



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

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:	Centre for Research, Innovation and Design		
PIA Drafter:	Nina Bennett		
Email:	nbennett@jibc.ca	Phone:	604-374-5865
Program Manager:	Ron Bowles		
Email:	rbowles@jibc.ca	Phone:	604.230.2721

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

1. Description of the Initiative

The Justice Institute of British Columbia is looking to adopt PebblePad Learning Platform to act as an ePortfolio system for students and support work integrated learning throughout the institution's various programs. An ePortfolio can be used for both academic and professional purposes. An ePortfolio acts as a digital collection of artifacts related to the individuals' field or program. For example, an ePortfolio could include reflections, assignments, course work, employment history, Capstone projects and volunteer experience. An ePortfolio is not simply a final project or showcase at the end of a program but encourages continuing education and personal



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

growth. Students and alumni are encouraged to continue using their ePortfolio past their program completion date.

The use of PebblePad as an ePortfolio system would allow faculty and staff to track students' competencies, review students' progress within programs, and mark student assignments. The use of an ePortfolio system would also be beneficial for students because it promotes a holistic learning experience, encouraging the student to do reflection activities, build community connections and continue their education program completion. PebblePad would also link directly to the Learning Management system that was being used within a program.

Moving forward the hope would be to integrate PebblePad across programs and the JIBC. Integration of the platform would mean the instructors would require students to have a PebblePad account to successfully complete certain courses and/or programs.

In conclusion, the JIBC recognizes the benefits of an ePortfolio system for students, faculty, staff, alumni and community partners; including the more seamless tracking of competencies, recent graduates to continue their education and community partners and mentors to mark students when participating in work integrated learning and hopes to adopt said system.

2. Scope of this PIA

The scope of the PIA covers the use of PebblePad as an ePortfolio platform. The amount of student information that the ePortfolio will hold depends on how much their department or program will choose to use it to support the students learning and professional development. If a program was to fully integrate the ePortfolio into the student's education the scope could include the students competencies, reflection activities, references from mentors, Feedback and Conversation with mentors and instructors, Assessments, Capstone Projects, Cover Letters, Resumes, Discussions with classmates and peers, videos, audio recordings. The amount that alumni would use the platform would be up to their own discretion.

3. Related Privacy Impact Assessments

No.



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

4. Elements of Information or Data

In this context, the personal information (PI) is that which is required and provided directly from individuals to participate in any JIBC activity or program and then utilized in PebblePad.

Collection of personal information from the individual is administered by JIBC during the onboarding and registration process. JIBC is responsible for the secure transmission of the data from its student information system to the PebblePad platform (e.g. Colleague).

Student personal information:

- *Name*
- *JIBC email address*
- *Reflections, opinions, thoughts on PebblePad material*
- *Username*
- *Password*
- *Student work product which MAY contain personal information*
- *Student grades/feedback/assessment (via JIBC instructor, students or an external professional)*
- *Area of Study*

Employee/Instructor personal information:

- *Name*
- *Feedback and instructor assessments*
- *Video/voice recording*
- *Username/ID*
- *Password*
- *Unique identifiers (e.g. Colleague employee no.)*

It will also include information/data that PebblePad collects from a user including; address used to connect the computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about visits, including the full Uniform Resource Locators (URL) clickstream to, through and from PebblePad site (including date and time); pages viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

Finally, PebblePad may receive information about a user if they use other websites or services operated by PebblePad. PebblePad also works closely with third parties (including, for example, business partners, sub-contractors in technical, payment, and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Please refer to Addendum A:

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

[PebblePad ePortfolio System]

PIA#2021.001

Part 2 – Protection of Personal Information

5. Storage or Access outside Canada

S.15(1)(l)

[REDACTED]

[REDACTED]

[REDACTED]

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;	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;	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

[PebblePad ePortfolio System]

PIA#2021.001

6. 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
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;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	n/a
<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>	

7. Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FOIPPA Authority
1.	JIBC registers students/staff (personal information) into during the onboarding and the registration process.	Collection	26(c)
2.	Students access PebblePad via SSO and create profile/portfolio.	Collection Use	26(c) 32(a)
3.	JIBC employee (faculty) is provided access to PebblePad student portfolios for assessment, feedback and assigning grades.	Use Access	32 (a) and 30.1
4.	User (student) securely logs into PebblePad to complete assignments, access online content, obtain information, and	Collection Use	26(c) 32(a)



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

	utilize tools, services and offerings.	Storage/Access	30.1
5.	User (employee) securely logs into PebblePad to review student content, access online content, obtain information, utilize tools, services, offerings, provide feedback/assessment and assign grades.	Use Storage/Access	32 (a) 30.1
6.	User (student) grants access to personalized PebblePad portfolio to external individuals (eg. JIBC students and/or external professional). External individuals access the User's portfolio.	Use Storage/Access Disclosure	32 (a) 30.1 33.1 33.2
7.	PebblePad discloses personal information to third parties to provide service, support and notifications.	Use Storage/Access Disclosure	32(a) 30.1 33.1 33.2

8. Risk Mitigation Table

Risks of using PebblePad may include student's personal information (name, email address, grades, assignments) being breached.

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	High
2.	Individuals could alter information within profiles that could affect individual's success academically and professionally.	Implementation of identification verification procedures.	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.	Data from users could be accessed and shared.	Policy developed to inform clients of risk. Data is stored on secure Canadian servers.	Low	High



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

5. <i>Unauthorized collection, disclosure, access or retention re: personal information by third parties</i>	<i>Contractual terms hold Pebblepad responsible for acts of its agents</i>	<i>Low</i>	<i>High</i>
--	--	------------	-------------

9. Collection Notice

Students either have a window appear every time they login the platform or they will be asked to fill out a Student Privacy Sign-Off form when they begin using PebblePad.

