

Privacy Impact Assessment

Ellucian Banner Cloud

Name of Department/Branch:	BCNET		
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1. Description of the Initiative

BCNET is taking the lead on the development of this Privacy Impact Assessment (PIA) on the Ellucian Banner Cloud platform, on behalf of its members and affiliations.

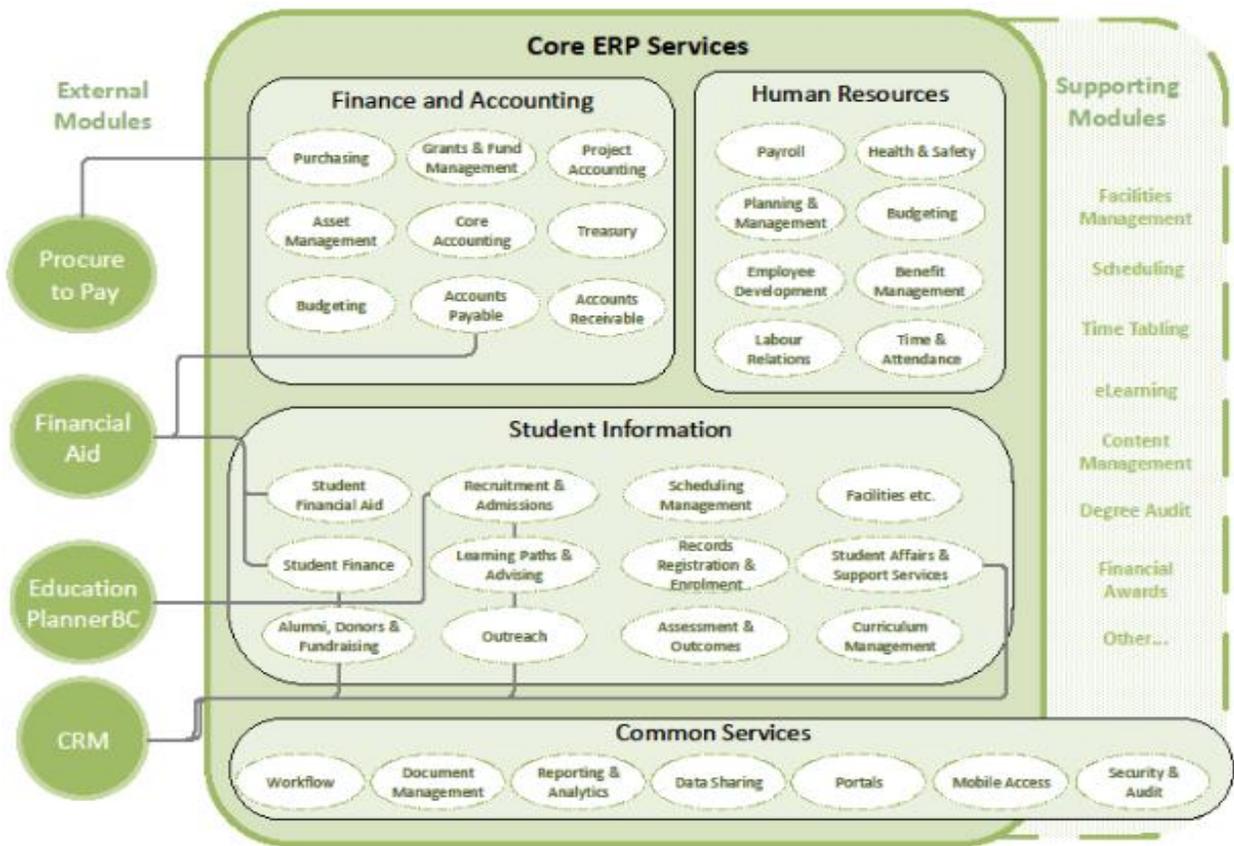
BCNET is a federally incorporated not-for profit services and information technology organization that represents the interests of its member institutions (to include 25 publicly funded) made up of universities, colleges, institutes and research organizations across British Columbia. It represents all public, post-secondary education institutions in the province and provides shared services to its members in the areas of networks, procurements, licensing and IT services.

