

# Privacy Impact Assessment

## Blackboard New Box View Integration

PIA# 18-013 (Office of the University Secretariat to assign)

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

### Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at [adam.cullum@unbc.ca](mailto:adam.cullum@unbc.ca) or (250) 960-5139 or visit <http://www.unbc.ca/foippa>.

### 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 Information Governance Officer 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:	Centre for Teaching, Learning and Technology		
PIA Drafter:	Grant Potter		
Email:	Grant.Potter@unbc.ca	Phone:	250 960 5188
Department Manager:	Anne Sommerfeld		
Email:	Anne.Sommerfeld@unbc.ca	Phone:	250 960 6655

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

### 1. Description of the Initiative

*'New Box View' is an API service that allows the display of high-fidelity, interactive viewers for documents, images, videos, 360 images and videos, 3D files and dozens of other file types in web and mobile apps. The new Box View can display nearly any file type without having to build additional viewers. As of January 2018, Blackboard stopped supporting the previous old document rendering technology (Crocodoc) and adopted 'New Box View'.*

*When enabled in <https://learn.unbc.ca>, instructors can annotate and grade student files directly within the browser without the need to download them and run them in an associated program for the file type. Students are able to review assessments and annotations on these files directly on their mobile devices without the need to download the file and run it with installed software. Instructors have reported that this feature significantly improves their ability to assess student submissions in an efficient and timely manner.*

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### 2. Scope of this PIA

*Reviewing the data handling model of the New Box View API integration with Blackboard at UNBC (<https://learn.unbc.ca>) to ensure the protection of student privacy. New Box View API integration with Blackboard would be available to all individuals utilizing Blackboard to collect, manage and support student submissions of assignments.*

### 3. Related Privacy Impact Assessments

N/A

### 4. All Elements of Information or Data

*UNBC data shared will be encrypted transfer of username, email, and the submitted assignment to Box.com servers. Data is not cached at the Blackboard Registrar Service.*

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 the Information Governance Officer for review. You will receive support completing the remaining steps of the PIA.

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### 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

*Blackboard Registrar Service uses the username and user email to generate a 'SiteID' and 'FileID'. These unique IDs are shared with Box.com to generate a document conversion request. The UNBC student username and email address is not 'stored' at the Registrar service, but used to generate perform a cryptographic hash function to ensure the New Box View service processes the correct document conversion sessions for instructors and student requests. During the View process, the Inline Grading service sends the Bb SiteID (a unique identifier automatically designated to each Learn instance from Blackboard's Cloud Registrar service - hosted in the United States) and New FileID to the micro service. In addition to hashed metadata, the contents of the student's file being submitted will likely contain name, student number, course, instructor, section, and intellectual property. The instructor's comments posted inside the file managed by new box view will also be transmitted outside of the country.*

#### 6. Data-linking Initiative\*

**In FIPPA, "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
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	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.	No
<b>If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.</b>	N/A

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### 7. Common or Integrated Program or Activity\*

<p><b>In FIPPA, “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.</b></p>	
<p>1. This initiative involves a program or activity that provides a service (or services);</p>	Yes
<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>	No
<p>3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.</p>	No
<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>	N/A

**\* 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) as well. Contact the Information Governance Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.**

