



Privacy Impact Assessment for Non-Ministry Public Bodies

Flipgrid
PIA#2021.003

Why do I need to do a PIA?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FOIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FOIPPA. Public bodies should contact the privacy office(r) for their public body to determine internal policies for review and sign-off of the PIA. Public bodies may submit PIAs to the Office of the Information and Privacy Commissioner for BC (OIPC) for review and comment.

If you have any questions about this PIA template or FOIPPA generally, you may contact the Office of the Chief Information Officer (OCIO) at the Privacy and Access Helpline (250 356-1851). Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to their privacy office(r) even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department/Branch:	CCSD		
PIA Drafter:	Paris Pang		
Email:	ppang@jibc.ca	Phone:	604.528.5689
Program Manager:	Charlene Dhaliwal		
Email:	cdhaliwal@jibc.ca	Phone:	604.528.5745

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

1. Description of the Initiative

Corrections would like to use Flipgrid for video discussion for course usage and staff / external employee to leave a retirement video message for Rob Chong. This is a free SaaS and accessible video experience which was acquired by Microsoft in June 2018. As it is part of Microsoft company, it leverages the same log in process as to O365 enabling educators to invite students for video discussion as part of their learning experience.

2. Scope of this PIA

The PIA covers the Flipgrid free cloud offering. It is an addon feature of Microsoft.



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Flipgrid
PIA#2021.003

3. Related Privacy Impact Assessments

Microsoft O365

4. Elements of Information or Data

When an educator invites students, a list of first and last name along with an email address will be collected by using existing Microsoft or google account. When message are posted, the post content will be kept until it's deleted. The list of email addresses will be hosted in a US based cloud services controlled by the educator that creates the account. Staff e-mail accounts are considered to be in the public realm.

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.



Privacy Impact Assessment for Non-Ministry Public Bodies

Flipgrid
PIA#2021.003

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

S.15(1)(l)



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;	yes/no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	yes/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.	yes/no
If you have answered "yes" to all three questions, please contact your privacy office(r) to discuss the requirements of a data-linking initiative.	



Privacy Impact Assessment for Non-Ministry Public Bodies

Flipgrid
PIA#2021.003

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/no
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/no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	yes/no
<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>	

** 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.

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

Refer to [Flipgrid - Privacy Policy](#)



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Flipgrid
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Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	Contact information from JIBC O365 is used to access Flipgrid	Use	32(a)
2.	Video data is stored in Flipgrid	Use	33.2

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	Oath of Employment; contractual terms, etc.	Low	Low
2.	Employees could share personal information of others by video online	Education, training, and governance. Data	Low	High
3.	Client's personal information is compromised when transferred to the service provider	Transmission is encrypted and over a secure line	Low	High
4.	Employees could with permission, could verbally state personal information which would result in personal information being stored outside of Canada.	Education, training, and governance.	Low	Medium

10. Collection Notice

This initiative does not involve the collection of any new information.



Privacy Impact Assessment for Non-Ministry Public Bodies

Flipgrid
PIA#2021.003

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.

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

[REDACTED]

S.15(1)(l)

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

[REDACTED]

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

JIBC’s Information Security Policy (2502) and Records and Information Management Policy (2102) protects the security of JIBC’s information assets and are applicable to all JIBC staff, faculty, and students.

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.

JIBC educators will have control on all students (guests) and be managed by JIBC Technology Services administrators.

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

O365 currently has robust auditing which is enabled and in operation. This initiative will rely on that service for logging into it.

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?



Privacy Impact Assessment for Non-Ministry Public Bodies

Flipgrid
PIA#2021.003

Currently, the only option for staff members to update their information is via Service Desk where one of JIBC Technology Services administrator will update the system that contains the information.

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

No

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.

N/A

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?

N/A

Part 5 – Further Information

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

No

<p><i>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).</i></p>	<input type="checkbox"/>
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21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No



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PIA#2021.003

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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PIA#2021.003

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).

FlipGrid stores personal information outside of Canada, which traditionally requires consent of the user. There is currently a ministerial order (M431) in place that sets aside the requirement for consent for disclosures of PI outside of Canada until May 31, 2021 (unless further extended). As such, FlipGrid may be used for its intended purpose, that being associated with the requirement of Rob Chong, which is expected to be April 23, 2021. If FlipGrid will be used after such date, please contact me to update this PIA, as there may be a requirement to obtain consent from users.

Derek
Deacon

 Digitally signed by Derek Deacon
Date: 2021.04.27 11:54:28 -07'00'

Privacy Officer/Privacy Office Representative

Signature

Date



Privacy Impact Assessment for Non-Ministry Public Bodies

Flipgrid
PIA#2021.003

Part 7 – Program Area Signatures

Charlene Dhaliwal

Program/Department Manager

Signature

April 26, 2021

Date

Paris Pang

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

Signature

April 26, 2021

Date

Mike Proud

Head of Public Body, or designate

Mike Proud

Signature

Digitally signed by Mike Proud
DN: cn=Mike Proud, o=JIBC,
ou=Finance,
email=mproud@jibc.ca, c=CA
Date: 2021.04.27 13:43:52
-0700

April 27, 2021

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.