

Privacy Impact Assessment

Capsim Simulation Software

PIA# 18-021 (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 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:	UNBC MBA Program		
PIA Drafter:	Philip Grant		
Email:	Philip.Grant@unbc.ca	Phone:	250960???? → No UNBC #
Department Manager:	Cheryl Wallace		
Email:	Cheryl.Wallace@unbc.ca	Phone:	250-960-6783

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

1. Description of the Initiative

Capsim provides a suite of simulations focused on providing students with an experiential learning environment where students can develop strategic management and leadership skills.

2. Scope of this PIA

The focus for the scope of the PIA will be MBA students, but any instructor in the School of Business will be able to utilize these simulations by adjusting the consent language to supply appropriate contact information.

3. Related Privacy Impact Assessments

N/A (While not directly related, the principles of information management and consent in a simulation learning tool will be similar to PIA 17-003 [ShadowHealth])

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4. All Elements of Information or Data

First name, last name, email address [UNBC email], student performance data (transcripts of tests and scores), student association with UNBC School of Business.

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.

COMPLETED INITIATIVE

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

Storage and access to data will be managed remotely on a cloud based server located in the United States of America. Participants will need to sign an informed consent form which will cover the risks of using this service before they begin using the service for classroom purposes. While the license for this service will be considered a required text for the course, the student will have the option of completing an alternative assignment if they refuse to sign the consent form to use this service.

6. Data-linking Initiative*

<p>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.</p>	
1. Personal information from one database is linked or combined with personal information from another database;	no
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
If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.	N/A

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7. Common or Integrated Program or Activity*

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.

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.	no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	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.**

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

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Students purchase the license from the UNBC Bookstore to use Capsim business simulation services and to register for a student account. In the registration process, the student matches their license to the course environment that the instructor(s) have developed for their class. Students sign the informed consent notice before they purchase the license. The School of Business provides the students with	Collection	26(d)

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	<i>the informed consent form to sign at purchase or in the semester before the course using Capsim is offered. This allows time to collect student consent prior to purchase of the license</i>		
2.	<i>Students participate in assigned product and service management simulations. Information is collected through typed submissions only. No transcripts are generated in their system. Responses and the overall assessment are stored on the student profile.</i>	Collection and Use	26(d), 32(b)
3.	<i>The students are assessed in real time and experience the immediate impact of their decisions. Students participate in debriefs after simulations are complete.</i>	Use	32(b)
4.	<i>Instructor(s) use the class profile to access the individual and cumulative scores of all work that has been done by the students for twelve months and one day after the last date the modules are used. CSV exporting will only be used if the service is suddenly discontinued before course grades can be calculated using the service. The School of Business will inform Capsim of the date the instructor(s) need to have their access to the course revoked.</i>	Disclosure / Disposition	33.1(1)(b), 31
5.	<i>By default, students can access their scores using the Capsim service for the rest of the academic year. Students will indicate on their informed consent form if they will want to maintain an alumni account. Students will provide this information to the School of Business administrative staff. School of Business administrative staff will request that all student data and course materials be deleted except those individuals that have indicated that they want to maintain an alumni account.</i>	Disposition	31
6.	<i>Students can opt-in for an alumni account to continue using Capsim simulation services. Students will be responsible for communicating to Capsim how they want their data managed.</i>	(Note)	Student's choice and responsibility

9. Risk Mitigation Table

Please identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also,

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please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table			
	Risk	Mitigation Strategy	Likelihood Impact
1.	[REDACTED]		
2.			

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10. Collection Notice

University of Northern British Columbia

School of Business, Masters of Business Administration

Informed Consent Form for the Management of Personal Information

Regarding Student Use of Capsim for _____ [course code]

I hereby consent to allowing Capsim to collect, use and disclose my personal information pertaining to my participation in or completion of course(s) in the School of Business to assigned instructor(s) in the School of Business, and servers housing Capsim. The collection, use and disclosure of my demographic and performance information is required for the purposes of:

- Evaluation of the depth and breadth of students' practical skills through the completion of online simulations.
- Documentation of completion of the targeted score simulation assessments required for grading the course using Capsim.
- Allowing students to review their own current skills to provide the opportunity to develop as required to complete the course.