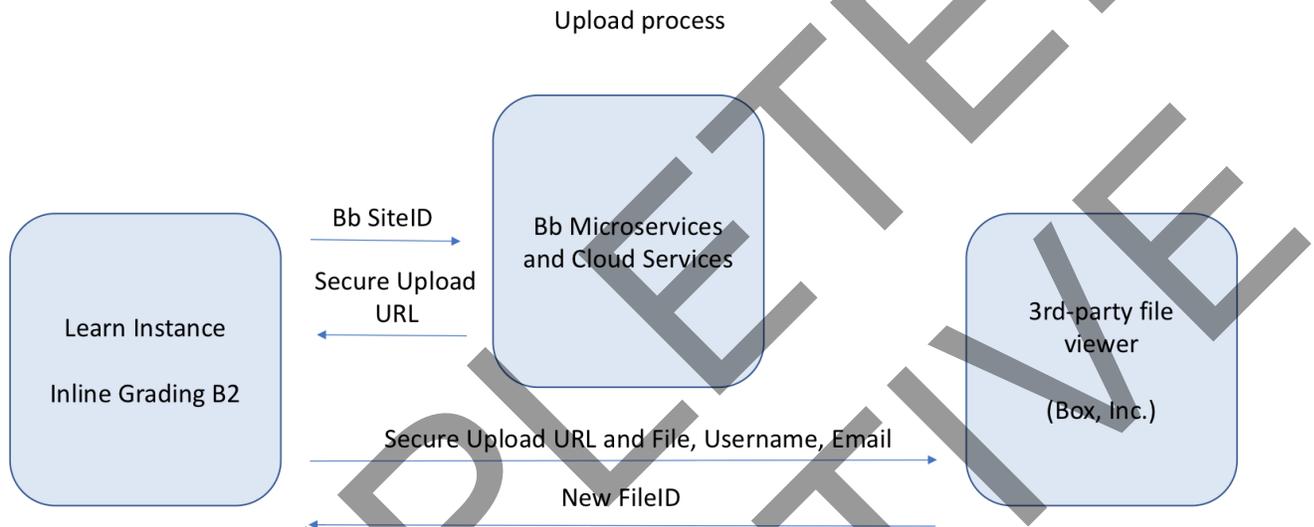
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### 8. Personal Information Flow Diagram and/or Personal Information Flow Table



Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	A user requests a document to be rendered in their web browser using the <a href="http://learn.unbc.ca">http://learn.unbc.ca</a> Inline Grading features enabled by New Box. The Inline Grading function in Blackboard transmits submitted files with encryption to the New Box View service - this would include the following from <a href="https://learn.unbc.ca">https://learn.unbc.ca</a> : <ul style="list-style-type: none"> <li>username</li> <li>email address</li> </ul>	Collection	26(d)
2.	<a href="https://learn.unbc.ca">https://learn.unbc.ca</a> shares the username and email associated with this request with the Blackboard Cloud Registrar service to perform a cryptographic hash function generating a unique 'SiteID' and 'FileID'. From this, New Box View generates a unique 'New FileID' (that is specific to	Disclosure	33.1(b)

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	<i>New Box View) and returns it to Learn for storage and reference during the View process</i>		
3.	<i>The resultant 'SiteID' and 'FileID' is passed along to New Box to request a document conversion.</i>	<i>Disclosure</i>	<i>33.1(b)</i>
4.	<i>New Box uses the Blackboard Cloud Registrar service to confirm SiteID and FileID enabling the document to render the web browser window of the user.</i>	<i>Use</i>	<i>32(b)</i>
5.	<i>During the View process, the Inline Grading service sends the Bb SiteID (a unique identifier automatically designated to each Learn instance from Blackboard's Cloud Registrar service - hosted in the United States) and New FileID to the micro service.</i>	<i>Disclosure</i>	<i>33.1(b)</i>
6.	<i>The micro service then uses the New FileID and an authenticated token to obtain a Secure View URL that is generated for the specific file being requested based on the expected input of the New Box View service.</i>	<i>Collection / Use</i>	<i>26(d), 32(b)</i>
7.	<i>The Inline Grading B2 then uses this Secure View URL and New FileID in the request for the specific file the user wants to view. New Box View then validates the Secure View URL and New FileID and returns the requested file as HTML content which is displayed and editable within the browser to the user.</i>	<i>Use / Disclosure</i>	<i>32(b), 33.1(b)</i>
8.	<i>Metadata from this process is retained at <a href="https://learn.unbc.ca">https://learn.unbc.ca</a> and may also be contained in Box.com servers.</i>	<i>Retention / Disposition</i>	<i>31</i>
9.	<i>The student's submitted and annotated file resides at <a href="https://learn.unbc.ca">https://learn.unbc.ca</a></i>	<i>Retention / Disposition</i>	<i>31</i>
10.	<i>On the <a href="https://learn.unbc.ca">https://learn.unbc.ca</a> platform the source file and the metadata are deleted by UNBC employees one year after the course is completed. Box.com will delete metadata fourteen days after the conclusion of their contract with UNBC.</i>	<i>Retention / Disposition</i>	<i>31</i>

