



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *WeVu Video for Health Programs Simulation Activities*

PIA# 2019\_001

clinical or practicum settings. The ability to capture skill demonstration on video provides those involved in clinical simulation experiences (students, faculty, simulation center staff, and health care professionals) the ability to review the simulated experience, debrief about areas of individual participant and/or team strengths and address ways to improve aspects of practice that require further development. The WeVu web-based application allows users to upload video of themselves and then provide commentary about their performance in real time on the video. Instructors and/or simulation leaders can provide the same type of commentary so students and simulation participants can review the taped performance on their own or with their instructor(s)/simulation leaders to identify demonstrated competencies and areas requiring further development.

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

This PIA would cover the use of WeVu to upload, store and discuss video files. Users would be students, instructors, health care professionals and, at times, community partners. Users will access the web application from any internet browser-enabled device. Typical devices used to access the application are smart phones, or in-lab computer webcams for recording and uploading video. Students will then access the video for review from their own private laptop/desktop computers while College faculty will view the video uploads from desktops/laptops that are property of the College. Faculty may also access the uploaded videos from their personal computers.

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

*There are no additional PIA's submitted for this initiative*

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

Names, email addresses, and user-chosen name of students and faculty using the application, audio and video of the simulation participants (primarily students and faculty but on occasion will include health care professionals and community partners), text/audio/video input by the user in the form of feedback, commentary or debrief/discussion, time of audio/video/text participation.

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.



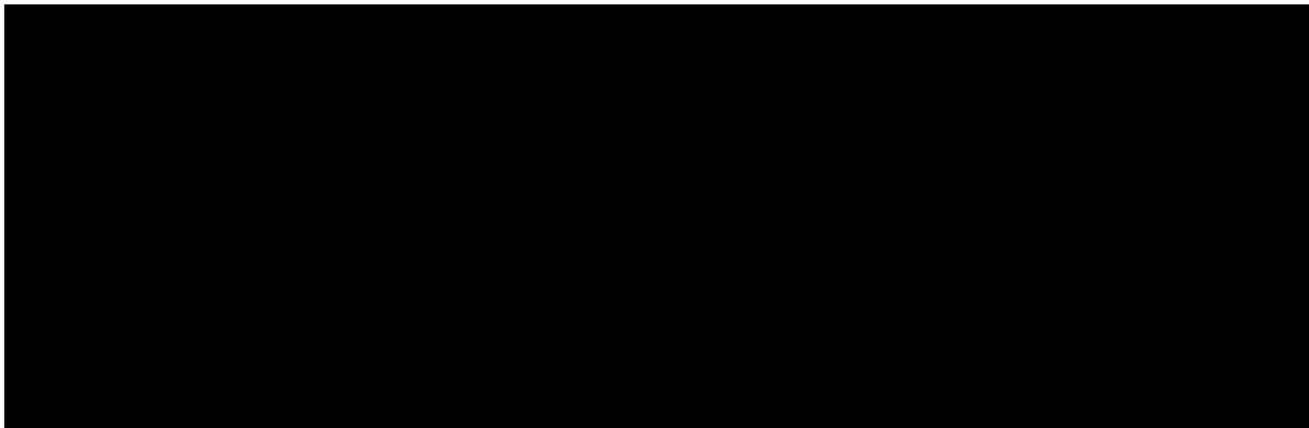
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## WeVu Video for Health Programs Simulation Activities

PIA# 2019\_001

### Part 2 – Protection of Personal Information

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



#### 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;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	N/A
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.	N/A
<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>	



# Privacy Impact Assessment for Non-Ministry Public Bodies

## WeVu Video for Health Programs Simulation Activities

PIA# 2019\_001

### 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>	
<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 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;</p>	N/A
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	N/A
<p><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></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 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.*



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *WeVu Video for Health Programs Simulation Activities*

PIA# 2019\_001

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

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Instructor or department staff require that students create an account on the WeVu service with clear communication of the intention, benefits to student learning and privacy protocols in place.	None	
2.	Student provides email address, name, and chooses a username on the WeVu web application. Or, in the case of SSO-integrated deployment, the student signs on with their institutional SSO credentials.	Collection	26 (c)
3.	Student uploads self-recorded videos of themselves and fellow students demonstrating their practice of assigned skill(s) in the learning setting; or Faculty or department staff record participant activity in simulation labs on campus and upload those videos to WeVu.	Use	32 (a)
4.	Faculty and/or department staff review videos to provide feedback and assess student performance	Use	32 (a)
5.	In some cases, student watch and review each other's performance in groups where the students' names are visible to each other. Students cannot see each other's email addresses.	Use and disclosure	32 (a) 33.2 (a)
6.	Instructors or program/ department staff download usage data or assessment from WeVu.video on to College issued computers for the purposes of entering student grades into the campus grades system. The data from WeVu is not disclosed anywhere to anyone outside the educational program.	Use and disclosure	32 (a) 33.2 (a)



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *WeVu Video for Health Programs Simulation Activities*

