

**PRIVACY IMPACT ASSESSMENT (PIA)
CLOSURE SUMMARY**

Initiative	Badgr, or Canvas Credentials (the “Initiative”)
PIA Reference #	
PIA Completion Date	November 21, 2022
Project Sponsor	Stuart Ruttan and Peter Gregorowicz
Position/Title	Stuart Ruttan, Dean, Criminal Justice & Security Peter Gregorowicz, Director & CIO Technology Services
Unit	School of Criminal Justice & Security, and Technology Services

The purpose of a PIA is to determine whether an initiative complies with the *Freedom of Information and Protection of Privacy Act* (“**FIPPA**”) and JIBC’s policies and procedures. This document is to advise that the PIA review of this initiative has been completed. The following outlines the scope, issues and conclusions associated with this PIA.

Initiative Description & Scope

The School of Criminal Justice and Security and Technology Services is looking to implement and integrate Canvas Credentials, which is an achievement recognition and tracking system to issue, organize and share Open Badges. In April 2022, Instructure, Inc. acquired all of the outstanding securities of Concentric Sky, Inc, the creators of the Initiative, which it is currently being rebranded to Canvas Credentials or similar. Concentric Sky is based in Oregon, and Instructure is based in Utah.

Open Badges are publicly available and verifiable. To achieve verifiability, a one-way encrypted/hashed value on email address unique to a badge’s owner is embedded in each badge.

Personal information that is collected from a badge recipient is user information including badge issue date, email address, first and last name, badge identifying information (i.e., the purpose of the badge), and the issuing organization’s name. We do not believe that the nature of the personal information collected, used and disclosed by this initiative constitutes “sensitive” personal information.

Personal information that is collected from badge recipients as a function of issuing badges is stored on Instructure’s server in a permanent data structure, which are operated on AWS Canada. Instructure’s contractual agreements with our customers prohibit us from using the personal information except as necessary to provide and improve Canvas Credentials, and as required by law.

Only the recipient and issuer have access to the URL needed to share the badge.

The Initiative integrates with the Blackboard LMS through Canvas Credentials LTI.

Canvas Credentials LTI is a connection mechanism between Blackboard and Badgr (configured by Badgr). The configuration information is then applied to Blackboard (Badgr API - to BB API (Application Program Interface)).

A privacy statement has been put in place to inform users that their personal information may be collected, for what purpose and under what legal authority.

Risk Classification

Based on the information provided in the PIA Risk Classification Tool, the Initiative has a risk classification level of "**Medium**". Please see Schedule A for more information.

Information Reviewed

Our review is based on the following information provided by the project team:

- a) Completed PIA Risk Classification Tool, the summary of which is at Schedule A.
- b) Telephone and/or virtual meeting, email, and/or in-person discussions; and
- c) Documentation provided by the project/initiative including:
 - a. the Initiative's Privacy Policy, which is attached as Schedule B;
 - b. the Instructure's answers to JIBC's privacy-related questions, which are attached as Schedule C;
 - c. Instructure's "Features Overview" document, which is attached as Schedule D; and
 - d. Instructure's Master Terms and Conditions, which is attached as Schedule E.

Conclusions

Based on the information provided, our review has concluded that there are no significant privacy or security risks introduced by this initiative provided the project team complies with the responsibilities listed below.

Responsibilities

The project team is responsible for:

- a) Ensuring that the initiative is planned and implemented in a manner that complies with FIPPA and JIBC's policies and procedures; and
- b) Informing the General Counsel of any material omissions or inaccuracies in the information relied upon in this PIA, and submitting to the General Counsel a new PIA request if there are any significant changes to this initiative.

If you have any questions or concerns about this PIA, please contact the General Counsel.

**SCHEDULE A
RISK CLASSIFICATION**

IMPACT			Score
1	How many individual records will be stored, accessed or used?	1-1000	1
2	What is the most sensitive type of Personal Information in these records?	Student Information	3
3	Is any of the information owned by another organization?	No	2.5

PROBABILITY			Score
4	Where will the information be stored?	[REDACTED]	5
5	How many users will have access to the information?	1-10	1
6	Will a third party (e.g. vendor or service provider) have access to the information?	No	2.5

S.15(1)(l)

PIA Priority Rating Table					
Impact	Probability				
	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

Colour Coding Key
LOW
MEDIUM
HIGH
VERY HIGH

Classification for this Project
6.1
MEDIUM

Legend

CLASSIFICATION	
Risk_No.	Risk_Rank
1	LOW
2	LOW
3	MEDIUM
4	MEDIUM
5	MEDIUM
6	MEDIUM
7	HIGH
8	HIGH
9	HIGH
10	HIGH
11	HIGH
12	HIGH
13	HIGH
14	VERY HIGH
15	VERY HIGH
16	VERY HIGH
17	VERY HIGH
18	VERY HIGH
19	VERY HIGH
20	VERY HIGH
21	VERY HIGH
22	VERY HIGH
23	VERY HIGH
24	VERY HIGH
25	VERY HIGH

1- NUMBER OF RECORDS	
Records	Rec_Rank
1-1000	1
1,001-10,000	2
10,001-100,000	3
100,001-1,000,000	4
1,000,000+	5

2- INFORMATION TYPE	
PI_Risk	PI_Type
N/A - No Personal Information	0
Student Information	3
Donor, Alumni & Other Third Party Information	3
Credit Card Information	5
Employee Information	7
Health Information	7

4- LOCATION OF INFORMATION	
Location	Loc_Rank
[REDACTED]	1
[REDACTED]	2
[REDACTED]	3
[REDACTED]	5

3/6 - YES/NO	
Yes/No	Pos_Rank
Yes	5
No	2.5

5- NUMBER OF USERS	
Users	Use_Rank
1-10	1
11-100	2
101-1,000	3
1,001-10,000	4
10,001+	5

S.15(1)(l)

**SCHEDULE B
PRIVACY POLICY**

Badgr's privacy policy was retrieved from the following link:

[Badgr Privacy Policy | Instructure | Policy | Instructure](#)

**SCHEDULE C
VENDOR'S ANSWERS**

Please see attached.

S.21(1)

SCHEDULE D
VENDOR'S FEATURES OVERVIEW

Please see attached.











