



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *WebSpace Project Phase 1*

### **Part 1 – General**

|                            |  |        |                       |
|----------------------------|--|--------|-----------------------|
| Name of Department/Branch: | Center for Teaching and Educational Technologies                         |        |                       |
| PIA Drafter:               | Bev Hooper   |        |                       |
| Email:                     | <a href="mailto:Bev.hooper@royalroads.ca">Bev.hooper@royalroads.ca</a>   | Phone: | 250 391-2600 ext 4178 |
| Project Manager:           | Araz Hamian  |        |                       |
| Email:                     | <a href="mailto:Araz.hamian@royalroads.ca">Araz.hamian@royalroads.ca</a> | Phone: | 604 788-7229          |

#### **1. Description of the Initiative**

Royal Roads University (RRU) would like to enhance their educational technology offerings using an open-source web publishing technology (Wordpress) for two use cases:

- 1) Provide web self-publishing options for students, in programs where instructors and course learning activity require the capability (student sites).
- 2) Enable the revised MALAT program to accomplish its education goals through a networked learning and open pedagogy learning environment (learning sites).

Historically, RRU's Centre for Teaching and Educational Technologies (CTET) has received numerous requests from faculty and program directors for a variety of course, faculty, and student-focused web publishing applications. In the past, CTET has supported such requests by recommending the use of commonly available, open source or low-cost technology solutions. In addition, the Masters of Arts in Learning and Technology (MALAT) program has submitted a program and curriculum renewal based on feedback from the stakeholders and their five year review. Network learning and open pedagogy are two of the revised MALAT program core design principles. This project will facilitate this learning environment.

RRU has selected Wordpress as the underlying technology platform for its WebSpace service. Wordpress is an online, open-source content management system. Wordpress is a flexible content publishing platform that can be adapted to fit a wide variety of user functional requirements using different plug-ins, theses and templates. It is a self-publishing tool that allows users to quickly set up and use websites, and can be configured to meet both of the use cases described above. It also allows learners to easily migrate to their content and artifacts from the RRU platform to another platform of their choosing after graduation, granting them ongoing access to their

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materials. Wordpress is currently in place at a number of post secondary institutions within British Columbia, and is a good functional fit for RRU.

RRU's WebSpace service will be hosted by a Canadian third-party Platform as a Service (PaaS) vendor, WPCloud.

This approach will enable RRU to meet the functional needs of its faculty and students while minimizing the requirements for on-premises RRU infrastructure and resources to support the service.

## Section 15(1)(l), Section 21

For Phase 1, CTET will provision user accounts for each student, faculty, and administrative user who needs access to the system. The user must already have an RRU account (username and password) – these are automatically provisioned. CTET will need to know the first and last name of the user and their RRU username in order to provision their account. Once the account is provisioned, the user will receive an email with a link instructing them to log in using their existing RRU credentials.

Once a user has logged into the WebSpace system using their existing RRU credentials, they will be able to set the privacy settings on their individual website so that it's completely private to the user, viewable only by selected individuals such as their instructor and/or fellow students, or completely public.

Regardless of how a user sets their privacy settings, if a second user on the system knows their RRU user name, the second user can search and find the user's site. However, the second user will not be able to see any information that the site owner has not allowed them to access.

The owner of an individual WebSpace website may choose to give other individuals editor or contributor privileges on their website, for example for collaborative projects. In order to do so, the owner will need to find out the email address of the other individual via another means – this information will not be shared by the WebSpace service.

All users of WebSpace are bound by RRU's Computer Usage Policy:  
<http://policies.royalroads.ca/policies/computer-usage-policy>

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In addition, faculty and staff users are bound by RRU's Employee Code of Conduct and the Confidentiality Policy (links below). The Code of Conduct includes a section on employee's responsibilities with regards to records management as related to FOIPOP.