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### 9. Risk Mitigation Table

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.				
2.				
3.				

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### 10. Collection Notice

*\*\* Contents of this form may be set up electronically as needed if the fields below are captured with a date and time stamp indicating acknowledgment before the use of the service\*\**

*Instructor Acknowledgment of the Appropriate Use of New Box View within Course Blackboard Shells*

*Centre for Teaching Learning and Technology / Office of the University Secretariat*

*I acknowledge that the Centre for Teaching, Learning, and Technology (CTLT) has reviewed with me the appropriate use of the New Box View functionality for viewing submissions and conducting inline grading of student assignments on the Blackboard shell I am using as a tool to manage my course.*

*I understand that I need to collect informed consent documented on the attached form from each individual student submitting assignments before I am able to ask that they submit assignments into Blackboard and before I am able to open assignments on Blackboard using New Box View which contains the inline grading functionality.*

*I understand that informed consent presented on the form cannot account for accusations of academic dishonesty, nor any comments regarding the character of the student. If academic dishonesty or character references about the student or third parties must be addressed, I will notify the student that a follow up meeting or call is necessary by highlighting the applicable sections of the submission and adding a note "please meet with me to discuss this" or similar language. I understand that I will not be permitted to explicitly accuse a student of plagiarism, academic dishonesty, or comment on the student's character while using the inline grading functions in Blackboard. Under any circumstance, I will avoid using language that unnecessarily compromises the reputation of the individual providing submissions for grading.*

*By signing below, I am confirming that the CTLT has completed the review of this notice and that I can commit to using the New Box View accordingly. Due to New Box View's full integration with all Blackboard shells, if I cannot commit to the contents of this notice I will not be able to use Blackboard for the grading of assignments without contravening section 30.1 of the Freedom of Information and Protection of Privacy Act (the Act). Contravening the Act will cause me to lose the privilege of using Blackboard as an instruction tool. I understand that the Information Governance Officer will be coordinating an audit of this process with the CTLT to ensure that I am successfully collecting signed informed consent notices from students. I understand that I will need to provide an alternative means for students to submit assignments that is compliant with the Act if there are any students do not consent to the use of New Box View or who do not sign a form.*

Instructor Name: \_\_\_\_\_ Signature: \_\_\_\_\_

CTLT Staff Member: \_\_\_\_\_ Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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*\*\* Contents of this form may be set up electronically as needed if the fields below are captured with a date and time stamp indicating consent to have personal information managed within this service before the first assignments are submitted\*\**

### Informed Consent Notice

University of Northern British Columbia

Consent for the Instructor's Use of New Box View in Blackboard through learn.unbc.ca  
To Mark and Provide Feedback Assignments and Submissions

*I acknowledge that my instructor has reviewed with me how my personal information will be managed during the use of the New Box View functionality for viewing submissions and conducting inline grading of my assignments on the Blackboard shell while I am registered in this course.*

*I understand that my personal information including my name, email address, and the contents of my assignment are transmitted to Box.com servers in the United States to allow my instructor to view them and provide commentary and/or grading for my assignments and other submissions. The University of Northern British Columbia (UNBC) collects information and transmits information to Box.com servers under section 26 (d) of the Freedom of Information and Protection of Privacy Act after receiving informed consent from you in this notice. I understand that the transmission of my personal information to Box.com servers is encrypted; however, UNBC does not have control over the security of my personal information transmitted to and from Box.com servers.*