This unique, collaborative shared services model provides a multitude of benefits to its members from reducing and containing costs and increasing spending power, to decreasing duplication and improving service quality and productivity. The model cultivates a strong community, where members actively engage with peers to share, explore and develop innovative ideas and solutions as they tackle a broad spectrum of common and unique research and education technology challenges and topics. BCNET strives to add value to its membership by leveraging an advanced network that provides economies of scale to maximize efficiencies and drive down collective costs, while at the same time, continuing to facilitate collaborative innovative solutions that meet the needs of their stakeholders in support of world-class research and education.

Ellucian Banner Cloud (EBC) is a leading enterprise resource planning (ERP) and complete student information system for post-secondary institutions. It is designed to support the higher education sector in staying competitive while delivering a convenient, connected technology experience anytime from any device. The platform allows institutions to create an integrated digital platform for all users (faculty, staff, students) making it easier to communicate, obtain information and accomplish tasks (including self-service options that enable user access to features).

EBC is based on transformative technology, mobile-first design and an intuitive interface with a comprehensive set of tools that connects departments and streamlines processes with complete, end-to-end functionality. The system supports the core mission of PSI's, while increasing productivity and providing innovative solutions for users.

The diagram below illustrates the main administrative functions of "core Enterprise Resource Planning (ERP) services" that are often conducted with Ellucian products:



In the coming years, many institutions will move some or the majority of their operations to the cloud. By using cloud technology, EBC reduces the cost of maintaining ERP systems with consistent and seamless component deployments while delivering a complete higher education approach:

- Safe, cost-effective and reliable and controlled platform
- Commitment to choice through pace and delivery method (cloud hosting, SaaS or on-premise)
- Unparalleled higher-education specific functionality (improving services and the student experience)
- Ellucian cloud maintenance

EBC is hosted by Amazon Web Services in Montreal and is fully cloud enabled. It is viewed as a foundational service linked to the delivery of BCNET member programs services and activities. EBC is available to all BCNET members who are Ellucian Banner licensees. A key component of facilitating innovative information technology (IT) solutions through this advanced network is ensuring they are hosted, accessed, managed and protected within a secure environment in accordance with Provincial (*Freedom of Information and Protection of Privacy Act*, FOIPPA) privacy laws, regulations and controls.

BCNET is committed to monitoring the ongoing deployment of EBC for compliance with provincial privacy and security legislative requirements, policies and practices, and working with its members to strive to reduce the privacy risks associated with the legislative requirements accordingly. These privacy risks are in turn managed through a combination of technical, administrative and physical controls that mitigate the associated risk.

This privacy impact assessment (PIA) is intended to support the ongoing use of EBC by its members, and to ensure that this cloud-based service is offered and provided in a way that allows BCNET users to continue to be compliant with the *Freedom of Information and Protection of Privacy Act* (FIPPA).

2. Scope of this PIA

This PIA covers the use of EBC, its services and operational controls as it relates to Privacy, Security, and Data protection in British Columbia. Other components of the Ellucian Platform are outside the scope of this PIA.

3. Related Privacy Impact Assessments

No other PIA's have been completed on this initiative.

4. Elements of Information or Data

In this context the personal information (PI) is that which is required and provided directly from individuals to participate in any BCNET member's activity or program and then moved in to the EBC platform by those members.

The collection of all personal information from the individual will continue to be the responsibility of the BCNET member (e.g. the provincial, public sector organization managing the application/operating system). Examples of personal information include: name, address, date of birth, phone no., gender etc. and may also include highly sensitive personal information as provided by the member to EBC. The BCNET member is also responsible for the secure transmission of the data from their operating system to the EBC platform. The platform offers members strong encryption for content in transit or at rest, including the option to manage their own encryption keys.

5. Storage or Access outside Canada

The Ellucian Banner Cloud platform is hosted on Amazon Web Services (AWS) in the AWS Canada Region. Assessment of this platform, including disaster recovery options, is covered in [BCNET's Amazon Web Services \(AWS\) Canada Privacy Impact Assessment \(PIA\)](#).

