



# Privacy Impact Assessment

## Emily Carr University of Art + Design

### Continuing Studies – Micro-credentials Project

PIA# 2021-05

#### Part 1 – General

<b>Name of Department/Branch</b>	Continuing Studies		
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<b>Program Manager:</b>	Tiffanie Ting		
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#### 1. Description of the Initiative

The purpose of the Micro-credentials project is to implement a web-based software service, offered by EdInvent, Inc., D.B.A. (as Accredible), that enables digital credentials to be issued to students who successfully complete one or more courses or programs offered by Emily Carr University of Art and Design (ECU).

Micro-credentials are digitally created documents (such as badges and certificates) that are more flexible than the traditional academic documents, as they can be awarded when a student completes a single course, multiple courses, or an entire program. The digital nature of these tokens makes them more useful to the student as the student has the option to share them on social media and professional sites and use them to pursue their professional objectives.

Executing this project will transform the way ECU recognizes the academic accomplishments of students, and display ECU's commitment to keeping with the trends, and to lifelong learning. This project is expected to increase student uptake in courses, program offerings and brand awareness

#### 2. Scope of this PIA

- Integration of the ECU's Enterprise Resource Planning application (i.e., Colleague) and Learning Resource Management systems (i.e., Moodle)
  - o Data (including personal information) will be transferred from Colleague to the Micro-credentials' solution
  - o This data will then be used to create the credential record for the student, on an ongoing basis
  - o The created credential record will then be shared with the student, and stored in the cloud on servers located in the US (the location of servers to be confirmed with the



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vendor)

**3. Related Privacy Impact Assessments**

- No previous assessment has been done on this initiative

**4. Elements of Information or Data**

Course Information				
Name	Type	Description	Example	Source
Course Name	Text	The title or unique identity of the course the student will register, and be issued a micro-credential for	Introductory Web Design	Colleague
Course Code	Varchar	A unique alpha-numeric combination assigned to the course	CEDA 100	Colleague
Course Description	Text	A brief description of the content provided within the course		Colleague
Course Credits	Integer	A recognition mechanism for courses taken, as part of the requirements for graduation.	3	Colleague
Course Program	Text	The umbrella term used to define a group of related courses, for which a micro-credentials badge and/or certificate will be awarded	Web Design	Colleague
Course Duration	Varchar	A numerical description of how much time (in hours) will be required to complete the course		Colleague
Semester	Varchar	A specification of the term in which the student will take the course	Fall 2020	Colleague
Course Start Date	Date	Format = DD/mmm/YYYY?	01/Sep/2020	Colleague
Course End Date	Date	Format = DD/mmm/YYYY?	02/Sep/2020	Colleague



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Student Information				
Name	Type	Description	Example	Source
First Name	Text	Student's first name (Consistent with preferred naming hierarchy in Colleague)?	John	Colleague
Last Name	Text	Student's surname	Doe	Colleague
Email Address	Varchar		<a href="mailto:jdoo@ecuad.ca">jdoo@ecuad.ca</a>	Colleague
Student ID Number	Text	Student's ID number	0012345	Colleague
Grades	Text	A letter representation that indicates the student's performance in the course.	Pass	Colleague

Badge Record				
Name	Type	Description	Example	Source
Badge ID	Short	Unique identifier for the instance of the badge or certificate to be created and issued		Micro-credentials Solution
Badge Name	Text	Mapped from course name in Course Information	Introductory Web Design	Micro-credentials Solution
Badge Criteria	Text	Mapped from Grades in Course Information		Micro-credentials Solution
Badge Image	Image	An uploaded or system-created image that will provide a visual representation of the badge or credential that will be awarded to the student	N/A	Micro-credentials Solution
Badge Issuer	Text	The name of the individual, entity or institution that awarded the badge to the student	Emily Carr University	Micro-credentials Solution
Badge Recipient	Text	Concatenation of first and last name from Student Information table	John Doe	Micro-credentials Solution



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<b>Tags</b>	Text	A one-worded description of the type of achievement. Multiple one-word selections would be possible for this data element		Micro-credentials Solution
<b>Alignment</b>	Text	A definition of the objectives or educational standards provided by a professional or governing body that the course is compliant with		Micro-credentials Solution
<b>Badge Issue Date</b>	Date	The date stamp that represents the point in time that the badge was issued to the student	01/Oct/2020	Micro-credentials Solution
<b>Expiration Date</b>	Date	Optional field indicating a specific point in time, after which the badge will no longer be considered valid unless renewed	30/Sep/2023	Micro-credentials Solution
<b>Evidence</b>	Text	Mapped from Course Description in Course Information table		Micro-credentials Solution
<b>Endorsement</b>	Text	A claim, made by an individual, entity or organization regarding the badge that has been issued, that provides a certification of trustworthiness		Micro-credentials Solution
<b>Language</b>	Text	A single selection of the language the course was instructed in. This could also be expressed as a tag	English	Micro-credentials Solution
<b>Version</b>	String	A number used as a mechanism to update a badge class without changing the meaning of previously awarded instances of the same	2.0	Micro-credentials Solution