The form will state the following:

Students who PebblePad need to agree to the use of the application. This can be emailed to them in order to activate their account (ideal) OR at each logon to Pebblepad:

For purposes of section 30.1 of the BC Freedom of Information and Protection of Privacy Act, you hereby acknowledge that by logging on to PebblePad, you are providing consent to Justice Institute of British Columbia that your personal information, such as my name, username, email address and course/module details may be stored in Amazon data centres outside of Canada.

If you do not consent or have any questions about the data collection, please contact your instructors.

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.

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

[Redacted]

S.15(1)(l)

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

[Redacted]

[Redacted]



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001



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

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

13. 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.

Server administration and access to management consoles is highly restricted and available only to PebblePad senior staff members. PebblePad policy is to minimize the number of third parties in use within the system. Where third parties are required (e.g. to provide customer support and customer relationship management), the provider must have appropriate certifications for the protection of customer data and a separate data processing agreement is required.

At the JIBC Tech Services will be appointed as the overarching global admin, that way they can help with the security of the system.

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

The JIBC does periodic audits on its own systems.

Part 4 – Accuracy/Correction/Retention of Personal Information

15. 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?

When PebblePad is first set up for your organization you will be asked to nominate up to three Global Administrators. These roles will be assigned as part of the initial set-up process. Further Global Administrators can be added at any time. Global Administrators can access the Administration portal via the Burger Menu in the top left corner in their Pebble+ account. The Administration portal includes tabs to manage People, Settings, Statistics, and Assets.

Please refer to Addendum E:



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

Individuals' information can be updated or corrected through Student Services and the Registration office. Updates to the individual's information will not be shared with others, updated, corrected or annotations to data will not be shared with the public.

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

Yes. The information that is collected in the E-Portfolio will be used to assess individual's success in course and/or program. The artifacts that are collected and uploaded to the E-Portfolio can also be used to assess individuals in their professional development.

PebblePad will also link directly to the Learning Management System that the Institution is using, so when artifacts are marked on the ePortfolio the marks will then populate the Learning Management System. Users can also download/export the assignments from their ePortfolio if they are asked to submit a separate document.

17. 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 Registration office and Student Services will play a vital role in ensuring that the information that is displayed is correct and accurate as they are responsible for student records. Faculty and mentors will also ensure competencies are accurate and complete by giving a grade and feedback.

18. 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. PebblePad data is held for the duration of time that the account is active. When a user account is deleted, the user's data is automatically purged after a period of 30 days. In the case of an organisation discontinuing their PebblePad licence, all associated account and user data is purged 150 days after the licence expiry date.

Support tickets are held for 5 years. Contact details gathered as part of marketing activities through our websites will be retained until a user makes a request to have data held about them deleted. Users shall be able to update their preferences or revoke consent to the processing of their data for marketing purposes via the options contained within all PebblePad communications.

Please refer to Addendum F:

<https://www.pebblepad.co.uk/gdpr.aspx#:~:text=PebblePad%20data%20is%20held%20for,after%20the%20licence%20expiry%20date>.



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

Part 5 – Further Information

19. 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).

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

As the JIBC is initiating a trial there may be a request for students to share their work or participate in a reflection of their experience using the platform. Also, this request may also be forwarded to staff, faculty and community partners to evaluate the product. The hope would be to learn more about the efficiency of the platform and individual's satisfaction with it. This exercise would be voluntary for individuals.

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).

21. 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.

Yes.

- a. *Pebblepad personalized learning and assessment platform.*
- b. *Use of PebblePad includes all personal information as outlined in point 4. (above).*
- c. *FIPPA section 26(c).*
- d. *Obtained, compiled, used and disclosed by JIBC as supported by, and in relation to the PebblePad platform.*
- e. *Used by authorized JIBC employees, students and PebblePad staff in support of the platform.*



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

The information and data collected may include name, address, e-mail address, phone number, organisation, department, job role and dietary requirements. The information collected would be collected by both staff and students who were using the platform. Program Directors and planners will have access to this data.

Please refer to Addendum G:

<https://community.pebblepad.co.uk/support/solutions/articles/13000027328-privacy-policy>

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



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

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).

User-created content in PebblePad is stored in Canada, however, PebblePad uses third party processors (i.e. to provide technical support and email notifications to users) which store or access personal information (as outlined in s. 10 of this PIA) outside Canada. As, under FIPPA, consent is required for storage or access of personal information outside Canada, if users do not consent to the storage and access of their personal information outside Canada and use of the platform is considered a requirement of the course, the instructor must either allow the user to anonymize themselves in PebblePad (i.e. with a pseudonym and non-identifying email address) or, if anonymization is not possible, provide an alternate assignment or method for the student to complete the work which does not require storage or access of their personal information outside Canada.

Derek Deacon Digitally signed by Derek Deacon
Date: 2021.05.20 10:36:44 -07'00'

Privacy Officer/Privacy Office
Representative

Signature

Date



Privacy Impact Assessment for Non-Ministry Public Bodies

[PebblePad ePortfolio System]

PIA#2021.001

Part 7 – Program Area Signatures

Ron Bowles

Program/Department Manager

Ron Bowles

Digitally signed by Ron Bowles
Date: 2021.05.19 16:22:53
-0700'

Signature

Date

Michael Currie

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

Signature

May 20, 2021

Date

Head of Public Body, or designate

Signature

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.