6. Data-linking Initiative*

<p>In FOIPPA, "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.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	Yes
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
<p>If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.</p>	

*EBC may be used as a vehicle for data linking, but any data linking that occurs is under the control of the public body.

7. Common or Integrated Program or Activity*

<p>In FOIPPA, "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>	
1. This initiative involves a program or activity that provides a service (or services);	Yes
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
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	N/A
<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>	

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table - Employee			
	Description/Purpose	Type	FOIPPA Authority
1.	PSI user (HR/Payroll staff) enters employee personal information into EBC upon hire.	Collection	26(c)
2.	PSI user securely logs in to EBC to provide, obtain or edit information (eg. HR/Payroll staff uploading employee pay and/or benefits details).	Use	32(a)
3.	Employee securely logs in to view HR/Payroll data.	Use	32(a)
4.	PSI user views EBC for additional info (related to staff pay, benefits, etc as above).	Use	32(a)
5.	<p>PSI user send relevant employee pay information to bank for direct deposit pay purposes.</p> <p>HR/Payroll staff send relevant employee demographic and entitlement information to benefits carriers for employee benefits.</p> <p>HR/Payroll staff send relevant employee demographic and entitlement information to unions for labour relations purposes.</p> <p>HR/Payroll staff send relevant T4 and T4A information for employees to the Canada Revenue Agency for income tax purposes.</p>	Use & Disclosure	32(a) 33.1 33.2

Personal Information Flow Table – Student/Instructor			
	Description/Purpose	Type	FOIPPA Authority
1.	Student information is entered into EBC upon enrollment & registration process (by PSI user [Registrar] for student).	Collection	26(c)
2.	Faculty securely logs in to EBC to obtain or edit information (eg. Instructor uploading student grades).	Use	32(a)
3.	Instructor logs in to EBC & assesses grades to determine pass/fail of course.	Use	32(a)
4.	Student logs in to EBC & views record (e.g. attendance, course info, grades, financial aid, etc.) in EBC.	Use	32(a)

5.	Instructor views EBC for educational info (related to student attendance/grades as above).	Use	32(a)
6.	Registrar's Office send relevant T2202 information for students to the Canada Revenue Agency. Registrar's Office staff sent relevant student loan and entitlement information to StudentAid BC.	Use & Disclosure	32(a) 33.1 33.2

9. Risk Mitigation Table

NOTE:

It should be noted that primary responsibility for the management and administration of any physical and/or technical security risks is born by any BCNET member choosing to deploy and utilize EBC. These privacy risks are managed through a combination of technical, administrative, and physical controls that are designed and in place to mitigate each associated risk.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Unauthorized individuals could access the personal information in the system and use or disclose it for personal purposes (within BCNET member environment).	Employee Code of conduct and Non-disclosure agreements; Use of Information & Technology Policies, password protected access, user access to system, based on need to know basis, permission restrictions, controls, and monitoring.	Low	High
2.	BCNET member personal information data is compromised during transmission from the member to EBC.	Data transmission is encrypted with 256 bit AES, TLS 1.1 or 1.2 encryption and over a secure line. Encryption keys are managed by BCNET members.	Low	High
3.	EBC/AWS Security Breach	EBC breach protocols are in place to reduce risks to member data in the event of a security breach. Furthermore, data is always encrypted during transmission or while being stored by EBC.	Low	High

10. Collection Notice

The BCNET member is responsible for ensuring the appropriate collection notification (for the specific application/program) is in place prior to the collection of personal information and before transmission to EBC Server.

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

BCNET and their service providers are responsible at all times for ensuring the physical security of all data while in their custody and/or control (including all data at rest or in transit) and must meet all applicable physical security standards required by their organization.

EBC:

The EBC Platform is hosted on Amazon Web Services (AWS) in the AWS Canada Region. Assessment of this platform, including disaster recovery options, is covered in [BCNET's Amazon Web Services \(AWS\) Canada Privacy Impact Assessment \(PIA\)](#).