<http://policies.royalroads.ca/policies/code-conduct-policy>

<http://policies.royalroads.ca/policies/confidentiality-policy>

Student users must follow the RRU student rights and responsibilities procedures (link below), which includes the procedure to be followed if a student violates existing RRU policies:

<http://policies.royalroads.ca/procedures/student-rights-and-responsibilities-procedures>

## **2. Scope of this PIA**

This PIA covers the implementation of WebSpace using a Wordpress platform in support of the enhancement of RRU's education technology offerings for its various programs and courses.

## **3. Related Privacy Impact Assessments**

None. This is the first PIA for this initiative

## **4. Elements of Information or Data**

Student, instructor, and administrative staff first and last names, RRU email address, and RRU account usernames. Student work product, instructor's comments and evaluations. Student, instructor and administrative staff analytics: when they logged in and how long they were logged in for.

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The following screenshot shows the consent form that users are presented with the first time they access the system.

**You are about to access the service:**

webspacespace.royalroads.ca of  
\$encoder.encodeForHTML(\$rpOrganizationName)

**Information to be Provided to Service**

|                        |                         |
|------------------------|-------------------------|
| commonName             | WP Student              |
| displayName            | WP Student              |
| eduPersonAffiliation   | student;member          |
| eduPersonPrincipalName | wpstudent@royalroads.ca |
| email                  | WPStudent@RoyalRoads.ca |
| givenName              | WP                      |
| surname                | Student                 |
| uid                    | wpstudent               |

The information above would be shared with the service if you proceed.  
Do you agree to release this information to the service every time you access it?

**Select an information release consent duration:**

This setting can be revoked at any time with the checkbox on the login page.

Ask me again at next login. I agree to send my information this time.

- Ask me again if information to be provided to this service changes. I agree that the same information will be sent automatically to this service in the future.

Do not ask me again. I agree that **all** of my information will be released to **any** service.

REJECT ✕

ACCEPT ▶



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From WPCloud:

When you visit our Websites, our server logs your IP address (unique network addresses), the time and duration of your visit, and the time and duration of the pages on our website you view. If you arrive at our website by clicking a paid advertisement (including a paid search engine result) or via a link in an email, then we will capture information that tracks your visit from that link. If you arrive at our Website by clicking a non-paid source, such as link in a non-paid search engine result or a hyperlink on another website, we may capture information that tracks your visit from that source, to the extent we are able to do so. We may also capture information about your computer system, such as your browser type and operating system.

We will likely place a cookie on your hard drive during the web visit. A cookie is a unique alphanumeric identifier that we use to help us identify the number of unique visitors to our Website, whether or not those visitors are repeat visitors, and the source of the visits. Cookies cannot be executed as code or used to deliver a virus. Other servers cannot read them and personal information cannot be gathered from them. They are simply an identifier shared between you and us to allow us to improve the services we offer to you through our Website. If you do not wish cookies to be placed on your computer, then they can be disabled in your web browser. The option to do so is found in your browser's "security settings" section. Permanently disabling cookies in your browser may hinder your use of our Website as well as other websites and interactive services.

*We do not collect personal information about you as part of a web visit, but web visit information may be tied to other information (including personal information) we collect from you via chat, web forms, and the other means we describe in this Privacy Statement.*

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to your privacy office(r). They will guide you through the completion of your PIA.

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### Part 2 – Protection of Personal Information

*In the following questions, delete the descriptive text and replace it with your own.*

#### 5. Storage or Access outside Canada

# Section 15(1)(l), Section 21

#### 6. Data-linking Initiative\*

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.

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

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

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.

|  |     |
|--|-----|
| 1. This initiative involves a program or activity that provides a service (or services);   | Yes |
| 2. Those services are provided through:<br>(a) a public body and at least one other public body or agency working collaboratively to provide that service; or<br>(b) one public body working on behalf of one or more other public bodies or agencies; | No  |
| 3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.  | No  |
| <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>   |     |

***\* 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 public body’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 public body’s privacy office(r) to determine how to proceed with this notification.***

