investigations that lead or could lead to a penalty or sanction being imposed, or (c) proceedings that lead or could lead to a penalty or sanction being imposed.

***Please note:** Nothing in this document constitutes legal advice to any person. The comments and opinions expressed in this document are to help illustrate the content needed to complete a School/District PIA. This information does not constitute ERAC or OIPC approval of the initiative being consulted on or fetter the Commissioner's discretion should the initiative later be the subject of a complaint or investigation. It remains the responsibility of the school districts to ensure that they comply with their duties and obligations under applicable laws and are compliant with the Freedom and Protection of Privacy Act.*