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

BCNET members and their service providers are responsible at all times for ensuring the technical security of all data while in their custody and/or control (including all data at rest or in transit) and must meet all applicable technical security standards required by their organization.

EBC:

EBC employs a host of information security policies, processes and controls. See attached security documents.

13. Does your branch/department rely on any security policies?

BCNET members and their service providers are responsible for the deployment, dissemination and administration of all organizational security policies etc. as it relates to the handling and management of personal information in their custody and/or control.

EBC:

EBC employs a host of information security policies, processes and controls. See attached security documents.

14. 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.

BCNET members and their service providers are responsible for the strict management and administration of user access based on a "need to know" basis only including maintenance and enforcement.

EBC:

EBC developers complete security training and security scans. Scans are performed every time a developer checks in code, including static code analysis, dynamic application scans and pen testing. All data is encrypted while transiting through EBC. EBC staff do not have access to unencrypted client data. External application users must be granted explicit access to perform updates. Strict access controls applying the most restrictive permissions are in place and regularly audited.

15. Please describe how you track who has access to the personal information.

BCNET members and their service providers are responsible for ensuring that access to all personal information in their custody and/or control is controlled, monitored, and reviewed/audited on a regular basis.

EBC:

EBC developers complete security training and security scans. Scans are performed every time a developer checks in code, including static code analysis, dynamic application scans and pen testing. All data is encrypted while transiting through EBC. EBC staff do not have access to unencrypted client data. External application users must be granted explicit access to perform updates. Strict access controls applying the most restrictive permissions are in place and regularly audited.

EBC will not change the way institutions process data, or the way data is linked – the primary change will be the ability for Ellucian to theoretically access data (if any) and protocols in place to mitigate risk of disclosure. This includes:

- Ellucian staff would not interact with client data on a day to day basis. They do administer the “containers” of client data such as databases to do backups, upgrades, patches, etc. Many of those processes are automated or semi-automated.
- On occasion, Ellucian staff may access client data to assist a client in resolving a specific issue.
- In terms of risk mitigation, access to the cloud environment, Ellucians SSAE-18 SOC1 and SOC-2 reports show controls and control objective.
- Access is limited to those employees which a job responsibility to administer the environment.
- All client data stay within the cloud (Canada) environment.
- Access is via 2-factor VPN and logged
- Change Management
- Logging

Institutions typically create security groups and classes to grant users access to screens and datasets on a need-to-know basis.

- 16. 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 public body notify them of the update, correction or annotation?**

Updates to an individual's information (employee/student) is recorded in EBC systems by the PSI or student. The PSI or student will then contact each area to make notification of the change.

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

Responsibility for ensuring all personal information is up to date and accurate lies with the registered user and BCNET member.

- 18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

Responsibility for ensuring all personal information is up to date and accurate lies with the registered user and BCNET member. Member is responsible for reviewing EBC logs for errors and following up on any inconsistencies.

- 19. If you answered "yes" to question 17, do you have 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?**

Responsibility for ensuring accurate and current records retention and/or disposition schedules lies with each individual BCNET member. Records are not retained in EBC for any purpose.

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

No.

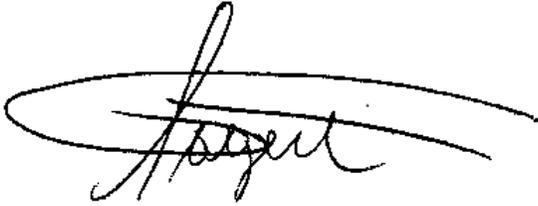
- 21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.**

No. EBC does not inherently expose PI for research or statistical purposes, although aggregated usage statistics and logs may be reviewed by member institutions.

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

No. BCNET members will be creating PIB's during the use of EBC.

BCNET Program Manager



March 26, 2020

Garry Sagert
ERP Project Lead
BCNET

Signature

Date

Head of BCNET

Bala Kathiresan
President & Chief Executive Officer
BCNET

Signature

Date

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