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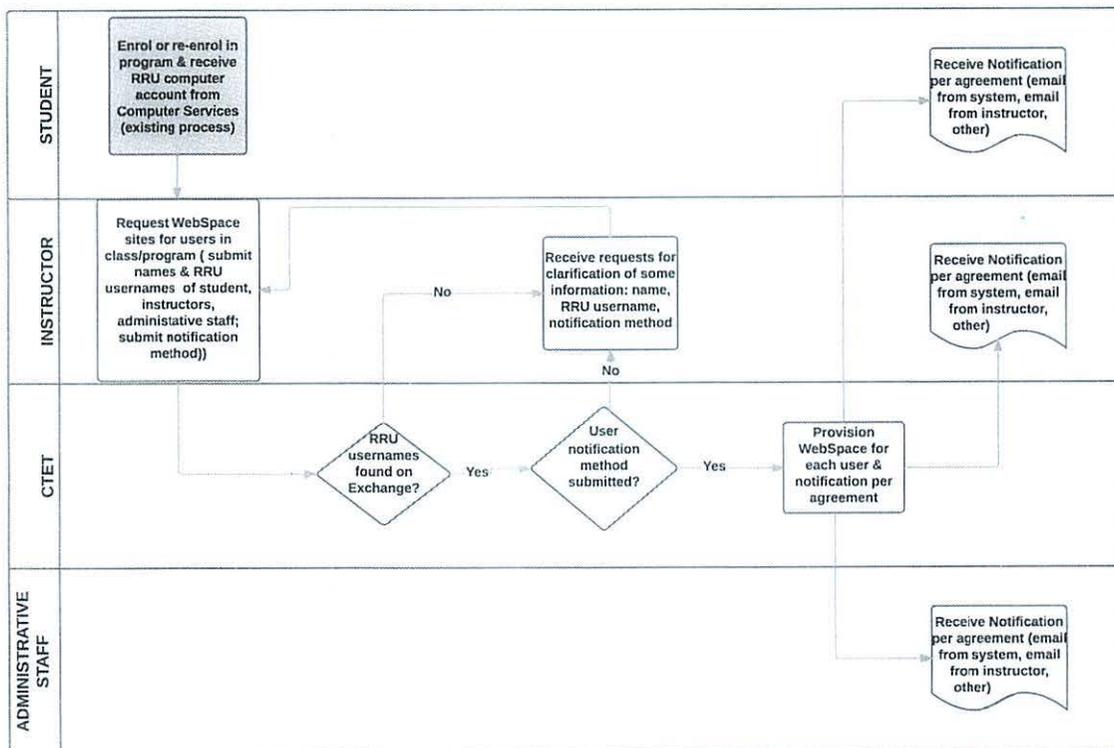
## WebSpace Project Phase 1

