

Privacy Impact Assessment for Low-Risk Initiatives Involving Personal Information

(to be completed by Department Chair, or Manager)

The initiative may use an external vendor, online service, product, or involve a program/activity that captures personal information

Department/School: eLearning, CETL, Learning Services Chair/ Manager: Emily Schudel

Service / Product Name: Video Assignments Vendor: Bongo

Description & Purpose:

To provide students with opportunities to engage in reflective practice, apply their learning through individual and group video/audio assignments.

To provide instructors with a video-driven skills development tool that enables peer-to-peer feedback between students, low-stakes self-assessment, and opportunities for authentic assessment of learning.

		Yes	No	Don't Know
COLLECTION				
1.	Will this activity or initiative collect personal information? <i>Personal information is recorded information about an identifiable individual other than business contact information.</i>	Y		
1 a	If yes, list what personal information will be collected, e.g., email address, name, identification number, academic/health/financial information, image, or voice.			
	<ul style="list-style-type: none"> • User name (First and Last Name) • User email address • Video and Audio of person doing the presentation 			
STORAGE				
2.	Will personal information be stored on servers external to Camosun (i.e., Cloud-based)?	Y		
2.a	If yes, will the external (i.e., Cloud-based) servers be located outside of Canada?		N hosted in AWS in Canada	

2.b	If yes, will there be options to minimize the amount of personal information the user provides, or enter non-personally identifiable information?			
3.	<p>What security measures does the vendor have in place to protect personal information stored on the external server or database? Provide copy or link, if available.</p> <p>https://www.bongolearn.com/privacy-policy/</p>			
4.	How long will personal information be stored on the server or database (whether on-premise or external)?	Yes	No	Don't Know
		As long as under contract with D2L/Bongo		
USE				
5.	<p>How will this activity or initiative use personal information?</p> <p>Email/User Name: For the purposes of identifying the user between the LMS and Bongo, Audio – in order to transcribe the presentation into a transcript. Video – for the instructor to assess the learner.</p>			
6.	Will the activity or initiative be mandatory?	Yes		
6.a	<p>If mandatory, can you provide an alternative activity?</p> <p>Please describe: Alternative activity would depend on the goals & objectives of the original activity, but from a Universal Design for Learning (UDL) perspective, should be possible to provide a student with opportunity to demonstrate learning through an alternate method of engagement.</p>			
6.b	If mandatory and you cannot provide an alternative, how will you obtain written consent from students, employees, or others to store or access personal information outside of Canada?			
6.c	Who holds the responsibility to correct or remove personal information, upon request of the affected individual?			
	Bongo supports GDPR regulations whereby personal information can be deleted upon request – Process: submitting a D2L support ticket and then Bongo will action			

DISCLOSURE			
7.	Will the activity or initiative require disclosure of personal information to any external organization or agency?		No
7.a	If yes, will there be a written agreement between Camosun and the other party?		
7.b	If yes, please provide a link or copy of the agreement.		
GENERAL INFORMATION			
8.	Will you use an online product or service for this activity or initiative?	Yes	
8.a	If yes, will you enter into a service agreement or contract with the vendor or service provider?	Yes, please see privacy policy for list of providers	
8.b	If yes, does it include an indemnity clause? <i>Contact the Administration Office to request review of indemnity clause.</i>	https://aws.amazon.com/agreement/	
9.	Is there a Privacy Policy or privacy/personal information-related clause associated with the product or service?	Yes	
9.a	If yes, please provide a link or copy to the agreement, terms of use and/or privacy policy, if available. https://www.bongolearn.com/privacy-policy/		

PIA Review:

Meets privacy protection requirements and can proceed

Does not meet privacy protection requirements; please submit additional information prior to proceeding:

Reviewed by: _____ Review Date: _____