The University of Northern British Columbia collects information and transmits and stores the information on Capsim servers under section 26 (d) of the Freedom of Information and Protection of Privacy Act for the purpose of providing the student the opportunity to learn a depth and breadth of business management skills online.

I will be responsible for the management of my student information in Capsim because this is a service I am purchasing and will own the license to. My instructor(s) will need to access performance information produced by the work I complete with my license. The end date for my instructor(s)' access to my personal information will be _____ [end date of course + one year and one day] [YYYY-MM-DD].

After access to my performance data has expired, the School of Business will request my information be deleted from Capsim servers unless I have indicated that I want to maintain an alumni account. If I choose to maintain an alumni account, I will be responsible for the continued maintenance of my personal information at Capsim after the instructor(s)' access to my personal information is revoked.

Please initial next to one of the statements below:

Please delete my information from the Capsim servers on the above mentioned date. _____

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Please keep my information on the Capsim servers as I wish to maintain an alumni account once the course is completed. _____

By signing below, I understand and I accept the use of Capsim as an evaluation tool for the School of Business course. I understand my responsibility for managing my personal information during and beyond the use of Capsim service for the above purposes. I will be transmitting information to:

55 E Monroe STE 3210 Chicago, IL 60603

Phone: 877.477.8787

Website: <https://www.capsim.com/contact/>

I understand that personal information such as my full name, mailing address, phone number, email address, personal submissions and performance evaluations of my assessments will be stored outside of Canada in a server in the United States of America. Capsim staff will be able to access my personal information from Chicago, Illinois. 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 outside of Canada as a requirement to complete a course at the University of Northern British Columbia. I understand that I am responsible for accurately entering my personal information into Capsim's online clinical simulation tools and student profile. I will report any corrections that need to be made to my instructor(s) if I cannot make the corrections myself.

I understand that by refusing to sign this waiver, I will not be able to use Capsim for the purpose of completing the simulation portion of my course. If I refuse to sign this form, I will be responsible for completing an alternative assignment to meet the simulation portion of my course that will be assigned by my instructor(s).

If you have any questions regarding the storage, use and disclosure of your personal information, please contact the MBA Program Director at Cheryl.Wallace@unbc.ca or 250 960 6783.

Please enter your details below:

Full Name: _____

(Please Print)

Mailing Address: _____

Phone Number: _____

Student Number: _____

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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.

[REDACTED]

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?

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Students will need to speak to their instructor(s) about any requests to annotate correction to their performance data. Capsim does not have the capacity to update or correct scores or any transcripts of assessments. Students will be responsible for updating their own demographic information but the course instructor(s) will provide support to the students having difficulties.

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

Yes. The use of the software accounts for the participation grade of the course. The student must reach a standardized score per simulation to receive full marks in the simulation component of the course.

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.

The instructor(s) or School of Business staff will annotate information that the student claims is inaccurate or incomplete regarding Capsim scores and transcripts.

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?

The School of Business will allow the instructor(s) to access data for one year and one day. The instructor(s) is responsible for reviewing with the students their responsibility to manage their own demographic and performance data managed by Capsim. Instructor(s) and School of Business staff will help students facilitate making requests for the management of student information.

Part 5 – Further Information

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

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.

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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.

No.

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 any substantive changes are made to the scope of this PIA, a PIA update will need to be completed and submitted for approval.

Due to the lack of privacy rights that Canadians and their personal information currently have in the United States of America, student cannot be required to use this service. An alternative option that does not require their personal information to be disclosed outside of the country must be available to student that refuse to sign the information consent notice.

The informed consent notice is designed to allow Capsim to be used for other courses if necessary. Some information on the informed consent notice may need to be altered to accurately reflect who to contact to enquire about how personal information is managed in Capsim.

Information will not be exported from Capsim and stored on UNBC servers or other external locations unless Capsim revokes their service to UNBC and the information needs to be kept for assigning a grade. If information needs to be exported, that information will only be retained for one year and one day after the course ends before being securely shredded/deleted.

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Part 7 – Program Area Signatures

Philip Grant

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

Signature

Nov. 18, 2018

Date

Approved
edits
after
signature

Cheryl Wallace

MBA Director

Signature

Date

Dec 12 2018

N/A

Signature

Date

N/A

N/A

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

Adam Cullum

Information Governance Officer
(Privacy Officer)

Signature

Date

Dec 12 2018

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.