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

**Diagram 1: Flow of information for provisioning a user account**

WEBSpace SYSTEM - PHASE 1

Ariaz Hamian | November 16, 2016



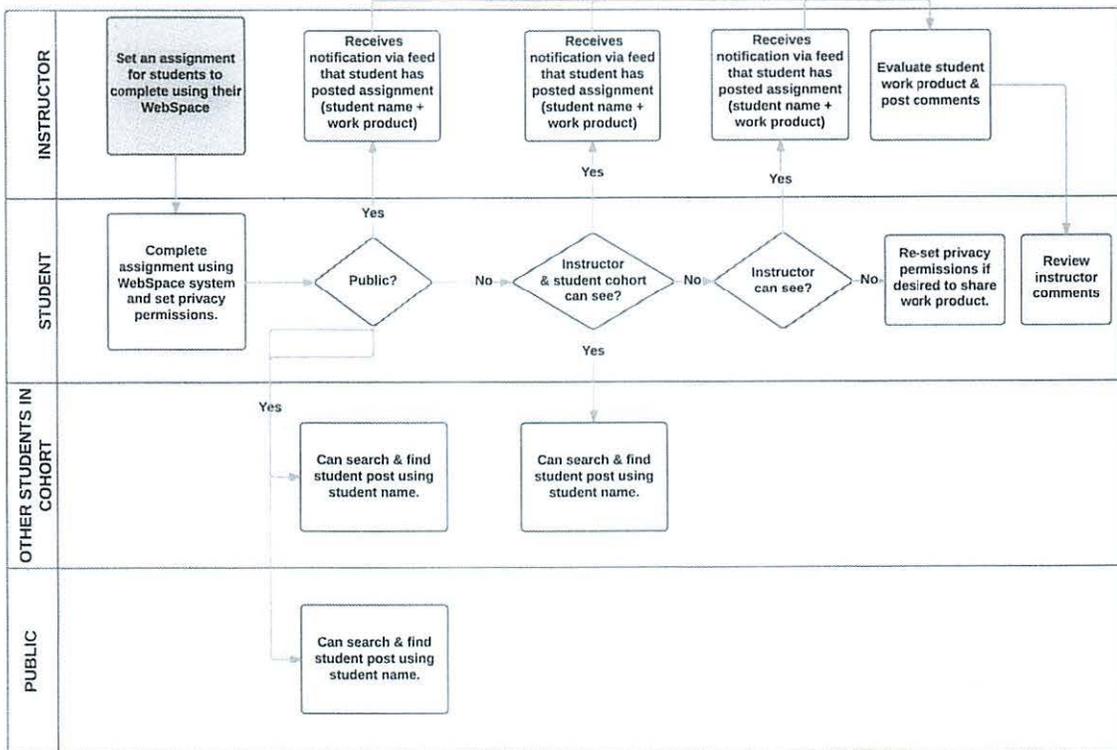
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## WebSpace Project Phase 1

Diagram 2: Flow of information for a student post

WEBSpace SYSTEM - PHASE 1

Araz Hamian | November 17, 2016



Examples can be removed and additional lines added as needed.

| Personal Information Flow Table |   |      |                  |
|---------------------------------|---|------|------------------|
|                                 | Description/Purpose   | Type | FOIPPA Authority |
| 1.                              | Instructor requests WebSpace sites for users in class/program | Use  | S.32(a)          |

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|    |   |                    |                     |
|----|---|--------------------|---------------------|
| 2. | CTET identifies RRU usernames and email addresses via the university student system   | Use                | S.32(a)             |
| 3. | CTET provisions WebSpace for each user and notifies instructor and administrative staff once completed.   | Use                | S.32(a)             |
| 4. | Student receives notification via email from the instructor that their Webspace has been provisioned.   | Use                | S.32(a)             |
| 5. | Student/instructor/administrative staff log into Webspace using existing RRU username and password.   | Use                | S.32(a)             |
| 6. | Students complete and post assignments using WebSpace system and sets access permissions for either public viewing, instructor and student cohort viewing, only instructor viewing or no viewing. | Use and Disclosure | s.32(a) and 33.1(b) |
| 7. | Instructor receives notification that student has posted assignments and may then evaluate student work product   | Use and Disclosure | s.32(a) and 33.1(b) |
| 8. | Other students in cohort may search and find student post using student name if privacy settings set by each student permit this.   | Use                | S.32(a)             |
| 9. | Public may search and find student posts using student name if privacy settings set by each student permit this.  | Use                | S.32(a)             |

### 10. Risk Mitigation Table

*Examples can be removed and additional lines added as needed.*

| Risk Mitigation Table |   |  |            |        |
|-----------------------|---|--|------------|--------|
|                       | Risk  | Mitigation Strategy  | Likelihood | Impact |
| 1.                    | Students could access personal information of other students and use or disclose it for personal purposes | Student determines who has access to view & comment on their own site. Students are reminded of their academic responsibilities per RRU policy, and also of RRU appropriate use guidelines, to not use/disclose others' personal information without permission. WPCLoud also has an acceptable use policy | Low        | High   |