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		badge, and allows for duplication and linkage to the previous version		
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## Part 2 – Protection of Personal Information

### 5. Storage or Access outside Canada

The Micro-credentials service is offered by Accredible. Accredible hosts, maintains and operates services and cloud infrastructure on Amazon Web Services (AWS) platform and Google Cloud Storage in the United States. User content can also be found in Accredible's backups, stored in AWS EC2, S3, Glacier, and GCS.

Accredible intends to use commercially reasonable efforts to:

- deploy industry standard security and encryption controls including without limitation, firewall and SSL technology.
- monitor, track, and report on Certificate Cloud Services availability; and
- limit access to the Services only to Authorized Users.

Data in-transit is encrypted using Transport Layer Security. Data at-rest is encrypted using AES encryption with a unique encryption key for each server. As well, All Accredible backups are encrypted with AES encryption.

Authority for Accredible to access and store user information as described above on servers outside of Canada is granted via privacy notice to impacted users and collection of signed consent forms. (Sample consent form can be found in Appendix B of this PIA for your customization)

### 6. 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



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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.	<b>No</b>
<b>If you have answered "yes" to all three questions, please contact the privacy office(r) at <a href="mailto:privacy@ecuad.ca">privacy@ecuad.ca</a> to discuss the requirements of a data-linking initiative.</b>	

**7. Common or Integrated Program or Activity\***

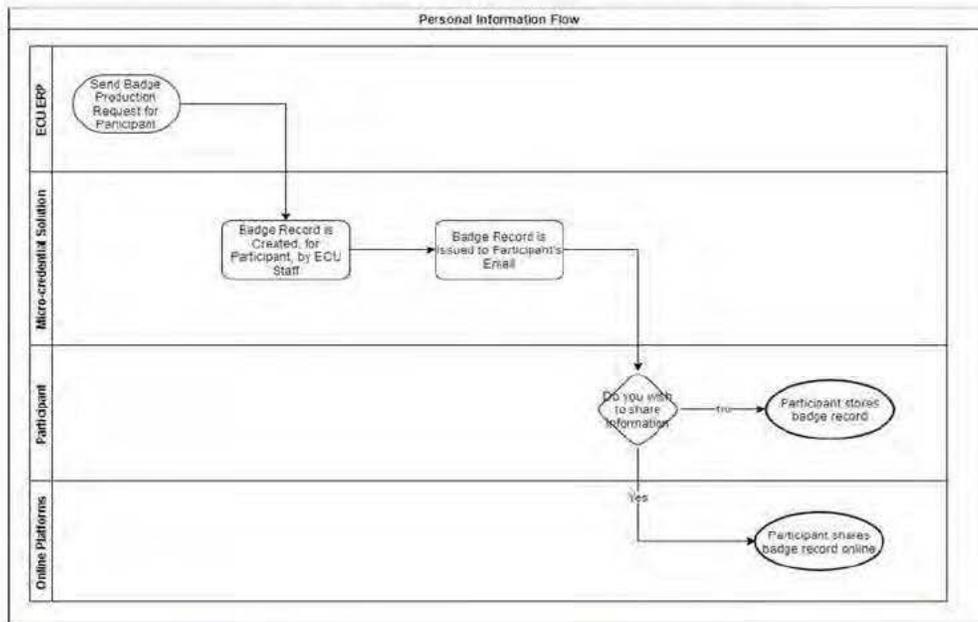
*In FIPPA, "common or integrated program or activity" is strictly defined. Answer the following questions to determine whether your initiative qualifies as "a common or integrated program or activity" under the Act. If you answer "yes" to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.*

1. This initiative involves a program or activity that provides a service (or services).	<b>Yes</b>
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.	<b>No</b>
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	N/A
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	<input type="checkbox"/>



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



Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Student and Course Information is transferred to the Micro-credentials' solution from Colleague	Use	32(a) and 32(b)
2.	The Micro-credentials' solution will use the data provided from Colleague to create a badge record for the student(s)	Use	32(a), 32(b)
3.	Once the badge record has been created, the record will be issued to the student's email address	Disclosure & Use	33.2(c) and 32(a)



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4.	<i>Student Stores Badge Record</i>	<i>Retention, use and access</i>	31,32
5.	The Micro-credentials solution will retain students' account information for internal and administrative purposes only (e.g., to track how many accounts have been created, or how many badges have been awarded, in total or to a particular account holder)	<i>Retention &amp; Disclosure</i>	31, 30.1(a) and 33.1(1)(p)

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The software vendor will, as part of the project's deliverables, create a Canadian AWS instance that will be used to host the ECU-licensed version of the software solution and store the data created. As an interim workaround, a privacy/consent note will be added in the solution to inform students of the interim privacy situation. This is consistent with the approach taken for other IT-related projects.