PIA# 2019\_001

### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Loss and disclosure of student names and email addresses and course enrolment	Use and enforcement of internal standards that restrict access to the information at both the educational institution and by staff of ISIT Technology. (Employees of both sign agreements for the acceptable use of student information and abide by the institutional policies for privacy and information security) Use of certified and audited cloud infrastructure (Microsoft Azure).	Low	Low
2.	Unintended public exposure/availability of student learning activity and skills practice demonstration videos	See above. WeVu is designed to allow download of videos only when instructor or department staff have permitted this and obtained consent from those who appear in the videos. Student names are not associated with video files unless the student has given the video a title including that student's personal information. This will be discouraged by both the educational program/department and within the software.	Low	Low
3.	Student upset that they were unaware that this is a cloud-	The URL for the service begins with "app.wevu.video", clearly	Low	Low



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *WeVu Video for Health Programs Simulation Activities*

PIA# 2019\_001

hosted service	differentiating it from College websites. Users are presented with a Terms of Service and referred to WeVu's Privacy and Acceptable Use policies and must consent to the terms before accessing the site/service.	
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### 10. Collection Notice

Each course that requires students to use the WeVu application will include the collection notice in the course syllabus. These syllabi will include the following language:

“This course uses the WeVu web application for recording of skill demonstration for the purpose of student self-assessment and self-reflection, instructor feedback and evaluation of demonstrated skills. To access the WeVu service you must create an account in WeVu by providing your email address, name and a username of your choice. Your name and email address is information you have already provided to the College of the Rockies as part of your registration into this program. For further information about the collection and use of this information, you may contact Heather Hepworth, Dean of Health and Human Services or Brenda Mathenia, Privacy Officer and Director of Teaching and Learning.

All private information is used in accordance with the following policies at College of the Rockies: *Policy 3.1.4 Freedom of Information and Protection of Privacy, Policy 8.1 Use of Technology, and Policy 2.4.11 Storage of Academic Works and WeVu.video's Terms of Use, Privacy Policy and Acceptable use policy found at: <https://wevu.video/wevu-privacy-policy/>. WeVu is a web-based application hosted and backed up entirely in Canada and the maker of WeVu, ISIT Technology, is a business based in British Columbia, Canada. The use of WeVu by the College of the Rockies has passed a Privacy Impact Assessment at College of the Rockies in accordance with the *Directions to Heads of Public Bodies that are not Government Ministries*, issued under Section 69 (5.3) of the *Freedom of Information and Protection of Privacy Act, R.S.B.C 1996 c.165*.*

When you participate in recorded activities and online dialogue, the video and associated text is stored only in the WeVu system and will remain in that system to be accessed securely only by students and instructors in the course and by WeVu support and technical staff for the sole purpose of providing the WeVu service. Your private information will not be divulged or shared with any other



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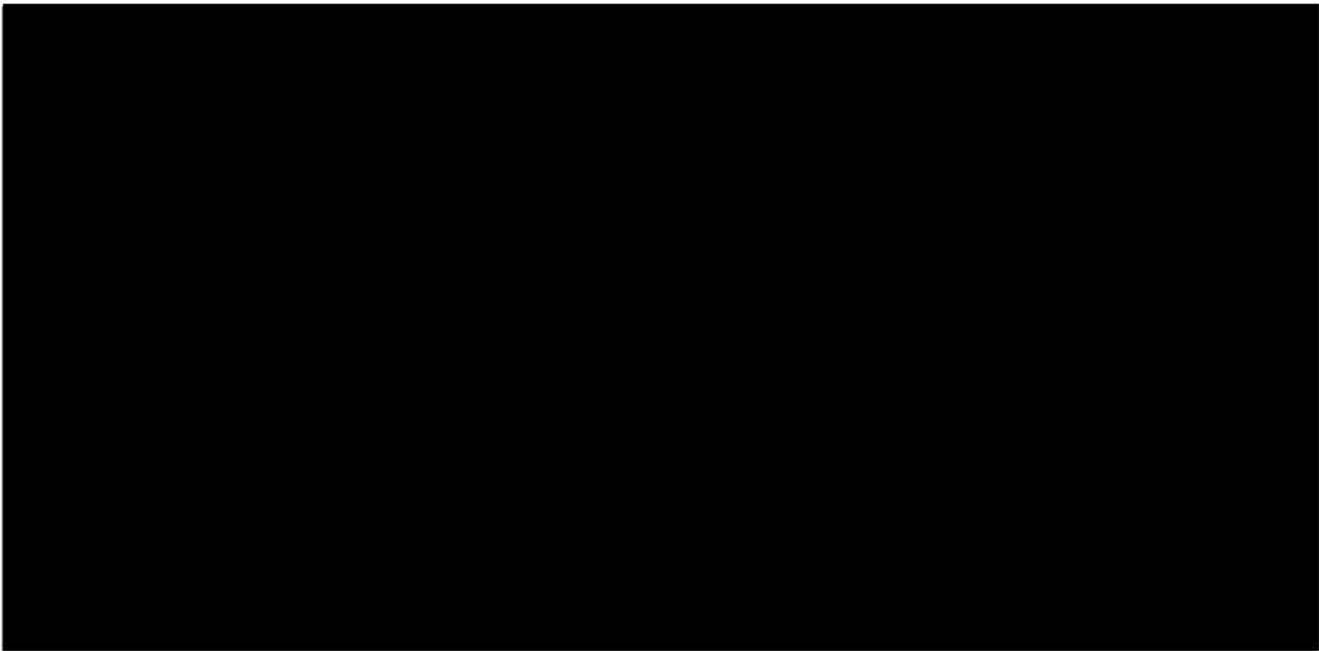
PIA# 2019\_001