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|    |   |  |        |        |
|----|---|--|--------|--------|
|    |   | on their legal page:<br><a href="https://wpcloud.ca/legal/">https://wpcloud.ca/legal/</a>  |        |        |
| 2. | Instructor may disclose student's personal information without their consent                    | Instructor does not have access to students' WebSpace site except by permission of each student. Instructors are reminded of RRU appropriate use guidelines. | Low    | High   |
| 3. | Student/Instructor personal information is compromised when transferred to the service provider | <b>Section 15(1)(l)</b>  | Low    | High   |
| 4. | Personal information is disclosed inappropriately by WPcloud                                    | WPcloud has and abides by appropriate security and privacy controls. See their Privacy Policy  | Medium | Medium |

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|  |  |  |  |
|--|--|--|--|
|  | here:<br><a href="https://wpcloud.ca/legal/">https://wpcloud.ca/legal/</a><br>Contractual privacy flow downs |  |  |
|--|--|--|--|

### 11. Collection Notice

Initial notification will occur when the student first registers with RRU. In addition the following notification will also be provided within the Terms of Use (provide link):

*Personal information provided for a RRU WebSpace website is collected under the authority of the University Act, and is subject to section 26(c) of the Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c.165. RRU will not disclose personal user information unless permitted by law or as directed by the user.*

*The personal information provided will be used to authenticate users to their own WebSpace website. Each user will have full administrative rights to their own WebSpace website.*

*For more information, please contact:*

*Privacy Officer  
Royal Roads University  
2005 Sooke Road  
Victoria, BC V9B 5Y2*

*Phone: 250-391-2600 ext 4178*

### Part 3 – Security of Personal Information

# Section 15(1)(I), Section 21

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

From Canadian Web Hosting site:

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## Section 15(1)(l), Section 21

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

## Section 15(1)(l), Section 21

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

From WPCloud legal page:

WPCloud is committed to industry best practices approaches concerning security measures to prevent the loss, misuse and alteration of the information in our possession. We use various security measures to protect the information we collect, as appropriate to the type of information, including encryption, firewalls, and access controls. We store information you provide to us on a computer system located in a controlled facility with a limited access. Visitor textual information is encrypted during transmission, our company databases are accessible only by WPCloud employees, contractors and agents on a need to know basis and who have entered into and are bound by a confidentiality and nondisclosure agreements with WPCloud.

**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.**

Each user is granted administrator privileges to their own site. It is then their own decision whether or not to grant editor or contributor privileges to others. Access to a WebSpace website

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to make changes to personal information by someone who does not have permission granted by the site owner is limited by the extensive security measures provided by WPCloud.

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

Only RRU's WebSpace service manager has access to analytics that show who has accessed the system, and privacy settings for each user's site. There is no auditing of access to this information. There is backup for the service manager.

### **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?**

Each User is responsible for the personal information that they provide at time of registration as well as the content that is loaded onto their site. If changes are required the individual is responsible for that process.

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

Yes – Instructors carry out academic evaluations of student work product that is posted to the student's own WebSpace.

**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.**

NA – It is the student's responsibility to ensure that their personal information on their WebSpace, as well as their work product, is accurate and complete.

**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?**

Yes

### **Part 5 – Further Information**

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

No

*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).*

21. 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).*

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

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



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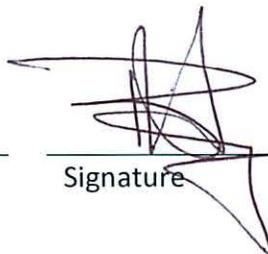
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### **Part 6 – Privacy Office(r) Comments**

*This PIA is based on a review of the material provided to the Privacy Office(r) as of the date below. 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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Bev Hooper  
Privacy Officer  
Royal Roads University



Signature

March 14/17  
Date



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## *WebSpace Project Phase 1*

### **Part 7 – Program Area Signatures**

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Roberta Mason  
Associate Vice-President  
Student and Academic Services  
Royal Roads University

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Signature

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Date

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Grainne Mcelroy  
Chief Information Officer  
Royal Roads University

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Signature

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Date

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Cheryl Eason  
Vice President and CFO  
Royal Roads University

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Signature

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Date

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

*If you have any questions, please contact your public body's privacy officer*