**9. Risk Mitigation Table**

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Employees shall sign a contract that binds them to a code of conduct that prohibits such practices, prior to being granted access to the system	Low	High
2.	Student's personal information is compromised when transferred to the host platform	Transmission is encrypted and over a secure line (and only accessible via VPN?). Pre-implementation testing is conducted to ensure that the data is correctly read	Low	High
3.	The Micro-credentials application is unable to read the received data	Ensure the micro-credentials application can read received data during the testing period of the execution phase	Low	Medium
4.	Inherent risks in sending personal information to a student via email	Policy developed to inform clients of risk. Limiting this option to clients can be considered.	Low	Medium



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5.	Unauthorized individuals gain access to the system	System is hosted behind a secure firewall and requires authorized VPN access	Low	High
6.	System includes incorrect or inaccurate personal information	Status tracking of all information sent. Policy developed to advise students of responsibility to ensure accuracy of information provided, at the point of course registration, and duty to notify institution of any change of personal information	Low	Medium
7.	Unauthorized employees can access and use personal information.	ECU user and audit tracking. Accounts will only be created for a user after a signed copy of contractual agreement has been provided	Low	Medium
8.	Service provider privacy breach	Data encryption measures	Low	High

**10. Collection Notice**

This initiative will not collect data directly from individuals, but from ECU database(s) *A portion of this initiative is collecting personal information directly from individuals. All individuals involved must be told the following (FIPPA s.27(2)):*

1. The purpose for which the information is being collected
2. The legal authority for collecting it, and
3. The title, business address and business telephone number of an officer or employee who can answer questions about the collection.

**Signup form, Opt-in Notification:**

We are required to inform you that by signing up:

- You consent to your personal information being collected, used, disclosed and stored as set out in [Micro-credential's Privacy Policy](#) and agree to abide by [Terms of Use](#).



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- You understand and acknowledge that this service utilises a platform, which is located in the United States of America (USA) and relevant legislation of the USA will apply.
- You can opt out if you choose by contacting ECU [[helpdesk@ecuad.ca](mailto:helpdesk@ecuad.ca)].

### Part 3 – Security of Personal Information

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

*For example: locked cabinets, securely stored laptops, or key card access to the building.*

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

*For example: use of firewalls, document encryption, or user access profiles assigned on a need-to-know basis.*

*Data is stored at a secure tier 3 SOC 2-certified data center.*

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

*Please describe any specific policies and procedures and provide contact details for someone who could answer further questions regarding these policies and procedures.*

#### 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.

*For example: role-based access.*

*Role-based access control framework ensures data is only provided to employees where their job responsibilities require it.*

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

*For example: audit trails or physical sign-in and sign-out of files.*

### Part 4 – Accuracy, Correction + Retention of Personal Information

#### 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?



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*For example: users have access to update their own information or, notes will be made on a case file.*

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

*Yes, badge record in the form of digital credentials is created and issued to students that have successfully completed one or more courses or programs offered by ECU.*

- 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.**

*For example: check to see that the information was obtained from a reputable source such as another government agency.*

- 19. If you answered “yes” to question 17, 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?**

*If you do not yet have a schedule, please document how these records will be kept until the schedule is in place. Please describe retention schedules that apply where retention exceeds the one-year requirement of FIPPA. Please contact your public body’s privacy office(r) and/or records office(r) if you require assistance.*

### Part 5 – Further Information

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

*For example: your department has a regular exchange of personal information (both collection and disclosure) with the federal government in order to provide services to your clients.*

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).



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

*For example: your public body will be disclosing information to PhD students so that they can conduct research.*

**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).**

**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 FIPPA. Under this same section, this information is required to be published in a public directory.**

*A personal information bank means a collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol, or other particulars assigned to an individual.*



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**Part 6 – Privacy Officer Comments**

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

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Privacy Office Representative

Signature

Date



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**Part 7 – Program Area Signatures**

<i>Tiffanie Ting</i>		December 6, 2021
Program/Department Manager	Signature	Date
<i>Sandeep Sidhu</i>	<u><i>Sandeep Sidhu</i></u>	Dec 16 <sup>th</sup> 2021
Contact responsible for Systems Maintenance and/or Security (Signature not required unless they have been involved in the PIA)	Signature	Date
Head of Public Body (or designate)	Signature	Date
<i>Adrian Tees</i>		

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

If you have any questions, please contact [privacy@ecuad.ca](mailto:privacy@ecuad.ca).