*I understand that if I do not consent to this notice, UNBC cannot collect my assignments through the Blackboard site learn.unbc.ca because New Box View is incorporated into and usable within all Blackboard course shells. I understand that my consent is required under section 30.1 (a) of the Freedom of Information and Protection of Privacy Act before my information can be stored in the United States. I will immediately discuss with my instructor a suitable alternative to submit assignments if I refuse to consent to this notice. If I have any questions about how Blackboard and New Box View manages my personal information, I may contact [clt@unbc.ca](mailto:clt@unbc.ca) to address my questions.*

*By signing below, I am confirming that my instructor has completed the review of this notice and that I can consent to my instructor using New Box View to comment on and grade my assignments.*

Student Name \_\_\_\_\_ Student ID \_\_\_\_\_

Student Signature \_\_\_\_\_ Date \_\_\_\_\_

Instructor Name \_\_\_\_\_ Course Number \_\_\_\_\_

Instructor Signature \_\_\_\_\_ Date \_\_\_\_\_

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### Part 3 – Security of Personal Information

*Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.*

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

[REDACTED]

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

[REDACTED]

13. Does your department rely on any security policies? If so, indicate here:

[REDACTED]

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.

[REDACTED]

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

N/A

### 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?

*The instructor is responsible for ensuring the correct student information is put into course lists. The CTLT is responsible for accurate entry of information and for supporting instructors or students that require information in Blackboard to be updated. The student is responsible for ensuring that the correct assignments are submitted and to resubmit versions of assignments if the wrong version or assignment is uploaded.*

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

*Yes – the New Box service allows a document that is stored at <https://learn.unbc.ca> to be rendered in a browser. It also allows annotations to be made on documents which may impact the grades of students. The New Box service uses the encrypted SiteID and FileID to render a document in real time and manage placement of annotations stored at <https://learn.unbc.ca>*

**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.**

*Instructors confirm that the annotations are formatted correctly on the submitted assignment when it becomes available to the student.*

**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?**

*Course shells actively using this service will maintain student access to the shell for one year. Instructors running the same course in more than one semester a year will need duplicate shells to keep students' personal information secure.*

### **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 the Information Governance Officer.***

N/A

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

No

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**Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Information Governance Officer, the UNBC Research Office or UNBC Archives.**

N/A

**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 FIPPA. Under this same section, this information is required to be published in a public directory.**

*There will not be a new personal information bank resulting from this initiative.*

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

### **Part 6 – Comments, Conditions & Concerns**

*This PIA is based on a review of the material provided to the Information Governance Officer 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 for approval.*

*The CTLT will be responsible for promotion of the appropriate use of New Box View to instructors across UNBC and managing the signed acknowledgments from all instructors that will be using New Box View to conduct inline grading. Part of the promotion of appropriate use and collecting acknowledgment is to ensure that instructors understand their responsibilities and maintain appropriate conduct while using this service*

*The individual instructors will be responsible for collecting signed informed consent forms from their students, and determining appropriate storage for the consent forms that are accessible for a three year period by department chairs and administrative assistants.*

*The Information Governance Officer will audit the use of New Box View in one year's time and if there are substantial concerns that the commitments to maintain privacy outlined in this PIA cannot be met, including the management of acknowledgement and consent documents, the Information Governance Officer will ask ITS to disable this service.*

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### Part 7 – Program Area Signatures

Grant Potter

\_\_\_\_\_  
Name of Individual leading the  
Program/Project  
(Normally the individual who  
completed the PIA)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Anne Sommerfeld

\_\_\_\_\_  
Director or Dean Overseeing the  
Program/Project

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Dave Kubert and/or Trevor Fuson

\_\_\_\_\_  
Contact Responsible for Systems  
Maintenance and/or Security  
(if applicable)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Adam Cullum

\_\_\_\_\_  
Information Governance Officer  
(Privacy Officer)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.