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person or body. If you have any concerns about your privacy and data security in the WeVu system, please contact your course instructor and [support@wevu.vidoe](mailto:support@wevu.vidoe) immediately."

### **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 public body'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.*



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

The following policies at the College of the Rockies speak to the security of personal information and expected treatment and/or use of such information: *Policy 8.1 Use of Information Technology*. For further information, please contact, Jonathon Butt, Director Information Technology Services at the College of the Rockies.

#### **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.**



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *WeVu Video for Health Programs Simulation Activities*

PIA# 2019\_001

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WeVu provides standard role-based access so that only instructors and program staff can see all students' email addresses and names, and instructors see this information only for students in their own courses. This data is, in any case, available to them on other platforms at the institution prior to the use of WeVu. This data is always used for the purposes for which it was collected and abides by the institution's policies with respect to privacy, acceptable use of information technology and information security.

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

WeVu stores logs of user access, user role changes, and most user behaviour that involves playing video or contributing to a dialogue about that video. These analytics are available to instructors and the program staff for analysis and for assigning credit for participation in the simulation activities. They will be made available to the appropriate institution staff, ministry staff and law enforcement under appropriate conditions. WeVu may also use this data to improve its services as specified in WeVu's Terms of Service.

### **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?**

Users will always be able to update their own information. They may cancel their account at any time after consultation with their academic program. Their data will be fully deleted and returned to them upon request and in consultation with institution staff.

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

The recording of student activity may be evaluated by academic staff and this evaluation may be part of a student's grade in the course, as specified in each course syllabus.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## WeVu Video for Health Programs Simulation Activities

PIA# 2019\_001

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.

The students themselves provide their own student information to the College of the Rockies and WeVu. In addition to the personal information provided to the College and to WeVu by each individual student, the course instructors will be able to identify each student in the course and match that student's physical appearance to the name and appearance of the student(s) on the videos.

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?

The College of the Rockies will ensure that access to the data stored in WeVu is available for at least one year from the last day of the academic term in which the course was offered.

### Part 5 - Further Information

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. Educational research may be conducted using the data in the system, but only at the aggregate level and without any personally identifiable information as part of the database. If this research is proposed, it must go through the Research Ethics Board at the College of the Rockies and any other relevant institution.



# Privacy Impact Assessment for Non-Ministry Public Bodies

## *WeVu Video for Health Programs Simulation Activities*

PIA# 2019\_001

***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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## WeVu Video for Health Programs Simulation Activities

PIA# COTR\_2019\_001

### 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).*

I, Brenda Mathenia, Privacy Officer and Director, Teaching and Learning Resources, for the College of the Rockies, have reviewed this Privacy Impact Assessment as submitted under the guidance of the Directions to Heads of Public Bodies that are not Government Ministries, issued under Section 69 (5.3) of the Freedom of Information and Protection of Privacy Act, R.S.B.C 1996 c.165.

Based on the information provided by the PIA originator, and my reading of sections 26, 32 and 33 of the British Columbia FOIPPA legislation, the use, collection and disclosure of information within, and in relation to the use of the WeVu Video for Health Programs Simulation, at the College of the Rockies, meets the established standards for the collection, use and disclosure of information as outlined within this Privacy Impact Statement.

It is my determination that no further review is necessary.

*Reviewed this day, Wednesday, July 17, 2019, by:*

**Brenda Mathenia, MSI, MUP, BSc**  
Director, Teaching & Learning Resources  
Privacy Officer  
College of the Rockies

*Brenda Mathenia*  
\_\_\_\_\_  
Privacy Officer/Privacy Office  
Representative

*Brenda Mathenia*  
\_\_\_\_\_  
Signature

*17 July 2019*  
\_\_\_\_\_  
Date



# Privacy Impact Assessment for Non-Ministry Public Bodies

## WeVu Video for Health Programs Simulation Activities

PIA# COTR\_2019\_001

### Part 7 - Program Area Signatures

Norma Sherret  
Program/Department Manager

[Signature]  
Signature

August 6, 2019  
Date

Contact Responsible for Systems Maintenance and/or Security  
(Signature not required unless they have been involved in this PIA.)

Signature

Date

President D. Walls  
Head of Public Body, or designate

[Signature]  
Signature

Aug 6, 2017  
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 office(r) or call the OCIO's Privacy and Access Helpline at 250 356-1851.***